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#05:043 Environmental Policy

THE HILL COMPANY

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The Hill Company

THE ENVIRONMENTAL POLICY

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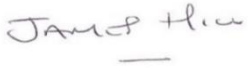
The Quality Management Team is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the ISO 14001:2015 Environmental Management Systems.

A current version of this document is available to all employees on request, it does not contain confidential information and can be released to relevant external parties. When any part of this Policy is amended, a record is made in the Version History Log shown below. The policy can be fully revised and re-issued at the discretion of the Quality Management Team.

This policy was approved by the Managing Director and is issued on a version-controlled basis under the signature of the Managing Director.

VERSION HISTORY

Version	Date	Detail	Author	Authorised
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1	31/01/2014	Agreed by Managing Director		JH
2	31/01/2015	New header format	TH	
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Signed		Name	James Hill
Position	Managing Director	Date	30/09/2019

RESPONSIBILITIES

MANAGING DIRECTOR

- Ensures that The Hill Company aims to continuously improve its environmental performance and to comply with all relevant environmental legislation that applies to the company.

QUALITY MANAGEMENT TEAM

- Ensure these policies are reviewed and current.
- To carry out internal audits to ensure the controls are being implemented and compliance is maintained.
- To ensure the impact and aspect matrix is current and reviewed to ensure compliance.
- To ensure all breaches or non-conformities that are reported are logged.

DEPARTMENT MANAGERS

- To ensure these policies are communicated to all employees.
- To ensure any breaches or non-conformities are reported to the Quality Management Team.

ALL EMPLOYEES

- To adhere to all the policies and to highlight any breaches or non-conformities to their supervisor or manager.

AIMS AND OBJECTIVES

The Hill Company aims to continuously improve its environmental performance, as far as resources allow, and will do this by.

- THC is committed to reducing any harmful impact its operations have on the local and global environment.
- THC will measure its impact on the environment and set targets for ongoing improvement.
- THC will comply with all relevant environmental legislation that applies to the company.
- THC will raise staff awareness of environmental issues and enlist their support to improve the Company's performance.
- Conserving energy, fuel, water, paper, and other resources.
- Reducing waste through minimising consumption, re-using and recycling and by using refurbished, recycled, and recyclable equipment, product and materials.
- Ensuring that our buildings achieve a good standard or environmental performance.
- Developing a procurement strategy to ensure that environmental and sustainability issues are addressed in evaluating all relevant contracts, including the purchase of products made from recycled materials.
- Ensuring that goods we buy, which derive from natural sources, do not have an adverse effect on the environment and comply with EU and international trading rules.

CONSERVING RESOURCES

ENERGY

The majority of energy produced in the UK comes from the burning of fossil fuels – principally coal and gas. Waste products include air pollution emissions such as oxides of nitrogen and sulphur dioxide and carbon dioxide that contribute to climate change. There are no national targets to reduce energy use as it depends on the type of business and the types of buildings occupied. There is, however, a national target to reduce CO₂ emissions.

To contribute to the national target, The Hill Company will aim to reduce its levels of CO₂ emissions.

To improve energy efficiency by;

- The Hill Company where possible will buy all electricity from renewable sources.
- Use energy products, such as light bulbs or fluorescent tubes that are low energy and recyclable and recycle them.
- Promoting best practice through, for example, giving practical advice to managers and staff.
- Buying energy efficient, value for money equipment; and where appropriate, taking advantage of public-private partnerships.
- Introducing new, more energy efficient techniques and technologies without sacrificing productivity or comfort.
- Installing 565 solar panels to Solus 31 site.

To measure and report on how much energy The Hill Company's buildings (and from The Hill Company's transport use when data collection methods permit) consume and the equivalent greenhouse gas emissions. Monthly bills are supplied from the energy supplier and compared to keep track of use and any trends. Facilities Management keep the bills and analysis.

ELECTRONIC EQUIPMENT

It is easy to throw away equipment rather than repair or recycle it. The Hill Company will assess what option should be used in each specific case.

Identify and buy electronic equipment that is as energy efficient as possible, conforms to EU standards, is capable of being recycled or reused by The Hill Company or can be recycled or reused.

Identify and buy electronic and electric equipment that is as quiet as possible, for example cleaning, copying etc.

Ensure that consumables and their packaging, such as toner holders for photocopiers and printer cartridges are capable of being recycled or reused and that they are recycled or reused.

Follow HSE standards for operators of electronic and electric equipment and ensure that appropriate furniture etc. is provided for their use.

