

Knowles Holdings Ltd

Group Environmental & Sustainability Policy



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1.0 INTRODUCTION

The Knowles Holdings Limited Board of Directors (**The Company**) has always considered environmental issues within its working practices and has implemented an Environmental Management System to meets International Standard ISO 14001 by BSI.

The overall plan for the works includes this document as the overarching Environmental Management Plan/Policy, and this document shall be supported by Environmental Aspect & Impact Assessments (Appendix 1) that covers the activities as per the programme of works.

The Environmental Aspect & Impact Assessment will be used to identify site-specific environmental impacts and their controls. An additional “Supervisor’s Checklist Sheet” will also be undertaken by the Foreman prior to commencing work.

A copy of the plan shall be presented to all management and supervisory staff who are required to implement and/or monitor the effectiveness of the plan.

1.1 Scope

This plan/policy is applicable to all employees Designers, Sub-contractors and their employees involved in the works.

1.2 Purpose of the plan

This Environmental Management Plan / Policy has been prepared as a management tool for all environmental activities within the framework of a contract.

This plan is intended to assist in the delivery of contracts /projects and to minimises their environmental impact.

The plan will be tailored to meet the requirements of each individual contract and to give clear guidance to all supporting documents, project specific supplements and procedures.

Management will monitor, periodically review and update this Plan /Policy for any changes in legislation, regulations, or working arrangements.

2.0 ENVIRONMENTAL POLICY STATEMENT TO ISO 14001

The Knowles Holdings Limited Board of Directors recognise that concern for the environment should be an integral and fundamental part of the business. We are aware of the impact of our day-to-day operations on the environment; our objective is to balance the need to achieve our business aims with an effort towards sustainable environmental improvement, which can be measured and monitored on an ongoing basis.

Company management have a specific responsibility for policy development, coordination and evaluation of performance. The environmental policy will be maintained and upheld by the designated managers to meet the commitment. Environmental aspects of our processes and activities will be effectively managed in order to protect the health & safety of our employees, customers and the public whilst contributing to the future wellbeing of the environment.

We will undertake to provide the necessary training and support to all employees to ensure that they understand and are able to fulfill the relevant aspects of the policy in their day-to day work. The policy shall be publicly available. We are committed to minimising the impact of our operations on the environment by means of a programme of continuous improvement and in particular will:

- Set clear objectives and targets with the aim of ensuring continual improvement of the company's environmental performance and management system.
- Conduct operations to ensure compliance with all relevant environmental legislation.
- Conduct operations to comply with other requirements.
- Show a continual commitment to the prevention of pollution through the use of operational controls, training and risk assessment;
- Make efficient use of resources, reuse rather than dispose where possible and promote the use of recycled materials.
- Improve waste management and reduce waste to landfill by 5% year on year with the specific aim to restrict the use of single use plastic on site.
- Continually aim to minimise energy consumption by 5% per year through effective energy management and use of modern equipment.
- Reduce wherever practicable the level of uncontrolled atmospheric emissions.
- Manage and control effluent discharges arising from our operations.

The system provides a framework for quality objectives through regular Management Review.

Appropriate resources will continually be made available to ensure that the environmental policy is implemented in full through managerial vigilance and regular audit and review.

Signed by:



Name:

Patrick Kilbane

Position:

