

Environmental Policy

Morris & Spottiswood (M&S) is committed to minimising the environmental impact of its operations and this policy document outlines the framework that will enable M&S to work towards and achieve its environmental objectives. The document identifies the structure of the organisation that will help to deliver environmental benefits; it outlines the responsibilities of key people with reference to the environment; it defines the arrangements in place for monitoring and training.

Scope

This policy applies to all aspects of the company's operations and covers both office and site based staff. This includes provision of fit-out services, refurbishment works, new build, housing, mechanical & electrical and reactive and planned maintenance works. In addition, the company's Group activities fall within the scope of the policy.

Environmental Policy Statement

M&S is committed to minimising the environmental impact of our operations within the Company's sphere of activities. It is the policy of M&S to ensure that every employee, our contractors and suppliers are encouraged to develop initiatives for the **continuous improvement** in the management of our environmental performance. The company will devote the necessary resources to ensure that this happens.

It is the policy of Morris & Spottiswood to:

- Liaise with our clients on potential environmental issues and work with them to address concerns, in so far as project constraints permit.
- Strive to minimise any emissions or effluents that may cause environmental damage.
- We will ensure we will preserve and protect the environments in which we are working.
- Conserve energy through minimising consumption and maximising efficiency.
- Minimise the use of materials that may be harmful to the environment.
- Promote efficient purchasing which will both minimise waste and allow materials to be recycled where appropriate.
- Employ sound waste management and minimisation practices.
- Put in practice procedures and support information that enables compliance with the law, regulations and codes of practice relating to the environment.
- Provide suitable and sufficient training on environmental issues for all employees.
- Recognise and encourage the contribution every employee can make towards improving environmental performance.
- Develop procedures and, where possible, set performance targets.
- Sustain and develop this policy by the production and implementation of an Environmental Management System within Morris & Spottiswood.
- Monitor environmental performance, undertake regular reviews of the policy and make improvements.
- Environmental issues **MUST** be addressed within every Health & Safety plan, with appropriate control measures implemented to prevent possible harm to the environment.
- In order to achieve all of the above stated objectives, Morris & Spottiswood shall set and maintain specific environmental targets and goals which are identified within the environmental aspects register and are reviewed annually by the Trading Board to ensure that they remain relevant to our business activities.

Responsibilities & Arrangements

The following details the responsibilities and arrangements that the company has in place to minimise the impact of our works on the environment. However, the first responsibility lies with each and every individual and can be summarised as follows:

All Employees:

- Must co-operate on all matters relating to reducing our impact on the environment
- Must work in a safe manner and adhere to all relevant rules, regulations and guidelines
- Must follow the controls identified by risk assessment before commencing any activity
- Must report any environmental incidents or bad practice immediately
- Must take care of themselves and the environment around them
- Must challenge any behaviour that puts people or the environment at risk

Organisation & Responsibility

Every employee has a responsibility and legal duty to ensure complete compliance with the general statement of this policy.

Specific duties have been placed on certain employees, such as:

Chairman / Trading Board of Directors

- Shall make certain that the environmental policy is updated, reviewed and developed.
- Shall ensure sufficient resource is made available to maintain the M&S environmental management system (EMS)
- Shall ensure the general principle of continual improvement towards the environment is achieved by reviewing operation performance annually as part of the overall environmental management review
- Shall ensure provision of appropriate information, supervision, training and instruction in order to meet the reviewed outcomes of both the environmental policy and the EMS.

Senior Leadership Team / Operational Board Directors

Are responsible for ensuring that the environment remains a top priority of the business and ensure full compliance with this policy and stated objectives of the company.

Environmental Representative – CFO / HSQE Team

Are responsible for providing advice, guidance, support and assistance appropriate to the requirements of the company to enable compliance with this policy. Shall ensure that a unified approach to environmental issues is implemented throughout M&S by:

- Developing and continually updating the M&S environmental strategy.
- Ensuring there is a maintained focus on the environmental strategy and achievement of goals, coordinating the implementation across all areas of the business.
- Liaising with environmental consultants for guidance on areas of legislation, compliance and best practice.
- Preparing and upkeep of both the M&S environmental policy and EMS.
- Developing environment led business initiatives.
- Implementing an environmental training plan for all staff.
- Developing systems to facilitate monitoring of KPIs, actions and compliance.
- Developing an integrated management system.
- Reviewing and monitoring the EMS to ensure continual improvement.

Monitoring

In order to maintain the M&S EMS, internal site audits shall take place in line with the annual targets identified by the M&S Trading Board which meet the requirements the ISO 14001: 2015 standard.