WASTE MANAGEMENT

BACKGROUND

Increasing environmental awareness and sustainable development drive the need for us to reduce the amount of waste released into the environment. It is therefore not surprising that stringent rules govern how we manage and dispose of those things we no longer want.

A legal "duty of care" exists upon anyone who produces, keeps, stores, transports, treats or disposes of waste. Commercial and industrial waste (toxic or not) are included as are the businesses that handle it. That duty of care only extends to domestic waste so far as for those handling its removal e.g. refuse collectors.

RESPONSIBILITIES

Where commercial or industrial waste is stored at the workplace, measures must be taken to prevent it from escaping and causing pollution or harm. This involves securing the waste in suitable containers and, especially if outside, making sure that none escapes into the environment. Measures to prevent arson and unauthorised access to waste are also included in this general duty of care.

The law stipulates that waste must only be transferred to an authorised person and before transferring waste to anybody, checks must be made that they have the authority to take it (as explained below). A written description of the waste must be handed to the authorised person on a signed document called a transfer note. The office/person making the transfer must ensure that this transfer note accompanies

the waste and, if this is handled by another, for example a landlord, then confirmation that this has been done must be sought from them. The aim being to be able to trace the waste from "cradle to grave".

AUTHORISATION

Those who accept commercial and industrial waste must be authorised and ensure that the waste producer gives a transfer note describing it. The copy of this written note must be kept on file for at least two years. The Environment Agency (EA) in England and Wales and the Scottish Environmental Protection Agency (SEPA) in Scotland enforce the laws relating to waste and may inspect waste management arrangements including transfer note copies kept on site.

Waste may be transported between different places within the same premises without the need for licensing but cannot be taken off site or handed to another without the required certification and documentation as described above. The copies of the transfer notes containing the written description of the wastes must be retained as stated and must be made available to the EA or SEPA if requested.

REDUCING

The Government has set guidelines for businesses to follow and reduce the amount of waste produced including setting targets to reuse and recycle wherever possible.

WATER

Water consumption is increasing – having both an energy (from the production of drinking water) and environmental impact (where too much water is extracted from rivers and aquifers). The Environment Agency gives a typical water use in UK offices as 50 litres (0.05 m³) per person per day. Government also has its own targets, for example the DEFRA target was for a maximum level of water consumption equivalent to an average of 11m³ per person (full time equivalent staff) in 1999-2000.

It is our intention to reduce water consumption in Hill Company buildings.

We aim to reduce water consumption by;

- Fitting water meters where possible.
- Following best practice, for example the Environment Agencies water use leaflets.
- Investigating and installing flow restricting devices such as waterless urinals and more efficient technologies where practicable and where they will achieve value for money.
- Specifying water-efficient appliances and equipment.
- Monthly bills are supplied by the water supplier and compared to keep track of use and any trends. Facilities Management keep the bills and analysis.

FURNITURE

A wide range of materials is used to make furniture for offices. Re-using and recycling furniture will reduce waste and help conserve resources. 'Second hand' should not be regarded as 'second rate'; used furniture can be cleaned. All furniture used in The Hill Company offices is recycled/re – conditioned office furniture.

The Hill Company has used re-conditioned and used furniture in all of their 5 sites and will continue to do so in the future.

- To re-use all furniture that is serviceable before buying new items.
- To recycle furniture that is serviceable and is no longer needed by The Hill Company.

- Broken furniture will be disposed of in the most environmentally friendly way.
- Seek to buy furniture made from materials that have been recycled or reused.

WOOD

Forests provide a rich range of habitats for wildlife and have a high recreational value. Ensuring that all timber comes from properly managed sources is important, as they are a dwindling resource. Ensuring imported timber is also managed in a sustainable manner and its production has not had a harmful effect on the environment or people.

To purchase sustainably produced timber and timber products (such as cardboard boxes joinery, fittings, furniture and veneers). We will do this by specifying that products carry the Forestry Stewardship Council (FSC) Certificate. If that is not possible then specifying in orders and contracts that suppliers provide documentary evidence that their timber has been lawfully obtained from forests and plantations that are managed to sustain their biodiversity, productivity and vitality, and to prevent harm to other ecosystems and any indigenous people. This documentary evidence should have been independently verified.

Evidence might take the form of a certificate issued under a credible, preferably independent, verification scheme. It might consist of other documents that demonstrate that timber producers are following an environmental management system, conforming to internationally recognised principles, such as the Helsinki Guidelines. (More information is in DEFRA's Green Guide for Buyers.)

