

## WARD SECURITY

### P 8. Environmental Policy

#### General Statement of Policy

Ward Security remains aware of the potential for its activities to impact upon the environment and publishes this policy statement and the accompanying organisation and arrangements in recognition both of this potential and its commitment to take all reasonable measures to minimise the impact of its activities on the environment. This policy and its implementation will be reviewed by the Directors of the Company periodically.

Notwithstanding the general commitment made above, the Company will seek to take due account of environmental issues in its management decisions and actions in respect of prevention of pollution including:

- Vehicle and equipment procurement and maintenance
- site operations
- minimisation and control of emissions to air and discharges to surface waters, groundwater and sewerage systems
- storage and transportation of materials
- minimisation, recycling and disposal of wastes
- energy and other resource utilisation
- seeking to continually improve all aspects of environmental management

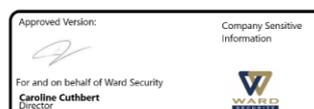
The Company recognises and respects compliance with environmental legislation as representing an important step in achieving the commitments made above and looks to promote co-operation and liaison between itself and the various enforcing agencies to achieve this objective.

The Company also recognises the importance of an effective management system to facilitate these commitments. The organisation and arrangements establish the management framework and provide the basis for a management system to enable:

- planning, setting and monitoring of performance standards and objectives
- provision of appropriate information, instruction, training and supervision to employees to enable them competently to discharge their responsibilities
- communication with employees on environmental issues
- monitoring of work activities and the investigation of incidents
- regular review of environmental performance

To fulfil these commitments and its legal obligations, the Company anticipates the co-operation and commitment of its employees at all levels in the organisation through:

- complying with procedures, arrangements and instructions
- remaining aware that their own acts and omissions can have an impact on the environment and taking all reasonable measures to prevent or minimise any such impact
- promoting and maintaining high standards of housekeeping



## WARD SECURITY

### P 8. Environmental Policy

#### Objectives

The Company will aim to:

- Develop and maintain emergency procedures to deal effectively with any significant environmental hazards which may arise as a result of its activities.
- Take all reasonable steps to prevent pollution of both its local and wider environments
- Ensure that it purchases goods and materials which comply fully with UK government and EU legislation and recognised environmental best practice
- Require its suppliers to provide goods and services with the minimum adverse environmental impact, and give preference to environmentally aware suppliers whenever possible
- Communicate its environmental performance both within the company and to the external community
- Maintain current and reliable information on the environmental impact of the goods and services it supplies and make this available on demand to enable its customers to make informed choices
- To maintain the regulatory compliance in accordance with the legal requirements defined in the environmental legal register.

#### Organisation

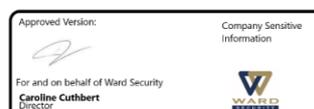
This section establishes duties and responsibilities for the Company's employees and establishes mechanisms of accountability.

#### Managing Director

The Managing Director accepts ultimate responsibility, on behalf of the Company, for the implementation of the environmental policy.

#### In particular he will:

- a. Ensure that adequate financial, manpower or other resources are made available to enable the commitments made in the policy to be achieved.
- b. Ensure as appropriate that environmental issues are raised, discussed and actioned at Board Meetings including the establishment of plans and the setting of standards and objectives.
- c. Ensure that an effective Company Environmental Policy is maintained and updated in line with developments in legislation and good management practice and in line with changes in the Company's activities and structure.



## WARD SECURITY

### P 8. Environmental Policy

- d. Establish suitable arrangements for bringing the Policy and any revision to it to the attention of employees.

#### Health and Safety Officer and Operations Directors

The roles of the **Health and Safety Officer** and Operations Directors are to provide advice, guidance and support to management and the workforce in general. They will:

- a. Interpret legislative requirements and provide guidance in the preparation and implementation of procedures and arrangements.
- b. Provide advice and guidance to ensure the development and implementation of good management practices and sound procedures and arrangements.
- c. Act on instances of poor practices and unnecessary risk taking, providing recommendations in regard to appropriate remedial actions.
- d. Ensure the investigation is completed for all incidents.

