



# **ENVIRONMENTAL POLICY DOCUMENT**

FOR

**THE HARLESTONE GROUP LTD**

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## 1. **Environmental policy**

The Group recognises it has an impact on the environment from a local to global level, both through its own actions and through its influence on other people or organisations when supplying and installing products.

The Group seeks to achieve sustainable development. Sustainable development can be defined as 'Improving the quality of life for everyone without damaging the environment for future generations. We will work with, and seek to influence, partner organisations to achieve this.

In recognition of its environmental impacts, and of the importance of protecting the environment, the Group is committed to effectively managing the impact it has on the environment. In order to achieve this the Group will:

1. Comply with all relevant environmental legislation, regulations and other requirements which apply.
2. Reduce the environmental impacts of our activities where practicable, through the effective management of our energy use, resource use, waste management and emissions.
3. Continually improve our environmental performance by setting annual improvement objectives and targets and developing actions to achieve them. These objectives and progress towards them will be formally reviewed each year.
4. Protect the environment and human health by preventing, and where this is not possible, minimising pollution through our own activities and influence others to do the same.
5. Educate staff to ensure an appropriate level of environmental understanding is established throughout the organisation so that environmental objectives can be achieved.

### **Local Environment & pollution prevention**

Aim - to create and maintain a clean, green, and safe environment by:

- Preventing and whenever possible minimising pollution of the air, land, and watercourses.
- Managing landholdings to protect the environment.
- Minimising the use of chemicals and harmful substances.
- Prevent, and as far as possible minimise nuisance to the local environment such as noise and dust.

### **Energy**

Aim - to minimise energy use and move towards use of more sustainable forms of energy by:

- Investing in energy efficiency within its buildings, equipment, and activities.
- Considering and effectively incorporating environmental and sustainability issues at the design stage of new development/construction projects.
- Effectively measuring and monitoring its energy consumption.
- Considering, and where practical implementing, the use of renewable energy sources in its own operations.
- Seeking to minimise the energy use associated with the travel and transport aspects of its operations.

### **Waste**

Aim – to minimise waste production and achieve more sustainable waste management practices achieve:

Through a sustainable procurement process that considers waste generation and aims to reduce it as far as is practicable.

- By managing its own waste effectively and seeking to reuse & recycle as much waste as practicable.

### **Resource Use**

Aim - to minimise resource use and use of consumable resources with least environmental impact The Group will:

- Through its procurement process ensure that the environmental impacts of its purchases of goods and services are minimised - through consideration of appropriate specifications, awarding of contracts and management processes.
- Where practicable purchase goods made from recycled materials or materials with lower environmental impacts.
- Where practicable source goods and services from local manufacturers and suppliers.
- Manage its buildings and operations effectively in order to minimise use of resources such as water, fuel and materials.

### **Environmental Awareness**

Aim – to increase awareness of environmental issues within the organisation and to encourage employees to contribute to the achieving the aims of this environmental policy The Group will:

- Provide environmental awareness training upon induction to new employees and at suitable frequencies to all employees.
- Promote environmental issues to employees.
- Consider environmental issues in operational method statements.

### **Operational Requirements**

The Group will ensure that we consider the environmental impact of our processes by ensuring that:

- All company vehicles are serviced to manufacturers' schedules and specifications to reduce emissions. Upon replacement all company vehicles are sourced with low emissions and fuel consumption levels assessed.
- All journeys and the use of transport are carefully evaluated to meet customer requirements and journeys minimised as far as practically possible. Car/van sharing is actively encouraged.
- All suppliers of plant and equipment are sourced on a local level as far as is reasonably practicable and deliveries are arranged directly to site.
- All off-cuts or spare materials are reused or recycled onsite, where practicable

Signed: \_\_\_\_\_



**Silas Wilde – Managing Director**

Date: 23<sup>rd</sup> April 2021 (Reviewed annually)

## 2. **Aspects & impacts**

As part of the Company's environmental impact survey the business processes which interact with the environment in a positive or negative way, have been identified and assessed as to the significance of their impact on the environment. The result of this assessment was the formation of the Company's environmental objectives and targets which focus on the aspects of highest significance.

The aspects and impacts documented procedure define how the 'Significance' of an aspect is determined using a simple scoring methodology.

## 3. **Policy & documentation control**

The Company has developed a number of supporting procedures as part of the environmental management system, these include:

- Control of aspects and impacts
- Emergency preparedness and response
- Waste disposal guidance

To ensure that the Company complies with the requirements imposed by the Environmental Protection Act 1990 our environmental policy and supporting procedures are reviewed and updated whenever there is a change to legislation or Company processes that impact on the environment.

## 4. **Organisation & responsibilities**

The achievement of the Company's environmental policy requires clear definition of responsibility at each level within the Company. Environmental management is an integral part of the way in which the Company operates.

### **Managing Director**

Responsible for the Company's compliance to applicable environmental regulations and commitment and support to achieve the Company's stated environmental objectives.