To make sure that timber purchases are made according to international agreements, such as the International Tropical Timber Agreement (ITTA).

To consider buying reclaimed timber or products made from reclaimed timber where practicable.

PAPER

Use of paper is increasing. It consists of 100 per cent recycled paper comprising 100 per cent genuine post-consumer waste that has been de-inked and manufactured using non-chlorine bleaching agents. Below are ways The Hill Company will use to reduce the amount of paper used.

To actively promote ways to reduce paper use, for example by;

- Printing and photo copying double sided wherever possible.
- Using alternative technologies and electronic media.
- Ensuring that all paper (writing paper, newspapers and magazines) and cardboard products are where possible reused or recycled.
- Where only virgin pulp paper products can be used it comes from sustainable forestry and that both the pulp and the recycling process is chlorine free, i.e. manufactured using non-chlorine bleaching agents such as oxygen, peracetic acid, sodium peroxide or more efficient pulping techniques.
- Ensuring that, wherever possible, material is sealed (if this is necessary) using a water-based varnish (not a plasticised finish) and is bound using materials that do not make it harder to recycle.
- Ensuring that paper products are packaged in materials that can, themselves, be recycled.

REDUCING POLLUTION CLIMATE CHANGE

Human activities can increase the emissions of 'greenhouse gases'. Once in the atmosphere, these gases are responsible for global warming.

The Hill Company will reduce greenhouse gas emissions by;

- Reducing energy consumption in Hill Company buildings.
- Buying 'green electricity' where it provides value for money.
- Controlling, where feasible, other gaseous and non-gaseous pollutants which contribute to climate change. For example, by switching where possible from hydrofluorocarbons (HFCs - used as refrigerants and in fire extinguishing systems), perfluorobutane (fire extinguishing systems) and sulphur hexafluoride (insulating switch gear) to environmentally-preferable substitutes with little or no potential to contribute to global warming.
- Cutting emissions of carbon dioxide from vehicle emissions.

OZONE-DEPLETING SUBSTANCES

Certain chemicals, once in the atmosphere, have been shown to destroy the ozone layer that helps protect the earth from excessive ultraviolet radiation. One major impact is then a subsequent increase in human skin cancer.

To ensure that The Hill Company does not buy any products which contain chlorofluorocarbons (CFCs) hydrochlorofluorocarbons (HCFCs), halons, carbon tetrachloride, 111 trichloroethane, or any other ozone-depleting substances, where there are suitable alternatives.

To comply with Sections 33 and 34 of the Environmental Protection Act 1990 by continuing to prevent equipment from giving off ozone-depleting substances and ensuring that at the end of its life, we recycle or destroy equipment using appropriate technology.

FLEET MANAGEMENT

To ensure THC continuously reduce the environmental impact of our fleet operations in terms of air quality and to strive towards achieving an optimised, sustainable low carbon vehicle fleet.

THC have established key strategies to support our aims, as outlined below.

- Vehicle Specification and Selection.
- Supporting Vehicle Tracking Technologies.
- Annual Targets with reporting mechanisms to monitor progress throughout the year.

THC own all the 24 vehicles used to carry out their business needs. All vehicles brought by THC meet the current VOSA requirements.

VEHICLES

- THC own all the 24 vehicles used to carry out their business needs.
- All vehicles brought by THC meet the current VOSA requirements.
- All vehicles are fitted with tracking devices to aid the efficient use of vehicle and will be used to identify instances of excessive engine idling, speeding, hard acceleration and harsh braking. Any speeding incidents are emailed from the software to the routing team and then are logged for review.

- Details available from the tracker software will be regularly monitored by the routing team and periodically monitored by the EMS Committee team to establish trends in use, and if vehicles are being inappropriately used.
- Milage and fuel consumption for every vehicle is logged daily on a matrix, and an individual vehicle review is conducted to ensure the vehicle is running within the recommend MPG.
- Routers will carefully plan fleet movement to ensure the right size vehicles are used for each route and to ensure where possible routes do not cross paths to maximise fleet efficiency.
- Routers will ensure that the routes will not exceed the vehicle weights, as this will impact on both environmental performance and safety.

DRIVERS

THC drivers also have a large part to play in the helping THC reach their environmental objectives with fleet management. Driving styles and behaviors impact significantly on the vehicles' fuel economy and the pollutants discharged.

