



Energy Policy Statement

allpay Limited is committed to responsible energy management to reduce energy consumption, minimise environmental impact, and support sustainable development. This policy establishes a structured framework for the continual improvement of energy performance and integrates energy management into core business activities in line with ISO 50001:2018.

This policy applies to the provision of financial payment services, including the design and manufacture of swipe and chip cards, client cards, and stationery products at the Whitestone site, and to all employees, contractors, and activities under allpay's control.

allpay has established, implemented, and maintains an Energy Management System (EnMS) that:

- integrates energy management into core business processes
- supports the achievement of strategic and operational objectives
- drives continual improvement in energy performance
- provides a framework for reviewing energy performance indicators and setting objectives and targets.

Detailed arrangements and the scope of the management system are defined within the Energy Strategy and supporting EnMS documentation.

allpay Limited is committed to:

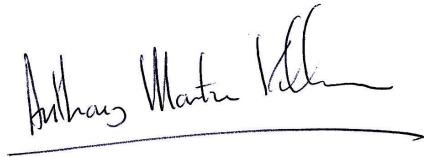
- Continual improvement in energy performance, including energy efficiency, use, and consumption
- Meeting legal and other requirements relating to energy use, consumption, and efficiency
- Providing the information, competence, and resources necessary to achieve energy objectives and targets
- Using relevant energy data and performance indicators to support decision-making
- Setting, monitoring, and reviewing energy objectives and targets aligned with business strategy
- Procuring energy-efficient products, services, and equipment while considering life-cycle impacts where appropriate
- Incorporating energy performance into the design and modification of facilities, equipment, systems, and processes
- Reducing greenhouse gas emissions associated with energy use

- Promoting awareness, competence, consultation, and engagement across all levels of the organisation.

Energy performance indicators (EnPIs) will be established, monitored, and reviewed to demonstrate trends and support continual improvement.

Objectives and targets will be documented within the Energy Strategy, supported by action plans, accountabilities, and timescales.

Performance will be reviewed regularly and corrective actions will be taken where required when performance deviates from expectations.

A handwritten signature in dark ink, appearing to read "Anthony Martin Killeen", with a horizontal line underneath.

Tony Killeen
CEO

A dark blue circular stamp with the text "July 2026" in white, centered within the circle.

July
2026

Energy Roles and Responsibilities

Top Management (Directors / Senior Leadership Team)

Top Management retains overall accountability for the effectiveness of the EnMS and shall:

- Provide leadership and demonstrate commitment to the Energy Management System (EnMS)
- Approve the energy policy and strategic objectives
- Ensure sufficient resources are allocated
- Review energy performance and progress during management reviews
- Promote a culture of energy responsibility across the organisation

Energy Manager

The Energy Manager is responsible for coordinating and maintaining the EnMS and shall:

- Develop, implement, and maintain the Energy Management System (EnMS)
- Monitor energy usage, analyse trends, and report performance
- Identify energy-saving opportunities and lead improvement initiatives
- Ensure compliance with energy regulations and standards (e.g., ISO 50001)
- Coordinate internal audits and reporting

Department Managers

Department Managers are responsible for ensuring energy standards are delivered in practice and shall:

- Integrate energy management practices into departmental operations
- Ensure team compliance with energy procedures and policies
- Support achievement of energy targets within their area
- Identify and escalate energy-saving opportunities
- Ensure staff are trained and aware of energy responsibilities

Employees

All employees share responsibility for energy and shall:

- Follow energy-efficient practices and operational procedures
- Report energy waste or inefficiencies
- Participate in training and awareness programs
- Contribute suggestions for improving energy performance

Procurement Stakeholders

Procurement Stakeholders shall:

- Consider life-cycle energy performance when purchasing goods and services
- Engage with suppliers to promote energy-efficient solutions
- Ensure energy performance criteria are included in procurement processes

Maintenance and Engineering Teams

Maintenance and Engineering Teams shall:

- Maintain equipment to ensure optimal energy efficiency
- Support energy monitoring activities
- Implement energy-efficient technologies and upgrades
- Ensure new installations meet energy performance requirements

Communication and Awareness

This policy will be communicated across all levels of the organisation via SharePoint and other internal communications as appropriate.

Personnel will receive suitable training and awareness support to understand their responsibilities and contribute to improved energy performance.

Relevant stakeholders will be engaged where appropriate to support energy performance improvements.

Monitoring, Audit, and Review

Energy performance will be monitored, measured, and analysed at planned intervals.

Internal audits and management reviews will be conducted to ensure the effectiveness and suitability of the EnMS.

This policy and associated EnMS documentation will be reviewed at least annually, or sooner where significant organisational, operational, or regulatory changes occur.

Continuous improvement actions will be tracked, verified, and incorporated into future planning.