Audits shall be carried out objectively in line with the internal auditing procedure. Corrective actions shall be subject to re-verification, either through a revisit or through the supply of appropriate evidence. EMS audits may be combined with other auditing activities, which may be required for other parts of the integrated management system. In addition to site inspections, environmental audits may take place in any part of the business.

Audit results shall be reviewed by senior management. In conjunction with information from other sources, audit results will inform decisions made relating to our environmental processes and procedures.

Compliance Monitoring

The M&S HSQE team shall liaise with environmental consultants for guidance on areas of legislation, compliance and best practice and shall ensure the upkeep of the M&S legal register.

Training

The M&S HSQE team shall identify applicable environmental training, compliance of which shall form part of each and every internal audit / review. It is each division's responsibility to ensure that their staff and tradesmen are adequately trained in environmental matters. A training database is maintained with M&S which records all formal training undertaken.

Communication

Environmental issues shall be communicated through a variety of methods, including:

- Environmental, health & safety meetings
- Environmental, health & safety briefings and toolbox talks
- Site and office notice boards
- Progress meetings
- The Environmental Management System
- Team meetings
- E-mail briefings

Selection and Monitoring of the M&S Supply Chain

- M&S shall monitor and review the environmental performance of our supply chain, ensuring they comply with all M&S policies and procedures in this area in addition to the applicable legislative requirements.
- M&S shall actively encourage our supply chain to develop environmental improvement initiatives within their own business and share with them any / all developments we have introduced.
- The M&S supply chain selection process shall progressively be weighted towards supply chain partners with a level of environmental performance and practical initiatives.

Emergency Preparedness & Response

In the event of an environmental incident, the M&S site specific environmental incident plan and emergency procedures shall be implemented and followed. An environmental incident report shall be sent to the M&S compliance team for review, outlining the details of the incident, the actions taken and points learned and identifying further continuous improvement. Where appropriate an environmental alert shall be prepared and issued throughout M&S to ensure learning from the incident. On an annual basis, as a minimum, specific emergency plans shall be tested by simulation of an environmental related emergency to ensure that the identified plan is suitable and sufficient to deal with the emergency in line with the ISO 14001: 2015 standard.

Waste

In general M&S aim to minimise waste being generated and disposed of by:

- Employing just in time ordering techniques
- Ensuring suitable storage of materials
- Reducing the volume of packaging being delivered to site
- Re-using materials
- Segregating waste materials for recycling

On site M&S shall minimise waste and maximise recycling through the application of the M&S project specific site waste management plan. The focus of each plan is to ensure M&S firstly minimise waste and where possible re-use materials within the construction works undertaken. Where waste cannot be avoided, ensure all waste is segregated and disposed of in conjunction with our waste provider to maximise the volumes that can be recycled / reclaimed at authorised waste transfer / segregation stations.

Chain of Custody

M&S must obtain copies of waste management licenses and carrier's licenses prior to removing waste off site. All waste shall be disposed of in accordance with the duty of care and all other relevant environmental legislation. All waste Transfer notes must contain the following information:

- Name and address of the waste producer, waste carrier and final destination (transfer station or land fill site)
- Description of the waste including the European waste classification code(s)

- Container type and quantity; size / volume / weight
- Date waste removed from site
- Signatures of the driver and approved person from site
- Hazardous waste premises code (hazardous waste only)

Material Storage

When storing materials on site, locations shall be selected that minimise the risk of damage by plant or pedestrian traffic, stolen or vandalised. Materials shall be protected from being damaged by the elements i.e. cover wood and plasterboard. M&S shall ensure that storage areas are kept clear, by removing all waste packaging and redundant material etc.

Procurement of Materials

M&S shall ensure the proper specification of materials to their specific use whilst recognising the choice conforms to, where possible, lifecycle costing, avoiding a depletion of non-renewable natural resources, low-embodied energy and being non-toxic to both internal and external environment.

M&S shall recognise a sustainable purchase of goods and services to take account of environmental and social issues that are applicable to purchasing decisions. Where our clients or their agents specify the materials to be used, M&S shall look to influence their decisions on product selection to minimise the impact on the environment through sharing our materials knowledge and the benefits they can bring.

Design

Where possible, throughout design & procurement the following issues shall be considered:

- Buildings shall be designed to reduce life cycle costs and environmental impact
- The procurement process must meet the required standards in BREEAM or other processes required by each client (where applicable)
- Designs shall incorporate ecological habitat & biodiversity considerations
- Waste shall be minimised through the design process including the need for segregation
- Buildings shall where possible, be designed & built using processes that limit dust, water and noise pollution, and the amount of waste produced.
- Hazardous materials shall be designed out and avoided wherever possible.
- Design for an energy efficient building and energy efficient services, including: heating, cooling, lighting, ventilation

Resource Management

M&S shall undertake regular assessment of all available primary energy sources to ensure the best balance between environmental impact, efficiency, economy & security of supply.

