

Environmental & Sustainability Policy

<u>Avrenim</u> is a Provider of Consultancy, Engineering, Project Development/Delivery, Operations & Maintenance, Facilities Management, Asset Management and Helpdesk services to clients across the public, private and corporate sectors. At the core of our business and embedded into our culture is our commitment to Environmental Management and Sustainability as outlined throughout this policy.

Avrenim are fully committed to the conservation and improvement of the environment and to minimising the environmental impact of the risks arising from our work activities.

In order to achieve this, the company has conducted an Environmental Risk Assessment (*Please refer to – AVR_QSHE_DOC_049*) and set out the following key objectives:

- We will develop robust Environmental and Sustainability policies, procedures, supporting processes and furthermore implement and communicate them across our businesses. This Environmental & Sustainability Policy is available through a direct link on our websites homepage. (www.Avrenim.co.uk)
- We adopt a holistic approach towards environmental management and sustainability to achieve our own internal goals and that of our clients and customers.
- We are passionate about mitigating any environmental risks identified throughout our work activities.
- We continually promote a positive environmental and sustainability focused culture across our business.
- Our employees will always take advantage of improving environmental risks and will always comply with current environmental directives and UK legislation.
- We will always endorse, environmentally responsible procurement of goods and services where possible.
- We look at minimising the environmental impact of using company vehicles i.e. CO2 and NOx emissions through the adoption of public transport, shared transport, EV vehicles and promoting bike to work schemes.
- As an ISO 14001 accredited business we are proud to demonstrate our commitment for managing environmental risks, optimising performance whilst continually seeking continual improvements
- Our leadership team, employees and supply chain partners are aligned with our commitment on environmental management, sustainability, climate change, decarbonisation and focus on net zero.
- We will always protect the environment by conserving and protecting natural resources whilst adopting pollution prevention controls for water discharge/waste/emissions etc.
- As part of our services, we would always drive reductions in waste materials, water consumption, energy consumption whilst promoting of recycling of materials/products.
- At a delivery level, our workforce will always look to enhance the biodiversity across our clients' facilities.
- Our Top Management are responsible for any Environmental Incidents and have the required Business Continuity Plans to manage.
- We will communicate the Company's environmental performance internally and to any external clients/stakeholders where required.
- As a responsible business, we continually assess the environmental impact of our operations, especially at site level and take the necessary action to reduce any adverse impacts to a practicable minimum.

Roles & Responsibilities

The primary responsibility for the implementation of this policy sits with the Top Management of Avrenim Subsidiary companies who will communicate its importance to all employees, sub-contractors and associated third parties. This policy and its effectiveness will be monitored in line with the Company's Integrated Management System and reviewed annually or when circumstances or legislation dictates. We will strive to continuously improve our environmental management performance and help foster an ethical and sustainable culture within our company.



Environmental Policy Organisation Hierarchy

Top Management | Managers | Supervisor | Operative

Top Management

- Top Management is ultimately responsible for providing Leadership & Direction across their business on all Environmental & Sustainability matters.
- Responsible for the implementation and effective communication of the Environmental & Sustainability Policy. They also have an overall responsibility for maintaining an organisation that ensures all requirements of the policy and associated statutory obligations are met by all employees and visitors/contractors to their nominated sites or other premises under the control of the Company.
- Conduct an environmental risk assessment to be reviewed throughout the year within Avrenim board meetings.

Special responsibilities include:

- To approve, personally sign and date, to take ownership of the company Environmental & Sustainability Policy and ensure that there are procedures in place for the policy to be adhered to.
- Setting the targets and objectives that Avrenim will work towards.
- Where required external consultants and specialist advice will be sought to ensure compliance with health, safety and environmental legislation, standards, and good practice.
- Ensuring that the conditions and requirements of the Environmental & Sustainability Policy are understood and implemented in the respective business or section of control.
- Ensuring that all necessary liability is covered by insurance and advising the extents to which risks are acceptable.
- Ensuring that adequate operational and financial resources are made available to achieve the objectives.
- Set an example, including considering the Environmental impacts of the offices, adhering to the hierarchy of control measures.
- Assess training needs for their business and arrange for all employees under their control to have suitable and sufficient safety training on an ongoing basis.
- Resourcing and investigating all Environmental related accidents, including any complaints directed at Avrenim.
- Monitoring and taking ownership of any environmental management and sustainability enquiries into their business from internal and external sources.
- Co-ordinating all activities/training/policy/procedures related to environmental management and sustainability.

Managers (Contract and Site)

Directly responsible to top management and for the health, safety, environmental and sustainability arrangements on all areas of the business under their control, and including:

- Implementation of this Environmental & Sustainability Policy (ESP)
- Recognise and cascade the importance of effective management of the Policy.
- Ensure that any work carried out under their control is affected in accordance with all contract and regulatory requirements, SSOW and including Risk Assessments & Method Statements.



