



Publicly Available Annual Report 2025

(1st January 2025 to 31st December 2025)

PAS 402:2025 – Waste Resource Management

Foreword

ROCKWOOL is the UK's leading supplier of mineral wool insulation for thermal, fire and acoustic protection. ROCKWOOL insulation is one of the few products capable of saving more than 100 times the energy used during its manufacture over its lifetime. It conserves scarce energy resources and helps reduce air pollution and carbon emissions by minimising energy consumption. The manufacturing plant for the UK and Ireland business is located in Bridgend, South Wales.

ROCKWOOL is not only a supplier of insulation materials but also an organisation committed to managing its interactions with the local and global environment responsibly. We recognise that our local actions have a wider environmental impact and are committed to operating in a socially, environmentally and economically responsible manner.

A key part of ROCKWOOL's sustainability programme is the Rockcycle® recycling service offered to customers. Our commitment is to provide a recycling service that is cost-effective, efficient and supports the diversion of waste from landfill. Returned ROCKWOOL stone wool is processed through our briquette plant and incorporated back into the manufacturing process to produce new ROCKWOOL insulation products, supporting our closed-loop recycling system.

ROCKWOOL is committed to the continual improvement of its environmental, health and safety, quality and operational performance. This report has been prepared in accordance with the requirements of PAS 402:2025 – Waste Resource Management – Performance Reporting and describes the performance of the ROCKWOOL recycling operation during the reporting period 1 January 2025 to 31 December 2025. It includes details of our waste resource management activities, operational performance, improvement actions undertaken during the reporting period, and our plans for continual improvement during the next operational year.

This report has been prepared by Emily Donovan, Environmental Manager, and has been reviewed and approved by top management.

Written by:

Emily Donovan

Date: 04/04/2026

Environmental Manager

Approved by:

Gavin Holley

Date: 02/05/2026

Safety, Health and Environmental Manager for UK

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1 Scope of Operations

ROCKWOOL encourages the return of ROCKWOOL off-cuts through the Rockcycle® recycling scheme. The cement briquette plant enables returned stone wool insulation to be recycled on site and incorporated back into the manufacturing process, supporting a closed-loop recycling system.

ROCKWOOL accepts returned recyclate (recycled material used to manufacture new products) that:

- Is wholly ROCKWOOL stone wool insulation.
- Is free from contamination. Any load containing non-ROCKWOOL materials or other contaminants may be rejected and returned to the originator at their expense.
- Contains only facings applied by ROCKWOOL, including aluminium foil, glass tissue, glass scrim and steel wire netting. Third-party facings may require removal before acceptance.

The ROCKWOOL Bridgend manufacturing facility operates under Environmental Permit **BS6149IQ**, issued to **ROCKWOOL Limited**. The permit authorises the acceptance and recycling of ROCKWOOL insulation waste (List of Waste Code **17 06 04 – Insulation materials other than those mentioned in 17 06 01 and 17 06 03**) generated off site for incorporation into the manufacturing process.

The relevant permitted activities are summarised below.

Description of Activities	Limits of Activities
Producing fibre from any mineral	From storage and receipt of recycle products and other raw materials to storage and dispatch of the mineral fibre products.
Product and by-product processing	From point of completion of production, or release from process as a waste, until products or wastes are exported from the Installation. The maximum permitted storage quantity of customer returned ROCKWOOL for recycling is 250 tonnes of waste type 17 06 04 ("Insulation materials other than those mentioned in 17 06 01 and 17 06 03")

Waste recycling operations covered by this report are undertaken at the ROCKWOOL manufacturing facility in Bridgend, South Wales, specifically at the weighbridge reception area, the returned material storage area located south of the Rodmill plant, the Rodmill processing facility and the Cement Briquette Plant (CBP), where recycled mineral wool is processed and incorporated into new raw material for manufacture.

The waste operations are undertaken within the boundaries of the ROCKWOOL Bridgend manufacturing installation and in accordance with the site's Environmental Permit and relevant planning permission for the installation.

Returned ROCKWOOL is received via the site weighbridge before being inspected, stored where necessary and processed through the Rodmill. The processed material is transferred to the Cement

Briquette Plant where it is manufactured into cement briquettes for reuse within the production process.

