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## FOREWORD

This Environmental Policy details the Leaves Building & Maintenance Contractors Ltd declaration of intent in respect of environmental management and aims to assist all employees in meeting minimum environmental legal requirements in line with the Environment Policy Statement.

Leaves Building & Maintenance Contractors Ltd will conduct its activities, so far as is reasonably practicable; in an environmentally responsible manner that does not expose the natural environment or our neighbours to unacceptable environmental risks.

Leaves Building & Maintenance Contractors Ltd recognises that every employee whilst at work must take reasonable care not to adversely impact the natural environment of our neighbours as a result of his or her work activities.

The Environmental Policy is based on legislative compliance, as a minimum. However, Leaves Building & Maintenance Contractors Ltd will also aim to raise the Performance Standards within the Company to exceed the industry environmental standard.

In order to minimise the impact upon the environment from our activities, we will:

- Assess the risks to the environment and to our neighbours from our work activities;
- Have effective arrangements in place for the planning, organising, controlling, monitoring and reviewing of preventative and protective measures;
- Appoint competent persons to help in undertaking the measures needed to comply with environmental law; &
- Provide employees with comprehensible and relevant information on the environmental risks and the preventative and protective measures necessary to control those risks.

All contractors employed by the Company shall be required to demonstrate a similar commitment to the management of environmental issues.

The Environmental Policy consists of three parts:

1. The **Environment Policy Statement** is the declaration of intent, signed by the Executive Board, which sets out the required environmental Performance Standards to be achieved across the Company and the management commitment to those Performance Standards in terms of accountability.
2. The **Organisation Responsibilities** details the environmental responsibilities across the Company.
3. The **Arrangements for Environmental Management** covers the systems the Company has in place to assist in ensuring effective environmental management across the workplace.



## 1. ENVIRONMENTAL POLICY STATEMENT

Leaves Building & Maintenance Contractors Ltd is committed to a policy of effectively managing environmental performance in order to minimise the impact of our business processes on the natural environment & the community at large. This commitment extends to all workplaces, employees & others affected by our operations. Our objective is to integrate the assessment, management & control of environmental issues into the management of our business. We will:

- Assess the environmental impact of our operations during planning, design & implementation phases so as to prevent pollution of the external environment;
- Ensure compliance with all relevant environmental legislation as a minimum &, where practical, approved codes of practice & other requirements such as those specified by our clients;
- Develop & implement objectives & targets to ensure a continual improvement in our environmental performance;
- Incorporate sustainable environmental considerations into our design Performance Standards & construction practices having particular regard to energy & water consumption, use of low environmental impact materials, designing out waste & reusing materials, wherever possible;
- Play our part in halving the amount of construction, demolition & excavation waste going to landfill & will work to adopt & implement Performance Standards for good practice in reducing waste, recycling more & increasing the use of recycled & recovered materials;
- Adopt a risk based approach to providing appropriate training in environmental issues for our employees according to their role, work they undertake & their environmental responsibilities.

The Executive Board has the overall responsibility for environmental management & will ensure that resources, facilities, finances, information, instruction, training & supervision are provided, as necessary, to maintain a positive environmental culture & performance.

Leaves Building & Maintenance Contractors Ltd management is responsible for the implementation of this Policy & for ensuring environmental risks are assessed & appropriate management controls are implemented in accordance with Leaves Building & Maintenance Contractors Ltd Performance standards. Environmental responsibilities have been defined for all Leaves Building & Maintenance Contractors Ltd personnel & are contained within the Environmental Policy Booklet.

All employees & contractors are expected to co-operate with Leaves Building & Maintenance Contractors Ltd in the implementation of the Environmental Policy & will ensure that their own work, so far as is reasonably practicable, is carried out with minimum risk to the environment. Consultation with all relevant stakeholders will be structured to ensure environmental awareness & to encourage feedback so as to continually improve our environmental management processes.

