



End-of-Life Product Service Policy

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1. Introduction & Purpose

LEDflex Group is committed to responsible product stewardship throughout the complete lifecycle of every linear LED lighting system we manufacture, from specification, manufacture, and installation to decommissioning, material recovery, and reintegration into the circular economy. This policy establishes the framework for the LEDflex Free End-of-Life (EOL) Service, a structured and technically governed programme available exclusively for LEDflex-manufactured products.

This edition strengthens our commitment to transparency and circular resource management by introducing enhanced technical guidance on material recovery processes, quantified diversion objectives, regulatory alignment, and comprehensive digital traceability. Every returned product is assigned a unique QR code, enabling end-to-end tracking throughout the collection, assessment, recovery, and recycling process, providing customers with greater visibility, accountability, and confidence in the responsible management of their products at end of life.

Why these matters

- Extending product life and recovering embodied materials reduces the whole-life carbon footprint of a LEDflex installation by a material margin compared with landfill disposal or third-party scrap recycling.
- This programme forms part of LEDflex's wider ESG framework, aligned to ISO 14001 environmental management principles and the UK's Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 (as amended).

2. Scope & Applicability

This policy applies exclusively to:

- Customers operating existing LEDflex linear LED fixtures with LEDflex profiles, drivers, controllers, and associated accessories.
- Projects undertaking a qualifying upgrade, retrofit, or full decommissioning of a LEDflex installation.
- Collections carried out under LEDflex's Retrofit, Repurpose & Recycle (R3) Initiative, as described in Section 3.

This policy does not extend to third-party luminaires drivers, or components not originally supplied by LEDflex Group, even were installed within the same scheme.

3. Program Framework -The R3 Initiative

The R3 Initiative (Retrofit, Repurpose & Recycle) is the operational framework underpinning this policy. It is structured around three technical pathways applied sequentially to every collected asset, in order of environmental preference, consistent with the waste hierarchy set out in the EU/UK Waste Framework Directive:

R1	Retrofit - Assess for continued service On-site technical audit determines whether existing fixtures, drivers, or control gear can remain in service or be upgraded in place, extending functional life before any material is removed from circulation.
R2	Repurpose - Recover for internal reuse Components that are structurally and electrically sound but unsuitable for continued field service are graded and redirected into LEDflex's own manufacturing, R&D, or quality-benchmarking operations.
R3	Recycle - Certified material recovery Material that cannot be retrofitted or repurposed is processed through Recolight's certified WEEE-compliant recycling network, with full documentation of tonnage and material streams recovered.

4. Service Offering

4.1 Complimentary Technical Site Assessment

Every participating project begins with a no-cost, technically detailed site assessment carried out by a LEDflex-qualified engineer. The assessment includes:

- Full electrical and photometric audit of existing LEDflex fixtures, drivers, and control/dimming systems, including lumen depreciation assessment where service records are available.
- Thermal and driver-load inspection to identify degraded components ahead of failure.
- A tailored upgrade proposal referencing current-generation product codes, efficacy (lm/W) improvements, and control-protocol compatibility
- Preferential retrofit pricing applicable to qualifying replacement orders.
- A quantified energy-saving projection (kWh/year and estimated CO₂e reduction) based on the proposed upgrade specification.

4.2 Product Take-Back & Reverse Logistics

As part of a qualifying new LEDflex product purchase, LEDflex arranges free collection of decommissioned fixtures, lamps, drivers, controllers, and associated cabling/accessories. Reverse logistics are managed as follows:

- Collection is scheduled directly with the customer's site contact and coordinated with the new-product delivery where practical, minimising vehicle movements.
- Items are consolidated, labelled, and manifested at the point of collection, with each batch assigned a unique tracking reference (see Section 6).
- Where installations include suspected hazardous components (e.g. legacy fluorescent control gear, certain older capacitors), these are segregated and transported in accordance with the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations, as applicable.