An upgrade to the Rodmill is planned to further improve recycling efficiency and increase processing capability in support of ROCKWOOL's sustainability objectives.

Scope exclusions

This report relates solely to the acceptance, storage, processing and recycling of externally returned ROCKWOOL insulation through the Rockcycle® scheme at the Bridgend manufacturing facility. All other manufacturing activities and waste management operations outside the scope of the Rockcycle recycling scheme are excluded from this report.

2 Client Relationship

ROCKWOOL's recycling facility at the Bridgend manufacturing site is capable of meeting growing customer demand for recycling and demonstrates the company's commitment to supporting a circular economy. Redundant ROCKWOOL insulation returned from customers, together with selected by-products generated during manufacture, are processed into cement briquettes which are subsequently incorporated into the manufacturing process to produce new stone wool insulation products. These briquettes typically comprise between **40% and 80%** of the cupola furnace charge.

For the purposes of PAS 402:2025, ROCKWOOL's clients comprise two categories:

Waste Producers

Waste producers are customers returning unused or surplus ROCKWOOL stone wool insulation through the Rockcycle® recycling scheme. Customers are provided with the Rockcycle® specification, booking documentation and terms and conditions before a return is accepted.

Incoming material is assessed against the Rockcycle® acceptance criteria to ensure it:

- consists solely of ROCKWOOL stone wool insulation;
- is free from contamination;
- contains only approved ROCKWOOL-applied facings; and
- complies with the agreed waste specification.

Requests that do not satisfy the acceptance criteria are rejected before delivery is arranged.

The process for arranging returns is described within the Rockcycle® Recycling Brochure. Enquiries are managed by the Customer Services Team, with returns scheduled following consultation with the Utilities Supervisor to ensure sufficient operational capacity is available.

Receiver of Outgoing Material

The receiver of the outgoing recycled material is the ROCKWOOL manufacturing process. Following inspection and acceptance, returned insulation is processed through the Rodmill before being incorporated into the Cement Briquette Plant, where it becomes a secondary raw material used in the manufacture of new ROCKWOOL stone wool insulation.

This internal closed-loop recycling process ensures that accepted returned material is recovered and reused within the manufacturing process, supporting ROCKWOOL's sustainability objectives and reducing the demand for virgin raw materials.

Returned insulation may occasionally be received in plastic packaging, all of which is segregated and managed appropriately to maximise diversion from landfill.

The cost of processing returned ROCKWOOL waste is approximately **£90 plus VAT per tonne**, although commercial arrangements may vary depending on the quantity returned. This provides customers with a competitive alternative to disposal, particularly when compared with landfill disposal costs.