This Policy statement will be prominently displayed at all workplaces & made available to other interested parties upon request. The Environmental Policy Booklet will also be available at all workplaces for reference by any employee or contractor, as required. The Environmental Policy is continually being monitored & developed & will be formally reviewed annually. However, in exceptional circumstances this Policy may be amended as required by changes in legislation or work practices.

*Signed for & on behalf of the Executive Board:*

**Paul Leaves**  
Managing Director  
Leaves Building & Maintenance Contractors Ltd

September 2022



## 2. ENVIRONMENTAL ORGANISATIONAL RESPONSIBILITIES

Leaves Building & Maintenance Contractors Ltd has its own Management Board that deals with all operational environmental matters. The Managing Director within the Company has responsibility for the execution of their business operations in an environmentally responsible manner together with Managers, and with support from the Health, Safety and Environment Consultant.

Directors and General Managers have responsibility for environmental matters in their operations with the support of the Support Staff.

The immediate responsibility for environmental management in each workplace is carried by the most senior line manager involved.

Responsibilities have been outlined in this document for each of the following roles:

- 2.1 Executive Board
- 2.2 All Directors & Business Management
- 2.3 Director Responsible for Company Environmental Management
- 2.4 Health & Safety Advisor(s)
- 2.5 Contracts Managers
- 2.6 Site Management
- 2.7 Site Supervisors
- 2.8 Site Operatives
- 2.9 Administration & Other Staff

### 2.1. Executive Board

*Definition: Executive Board chaired by the Chairman & comprising the Company Managing Director, Finance Director, Operational Directors & the Company Secretary. Responsible for the executive management of the Company.*

In meeting the Leaves Building & Maintenance Contractors Ltd Environmental Policy, the Leaves Building & Maintenance Contractors Ltd Executive Board should, where reasonably practicable:

- Provide the organisation, finances & resources necessary for the implementation of the Leaves Building & Maintenance Contractors Ltd Environmental Policy;
- Appoint an Operational Director to be responsible for Company Environmental Management;
- Include Environmental in Executive Board meeting agendas & monitor the Company's Environmental performance & respond accordingly;
- Take reasonable steps to ensure that Leaves Building & Maintenance Contractors Ltd complies with Environmental legislation;
- Accommodate a sufficient number of competent Environmental personnel to implement the requirements of the Leaves Building & Maintenance Contractors Ltd Environmental Policy.



## 2.2. All Directors & Business Management

*Definition: All Directors & Business Managers responsible for matters concerned with the overall management of developments, tenders & all contracts/workplaces.*

In meeting the Leaves Building & Maintenance Contractors Ltd Environmental Policy all Directors should, where reasonably practicable:

- Be aware of the Company's Environmental Policy requirements & other statutory requirements affecting Leaves Building & Maintenance Contractors Ltd operations & seek further advice when necessary;
- Monitor contract/workplace Environmental performance, stop acts of environmental damage, neglect or pollution & respond accordingly;
- Ensure that staff under their control are provided with the Leaves Building & Maintenance Contractors Ltd Environmental Policy & are conversant with its requirements;
- Actively promote at all levels Leaves Building & Maintenance Contractors Ltd's commitment to effective Environmental management;
- Assist in the investigation of incidents where required & that any non-compliances reported on internal & external Environmental reports/audits are appropriately closed out;
- Ensure the effective communication of Environmental information throughout the Company.

## 2.3. Director Responsible for Company Environmental Management

*Definition: Director Responsible for Company Environmental Management & for matters concerned with the overall Environmental management of all contracts/workplaces.*

In meeting the Leaves Building & Maintenance Contractors Ltd Environmental Policy & in addition to the responsibilities detailed in 2.2 the Director Responsible for Company Environmental Management should, where reasonably practicable:

- Instruct that operational managers take immediate action when Environmental Advisors require that work operations should stop, where unsafe working practices are observed;
- Ensure that the necessary finances & resources have been provided for the implementation of the Leaves Building & Maintenance Contractors Ltd Environmental Policy on all contracts & in all workplaces;
- Ensure that staff at all levels receive the appropriate Environmental training, as agreed by Executive Board through HS&E Committee recommendation;
- Monitor the Environmental performance on sites, including Environmental Advisors' performance reports, & take the appropriate action whenever safety performance fails to meet the Leaves Building & Maintenance Contractors Ltd Environmental Performance Standards;
- Ensure accident & incident investigations are completed & that any non-compliances reported on internal & external Environmental reports/audits are appropriately closed out;
- Ensure all reportable accidents & incidents are reported to Company solicitors & insurers as appropriate;



- Ensure that any enforcement notices are responded to;
- Ensure that a suitable internal Environmental forum, e.g. team briefing, Environmental review meeting or other, which included the attendance of senior management, is held at regular intervals to discuss the Environmental performance of the Company & agreed actions for continual improvement as appropriate.

#### 2.4. Environmental Advisors

*Definition: Environmental Systems Manager (Company Environmental Manager), (Senior) Environmental Advisor(s), all in-house & Consultant Environmental Advisors & Site Support Staff.*

In meeting Leaves Building & Maintenance Contractors Ltd Environmental Policy all environmental support staff should, where reasonably practicable:

- Provide specialist environmental input to operational staff through advise, guidance and support;
- Carry out an environmental review at all workplaces on a regular basis, as appropriate, to ensure compliance with the Leaves Building & Maintenance Contractors Ltd Environmental Policy;
- Where working practices are observed that pose a significant environmental risk, ensure that, where possible, the activity is stopped; inform site and contracts management immediately; provide appropriate support, advice and assistance in identifying and implementing the necessary remedial actions;
- Provide suitable environmental information to the Company in the form of staff briefings, annual update forums, workshops, presentations etc and support and participate in any Company environmental induction programmes, as appropriate;
- Collate environmental information, as provided by workplace management, for monthly reports;
- In conjunction with the operation staff, identify areas/operations that require specific environmental improvement and assist in the organising or undertaking of such improvements, as appropriate;
- Provide information in the form of instructions, Best Practice Guidance, Codes of Practice, Environmental Information Sheets etc., as appropriate, and ensure operational staff are provided with Company communications on effective environmental working practices and alerts;
- Ensure environmental induction instructions are reviewed regularly for relevance to current operations, and ensure that they are being effectively communicated;
- Assist operational staff in the review of environmentally high-risk contractors' method statements, provide appropriate assistance in assessing other environmentally related method statements, and monitor the implementation of the same in the workplace, as appropriate;
- Assist the Company in the environmental performance management of contractors;
- Assist contracts management through advise, information, training and encouragement, as appropriate, to ensure that projects continually meet Leaves Building & Maintenance Contractors Ltd's Environmental Standards;



- Ensure that the relevant manager is advised if operations are not achieving Leaves Building & Maintenance Contractors Ltd's Environmental Performance Standards, and further advise the Company Environmental Manager, as appropriate;
- Communicate effectively with the Environment Agency (EA) or other enforcing bodies regarding this Environmental Policy and all relevant environmental inspections and incidents;
- Ensure that significant environmental incidents are reported promptly to the Director Responsible for Company Environmental Management & Company Environmental Manager & the EA, as appropriate;
- Promptly investigate all environmental incidents and make known and discuss any significant findings/recommendations within the business, as appropriate;
- Liaise with Contracts Managers on operational environmental performance standards;
- Provide feedback to the Company Environmental Manager on the effectiveness of the Company's environmental management systems (EMS) and any improvements necessary;
- Promote involvement in environmental management of all operational staff by discussion, briefings, training sessions and effective communication;
- Review all workplaces in line with current environmental laws;
- Assist contracts management in the production of project environmental plans in the approved format;
- Monitor the Business Units to ensure that all staff, including office based personnel, receive appropriate environmental training and instructions.