- Seek the advice of Top Management when in doubt, on Environmental & Sustainability matters.
- Liaise with the Top Management at the planning stage of contracts.
- Develop and implement the obligations set out within the Site Waste Management Plan.
- Ensure COSHH assessments are completed on all COSHH related substances to be used on site.
- Supervise arrangements with subcontractors and possible other contractors on site to avoid confusion over areas of responsibility.
- Constantly look out for hazards from equipment and materials.
- Ensure checks on Plant and machinery either hired or owned by the company and used within contracts are carried out to ensure that they are safe and in good working order and maintained accordingly.
- Investigate environmental issues/risks and report immediately to the Top Management as appropriate.
- Ensure that Subcontractors have been onboarded to meet Avrenim's procurement obligations.
- Ensure all site personnel are fully competent and trained in the tasks to be undertaken.
- Ensure that the human and physical resources are in place for those who will be carrying out the works.
- Review regularly and offer feedback on the success and failures of any part of the Environmental & Sustainability Policy (ESP) and/or Environmental Management system.
- Facilitate communication through all levels of the company, this will be through regular team briefs, toolbox talks and project/contract review meetings.
- Responsible for the participation of all employees working for the company in the development of the IMS.
- A key stakeholder in identifying environmental hazards and the implementation of control measures to mitigate risks.

Supervisors

Directly responsible to the relevant Line Managers for Environmental & Sustainability arrangements under their control, and include:

- Be conversant with the requirements of this Environmental & Sustainability Policy (ESP)
- Carry out regular inspections of plant, equipment, tools and PPE as appropriate.
- Bring to the attention of all operatives any information or new legislation which requires to be effectively implemented (team briefs / toolbox talks)
- Ensure that all personnel are trained in the relevant emergency procedures.
- Ensure that wherever an activity is deemed hazardous, and therefore subject to permit-to-work, that all appropriate records are held, and staff receive suitable instruction.
- Discuss any training needs identified with the line manager.

Operative

- Read and adhere to the Environmental & Sustainability Policy (ESP) & Relevant Procedures.
- Observe all laid down safe systems of work; risk assessments, method statements, permit to work; and other safety procedures concerning work activities, plant, materials and substances.
- Do not take unnecessary risks, which could have a negative impact on the Environment.
- Report any environmental hazard within the work area or defect in any office equipment, machinery, plant to the appropriate Supervisor or Line Manager.
- Always act in an orderly manner in the workplace and refrain from any form of horseplay.
- Dress sensibly and safely for the work environment or occupation involved in.
- Do not act in a manner that could detrimentally impact on the neighbouring community.

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Environmental Management System (EMS) Arrangements

Environmental Impacts Nuisance

Avrenim will be considerate and put in place the appropriate control measures to reduce any nuisance that could be caused to the local communities or neighbours as a direct result of the works. The nuisance activities such as works that can create dusts and noise will be assessed at the planning stages and will be controlled using appropriate measures.

Climate Change

Avrenim take seriously our responsibilities to mitigate climate change.

We passionately believe that we can truly make a difference through our integrated approach in reducing greenhouse gas emissions and have set a target of 2035 for becoming carbon neutral.

Our energy services business is already providing low carbon, decarbonisation, and net zero solutions to clients across the public, private and corporate sectors therefore feel we are innovators and ambassadors across the sectors we serve.

Waste

Avrenim will always ensure that a Waste Management plan is in place across sites that are under our control. Our goal of sustainable waste management is to reduce the number of natural resources consumed, confirm that any materials that are taken from nature are reused as many times as possible and that the waste created is kept to an absolute minimum. At present, Avrenim do not transport any waste materials, we employ specialist waste management companies to store, manage and transfer to meet our statutory obligations. This will be reviewed for each individual contract. If the requirement to transport waste on the public highway arises then Avrenim will apply for a Waste Carriers Licence from the Environment Agency.

Segregation of Wastes on Site

Avrenim will always build into our delivery model the requirements of a Waste Management Plan to satisfy the criteria required to meet local Segregation of Waste obligations.

For Construction Projects and Operations Contracts we would always look at ways of designing out waste. We recognise that design decisions not only prevent waste from being produced in the first place, but also positively improve the recycled content and future recyclability and sustainability of a project, its crucial.

The waste hierarchy that we adopt consists of the following.

- Reduce the amount of waste you create, using waste prevention measures.
- Re-use materials to avoid waste being created.
- Recycle materials from site where materials cannot be re-used.

Avrenim take seriously our waste segregation and waste management obligations across all sites to meet environmental, sustainability and contractual responsibilities.

Water Use and Efficiency

Avrenim understands that using less water is not only good for the Environment but also makes good business sense. In the offices there is a maintenance programme in place to ensure that there are no leaks that are left unattended.



The toilets are fitted with water saving flush devices, the rainwater on sites where practicable is saved in butts for wash out. Paint brushes are wrapped instead of washed out every day.

Sustainability

Concern for the environment and promoting a broader sustainability agenda are integral to Avrenim's professional activities and the management of the organisation.

Our Sustainability culture and approach is based upon the following principles:

- To comply with, and exceed where practicable, all applicable legislation, regulations, and codes of practice.
- To integrate sustainability considerations into all our business activities and decision-making processes.
- To ensure that all staff are fully aware of our Environmental & Sustainability Policy (ESP) and are committed to implementing and improving it.
- To minimise the impact on the environment during our work activities.
- To make clients and suppliers aware of our Environmental & Sustainability Policy (ESP) and encourage them to adopt sound sustainable management practices.
- To review, annually report on & continually strive to improve our environmental performance.
- Seek to purchase energy from a sustainable source whilst also supporting investment in new renewable energy schemes.
- Undertake voluntary work with the local community and / or environmental organisations and make donations to seek to offset carbon emissions from our activities.

Signed by

Simon Harris Date: 4th July 2022