In particular the Managing Director will:

- Ensure the implementation and overall effectiveness of the Company's environmental programs.
- Determine appropriate levels of resources and responsibility in order for the Company to fulfil its commitment to conduct its operations in compliance with applicable legislation and accepted practices for environmental protection.
- To ensure that all Directors and Managers understand and fulfil their responsibilities with regard to environmental management.
- Make provision for adequate and appropriate training to be given to all employees.

### **Directors**

The Directors are accountable to the Managing Director for matters relating to environmental management in their respective areas affected by the Company's operations.

In particular Directors will:

- Understand and ensure the implications and duties imposed by environmental legislation are acted upon to ensure the Company fulfils its legal obligations.
- Help establish and monitor environmental objectives and targets and review progress at the monthly Executive Management Team meeting, where environment is an agenda item.
- Bring Company related environmental matters to the attention of the Executive Management Team.
- Ensure good communication exists between employer and employees on environmental matters.

- Liaise with the person appointed in the role of Environmental Advisor over the full range of their duties and responsibilities, with respect to inspections, audits, report recommendations, changes in legislation and advice obtained from other sources.
- Ensure that an adequate programme of training for environmental management is established and that the environmental protection culture is encouraged amongst employees.
- Support environmental protection through the provision of adequate resources, both financial and physical to ensure environmental legislation and any stated objectives are achieved.

### **Managers**

Each Manager is responsible for their personal safety and that of all personnel under their authority, including others who may be affected by the Company's activities.

In particular they will:

- Ensure environmental obligations are carried out by everyone working in their operational area.
- Communicate to their employees, subcontractors, and visitors that concern for the environment are top priorities on Company sites and that everyone has an obligation to work in an environmentally protective manner.
- Ensure work procedures reflect the environmental objectives of the Company and minimise environmental impact, including.
  - Emergency response
  - Fire prevention
  - Groundwater protection
  - Hazardous waste
  - Energy use
  - Raw materials
  - Noise
  - Emissions to air

### **Employees**

Every employee has a responsibility to protect the environment within their operation work area.

All employees are expected to:

- Comply with applicable environmental legislation and Company policies, procedures, and practices.
- Observe environmental related signs, posters, warning signals and written directions.
- Be familiar with emergency plans, alarms and assembly points for their location or site.
- Learn about potential environmental hazards associated with their work and work area; know what information on those hazards is kept and where and use this information when needed.
- Report any environmental concerns or incidents to their line manager.

### **Environmental Advisor & Representative**

The Company's Environmental Advisor & representative, hitherto referred to as Environmental Advisor, is primarily there to provide advice and guidance on environmental management matters to ensure the Company complies with its legal environmental obligations.

In particular the Environmental Advisor will:

- Assist in determining the applicable environmental legislation relevant to the Company's business activities.
- Keep up to date with changes in environmental legislation and bring to the attention of the Director or Manager responsible any changes required to meet new legislation.
- Conduct environmental audits and prepare reports identifying any areas for improvement.
- Immediately contact the appropriate Director if situations are found that, in the opinion of the Environmental Advisor, require immediate rectification or the stopping of any operation.
- Bring new techniques for improving environmental protection to the attention of the Directors and Managers as appropriate.
- Assess and report on the environmental risks associated with the Company's business activities and highlight any specific risks or additional control measures that may be required.
- Carry out environmental incident and near miss investigations and liaise as required with the enforcing authorities.

5. **Communication**

The Company communicates with its employees, subcontractors, visitors, clients and enforcing authorities on environmental matters. Communication includes newsletters, emails, toolbox talks, quarterly employee SHE committee meetings, induction training and notice boards as appropriate.

6. **Emergency response & incident reporting**

The Company has put in place procedures for dealing with emergency response to environmental incidents such as an unintentional diesel fuel leak which would be contained using a spill kit.

Emergency response procedures are periodically tested to ensure they are effective and, where necessary, improvements made.

Environmental incidents including near-misses, spillages and unintentional emissions to atmosphere are reported using the Company nonconformance - preventive and corrective action procedure.

If there has been an environmental impact, then a formal investigation is carried out by the appropriate manager and/or the Environmental Advisor and improvement action agreed. Actions are tracked as part of the regular monthly management team meetings.

7. **Subcontractor management**

The Company understands that subcontractors employed on its behalf to carry out work at its premises in Northampton or on client sites can have an impact on the environment. Before commencing work for the Company subcontractors are vetted to ensure they are competent and capable of performing the work in accordance with environmental legislation and Company and/or client environmental requirements.

Subcontractors are required to complete a detailed questionnaire; supply supporting evidence and sign a declaration obliging them to implement any required pollution prevention controls. In addition, subcontracts receive site induction training when working at the Company's premises in Northampton and, when applicable, client sites.

8. **Monitoring & review**

As part of the policy to maintain an effective environmental management system the Company carries out a number of monitoring and review activities. These include an annual legal compliance audit and internal audits based on environmental risk.

A documented internal audit procedure and annual audit plan describe how and when audits take place. Where legal breaches or process nonconformances are identified these are logged, reported and improvement actions tracked as part of the monthly management meetings.