## 2.5. Contracts Managers

*Definition: Contract Managers & other managers with responsibility for the management of contracts & other employees.*

In meeting the Leaves Building & Maintenance Contractors Ltd Environmental Policy, the Contracts Managers should, where reasonably practicable:

- Be aware of the Company's Environmental Policy requirements & other statutory requirements affecting Leaves Building & Maintenance Contractors Ltd operations & seek further advice when necessary;
- Ensure that there is a system for formally appointing personnel to be responsible for Environmental matters in every workplace;
- Assist in the production of project environmental plans in the approved format & ensure that a written environmental plan & associated documentation in the approved format is in place prior to works commencing;
- Ensure sub-contractors are approved in liaison with the Environmental Department; assist in the approval of sub-contractor documentation prior to works;
- Ensure that there is adequate supervision in place to cover all workplaces & work operations as appropriate, & to report & manage any Environmental incidents;



- Ensure that regular Environmental reviews take place at all workplaces, as appropriate &, in conjunction with the workplace management team & Environmental support staff;
- Monitor the overall Environmental performance of all operations under their control & ensure that appropriate action is taken whenever operations fail to meet the Leaves Building & Maintenance Contractors Ltd Environmental standards;
- Discuss Environmental matters with operation staff at regular workplace management meetings;
- Ensure appropriate data is provided on accidents, incidents, dangerous occurrences, & enforcement action to enable the Company Environmental Manager to formulate monthly reports;
- Ensure all reportable accidents & incidents are reported to the Company Environmental;
- Ensure that any enforcement notices are responded to & the Company Environmental Manager is informed;
- Ensure operation staff have adequate planning time, resources, information, skills & training to carry out the operations in accordance with Leaves Building & Maintenance Contractors Ltd Environmental standards;
- Report through appropriate line management any problems with or improvements required to this Policy;
- Actively promote at all levels Leaves Building & Maintenance Contractors Ltd commitment to effective Environmental management.

## 2.6. Site Management

*Definition: Project Manager, Site/Workplace Manager/Company Office Manager or other persons appointed as the most senior person with overall responsibility for managing projects, sites or premises.*

In the meeting Leaves Building & Maintenance Contractors Ltd Environmental Policy all Site Management should, where reasonably practicable:

- Be aware of Leaves Building & Maintenance Contractors Ltd's Environmental Policy requirements and other environmental statutory requirements affecting Leaves Building & Maintenance Contractors Ltd operations and seek further advise, when necessary;
- Ensure that all Supervisors are aware of their environmental responsibilities;
- Ensure all new employees, contractor's employees and visitors, including delivery drivers, are instructed on the relevant sections of Leaves Building & Maintenance Contractors Ltd's Environmental Policy and any location specific environmental requirements;
- Organise and plan workplaces so that work is carried out in accordance with the Leaves Building & Maintenance Contractors Ltd Environmental Standards with minimum risk to the natural environment or neighbours;
- Bring to the attention of the Contracts Manager and Environmental Advisor, as appropriate, any environmental improvement required or problems being encountered;
- Plan environmental requirements into all operations in accordance with Leaves Building & Maintenance Contractors Ltd's Environmental Standards;





- Ensure adequate supplies of environmental control equipment (e.g., spill response equipment) are available and are appropriately used;
- Accompany all Environment Agency (EA) Inspectors and Enforcing Officers on their visits to sites/workplace;
- Make full use of the services of the Environmental Department and ensure that all reasonable recommendations are actions. Report immediately any significant environmental incidents, disciplinary action or enforcing bodies' visits to the Environmental Department;
- Ensure that all contractors are made aware of their responsibilities for environmental matters on the project;
- Actively promote at all levels Leaves Building & Maintenance Contractors Ltd's commitment to effective environmental management;
- Ensure that all environmental risk assessments are effectively monitored, reviewed and communicated at the workplace;
- Identify the environmental requirements within method statements, and ensure that they are produced and reviewed on time. Identify method statements' required distribution (e.g. foremen, supervisors, operatives and customer) and ensure that they are followed and controlled, as appropriate.

In addition to the responsibilities identified in 2.10 the **Company Office Manager** is responsible for:

- Maintaining the Company Environmental Training Matrix & advising the Company Environmental Manager;
- Providing personnel & other resources in order to assist the Environmental Department in its responsibilities.