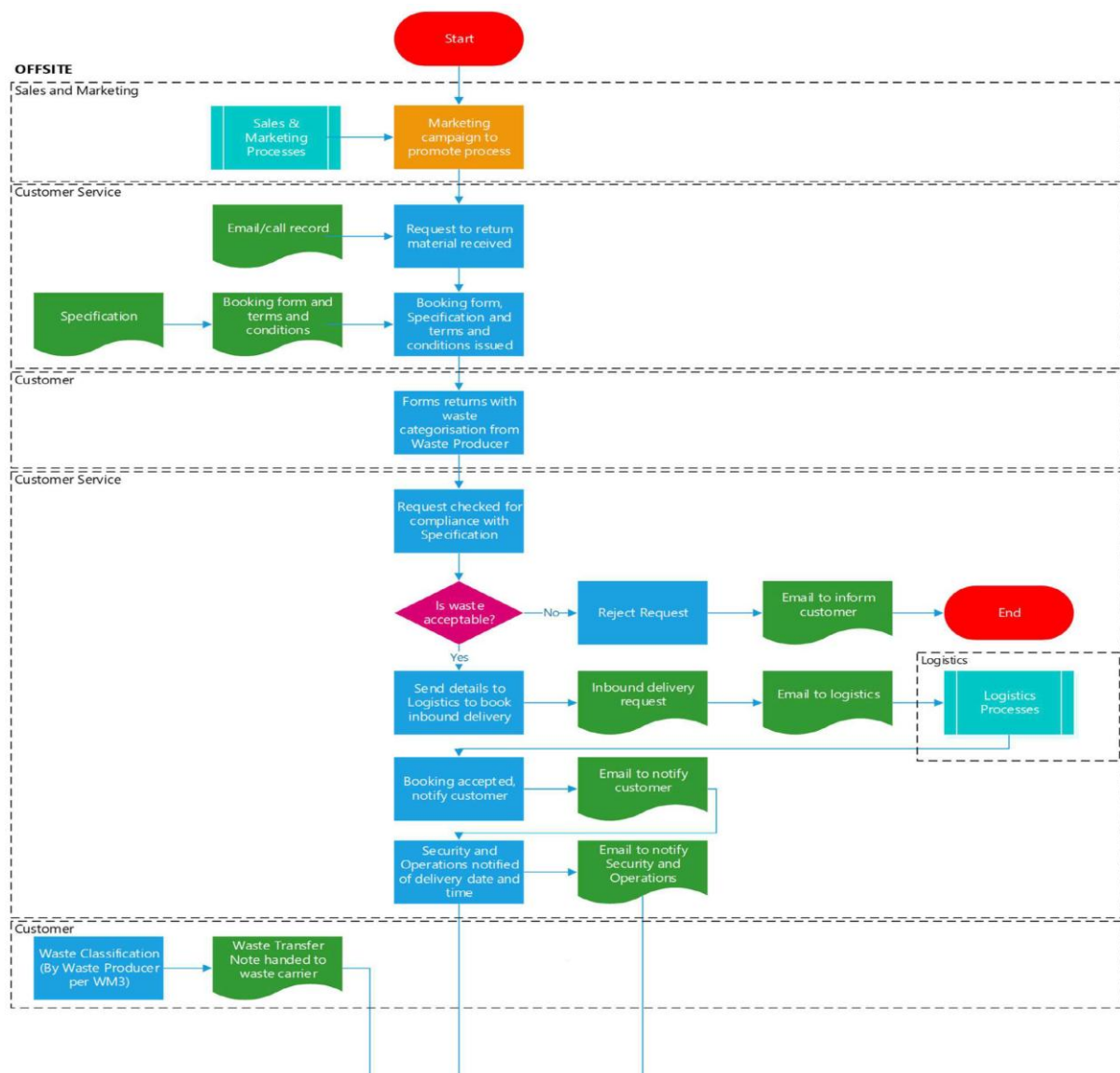
As insulation is a low-density material, transporting waste over long distances is not always economically or environmentally beneficial. ROCKWOOL continues to investigate improvements to the Rockcycle® scheme as part of the wider ROCKWOOL Group sustainability strategy.

An ongoing improvement programme involving Logistics, Marketing, Customer Services, Senior Management and the Environmental Team continues to develop the Rockcycle® scheme through increased collections, improved customer engagement, enhanced logistics and evaluation of opportunities to expand recycling capacity and establish additional recycling hubs across the UK.

ROCKWOOL maintains certification to **ISO 9001, ISO 14001, ISO 45001 and ISO 50001**, with procedures in place to manage customer enquiries, complaints and feedback to support continual improvement.

Figure 1 illustrates the Rockcycle® customer return process, including customer enquiry, specification review, assessment of incoming material against the acceptance criteria, booking, logistics coordination and receipt of compliant material.

Figure 1. Rockcycle Client Relationship and Waste Acceptance Process



3 Impacts and Risks

ROCKWOOL operates an **ISO 45001:2018** certified Health and Safety Management System. The Health & Safety Policy demonstrates ROCKWOOL's commitment to undertaking risk assessments, audits and inspections to identify hazards and implement appropriate control measures.

A standardised risk assessment template is maintained on the ROCKWOOL UK SharePoint to ensure a consistent approach across the site. Risk assessments are undertaken by supervisors responsible for the relevant operational area, with support from the Health & Safety Team. Supervisors receive appropriate training to ensure they have the competence required to identify hazards and assess risks effectively.

Following the identification of hazards associated with each operation, the assessor considers who may be affected, including employees, contractors, visitors, customers and members of the public, before evaluating the likelihood and consequence of the identified risks. Suitable control measures are implemented to eliminate risks where practicable or reduce them to an acceptable level.