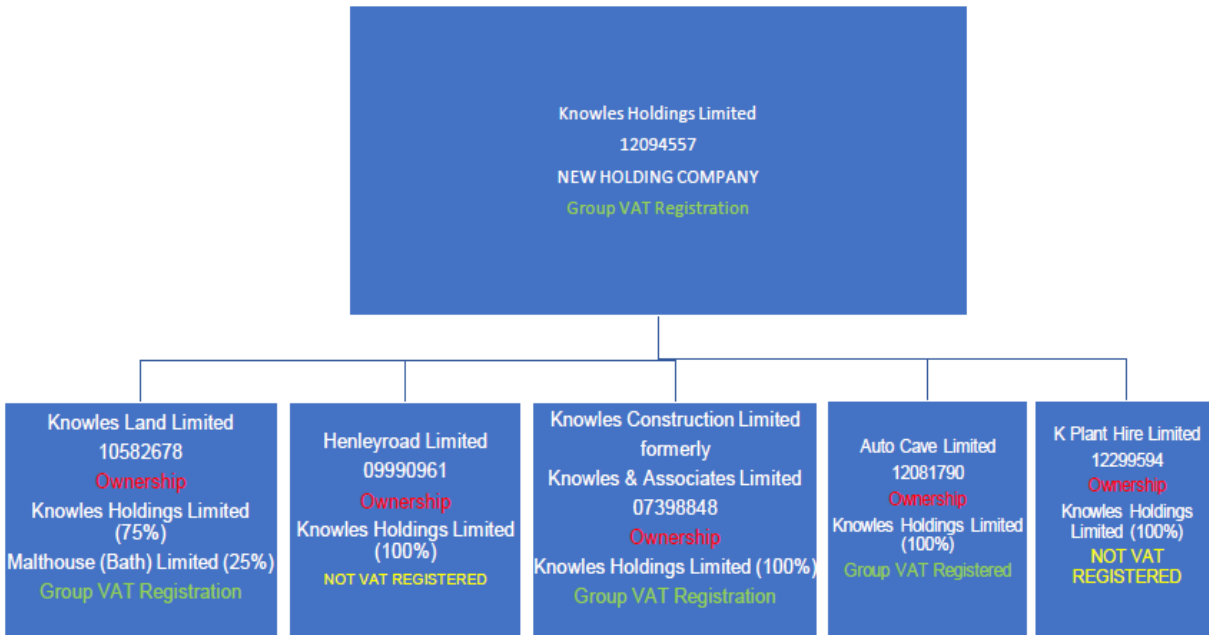
Director for Health & Safety

Date:

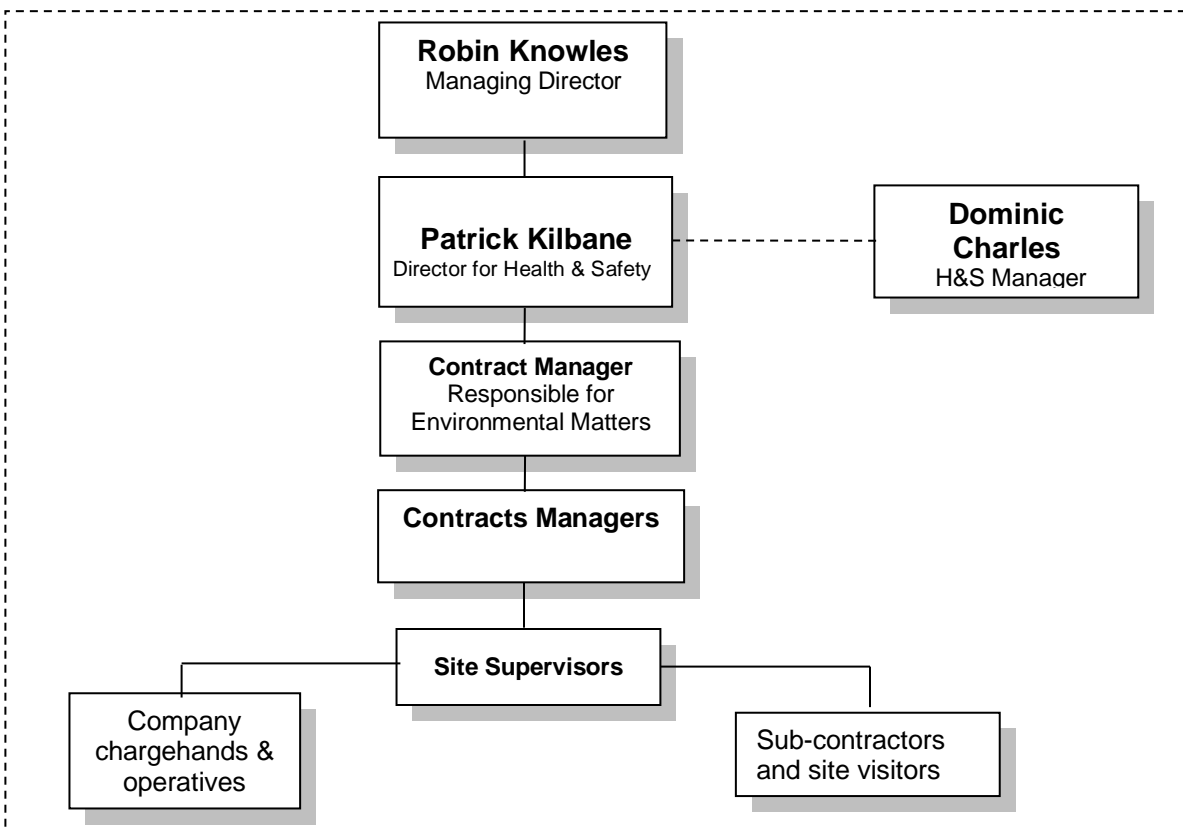
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3.0 ORGANISATION STRUCTURE