## 2.7. Site Supervisors

*Definition: Assistant Site/Workplace Manager, Foreman, Gangers, Team Leaders or any other person in charge of the works, with responsibility for the supervision of people, materials, equipment, etc, including Leaves Building & Maintenance Contractors Ltd Appointed Persons.*

In meeting Leaves Building & Maintenance Contractors Ltd Environmental Policy all Site Supervisors should, where reasonably practicable:

- Be aware of Leaves Building & Maintenance Contractors Ltd's Environmental Policy requirements and other environmental statutory requirements affecting Leaves Building & Maintenance Contractors Ltd operations and seek further advise, when necessary;
- In conjunction with the Senior Site Manager, ensure all new employees, contractor's employees and visitors, including delivery drivers, are instructed on Leaves Building & Maintenance Contractors Ltd's Environmental Performance Standards and any project specific environmental requirements, as appropriate;
- Ensure that all relevant persons are briefed on the contents of any environmental risk assessment and method statements produced and monitor operatives (including contractors) for compliance;
- Ensure that an adequate supply of environmental control equipment (e.g., spill response equipment) is kept on the site and implement disciplinary procedures against any employee who abuses or does not make full use of this equipment, when required;



- In conjunction with the Senior Site Manager plan environmental standards into work activities;
- In conjunction with the Senior Site Manager discuss environmental matters with all supervisors, including contractors, on a regular basis, and record where appropriate;
- Ensure all Leaves Building & Maintenance Contractors inspections are carried out as prescribed in the Company environmental management system;
- Make full use of the services of Environmental Advisors and co-operate with them to achieve Leaves Building & Maintenance Contractors Ltd's Environmental Performance Standards at all workplaces;
- Follow Leaves Building & Maintenance Contractors Ltd Environmental Performance Standards and report any problems in achieving these standards to the Senior Site Manager and Environmental Advisor, as appropriate;
- Actively promote at all levels Leaves Building & Maintenance Contractors Ltd's commitment to effective environmental management;
- Ensure that the requirements of all environmental risk assessments are brought to the attention of all operatives involved, including contractors;
- Actively encourage employees to report environmental problems as soon as they are discovered or if they are anticipated in the future.

## 2.8. Site Operatives

*Definition: Labourer, ground worker, machine operative, tradesman, or other worker in a non-managerial/supervisory role.*

In meeting Leaves Building & Maintenance Contractors Ltd's Environmental Policy all Operatives should, where reasonably practicable:

- Make themselves familiar with the Company's Environmental Policy and adhere to all the site rules, notices and procedures made known to them.
- Actively participate in the management of environmental issues by reporting all environmental incidents.
- Participate in environmental committees or other formal environmental consultation procedures and notify their immediate line manager of any reason preventing them from compliance with the Leaves Building & Maintenance Contractors Ltd Environmental Policy.
- Work in an environmentally responsible manner and follow defined environmental work practices for the site, which may be set out in method statements, risk assessments, site rules, or otherwise.
- Refrain from working if they think their work activities will contribute to a significant adverse impact to the natural environment or neighbours, and inform their immediate line manager of their concerns.

## 2.9. Environmental Responsibilities of All Personnel (to be displayed on workplace noticeboards)

*Definition: Any employee regardless of employment status e.g. staff, contractor, labour only, self-employed, etc.*

In meeting the Leaves Building & Maintenance Contractors Ltd Environmental Policy all personnel are required to work in an environmentally responsible manner so as to minimise disturbance to, and enhance where possible, the natural



environment and neighbours who may be affected by their work activities. The Company expects a reasonable and responsible attitude from all personnel towards meeting their environmental obligations whilst at work.