5. End-of-Life Processing Pathways

5.1 Certified Recycling via Recolight

LEDflex is a registered member of Recolight, the UK's producer compliance scheme dedicated to lighting-sector WEEE. All material entering the recycling pathway is processed through Recolight's approved network of Authorised Treatment Facilities (ATFs), which operate to the technical treatment standards set out in WEEE Regulations 2013 (as amended) and the associated Best Available Treatment Recovery and Recycling Techniques

Material Stream	Recovery Process	Typical Recovery Rate	Downstream Application
Aluminium extrusions & heat sinks	Mechanical shredding & eddy-current separation	≥ 95%	Re-smelted into new extrusion billet stock
Copper (cabling, windings)	Wire granulation & density separation	≥ 90%	Refined copper for cable and driver manufacture
Silicone diffusers & profiles	Manual sort & polymer reprocessing	70–85%	Compounded feedstock for non-optical silicone parts
Printed circuit boards / drivers	Precious-metal & base-metal recovery (smelting)	80–98% by element	Recovered gold, copper, tin re-enter electronics supply chain
Optical-grade polycarbonate / PMMA	Sorting, granulation, re-pelletising	60 – 80%	Recycled resin for non-optical mouldings
Glass (where present)	Crushing & cullet processing	≥ 90%	Glass cullet for construction or container glass

Recovery-rate figures represent typical industry ranges achieved by Recolight-approved ATFs and are provided for indicative technical guidance; actual rates vary by material condition, contamination, and batch composition.

5.2 Repurposing Within LEDflex

Where collected components remain structurally and electrically sound following inspection, they are graded and redirected into internal operations rather than entering the recycling stream:

- Silicone extrusions and profiles - re-cut and repurposed for custom or prototype assemblies during new product development.
- LED drivers and power supplies - subjected to a full electrical safety re-test (insulation resistance, output ripple, thermal cycling) before refurbishment for demonstration units or internal R&D use.
- Aluminium profiles and heat sinks - cleaned, inspected, and returned to the fabrication process as recovered material input, reducing virgin aluminium demand.
- Neon Flex and tape-format segments - assessed for use in accelerated ageing tests, quality-benchmarking studies, or customer sample kits.

Every repurposed component is logged against a unique component ID, allowing LEDflex's quality team to trace recovered material back to its originating batch for benchmarking and continuous improvement.

5.3 Component Assessment & Grading Protocol

All returned components pass through a standardised four-stage technical grading protocol prior to allocation to a Retrofit, Repurpose, or Recycle pathway:

1. Visual & mechanical inspection - Check for physical damage, corrosion, discolouration, and housing integrity.
2. Electrical safety test - Insulation resistance, continuity, and where applicable, driver output verification against original specification.
3. Material identification - Confirmation of alloy/polymer grade to ensure compatibility with target reuse or recycling stream
4. Pathway allocation - Component routed to Retrofit (return to service), Repurpose (internal reuse), or Recycle (certified material recovery), with outcome logged against the batch record.

6. Digital Traceability & QR Code Tracking

To provide customers with full transparency over what happens to their decommissioned products, every collection batch - and, where practicable, individual fixtures - is issued a unique QR code at the point of collection.

How it works

- The QR code is affixed to the collection manifest and, where applicable, to the packaging of each returned unit.
- Scanning the code with a smartphone camera directs the customer to a secure LEDFlex tracking page showing the live status of that specific batch.
- No app installation or account is required to view the status page.

The tracking page reflects the current stage of the item within the R3 process, updated by LEDFlex operations and logistics partners as each milestone is completed:

1	Collection Scheduled Batch reference generated; QR code issued and linked to the customer's site and order record.
2	Collected from Site Reverse-logistics partner confirms uplift, timestamp, and item count against the manifest.
3	Received at Facility Goods-in confirmation at the LEDFlex or Recolight-approved facility, including weight/tonnage capture.
4	Assessed & Graded Component grading protocol (Section 5.3) applied; pathway allocation recorded - Retrofit, Repurpose, or Recycle.
5	Processing In Progress Material undergoing repurposing at LEDFlex or certified treatment at the recycling facility.
6	Completed & Certified Outcome recorded; tonnage diverted from landfill and material stream data compiled into the environmental impact record referenced in Section 9.

This traceability layer also strengthens the audit trail LEDFlex maintains for regulatory purposes, supporting due-diligence requirements under the WEEE Regulations and providing verifiable evidence for customer ESG and sustainability reporting.

Note: QR code tracking is being rolled out progressively across LEDFlex collection regions; availability may vary by territory during the initial deployment phase.