Group Structure

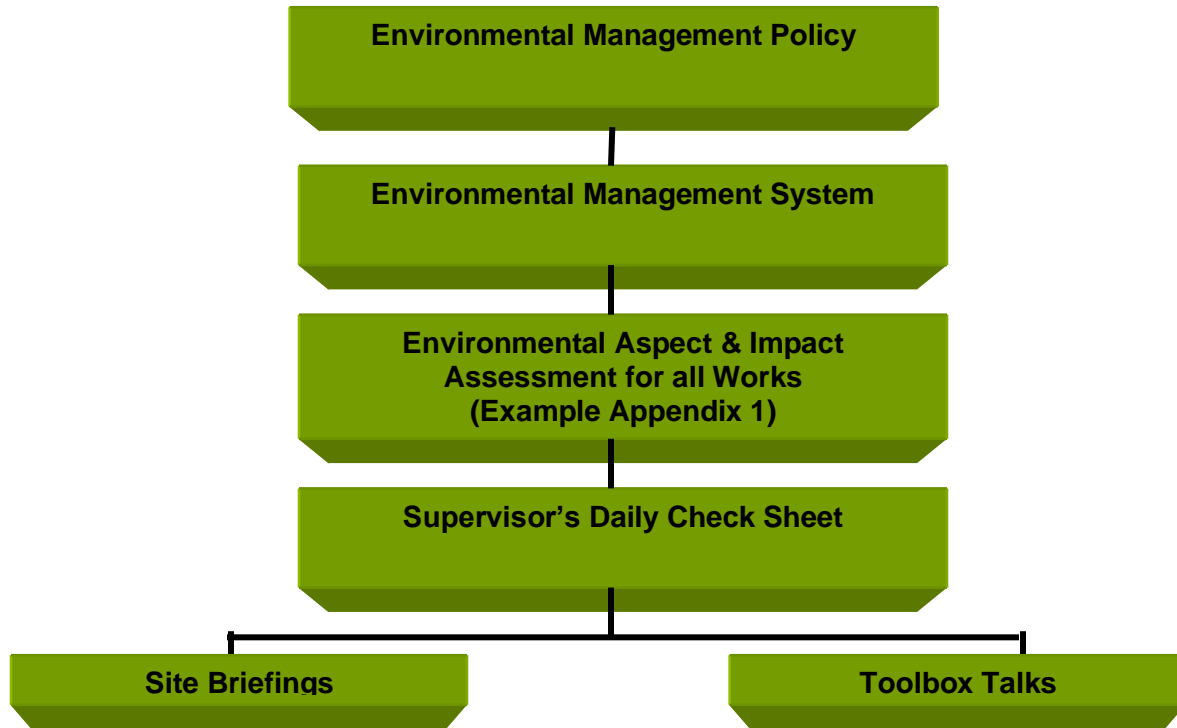


Operating Unit Structure



4.0 GROUP ENVIRONMENTAL MANAGEMENT SYSTEM

This document defines the Environmental arrangements that will be put in place by The Company whilst undertaking contracts. The plan is based upon and will be operated as part of the existing procedures and documentation used in the company Environmental Management System. The following diagram shows the relationship between the various documents used to manage the environmental aspects of the works.



5.0 TRAINING, AWARENESS AND COMPETENCE

Staff will receive training in the Environmental Management System as required with a view to promoting continual improvement. Additional training is provided where appropriate or identified in the company's training programme.

The training outlines the importance of the policy and procedures, the environmental impacts of work activities, roles and responsibilities and the consequences of departure from the procedures.

All of our Supervisors and a high percentage of our operatives are trained to NRSWA (street works training) and all operatives have been successfully registered to the CSCS Scheme, which keeps them up to date with new legislations and working practices.

Training, development and the identification of training needs are documented within the SHE Management System to which we are committed. Training records are maintained for all staff, which are audited as part of our Quality Management System and Environmental Management System.

Site Briefs

Site briefs are carried out by the Site Foremen (first day of each project and at regular refreshers for the duration of the contract) and briefed down to all members of his team.

Typical site briefings include:

- Induction
- Method Statement Reviews / Task Briefings
- Environmental Aspect & Impact Assessments (Appendix 1)
- Foreman's Daily Check Sheet (Appendix 2)
- Toolbox Talks
- Emergency Response
- Waste Management Training
- Plant Operation

The Contract Manager will be responsible for maintained a record of Site Briefings, which will be filed at the head office.

Staff competencies are reviewed regularly at management meetings. Certification renewals, updates and new training requirements are identified and passed to the Training Manager for implementation.