All personnel should, where reasonably practicable:

- Be conversant with the relevant requirements identified in the Leaves Building & Maintenance Contractors Ltd Environmental Policy;
- Demonstrate commitment to the implementation of the Environmental Policy and abide by any environmental rules and instructions given during any location specific induction;
- Demonstrate commitment to the implementation of Company Environmental Performance Standards;
- Co-operate with the Company in fulfilling its environmental legal obligations and to avoid instances of pollution and environmental nuisance;
- Follow environmentally responsible methods and systems of work established for the site which may be set out in method statements, risk assessments, site rules, or otherwise;
- Set a personal example by using environmental control equipment (e.g., spill response equipment), when and where appropriate;
- Work in an environmentally responsible manner at all times, take appropriate action where potential environmentally damaging working practices or significant environmental risks are observed and report these to the relevant manager;
- Actively participate in the management of environmental issues by reporting all environmental incidents;
- Where appropriate, participate in environmental committees or other formal environmental consultation procedures;
- Refrain from working if they think their work activities will contribute to a significant impact to the natural environment or neighbours and inform the relevant manager of their concerns;
- Co-operate with the Company to achieve continual environmental performance improvement.

**Note: Refusal or consistent failure to comply with the Company Environmental Policy and Environmental Performance Standards will be considered a serious disciplinary offence.**

**All employees and contractors are expected to co-operate with Leaves Building & Maintenance Contractors Ltd in the implementation of the environmental Policy and will ensure that their own work, so far as is reasonably practicable, is carried out with minimum risk to the environment.**

### 3 ENVIRONMENTAL ARRANGEMENTS

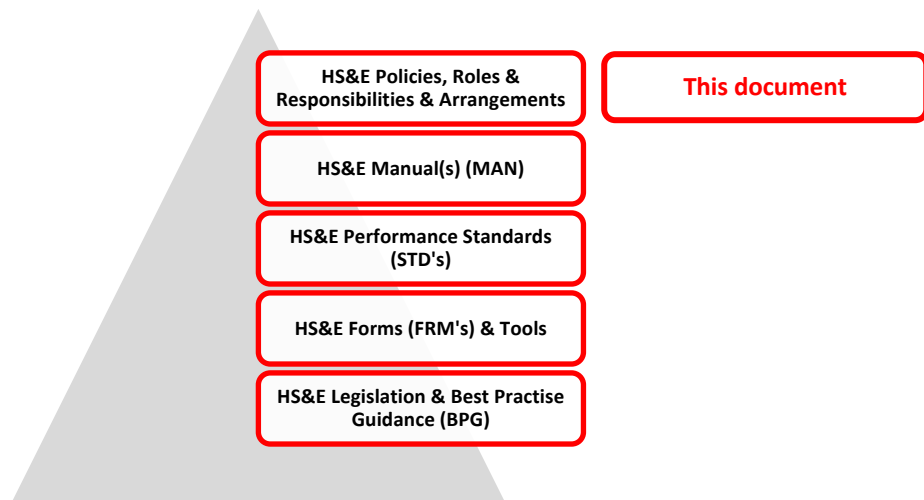
#### 3.1 Document Issue & Control

The Environmental Policy is produced & controlled by the Leaves Building & Maintenance Contractors Ltd.

The document shall be reviewed, & revised as necessary, at intervals not exceeding one year. Interim revisions will be issued as addenda, when necessary.

A copy of this Environmental Policy document, & subsequent revisions, will be issued to all employees & made available to other interested parties, as appropriate.

Table 1 below shows the hierarchy of Health & Safety Documentation that forms the basis of the Company Health, Safety & Environmental referred to in this section & in the Company Health, Safety & Environmental System Manual. *Note: Health, Safety & Environmental procedures, performance standards & related documentation shall be integrated where possible.*



**Table 1 – Health, Safety & Environmental Management System**

#### 3.2 Application

The Environmental Policy has been produced for all activities undertaken by Leaves Building & Maintenance Contractors Ltd & includes for all Leaves Building & Maintenance Contractors Ltd construction sites, premises & office workplaces.

It is recognised that regulations, custom & practice will differ between Leaves Building & Maintenance Contractors Ltd companies. However, all companies will adopt & implement, as a minimum, the Performance Standards set out in the Environmental Policy. Leaves Building & Maintenance Contractors Ltd management in all Leaves Building & Maintenance Contractors Ltd companies will ensure that this Policy is used as the bases of all operation specific environmental management, & that any processes developed by individual operating units incorporate the applicable Leaves Building & Maintenance Contractors Ltd Environmental Performance Standards & guidance.

