

It is the objective of GRAHAM Asset Management to ensure total compliance with BS EN ISO 14001:2015.

This Environmental Management System (EMS) has been successfully assessed and registered to the provisions of BS EN ISO 14001:2015.

Top Management in conjunction with the Environment Management Representative endorses this policy and ensures it is compatible with the context and strategic direction of the Company. Top Management are accountable for the effectiveness of the EMS and are responsible for ensuring that it is communicated, implemented at all levels within the Company and that it achieves its intended outcome.

Top Management is committed to ensuring that GRAHAM Asset Management: -

- Complies with all compliance obligations, where these relate to our environmental aspects.
- Provides appropriate resources, which relate to the operation of the EMS.
- Promote continual improvement of the EMS to enhance environmental performance.
- Strives to integrate the EMS into all processes where applicable.
- Protects the environment, including pollution, waste management and meet all relevant legislation.
- Ensures that the environment is considered in the procurement of goods and services.
- Show consideration to the environment in the goods and services we provide to customers.
- Not only meet current legislative requirements, codes of practice and industry best practice, but to exceed our obligations under the relevant legislation.

This policy will be communicated to all employees and organisations working for us or on our behalf. Employees and other organisations are expected to co-operate and assist in the implementation of this policy.

This policy will be reviewed annually by Top Management and where necessary will be re-issued. It will also be made available to interested parties, upon request.



Hugh Dempsey
Managing Director
GRAHAM Asset Management Ltd.
8th January 2026