Pollution

Where deemed necessary M&S shall incorporate a pollution prevention plan and a site waste management plan for each project. The use of these plans will minimise the risk of pollution and ensure plans are in place to minimise any impact if it occurs.

Transportation / Traffic

Through the M&S procurement & delivery process we shall minimise the number of deliveries and distance travelled to site. Hence, reducing CO2 emissions as well as minimising any disruption to the site and surrounding buildings, minimising fuel cost and reducing the volume of road traffic as well as reducing disruption to local residents / businesses. M&S encourage car share schemes & the use of fuel-efficient / hybrid vehicles as well as utilising public transport (bus & rail) for all staff, clients and contractors travelling to offices and sites.

Plant & Refuelling

Refuelling must only take place in a designated area where the risk of contamination to watercourses (including mains & foul sewers) is minimised, with protection in place before start by using drip trays, spill kits and drain covers.

Fuel & Chemical

All chemical containers on site shall be correctly labelled, fit for purpose, protected against unauthorised use and securely stored to prevent them being damaged or accidentally spilt. M&S shall ensure that all legal requirements outlined for oils and oil type substances covered by Pollution regulations are met.

Cement & Concrete

Designated controlled areas shall be used for minimal cleaning of chutes only. Water from concrete or cement washing-out shall not be allowed to enter any drains. Cleaning & washout water disposal methods must be agreed with the project / site manager before concrete / cement arrives on site.

Ecology & Wildlife

Trees & Hedgerows

The removal or trimming of trees / hedges must be agreed with the relevant local council or national park authority as part of the planning process. TPOs (Tree Preservation Orders) may have been applied or trees may be within a conservation area. These issues must be checked with consent sought for any work with the same authority. In all instances where nesting birds, bats, badgers or red squirrels are found to be in residence, the plant(s) must be left undisturbed until specialist advice is sought and suitable action undertaken.

Nesting Birds

All buildings, trees and shrubs shall be inspected for nesting birds prior to carrying out any works that may affect the nest site. Where the presence of a nest is suspected, the project / site manager shall be informed and specialist ecologists brought onto site if necessary.

Protected Species

The appropriate authority must be notified where there is any evidence of possible occupation by protected species within the site of, or an area likely to be affected by, a development proposal.

Scotland
Scottish Natural Heritage

England
Natural England

Northern Ireland
Northern Ireland Environment Agency

Wales
Countryside Council for Wales

Archaeology

Where there is evidence of archaeological remains uncovered after works have begun then the work must be stopped immediately and the area cordoned off and access restricted. The project / site manager should be informed and the appropriate authority notified.

Scotland
Historic Scotland

England
English Heritage

Northern Ireland
Northern Ireland Environment Heritage Service

Wales
CADW

Contaminated Land

There is the possibility that areas within a site may be contaminated and not identified at the pre-construction phase. Contaminated land may be indicated by areas of:

- Discoloured soil (e.g. chemical residues);
- Fibrous texture to the soil (e.g. asbestos);
- Presence of foreign objects (e.g. chemical / oil containers);
- Evidence of previously worked soil;
- Evidence of underground structures, tanks etc.
- Waste pits;
- Old drain runs, tanks, flues, etc.
- Evidence of liquids or solid wastes.
- Odour

If any or all the above have been discovered, M&S must stop work immediately, identify the potentially contaminated area and prevent access. The project / site manager shall then carry out further investigation. M&S shall not move the material until formally instructed to do so after an investigative survey has taken place. Excavated contaminated ground must be disposed of appropriately (either as active or hazardous waste depending on level of contamination), with relevant documents completed and retained.

Community Issues

The behaviour and language of all those on site shall reflect the sensitivity of the site and show consideration and respect for all site neighbours. Disciplinary action shall be taken against anyone found to be behaving inappropriately. M&S shall ensure early liaison with relevant individuals and community bodies providing contact details for the site together with an understanding of future proposed works.

Review of Policy & Performance

As a minimum, this policy will be reviewed & revised on an annual basis by the M&S Trading Board to ensure that it remains appropriate to our business, and shall be signed off by the M&S chairman and CEO. The company's environmental performance and impact is reviewed continuously, through a program of internal audit which is reported to all operational boards. Whilst the progress made in meeting our stated environmental targets to comply with the ISO 14001: 2015 standard will be analysed on a di-annual basis, which shall form part of the environmental board report, results of which shall be communicated throughout M&S and be made available to all interested external parties.



George Morris
Chairman



Jon Dunwell
CEO

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