

Environmental Policy

Bradford Labs, Inc (Bradford Labs) is a contract manufacturer of personal care products across aerosol, liquid, solid, and hot-pour formats. Our customers, employees, and communities expect us to operate responsibly, and we share that expectation. This Environmental Policy sets out the principles and commitments that govern how we design our operations, manage our facilities, and work with our supply chain to reduce environmental impact across every format we produce.

1. Scope and Applicability

This Policy applies to all Bradford Labs sites, employees, contractors, and on-site service providers, and to all activities involved in the formulation, filling, packaging, warehousing, and distribution of aerosol, liquid, solid, and hot-pour products manufactured on behalf of our brand customers. It covers facility operations, materials sourcing, energy and water use, air emissions, waste generation, and the products and packaging we deliver.

2. Guiding Principles

Our environmental program is built on five guiding principles:

- Compliance as a floor, not a ceiling. We meet or exceed all applicable environmental laws, regulations, permits, and customer requirements in every jurisdiction where we operate.
- Prevention before mitigation. We design processes, select materials, and operate equipment to prevent pollution, waste, and emissions at the source rather than treat them downstream.
- Format-specific stewardship. Aerosols, liquids, solids, and hot-pour formats present distinct environmental profiles. We manage each format against the risks and opportunities specific to it.
- Continuous improvement. We set measurable objectives, track performance, and improve year over year.
- Transparency. We report progress honestly to our customers, employees, and the public, including where we have fallen short.

3. Compliance and Management System

We are in the process of establishing an environmental management system aligned with the principles of ISO 14001, with a target completion date of year end 2027. The system includes: documented environmental aspects and impacts for each format and process; a permit and regulatory register reviewed annually; defined roles and accountability up to the executive level; internal audits and management review on a fixed cadence; corrective and preventive action



tracking; and emergency preparedness procedures, including spill response and release scenarios.

4. Format-Specific Commitments

4.1 Aerosols

Aerosol manufacturing presents the most stringent environmental and safety profile in our product mix. We commit to: work with customers on lower-VOC and compressed-air formulations where performance allows; ensure VOC emissions from gassing rooms are in accordance with permit limits; and operate gas houses to NFPA 30B and equivalent standards, with leak detection, deflagration venting, and inspection programs; and recycle filled-can rejects where feasible.

4.2 Liquids

For liquid formats — shampoos, conditioners, lotions, serums, and similar products — we commit to: minimize water consumption in batching and clean-in-place cycles through metering, recovery, and rinse-reduction programs; segregate and treat process wastewater to meet or exceed local discharge limits, with attention to surfactant, oil, and grease loading; and work with customers to avoid the use of ingredients of concern (e.g., microplastics, persistent surfactants) and deliver high product efficacy and quality.

4.3 Solids

Solid formats — bar soaps, syndet, shampoo and shave bars — generally carry a lower water and emissions footprint than liquid formats. We commit to: capture and reuse trim, scrap, and off-spec material back into production wherever product specifications permit; control particulate emissions from milling and pressing operations through enclosed equipment and dust collection; and offer customers solid and concentrated options as alternatives to liquid SKUs with the goal of reducing environmental impact.

4.4 Hot Pour

Hot-pour formats — lip balms, deodorant sticks, balms, and wax-based products — are energy-intensive due to heated kettles and filling lines. We commit to: insulate heated vessels and piping to reduce thermal losses; schedule production to minimize heat-up and cool-down cycles and consolidate changeovers; and source waxes, butters, and oils with verified supply-chain credentials, including RSPO-certified palm derivatives where palm is used.



5. Energy and Climate

We measure Scope 1 and Scope 2 greenhouse gas emissions across our manufacturing footprint and are building Scope 3 inventory in partnership with our suppliers and customers. We commit to: set science-based reduction targets for Scope 1 and 2 emissions on a defined timeline; procure renewable electricity through on-site generation, power-purchase agreements, or certified instruments, with targeted year-over-year increases; improve energy efficiency in compressed air, refrigeration, lighting, and HVAC through audits and capital reinvestment; and disclose our climate performance annually through CDP or an equivalent public framework.

6. Water Stewardship

Water is a primary input for our liquid formats and a critical utility for cleaning across every format. We commit to: assess water risk at each manufacturing site; meter water use at the line and/or utility level and set site-specific reduction targets; treat all process wastewater to a quality consistent with applicable regulations and customer requirements before discharge; and report water withdrawal, consumption, and discharge in our annual sustainability disclosure.

7. Waste and Circularity

We apply the waste hierarchy — prevent, reduce, reuse, recycle, recover, dispose — to every waste stream we generate. We commit to: divert 75% or more of non-hazardous operational waste from landfill, with site-level reporting; manage hazardous waste, including aerosol rejects, solvent-bearing rinses, and contaminated PPE, through licensed facilities with documented chain of custody; recover product and packaging from line rejects, returns, and changeovers wherever quality and regulatory frameworks allow; and support customers in moving toward recyclable, reusable, refillable, or post-consumer-recycled-content packaging.

8. Air Quality and Emissions

Beyond greenhouse gases, we manage VOCs, particulates, fragrance emissions, and combustion byproducts. We commit to: operate all permitted sources within applicable limits and maintain abatement equipment to manufacturer specification; track VOC inventory at the formulation level and work with customers to reduce VOC content where regulation, performance, and consumer expectations align; and continue eliminating/reducing ozone-depleting and high-GWP substances from our facilities.



9. Responsible Sourcing

As a contract manufacturer, the majority of our environmental footprint sits in the raw materials and components we purchase on behalf of our customers. We commit to: maintain a Supplier Code of Conduct covering environmental, labor, and ethical standards, with right-to-audit provisions; prioritize suppliers with credible third-party certifications (RSPO, FSC, Cosmos, Ecocert, ISO 14001) where applicable to the material; screen new raw materials against ingredients-of-concern lists agreed with our customers; and engage strategic suppliers on emissions reporting, packaging takeback, and shared improvement targets.

10. Governance and Accountability

Accountability for this Policy rests with our Chief Executive Officer and is delegated to the Chief Operations Officer and the Environment, Health, Safety and Security Director. Site-level implementation is the responsibility of plant management, with technical support from corporate EHS. Environmental performance against this Policy is reviewed by executive leadership at least annually. Every employee and contractor is responsible for operating within the commitments above and for raising environmental concerns through our internal reporting channels, which protect against retaliation.

11. Reporting and Continuous Improvement

We publish an annual sustainability report covering performance against the commitments in this Policy, the targets we have set, and our progress toward them. We respond transparently to customer questionnaires, EcoVadis and CDP assessments, and other recognized disclosure frameworks. We review this Policy at least every two years, or sooner when material changes in our operations, regulations, or customer expectations warrant revision.

12. Contact

Questions, feedback, or concerns about this Policy may be directed to Erin Cullen, EHS&S Director at ecullen@bradfordlabs.com or 401-381-6288.

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*Approved by: Shaun Gaus, PhD, President & CEO
Effective Date: May 27, 2026*

A handwritten signature in black ink, appearing to read 'Erin Cullen'.

*Approved by: Erin Cullen, EHS&S Director
Effective Date: May 27, 2026*