ROCKWOOL maintains a close working relationship with Natural Resources Wales and operates within the requirements of Environmental Permit **BS6149IQ** to ensure environmental impacts are identified, assessed and effectively controlled. The site operates an **ISO 14001:2015** certified Environmental Management System, which provides the framework for identifying environmental aspects, evaluating environmental risks and implementing operational controls.

Emergency situations, including fire, chemical spills and other environmental incidents, are managed through documented Emergency Preparedness and Response Procedures. The company also maintains a Crisis Communications Cascade and Business Continuity Plan that details arrangements for protecting employees, maintaining communication with stakeholders and continuing operations following a significant disruption.

Climate Change Assessment

ROCKWOOL recognises that climate change presents both risks and opportunities to its operations. Potential risks include increased frequency and severity of extreme weather events, flooding, high temperatures and disruption to transport networks, which could affect the delivery of returned materials, availability of raw materials and continuity of manufacturing operations. These risks are considered through the site's environmental risk assessments, emergency preparedness arrangements and business continuity planning to improve operational resilience.

The Rockcycle® recycling scheme contributes positively to climate change mitigation by supporting the circular economy through the closed-loop recycling of returned stone wool insulation. Recycling returned material reduces the demand for virgin raw materials, diverts waste from landfill and supports the efficient use of resources within the manufacturing process, contributing to ROCKWOOL's wider sustainability and decarbonisation objectives.

As a further assurance, ROCKWOOL undertakes a programme of internal audits to support continued certification to **ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and ISO 50001:2018**. Audit findings, inspections, incidents and management reviews are used to verify compliance, identify opportunities

for improvement and ensure the continued suitability and effectiveness of the company's management systems.

4 Operational Management

In order to ensure that we are operating within our licensing and legal obligations, we have developed a number of internal operational control systems and procedures. Returns are booked in advance through a collaboration between the Customer Services, Environmental and site Operations teams. Returns are only permitted from 08:00-15:00, Monday to Wednesday, to make sure that the process is fully supported by the relevant stakeholders.

All returned waste is weighed on our calibrated weighbridge and details of every load are recorded. An internal waste report is produced every month. Customer returns are logged and managed by the Utility Supervisor.

Waste traceability is maintained throughout the recycling process. Each return is recorded upon receipt and linked to the accompanying waste documentation and weighbridge records. The movement of material from receipt, inspection and storage through to processing in the Rodmill and incorporation into the Cement Briquette Plant is recorded using site operational records, ensuring the waste remains identifiable and traceable throughout its management.

Operators involved with waste management on site have job descriptions that reflect this and each individual is rated on a skills matrix for the appropriate tasks required of the role.

Rockwool ensures that appropriate Duty of Care measures are applied by informing customers to use licensed waste carriers and by maintaining records of incoming wastes. Wherever possible, returned waste is put immediately into the process which therefore negates the need for storage. However, we have suitable and sufficient waste containment bays that are used within the site permit boundary if necessary.

All waste is managed in accordance with the conditions of Environmental Permit BS6149IQ. Incoming material undergoes a thorough inspection prior to acceptance to ensure contaminated or unacceptable material does not enter the recycling process. Where non-conforming material is identified, ROCKWOOL reserves the right to reject the load and return it to the customer at their expense.