Additional Training

Toolbox talks are also given on regular and recorded basis by qualified personnel, on existing and new working practices to inform or refresh staff of the relevant safety and environmental issues of their work.

6.0 ENVIRONMENTAL ASPECTS & IMPACTS

Operational site impacts are reviewed and a generic set of potential impacts have been developed. This acts as a checklist and forms part of the Environmental Aspects and Impact assessment.

For all working sites a" Supervisor's Daily Check Sheet" including Environmental Issues (see Appendix 2) is completed by the Site Supervisor or Contract Manager, which will typically address items such as:

- Site layout and general requirements
- Contamination of Highways
- Grassed areas
- Traffic (Pedestrian and Vehicular)
- Noise & vibration
- Air quality
- Waste management

Environmental aspects will be controlled by use of site environmental risk assessments, which will be carried out regularly by the site supervisor or other suitably qualified persons.

All crews have received training on environmental management and carry an “Environmental Site Handbook” which provides advice on methods of eliminating or reducing the most common adverse effects.

6.1 General site issues

- All sites will be kept clean and tidy and good housekeeping will be enforced.
- There will be no jet washing on site.

6.2 Traffic & Transport

The Company recognise that good quality, modern plant, equipment and small tools, maintained to a very high standard, are necessary to the effective and efficient running of all jobs.

Company policy for fleet and plant replacement is to buy equipment that meets the latest Euro environmental efficiency standards for emissions, noise and vibration.

All of our plant and equipment is serviced in accordance with the manufacturer’s instructions and to comply with all statutory obligations. Vehicle service records are held by our transport manager, who is responsible, along with the plant manager for ensuring that the maintenance programme is adhered to. Auditing of the service and maintenance records takes place as part of our quality management process.

Operating times for all plant and equipment will be kept to a minimum, and when idle, plant and equipment will be turned off.