- Drivers are aware of the vehicle tracking software used to identify instances of excessive engine idling, speeding, hard acceleration and harsh braking. These unnecessary behaviors contribute to additional environmental impacts and will be reported directly to the driver for subsequent corrective action.
- Driver training and awareness will be promoted to improve driving styles, particularly where the need for corrective action has been clearly identified.

VEHICLE MAINTENANCE

- Pre use checks are carried out before every route to ensure vehicle is safe to use (including tyre pressures) to optimise performance.
- THC will ensure that its vehicle fleet is regularly serviced and maintained.
- THC vehicle maintenance providers will be required to ensure that any by-products or waste generated because of their activities, is disposed of by a fully accredited waste carrier.

PEST CONTROL, PESTICIDES AND ARTIFICIAL FERTILISERS

Use of pesticides and artificial fertilisers have been shown to damage and accumulate in the environment. Pesticides and artificial fertilisers can also be hazardous to people.

To minimise the use of pesticides and artificial fertilisers, by for example switching to natural methods of controlling weeds, insects and fungi and maintaining soil fertility wherever possible.

To practice humane pest control within the law and regarding other wild species.

ASBESTOS

Asbestos was used widely in buildings as a fire retardant. If damaged, asbestos fibers can cause specific lung cancers in people and is now generally removed from buildings.

Keep and maintain a register of asbestos located in Hill Company buildings for use by contractors and others when carrying out works.

To ensure that we use appropriate risk management techniques when undertaking work in buildings where asbestos could be present.

To manage undamaged materials on site by monitoring them regularly for signs of deterioration and, where it occurs, by sealing, encapsulating and labelling as appropriate. Where we must remove and

dispose of asbestos materials, to do so according to regulations and guidance, to minimise the risk asbestos fibres might pose to human health.

To use asbestos – free materials for new work or where replacing existing asbestos materials.

None of the current Hill Company premises contain asbestos within or around the building.

HAZARDOUS SUBSTANCES

The Chemicals of Substance Hazardous to Health (COSHH) regulations are now used to protect people from excessive exposure to substances that have been shown to be or are thought to be hazardous.

We will achieve this through the following;

- Minimise the use of hazardous substances or techniques.
- Ensuring that we store, use, and dispose of hazardous substances according to the law and best practice. Wherever appropriate, to use building materials, furnishings etc., which are low emitters of formaldehyde, volatile organic compounds and other potentially hazardous substances.

BATTERIES

Batteries contain heavy metals that can contaminate land when disposed of. This disposal also wastes resources.

To avoid using batteries (especially those with high levels of lead, mercury and cadmium) where there is a better environmental option offering value for money (e.g. rechargeable or solar cell products). Where batteries are essential, to recycle them at suitable outlets.

SOLVENTS AND PAINTS

Linked to the Control of Substances that are Hazardous to Health (COSHH) Regulations. Solvents can be harmful to the person using the products and once they escape into the atmosphere, cause pollution.

To specify that staff and contractors should not use products containing potentially harmful solvents where they can replace them with low solvent or solvent free products, such as water or vegetable-based paints, varnishes and glues.

BIO-DEGRADABLE SUBSTANCES

These substances can rot down and then pose no further hazard to the environment.

To use biodegradable substances such as wood, cardboard and vegetable-based lubricating oils where they provide the best environmental option and value for money.

LITTER

Litter is unsightly and needs to be disposed of sensibly.

To comply with the Environmental Protection Act 1990 by keeping The Hill Company grounds clear of litter and refuse, taking account of the statutory Code of Practice on litter.

Good housekeeping is promoted throughout The Hill Company, recycle bins are located in key areas on site.

NOISE

Excessive noise can cause a nuisance and can also cause stress and damage to hearing.

To comply with statutes, regulations, by-laws and codes of practice to keep noise as low as practicable, this includes;

- Installing and maintaining equipment so as to minimise noise and vibration.
- Using the quietest vehicles possible to carry out Hill Company duties and functions.
- Where possible avoiding transport, building work or other noisy activities at night.
- Regarding occupational health requirements when using equipment (Health and Safety Executive standards)
- Maintaining noise levels that permit building users to carry out their activities without stress. Special attention should be paid to the needs of those with a hearing or visual impairment.

SOLAR PANEL

- Our Solus 31 depot, has had installed 576 solar panels in February 2016
- Our solar panels can produce a maximum of 149.73kWh.
- Out of the 100% of electricity that our panels will produce, 85% will be used internally, while the 15% will be put back into the grid.

**This document forms part of The Hill Company's Environmental Management System,
and must be fully complied with.**