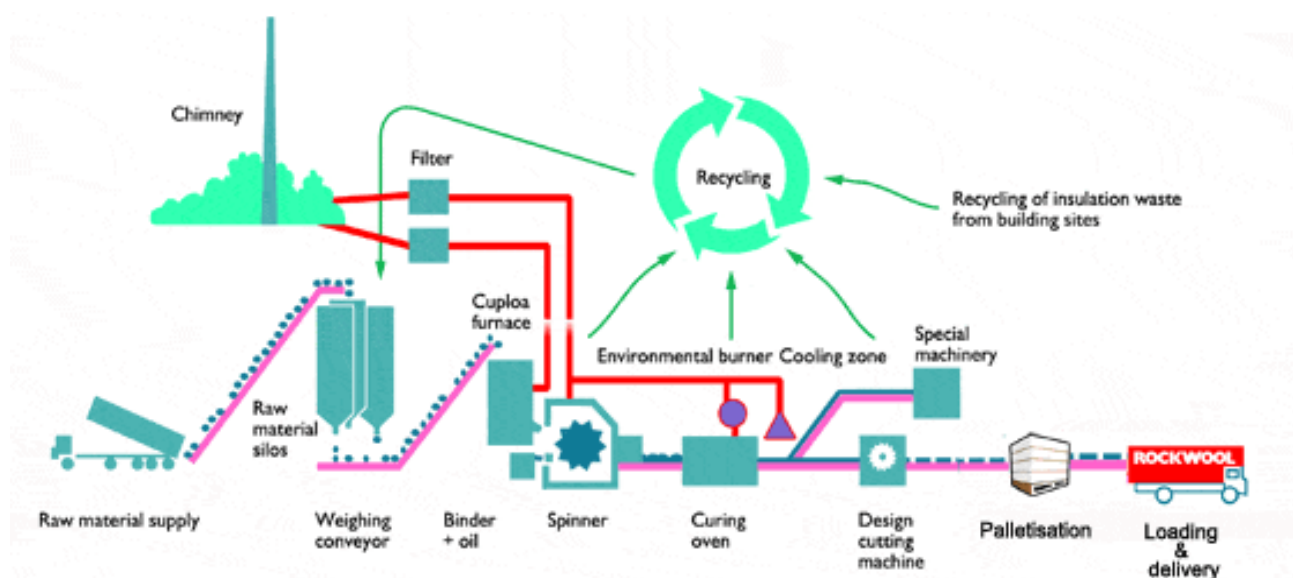
Operational controls ensure that waste storage and processing activities remain within the limits specified by the Environmental Permit. Incoming returns are scheduled in advance, storage quantities are routinely monitored and operational planning ensures that the maximum permitted storage capacity of 250 tonnes of returned ROCKWOOL insulation is not exceeded.

Returned waste is combined with suitable process waste and processed through the Rodmill, where it is converted into a sand-like material. This processed material is transferred to the Cement Briquette Plant (CBP), where it is blended with cement, sand, fly ash and water before being pressed into cement briquettes. These briquettes are subsequently reused as a secondary raw material within the stone wool manufacturing process.

Plant and equipment associated with the Rockcycle® recycling operation, including the weighbridge, Rodmill and Cement Briquette Plant, are subject to planned inspection, preventative maintenance and routine servicing. Maintenance activities are managed through the site's maintenance

management system to minimise equipment failure, reduce operational risks and maintain compliance with permit conditions.

