

# Environmental Policy

## General Statement of Intent

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The company believes that continuous improvement in environmental management is an essential element within its overall business plan &ndash; minimising waste, consumption of resources and pollution goes hand in hand with high productivity and quality standards. This policy therefore applies to, and will be integrated with, all business activities, products and services with the potential to adversely affect the environment on a local or global scale.

We recognise and accept our legal duty of care toward the environment and are committed not only to complying with our legal duties and with other requirements to which we subscribe but to exceed these requirements where reasonably practicable.

Energy generation and consumption is a major contributor to the production of greenhouse gases and global warming and a significant cost to the business. We commit to actively managing our use of energy, reducing consumption and continuously improving efficiency wherever possible. We will also seek to minimize our direct and indirect consumption of other natural resources, particularly those obtained from non-renewable or non-sustainable reserves.

We will seek to identify all processes that generate waste &ndash; whether from the inefficient use of resources or the production of by-products, emissions or effluent discharges - and will seek to avoid pollution by eliminating, minimising or reusing waste products wherever reasonably practicable or, where this cannot be achieved, identifying and taking advantage of opportunities for recycling and waste recovery.

The basis of our environmental management system will be an ongoing review of business activities and the identification of aspects of our work that could have an impact upon the environment and the implementation of proactive steps to eliminate, minimize or manage them so that adverse environmental effects are minimised.

To enable us to measure our environmental performance we will establish and monitor suitable objectives and targets that will promote continual improvement year on year in our environmental performance.

## Scope

The scope of the Environmental Management System extends to all products and services produced by the company.

Included within this definition and in addition to planned operating conditions are non-routine activities and foreseeable emergency situations.

The environmental management system will also apply to those aspects of the activities of suppliers and service providers over which we have, or could have an influence and the environmental performance of our business partners. Organisation

The organisation established to implement this Environmental Policy is shown in the Organisation Chart (QP11).

## Arrangements for Implementation

### 1. Environmental Aspects

The identification of those aspects (environmental aspects) of our activities, products and services that could have an impact upon the environment will be fundamental to our environmental management system. This policy will apply to those aspects over which we have control or can exert influence and will also apply to new developments, new or modified activities, products and services. Details of all environmental aspects will be recorded in the Register of Environmental Aspects.

Having identified our environmental aspects, we will assess those that have the potential to have a significant impact upon the environment (&lsquo;significant aspects&rsquo;) and it is these aspects that will be taken into account in establishing, implementing and maintaining this environmental management system.

### 2. Legal and other requirements

The initial identification of legal requirements applicable to the business&rsquo; environmental aspects is the

responsibility of the System Manager. Regular reviews of legal requirements relevant to the business will be carried out on a 6 monthly basis or when changes are made to business activities. The results of legal compliance reviews will be reviewed by top management during regular Management Review meetings.

### 3. Objectives, Targets and Programmes

In order to achieve continuous improvements in the performance of the environmental management system, objectives and targets associated with significant environmental aspects will be set by the Management Board and reviewed on a regular basis at the Management Review meeting. Objectives and Targets will be managed in accordance with Environmental Procedure EP3 (Objectives & Targets).

### 4. Competence, Training and Awareness

Induction training for all new employees will include the importance of conformity with the environmental policy and procedures and information about significant environmental aspects and potential impacts associated with their work and how their personal performance contributes toward protecting or polluting the environment.

Specific tasks or locations which could cause a significant environmental impact are listed in the Register of Significant Environmental Aspects. The company is committed to ensuring that all persons employed either directly or under a temporary contract, in carrying out tasks with the potential to have a significant environmental impact are competent on the basis of appropriate education, training or experience.

The competence of prospective contractors to comply with the terms of this policy will be verified as a part of the tender process with contractor performance will be monitored throughout the life of the contract.

In order to ensure that skills remain relevant, training records will be maintained and managed on an ongoing basis with refresher training being delivered, where required, at appropriate intervals.

### 5. Communication

In order for the environmental management system to function effectively and that it responds proactively to business needs, it is essential that effective lines of communication exist between the various levels and functions of the organisation. All communication, both internal and externally with interested parties will be conducted in accordance with Environmental Procedure EP4 (Communication).

### 6. Control of Document

Where documents are used as part of the environmental management system, it is essential that they are effectively controlled to ensure that they are fit for purpose, that the correct version is available at the point of use and periodically reviewed to ensure that the document continues to meet requirements. In order to achieve this, all documents will be managed in accordance with Standard Procedure QP1 (Document Control).

### 7. Operational Control

The practical effectiveness of the environmental management system depends on processes and procedures associated with the significant environmental aspects and those contributing to our environmental objectives and targets are carried out under planned conditions. Where deviation from planned conditions could lead to a failure of the aims and objectives of the environmental management system, procedures will be documented along with critical operating conditions that must be maintained.

Where goods or services supplied by external partners are associated with the control of significant environmental aspects, requirements will be communicated to them by the Aspect Sponsor.

### 8. Emergency Preparedness and Response

It is essential that operational control extends to foreseeable emergency situations. Risk assessments associated with the significant environmental aspects will be carried out to identify and assess the risks associated with the onset of emergency situations and to plan effective controls to either eliminate the risk or respond effectively to them. Emergency response procedures will be prepared as required, in accordance with Environmental Procedure EP4 (Emergency Preparedness & Response).

Where emergency response procedures are put in place they will be reviewed annually by the Aspect Sponsor or after actual emergency events and tested at regular intervals to ensure effectiveness.

### 9. Checking

To ensure that processes associated with significant environmental aspects are being carried out within specified operating limits, suitable monitoring and measurements will be carried out on a regular basis, with the results being recorded in a suitable form. Documentation setting out the required operating conditions will be made available to those responsible for ensuring that compliance is maintained along with appropriate calibrated equipment to enable them to take accurate measurements.

The results of monitoring and measuring will be reviewed on an ongoing basis so that effective action can be taken to address deviations before hazardous situations develop. The results of monitoring and measurement will be formally evaluated against legal compliance or other standards to which the business subscribes on an ongoing basis by the Aspect Sponsor. A record of the findings of these formal reviews will be made and retained by the Aspect Sponsor.

#### 10. Nonconformity, Corrective Action and Preventative Action

Processes and procedures associated with significant environmental aspects will include details of actions to be taken to ensure that where deviations from planned operating conditions are detected, effective action can be taken to deal with the non-conformity to correct it or mitigate the environmental impact.

Nonconformities, Corrective actions and preventative actions will be dealt with in accordance with Standard Procedure QP4 (Nonconformities, Corrective and Preventative Actions).

#### 11. Control of Records

Records required as part of our compliance with statutory obligations or other standards to which the company subscribes will be made and retained in accordance with Standard Procedure QP2 (Control of Records).