As far as is reasonably possible all existing public access routes will be maintained or alternative signposted routes will be provided where required by the client

The Company will in agreement with the client (and emergency services as appropriate) implement appropriate mitigation / control measures in areas identified as having potential for causing traffic or access difficulties to individual properties. Disabled access will be maintained.

Surplus materials will be cleared from the site, leaving it in a clean and tidy condition in accordance with the requirements of this policy.

6.3 Noise and Vibration

The Company will ensure that the ambient noise level, from all sources when measured 2.0m above the ground at a noise control station shall not exceed by more than 3dB(A) the existing ambient noise level at the control station measured over the same period, whichever is greater.

All measurements will be taken on either a sound meter to the latest BS Standard (type 1 or an equivalent noise meter)

The Company will comply with the following requirements:

- All vehicles, plant and machinery used for the works will be fitted with effective exhaust silencers and shall be kept in efficient order.
- All diesel engine powered plant will be fitted with an effective air intake silencer.
- All compressors will be 'sound reduced' models fitted with properly lined and sealed acoustic covers, which will be kept closed whenever the machines are in use.
- Machines in intermittent use will be shut down or throttled down.
- All ancillary plant such as generators and pumps will be positioned so as to cause minimum noise disturbance. If necessary, acoustic enclosures will be used

Best Practicable Means (BPM) as recommended and set in out in BS 5228, Part 1 to 4, will be applied to all works with regard to noise. In summary, this means that local conditions and circumstances shall be taken into account (such as background noise levels, locations of sensitive buildings and sensitive time periods), current technical knowledge shall be applied with regard to the type of plant and equipment used to ensure no excessive noise is generated and the financial implications of additional equipment to beneficially reduce noise shall be assessed if necessary.

Core Working Hours will be from 0800 to 1800 on weekdays and 0800 to 1300 on Saturdays. Works will adhere to these core working hours as far as reasonably practicable, and will only deviate where other restrictions apply.

All plant or equipment used will comply with the noise limits contained in European Commission Directive 2000/14/EC/United Kingdom Statutory Instrument (SI) 2001/1701.

Any plant and equipment with the potential to create noise will as far as is reasonably practicable be located away from sensitive buildings. Plant and equipment will be maintained in good and efficient working order to minimise noise as is reasonably practicable.

Any machinery used intermittently will be shut down or throttled down to a minimum between work periods to avoid unnecessary noise.

6.4 Air Pollution and Dust

The Company will take all reasonably practicable measures to avoid nuisance dust arising from dust or fumes or any other air-borne pollutants. Where possible, local exhaust ventilation shall be utilised to restrict the levels of dust entering the atmosphere and ensure that:

- All vehicles used in the provision of the Service will comply with the Low Emission Zone emission standards for London.
- All construction plant will be maintained in accordance with a strict maintenance policy to ensure that all plant operates as efficiently as possible. All plant will be turned off during break times and at the end of each shift as well as any other time when not in use.
- Dust suppression using water if required, sheeting of vehicles and stockpiles, local exhaust ventilation system.
- Storage and use of hazardous substances will be controlled by adherence to COSHH data and method statements

The Company will at all times comply with all relevant current English Environmental regulations and legislation including:

- Health & Safety at Work Act 1974
- Environmental Protection Act 1990
- Pollution Prevention and Control Act 1999
- Waste (England and Wales) Regulations 2011
- The Environment Act 1995
- The Clean Air Act 1993

6.5 Water Resources

The positions of underground services will be clearly marked where service plans are available to avoid damage to water pipes / services.

All hazardous substances including oil drums or containers on the site shall be placed in bunds so that in the event of spillage or leakage no oil or other contaminants are allowed to reach watercourses or groundwater, including aquifers.

Construction equipment and vehicles will be free of all oil leaks and will be refuelled on a daily basis off site.

All crew vehicles will carry spill kits and crews trained in their use

Should dewatering of excavations be required in the unlikely event of a flash flood for example in a trench, the excess water would be tankered away and disposed of in accordance with relevant waste legislation.