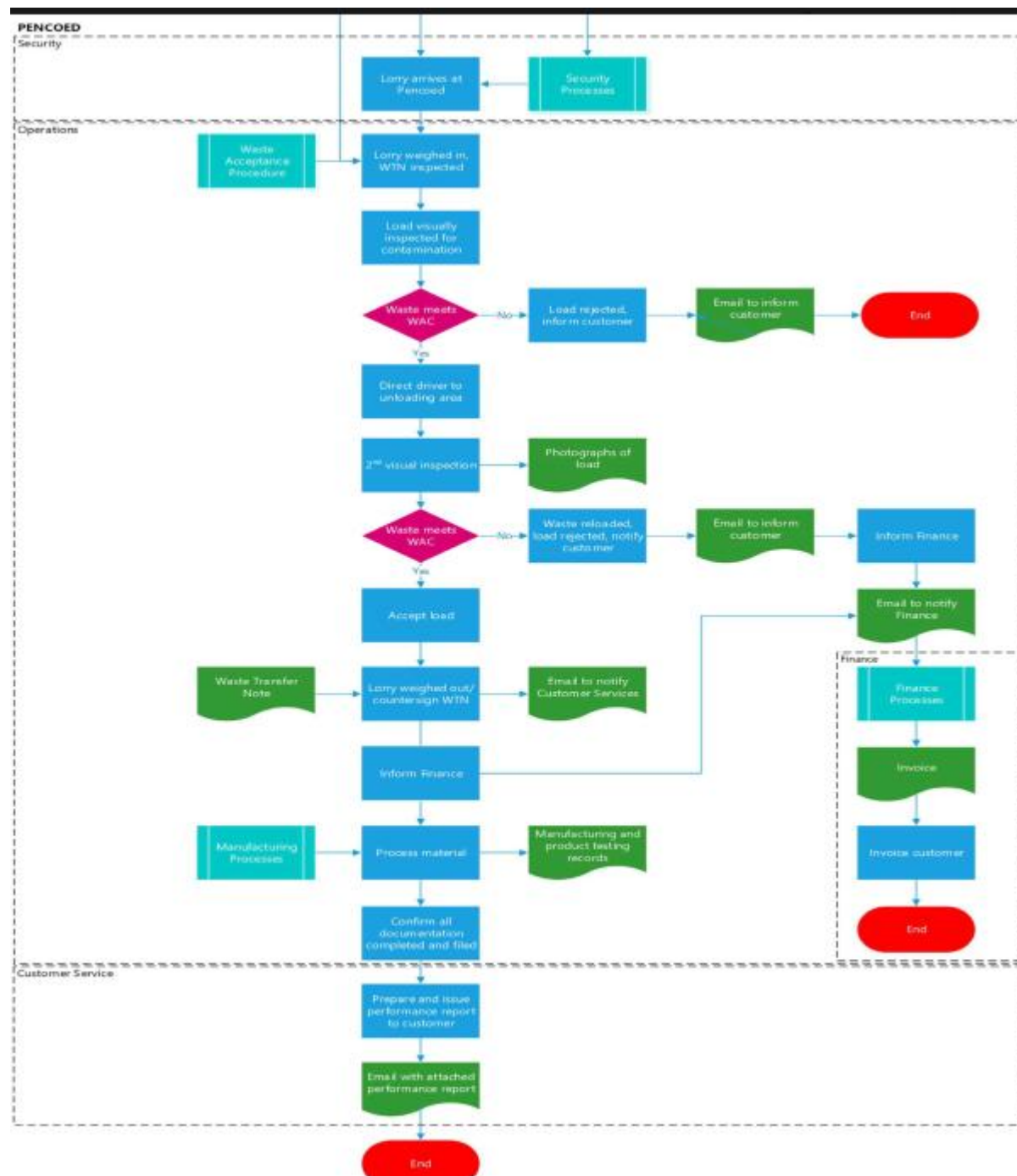
Figure 2 illustrates the closed-loop recycling process for returned ROCKWOOL insulation. Following receipt and inspection, returned material is processed through the Rodmill before being incorporated into the Cement Briquette Plant, where it is manufactured into cement briquettes for reuse in the production of new stone wool insulation products.



Waste management activities across the Bridgend site, including the management of returned ROCKWOOL insulation and process-generated wastes, are controlled through documented operational procedures maintained within the ROCKWOOL Environmental Management System.

Figure 3 illustrates the operational management process for the receipt, inspection, acceptance and processing of returned ROCKWOOL insulation through the Rockcycle® scheme. The process ensures all incoming waste is inspected against the Rockcycle® Waste Acceptance Criteria (WAC), supported by weighbridge records, Waste Transfer Notes, photographic evidence where required, customer notifications and manufacturing records, providing full traceability from receipt through to incorporation into the manufacturing process.

Figure 3. Operational management process for the receipt, inspection and processing of returned ROCKWOOL insulation.



5 Competence

We have technically competent and qualified staff working throughout our operations. When deemed necessary we seek external training to industry recognised certification standards, this is supported by the Health & Safety team. On commencing employment, every individual is given a thorough job and site specific induction. Roles are analysed by individual managers to identify the training needs of all employees under their supervision.

When they have determined what training is required in order to fulfil each role, the manager will liaise with the Human Resources department to source applicable training. All training that is required or has been undertaken is recorded on the department specific competency matrix. All training needs are reviewed by senior management as part of the management review process in accordance with the requirements of ISO 9001:2015, ISO 14001:2015, ISO 50001:2018 and ISO 45001:2018.

All system documentation relating to the various roles and responsibilities within the organisation, such as standard operating procedures (SOPs), are available to employees via our SharePoint system.

The Utilities Team control the waste ROCKWOOL returns movement on site. The Utilities team have SOPs relevant to this recycling scheme. Examples of relevant SOPs include:

Outside & Utilities SOP 63 - Traffic movements on the raw material yard,

Outside & Utilities SOP 83 - Offloading a Vehicle near the Weighbridge and,

Outside & Utilities SOP 38 - Start up for the Rodmill.