7. Regulatory & Compliance Framework

The EOL Service and the R3 Initiative operate within, and are audited against, the following regulatory and standards framework:

Framework	Relevance
WEEE Regulations 2013 (as amended)	Governs the collection, treatment, and recovery of waste electrical and electronic equipment in the UK; underpins the Recolight-managed recycling pathway.
RoHS Regulations (2011/65/EU as retained in UK law)	Restricts hazardous substances in electrical equipment; informs material handling and treatment protocols for legacy components.
REACH Regulation (EC 1907/2006)	Governs registration and safe use of chemical substances; relevant to material composition data used during recycling/repurposing assessment.
ISO 14001	Environmental management systems framework underpinning LEDFlex's wider sustainability governance.
Waste (England and Wales) Regulations 2011	Establishes the waste hierarchy (prevent, reduce, reuse, recycle, recover, dispose) applied when allocating components to the R1/R2/R3 pathways.

8. Eligibility Criteria

Criterion	Requirement
Product origin	Original installation must comprise genuine LEDFlex-manufactured products.
Installation age	Minimum 7–10 years in continuous operation from original installation date.
Site condition	Installation must be well-maintained, free of significant damage, neglect, or unauthorised alteration.
Qualifying purchase	Service is available only in conjunction with a qualifying new LEDFlex product order.
Pre-qualification	Subject to review and approval by the LEDFlex technical team prior to collection scheduling.

9. Environmental Impact Reporting & Certification

On completion of processing, participating customers receive a formal EOL Processing & Environmental Impact Certificate. This document provides a verifiable record of how the customer's returned assets were handled and is intended to support the customer's own sustainability disclosures and ESG reporting requirements.

The certificate includes:

- Total tonnage of material diverted from landfill, broken down by material stream (aluminium, copper, silicone, PCB/electronics, optical polymer, glass).
- A breakdown of the proportion of the batch allocated to each of the Retrofit, Repurpose, and Recycle pathways.
- Reference to the applicable Recolight or LEDFlex processing facility and relevant compliance scheme membership number.
- The unique batch reference and associated QR code, allowing the customer or their auditors to verify the record independently at any time via the tracking page described in Section 6.

This certificate replaces any previously issued environmental recognition document under this policy and represents LEDFlex's current standard for documented, auditable end-of-life reporting.

10. Health, Safety & Handling Considerations

- All collection and handling activity is carried out in accordance with LEDFlex's site safety procedures and relevant UK health and safety legislation, including the Control of Substances Hazardous to Health (COSHH) Regulations where legacy components require special handling.
- Components suspected of containing hazardous substances (e.g. certain legacy control gear or capacitors) are segregated, labelled, and transported in compliance with applicable dangerous goods transport requirements.
- Isolation of electrical supply prior to de-installation remains the responsibility of the customer's qualified electrical contractor unless otherwise agreed in the site assessment scope.
- LEDFlex reserves the right to decline collection of any item presenting an unmanaged safety risk, pending appropriate remediation.

11. Exclusions & Limitations

- This policy applies exclusively to genuine LEDFlex products; fixtures or components from other manufacturers are not eligible under this service.
- The service does not extend to warranty replacements, routine maintenance, or upgrades unrelated to an LEDFlex EOL/retrofit scope.
- Transportation of items classified as hazardous beyond standard legal or logistical limits is excluded and must be arranged separately by the customer, where required.
- Recovery-rate figures quoted in Section 5.1 are indicative technical ranges, not guaranteed outcomes for any individual batch.

12. Terms & Conditions

- Service is subject to pre-qualification and approval by the LEDFlex technical team.
- LEDFlex reserves the right to decline service where eligibility, condition, or safety criteria are not met.
- Retrofit pricing incentives and collection services are valid for the period quoted at the time of site assessment and are subject to change.
- This policy may be updated periodically; the version in effect at the time of collection scheduling shall apply

13. Document Control & Revision History

Version	Date	Summary of Changes
1.0	2024	Initial issue of Free End-of-Life Service Policy.
2.0	2025	Introduction of R3 Initiative structure and eligibility criteria.
3.0	2026	Added material recovery data through recolight, component grading protocol, regulatory cross-referencing, QR code digital traceability, and formal certificate specification.

14. Contact & Support

For eligibility enquiries, site assessment bookings, or support with an active QR-tracked collection, contact the LEDFlex Sustainability & Product Compliance team through your account manager.