#### Directors / Supporting Directors/ – General Responsibilities

Each Director / **Supporting** Director accepts overall responsibility for implementation of the Company's Environmental Policy within the area of their control.

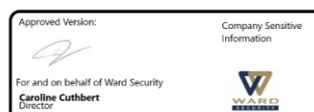
Each Director/**Supporting** Director will, in so far as they apply:

- a. Ensure that they understand the Company environmental policy and that employees within their area of responsibility are provided with appropriate information, instruction and training to enable them to understand the policy and fulfil their responsibilities as defined within it.
- b. Monitor the application of the Company environmental policy within their area of responsibility and ensure that any concerns relating to the application of the policy are drawn to the attention of the Board.
- c. Require as necessary from regional managers reports on environmental incidents and general performance and act on any concerns arising from them.
- d. Develop procedures to ensure that environmental issues are addressed in risk assessments.
- e. Develop and review arrangements for the management and physical control of emissions and discharges, storage and transportation of materials and wastes and the utilisation of energy, water and other resources.
- f. Develop suitable arrangements to ensure that employees receive appropriate communication on environmental issues and are consulted where such issues may have a significant impact on the nature of their work or working methods.
- g. Implement any additional and/or specific environmental responsibilities as required.

#### Operational Management – General Responsibilities

The duties and responsibilities assigned to Operational Managers recognise their overall responsibility for the implementation and monitoring or arrangements and procedures to ensure operation of the environmental policy within the areas of their control.

Each Operational Manager will, in so far as they apply:



## WARD SECURITY

### P 8. Environmental Policy

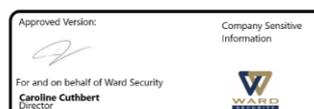
- a. Assist and support the Directors in their execution of their responsibilities under the Company environmental policy.
- b. Ensure they and their line managers maintain an appropriate working knowledge of environmental legislation (to the extent that it is likely to impact upon their area of responsibility).
- c. Ensure that they understand the Company environmental policy and that employees within their area of responsibility are informed of the Company environmental policy and any revisions to it and understand the requirements of the policy in so much as it assigns responsibility to them.
- d. Ensure the provision of appropriate information, instruction, and training to employees to enable them to perform competently their general and specific responsibilities.
- e. Ensure that environmental issues are addressed in risk assessments and that appropriate prevention or risk control measures are identified and implemented.
- f. Investigate environmental incidents determine their causes, identify and implement appropriate remedial measures.
- g. Monitor and report on environmental performance.
- h. Implement and monitor arrangements for the management and physical control of emissions and discharges, storage and transportation of materials and wastes and the utilisation of energy, water and other resources.
- i. Communicate with employees on environmental issues, in particular where such issues may have a significant impact on the nature of their work or working methods.
- j. Implement any additional and/or specific environmental responsibilities as required.

### Site Management

Each Site Manager will ensure the day to day management and physical control of the environmental risks arising from activities under their control. In particular each will:

- a. Ensure they understand the Company Environmental Policy and ensure that it is explained to employees.
- b. Manage operations and the work of employees to ensure that activities are undertaken in accordance with the established arrangements for the management and physical control of emissions and discharges, storage and transportation of materials and wastes and the utilisation of energy, water and other resources.
- c. Where work is not being undertaken in accordance with the established procedures and arrangements or with due care, inform and instruct employees of the correct procedures to be followed. In the case of persistent failure, consider and implement appropriate disciplinary measures.
- d. Supervise the work of contractors and ensure that it is being undertaken in accordance with the Company's policy and with due regard to environmental risks.
- e. Carry out regular inspections and report or remediate concerns as necessary.

This policy is subject to annual review by the Senior Management team as part of the Management Review regime; however changes to legislation, working practises or changes to this policy required as a result of on-going monitoring will necessitate both re-active measures and policy review. This policy is correct as of date of printing



**WARD SECURITY**  
**P 8. Environmental Policy**



Signed.....

Director

Date: 23rd Jul 2019

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| Approved Version:<br> | Company Sensitive<br>Information  |
| For and on behalf of Ward Security<br><b>Caroline Cuthbert</b><br>Director                               |  |