The Utilities team has a total of 46 staff and 4 have direct involvement in the returns handling process – the 2 weighbridge operators and 2 recycle scheme operators. All 4 are trained in the use of forklift and the recycle scheme operators have also attended manual handling. In addition, the weighbridge operators have received role specific training material, such as waste documentation.

First aid training has been provided to a total of 41 staff on site on shifts, with at least 7 extra first aiders supporting on days.

6 Corrective, Preventive and Improvement Actions

ROCKWOOL maintains an integrated management system certified to ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and ISO 50001:2018. These management systems provide the framework for monitoring compliance with legal, environmental, quality, health and safety, and energy management requirements, whilst supporting continual improvement across the business.

Legal and permit compliance is monitored through routine compliance evaluations, internal audits, management system audits, inspections, environmental monitoring and regular liaison with Natural Resources Wales. Compliance with the conditions of Environmental Permit BS6149IQ is routinely reviewed, with any non-conformances, permit breaches or improvement opportunities investigated and appropriate actions implemented.

All employees are made aware of ROCKWOOL procedures, which are available through the company SharePoint system. The Corrective and Preventive Action Procedure (Procedure 331) defines how corrective actions, preventive actions and improvement actions are identified, investigated, implemented and reviewed.

Records of actions are maintained through the Corrective and Preventive Action Log (Document 353) and the Non-Conformance Register (Document 78). Actions are assigned to responsible persons, monitored to completion and reviewed to verify their effectiveness before being formally closed.

Environmental incidents, health and safety incidents, complaints, audit findings, permit non-compliances and operational issues are investigated to determine their root cause. Corrective actions are implemented to prevent recurrence, while preventive actions are identified through risk assessments, inspections, audits and management review to reduce the likelihood of potential non-conformances occurring.

All accidents and incidents are recorded within the RockSHE incident management system. Where applicable, incidents are reported to the Health and Safety Executive in accordance with the company's RIDDOR procedure. Incident trends are reviewed by the SHE Manager and the Safety Committee to identify opportunities for additional control measures and continual improvement.

Continual improvement is supported through internal and external audits, management review meetings, environmental objectives, employee feedback, customer feedback and performance monitoring. Improvement opportunities identified through these processes are incorporated into site action plans to enhance operational performance, maintain legal compliance and improve the effectiveness of the integrated management system.

7 Performance Review

ROCKWOOL monitors key performance indicators (KPIs) relating to environmental performance, operational efficiency and continual improvement. These include the quantity of returned ROCKWOOL insulation received for recycling, raw material consumption, production efficiencies, waste recovery performance and health and safety performance. Performance is reviewed regularly by the factory management team alongside the activities described in Clauses 5 to 10 of this report. The results are used to identify trends, support continual improvement and monitor compliance with Environmental Permit BS6149IQ and the requirements of PAS 402:2025.

During the reporting period 1 January 2025 to 31 December 2025, ROCKWOOL received 1,539 tonnes of returned ROCKWOOL insulation for recycling. All accepted material was incorporated into the manufacturing process through the Cement Briquette Plant, resulting in a 100% landfill diversion rate and a 100% material recovery rate for accepted Rockcycle® material.

7.1 Performance Summary

Performance Summary	Tonnes
Total material inputs this period	1,539
Waste used/retained on site	1539
Waste remaining on site (unprocessed)	0
Waste remaining on site (processed)	0
Total waste remaining on site	0
Waste sent offsite for reuse/repair	0
Waste sent offsite for recycling	0 (<i>internally recycled</i>)
Waste sent offsite for energy recovery	0
Qualifying fines	0
Non-qualifying fines	0
Materials sent offsite as non-waste	0
Waste sent for disposal (incineration)	0
Waste sent to landfill	0
Total materials sent offsite	0

7.2 Annual Recovery and Disposal Tonnages

Incoming LoW Code	Incoming Tonnes	Outgoing Code	Outgoing Tonnes	Waste Stream	Destination/Treatment
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17 06 04 – Insulation materials	1,539	Internal reuse	1,539	Returned ROCKWOOL insulation	Rodmill → Cement Briquette Plant → Manufacturing
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7.3 Material Processed by Waste Hierarchy

Waste Hierarchy	Annual %
Reuse	0
Repair	0
Recycle	100
Energy Recovery	0
Landfill Cover	0
Disposal	0

7.4 Landfill Diversion and Material Recovery

Landfill diversion and material recovery rates have been determined in accordance with Clause 12 of PAS 402:2025.