Where Leaves Building & Maintenance Contractors Ltd enters into a Joint Venture with one or more other entities, an agreement will be made, as part of the Contract, as to which environmental management system will be utilised for operations. Where this is not the Leaves Building & Maintenance Contractors Ltd Environmental Policy, Executive Board authorisation is required.



### 3.3 Planning

Planning is an essential factor in meeting the Environmental Policy in order to identify the measures required to achieve effective environmental risk management across the Company.

#### 3.3.1 Environmental risk Assessment & Control

At all workplaces, Leaves Building & Maintenance Contractors Ltd management will identify & assess potential environmental risks & record the findings. Subsequent control measures for the management of environmental risk will reflect the principle of risk elimination where reasonably practicable, followed by risk reduction, with the adoption of environmental control equipment as a last resort.

Leaves Building & Maintenance Contractors Ltd managers & supervisors will apply the Company Environmental Performance Standards, as appropriate, to meet the specific demands of the workplace, to ensure that environmentally responsible work practices are adopted, so far as is reasonably practicable.

Leaves Building & Maintenance Contractors Ltd will provide environmentally responsible work practices through:

- Effective organisation & planning;
- Evaluation of environmental risk;
- Identification of the appropriate controls, so far as is reasonably practicable;
- Production of suitable & sufficient environmental risk assessments, method statements, etc; &
- Supervision, inspection, monitoring & review.

#### 3.3.2 Legal & other Requirements

Leaves Building & Maintenance Contractors Ltd will maintain a process for identifying & assessing the environmental legal & other requirements applicable to it. This information will be kept up to date & communicated to its employees & other relevant interested parties, as appropriate.

#### 3.3.3 Objectives

Leaves Building & Maintenance Contractors Ltd will develop & maintain documented & measurable environmental objectives, as appropriate, & in agreement with the Leaves Building & Maintenance Contractors Ltd Executive Board. This shall cover areas for improvement across the Company as a whole.

Contracts in turn shall develop specific objectives, as appropriate, & in line with those agreed by the Executive Board & specific business parameters.

### 3.4 Implementation & Operation

#### 3.4.1 Training, Awareness & Competence

Leaves Building & Maintenance Contractors Ltd will adopt a risk-based approach to ensure all staff are provided with appropriate training & awareness according to their position, the work they are to undertake, & their environmental responsibilities. Personnel with key environmental roles & the appropriate competency levels shall be formally appointed at all workplaces.

Environmental training requirements will be identified for each level & function across Leaves Building & Maintenance Contractors Ltd & training provided, as necessary. Leaves Building & Maintenance Contractors Ltd will maintain systems for ensuring individuals have acquired & maintained the knowledge & competency required. Records of training will also be maintained.



### 3.4.2 Communication

Leaves Building & Maintenance Contractors Ltd systems are structured to ensure that all personnel have a clear understanding of what is expected, & what role the individual plays, in relation to environmental management.

Leaves Building & Maintenance Contractors Ltd encourages participation in good environmental practice & improvements to Company Performance Standards from all those affected by its operations. To that end, appropriate means of environmental communication shall be planned into all works at workplace, operation, contractor & individual level to ensure effective communication & consultation.

### 3.4.3 Operational Control

Leaves Building & Maintenance Contractors Ltd will maintain Performance Standards for activities associated with known environmental risks to ensure, so far as is reasonably practicable, that minimum legal requirements are met, effective control & counter measures are applied, & risk control is continually improved.

Performance Standards take the format of documented Environmental Performance Standards & Best Practice Guidance. These are subject to regular review, & amendment where necessary, to ensure their continued suitability, adequacy & effectiveness.

Due to the variance of Company activities, management may need to take account as to the application of the Performance Standards in certain situations.

