

Environmental Policy

Aligned with ESRS E1, E2, E4, E5 standards and EcoVadis requirements

PURPOSE AND SCOPE

This Environmental Policy applies to all Hemodia sites and activities, including the design, manufacturing and marketing of single-use medical devices. It applies to all employees, subcontractors and partners operating on our sites.

This policy addresses the environmental issues identified through our double materiality assessment, including:

- **ESRS E1 – Climate Change:** GHG emissions, energy consumption (impact score: 24)
- **ESRS E2 – Pollution:** plastic waste, chemical substances (impact score: 36)
- **ESRS E4 – Biodiversity:** natural resources, regulatory risk (impact score: 8)
- **ESRS E5 – Circular Economy:** medical waste, waste recovery (impact score: 36)

REFERENCE FRAMEWORK

Our Environmental Policy is implemented in compliance with:

- Applicable environmental regulations (French Environmental Code)
- The ICPE regulations (Classified Installations for Environmental Protection)
- ISO 13485 and ISO 14001 standards
- The REACH Regulation and the RoHS Directive
- The European Medical Device Regulation (MDR 2017/745)
- The European Sustainability Reporting Standards (ESRS)
- EcoVadis assessment criteria
- Sustainable Development Goals (SDGs) 6 (Clean Water), 7 (Affordable and Clean Energy), 12 (Responsible Consumption and Production) and 13 (Climate Action)

GOVERNANCE AND RESPONSIBILITIES

Governance Structure

- A dedicated CSR Steering Committee meets on a monthly basis.
- A four-person team led by the CSR Project Manager.
- Environmental representatives appointed at each site.
- Regular reporting to Executive Management.

Environmental Management System

- Environmental risk mapping updated annually.
- Documented environmental management procedures.
- Regular internal audits and DREAL inspections (France's regional environmental, planning, housing, and transport authority.).
- Annual management review.

OUR COMMITMENTS

1. Climate Change and Energy (ESRS E1)

Hemodia is committed to reducing its carbon footprint throughout its entire value chain.

Greenhouse Gas Emission Reduction Targets

Scope	2030 target	2050 target
Scope 1 (direct emissions)	-10%	-90%
Scope 2 et 3 (indirect emissions)	-5%	-90%

Actions implemented :

- Conduct a comprehensive carbon footprint assessment (Scopes 1, 2 and 3).
- 100% renewable electricity (Guarantees of Origin contracts).
- Transition the vehicle fleet to hybrid and electric vehicles.
- Install electric vehicle charging stations at company sites.
- Optimize logistics flows and consolidate deliveries.
- Develop a photovoltaic installation project.

2. Pollution and waste management (ESRS E2)

As a manufacturer of medical devices, Hemodia generates specific types of waste that are subject to rigorous and fully traceable management.

Hazardous Waste Management (Healthcare Risk Waste)

Healthcare Risk Waste (DASRI) and other hazardous waste are managed through a fully traceable system:

- Waste Tracking Forms (BSD) for all hazardous waste.
- An up-to-date waste register.
- Documented handling and storage procedures.
- Trained and authorized personnel.
- Partnership with approved service providers (SICOVAL).
- Online monitoring dashboard.

Plastic Waste – Sector-Specific Constraints

Important note: In the medical device sector, reducing plastic use is constrained by strict regulatory requirements relating to patient safety and sterility. Patient protection takes precedence over plastic reduction. Nevertheless, Hemodia is working on:

- Optimizing secondary and tertiary packaging.
- Researching alternative materials compatible with healthcare requirements.
- Maximizing the recovery of plastic production waste.
- Monitoring innovations in medical bioplastics.

Chemical Management

In accordance with the REACH Regulation and ICPE requirements:

- Inventory of chemical substances used.
- Up-to-date and accessible Safety Data Sheets (SDS).
- Substitution of substances of concern whenever possible.
- Storage compliant with ICPE requirements.

3. Water Management (ESRS E3)

Hemodia ensures responsible water resource management in accordance with ICPE regulations and prefectural requirements.

Water Consumption

- Monthly monitoring of water consumption at each site.
- Rapid identification and repair of leaks.
- Employee awareness initiatives to promote water conservation.
- Optimization of cleaning processes.

Discharges and Compliance

- Compliance with prefectural discharge permits.
- Regular analysis of wastewater.
- No direct discharge into the natural environment.
- Compliant DREAL inspection reports.

4. Circular Economy (ESRS E5)

Hemodia is committed to implementing a circular economy approach across all its activities.

Waste Prevention

- Optimization of production processes to minimize waste.
- Reduction of excessive packaging.
- Employee training on best practices

Sorting and Recovery

- Advanced waste sorting system implemented at all sites.
- Dedicated recycling channels by material type.
- Recovery of plastic production waste.
- Objective: maximize the material recovery rate.

Eco-design

- Integration of Life Cycle Assessment (LCA) from the design stage.
- Research into more sustainable and recyclable materials.
- Optimization of product recyclability.
- Training of R&D teams in eco-design.

PERFORMANCE INDICATORS (KPIs)

Hemodia monitors its environmental performance on a **biannual** basis through a dedicated environmental dashboard.

Environmental Dashboard

Indicator	Unit	Frequency
CLIMATE (E1)		
Scope 1 GHG emissions	tCO ₂ e	Annual
Scope 2 GHG emissions	tCO ₂ e	Annual
Scope 3 GHG emissions	tCO ₂ e	Annual
Total energy consumption	MWh	Monthly
Share of renewable energy	%	Annual
WASTE (E2/E5)		
Total hazardous waste	tonnes	Annual (BSD)
Total non-hazardous waste	tonnes	Annual
Material recovery rate	%	Annual
WATER (E3)		
Water consumption	m ³	Monthly
Discharge compliance	Yes/No	Annual
OTHER		
Environmental incidents	number	Ongoing
Suppliers assessed for CSR performance	%	Quarterly

REGULATORY COMPLIANCE

ICPE Regulations

Hemodia's facilities are subject to the French regulations governing Classified Installations for Environmental Protection (ICPE). Compliance is ensured through:

- Up-to-date prefectural declaration/authorization.
- Compliance with the requirements set out in the prefectural order.
- Regular DREAL inspections.
- Archived inspection reports available upon request.

APPROVAL AND REVIEW

This policy is reviewed annually by the Executive Committee and updated whenever significant regulatory changes occur.

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Approved by :

M. Rémi Teulière

General

Management

HEMODIA

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