Landfill Diversion Rate

$$\frac{\text{Waste Received} - \text{Waste to Landfill}}{\text{Waste Received}} \times 100$$

= 100%

Overall Material Recovery Rate

$$\frac{\text{Waste Received} - \text{Waste to Landfill} - \text{Waste to Disposal}}{\text{Waste Received}} \times 100$$

= 100%

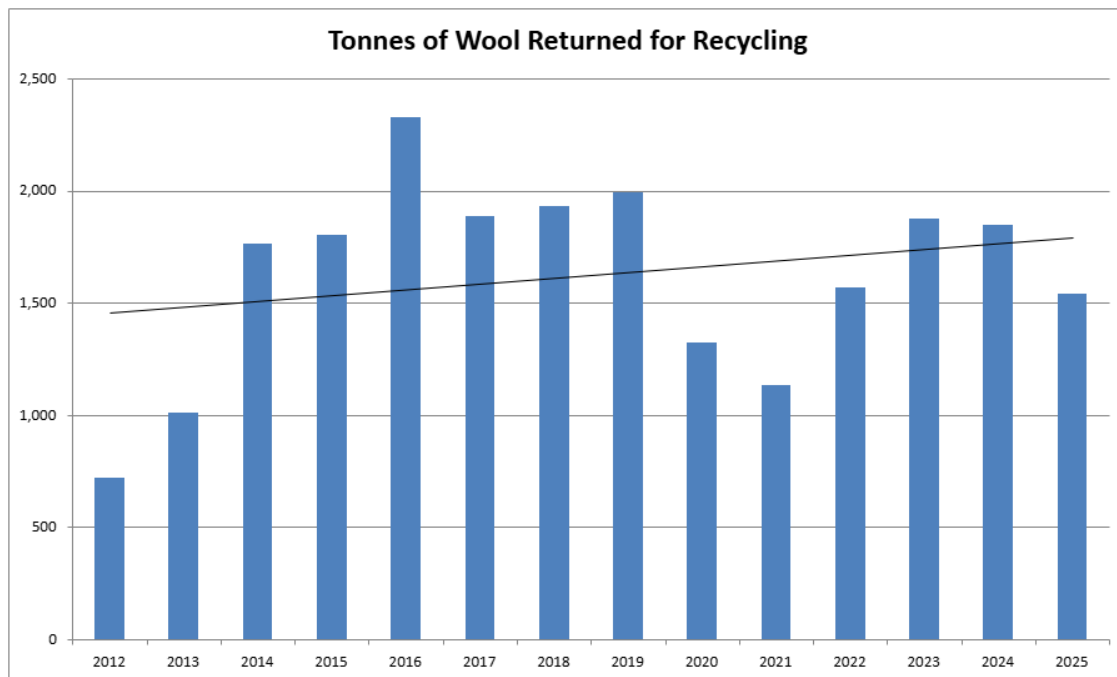
All returned ROCKWOOL insulation accepted through the Rockcycle® scheme was recycled through the Cement Briquette Plant and incorporated into the manufacture of new stone wool insulation products. No accepted material was disposed of to landfill or sent for disposal during the reporting period.

Performance Trends

The quantity of returned ROCKWOOL insulation received during the reporting period is summarised below.

Waste Type	Q1	Q2	Q3	Q4	Total
ROCKWOOL Products (17 06 04)	411	331	398	399	1,539

The quantity of returned ROCKWOOL insulation was slightly lower than the previous reporting period. Following reduced returns during the COVID-19 pandemic, recycling volumes recovered in subsequent years. The slight reduction observed during 2025 is considered to reflect lower market demand and temporary operational constraints associated with internal material stock levels. ROCKWOOL continues to promote the Rockcycle® scheme and invest in improvements to increase future recycling capacity.



Over the course of 2025, ROCKWOOL improved on the current Rockcycle® scheme by increasing the awareness of ROCKWOOL's recycling capability externally by producing an update procedure. This provides clear service details, increasing returns/logistics options and considering varying container/packaging options.