Performance Standards include, but are not limited to, the identified risks involved in the following areas:

- Ecology. Performance Standards include; conducting ecological surveys, where appropriate, assuring the competency of ecological contractors; programming works to avoid sensitive ecological constraints; avoiding damage or disruption to protected flora & fauna; gaining regulatory approvals; & monitoring ecological performance.
- Nuisance. Performance Standards include; conducting baseline surveys, where necessary; gaining regulatory approvals; communicating with potentially affected parties; managing noise, odour, dust, traffic, visual vibration & light impacts; & monitoring performance.
- Water. Performance Standards include; consulting with regulatory bodies; conducting baseline water quality surveys, when appropriate; managing water abstraction, dewatering & discharge; working near watercourses & tidal waters; controlling washing operations; & monitoring water quality performance.
- Waste. Performance Standards include; reducing construction waste streams; generating waste management plans; storing & handling construction wastes; & ensuring compliant disposal of all waste streams.

### 3.4.4 Emergency Preparedness

Leaves Building & Maintenance Contractors Ltd will prepare, & periodically test, as necessary, emergency plans & procedures appropriate to the environmental risks identified in each workplace. This may include, but is not limited to, emergency plans for spill response.

Emergency preparedness & response plans will be regularly reviewed, in particular after the occurrence of an emergency incident.



Emergency plans will include for; identification of potential emergencies; nominations of personnel to take charge of emergency situations; actions to be taken in an emergency; means of raising the alarm; & identification of any emergency equipment required.

The workplace specific emergency plans should be communicated to employees at induction & environmental briefings & any changes to these plans will also be communicated to all employees.

#### 3.4.5 Discipline

Leaves Building & Maintenance Contractors Ltd takes the management of environmental issues very seriously & shall take appropriate disciplinary action against any person whose behaviour falls below that expected by the Company in terms of environment managements.

### **3.5 Checking & Corrective Action (Performance Measurement & Monitoring)**

#### 3.5.1 Monitoring of Environmental Performance

Leaves Building & Maintenance Contractors Ltd will identify & monitor environmental performance across all operations to ensure that, so far as is reasonably practicable, risk controls are implemented & effective, environmental policy requirements & objects are being met, & lessons are being learnt from any management system failures.

Leaves Building & Maintenance Contractors Ltd will ensure that there is sufficient approved supervision on a continual basis to adequately monitor environmental performance, including any contractors' environmental performance. Leaves Building & Maintenance Contractors Ltd will also maintain records, checklists, forms & registers, as appropriate, to document performance measurement.

All Leaves Building & Maintenance Contractors workplaces will be assessed by a Health, Safety & Environment Advisor on a regular & formal basis, as appropriate, in order to measure performance against Leaves Building & Maintenance Contractors Ltd Environmental Performance Standards. Reports of performance measurement will be recorded, communicated, discussed & addressed throughout Leaves Building & Maintenance Contractors Ltd, as appropriate.

#### 3.5.2 Environmental Incident Reporting & Investigation

Leaves Building & Maintenance Contractors Ltd has identified responsibilities & Performance Standards in order to ensure that environmental incidents are reported, investigated & reviewed, as appropriate.

#### 3.5.3 Environmental Incident Analysis

Information relating to environmental incidents will be formally reported within Leaves Building & Maintenance Contractors Ltd on a regular basis. This is to enable internal collation, analysis & reporting of data as an additional measurement of environmental performance. This information will be distributed throughout Leaves Building & Maintenance Contractors Ltd, as appropriate.

#### 3.5.4 Audit

Leaves Building & Maintenance Contractors Ltd will conduct audits of the environmental management system on a periodic basis to determine the level of conformity against planned arrangements for environmental management, relevant environmental legislative & other requirements as well as to ensure the management system is properly implemented & maintain.

Results of audits will be forwarded to management for review & action, as appropriate.



### 3.6 Management Review

Senior management will review the overall performance of the environmental management system on a regular basis, in order to ensure its continued suitability, adequacy & effectiveness.

Records of the management review shall be kept & distributed, as appropriate. These records will include the details, & implementation plan, of any required corrective action plan.