There will be no discharges to surface water or foul sewer systems without consent from the relevant body (Environment Agency or local water undertaker respectively).

6.6 Waste Management

The Company is a registered waste carrier.

Any excavated, waste or surplus material removed off site will be transported and disposed of in a manner which complies with the Environmental Protection Act 1990, together with The Duty of Care Waste Management Code of Practice and the Waste (England & Wales) Regulations 2011. All waste will be transported to our transfer station at 455 Wick Lane, London E3 2TB, Waste Management Licence Number 80137. At the transfer station, the waste will be segregated and transferred in accordance with the conditions of our Waste Transfer Licence.

Wherever possible The Company will identify the waste streams and their approximate volumes, and will record this information. All activities will be reviewed against 'reduce, re-use, recycle' criteria to minimise waste and maximise the re-use of existing materials. With the exception of "Hazardous Waste" all excavated materials arising from the works will be taken to a reprocessing for recycling into materials acceptable for re-use in construction.

6.7 Contaminated land

In the event that suspected contaminated soil (i.e. olfactory evidence, oil) is discovered The Company shall use the reporting lines shown in Section 8 and cease all activity until agreements are in place to proceed.

Any contaminated soil will be disposed of under the Duty of Care regulations and appropriate waste regulations (hazardous or non-hazardous and waste acceptance criteria [WAC] testing).

6.8 Archaeology

In the event that potential archaeological remains are discovered the reporting lines in Section 8 and protect the area until such a time that an agreement can be made with the Client and any appointed archaeologist on methods of continuing with the works.

6.09 Ecology

The Company comply with the relevant statutory provisions in respect of the protection of areas of nature conservation interest and of protected species and will control and limit, as far as practicable, any disturbance to such areas and such species.

Where any species encountered are protected by specific legislation, The Company will follow approved guidance to comply with those requirements and allow sufficient time for any licences or consents to be obtained.

Where possible, work will be conducted so as not to interfere with any tree root systems. However, should works have to be located in the vicinity of trees (i.e. beneath the tree canopy, which is deemed to be roughly equivalent to the area of the tree root system) The Company will afford appropriate protection to any trees (As specified in BS 5873:2005), particularly those subject to Tree Preservation Orders (TPOs) or located in Conservation Areas as required by the Client. Where consent is required for tree works, this will be sought and obtained.

The following actions will be taken should works be required in the vicinity of trees:

- No signage or fencing will be attached to any tree
- No vehicles will be parked on the ground without hard cover beneath tree canopies
- No materials will be stored on the ground without hard cover beneath tree canopies
- No chemical storage will be allowed within the vicinity of the tree root system
- No spoils will be deposited on ground without hard cover beneath the tree canopies
- Excavations will be hand-dug below bellow the tree canopy to prevent damage to tree roots

6.10 Boundaries

Where existing retaining walls, parapets or other barriers do not naturally protect the site the provision of temporary hoardings or 2m Heras fencing may be used to segregate the works from pedestrians / roads.

6.11 Lighting

Any temporary lighting will be designed, positioned and directed so as not to unnecessarily intrude on adjacent buildings and land uses. Lighting of the site for security and safety shall be of a standard and arrangement acceptable to the Client so as to prevent interference with local residents or the navigation lights for air or water traffic.

7.0 MONITORING & INSPECTIONS

Environmental site audits and inspections will be conducted by the Safety Manager as part of the safety inspection regime. The records of all site audits and inspections will be retained by the Contract Manager and at head office by the Safety Manager.

8.0 EMERGENCY PREPAREDNESS AND RESPONSE

All operatives have received training in basic emergency response procedures including the use of fire extinguishers, spill kits and correct storage and disposal of hazardous waste via site inductions and toolbox talks.

Sites will maintain a pack containing the relevant documents to enable safe working practices to be observed at all times. These include method statements, risk assessments, COSHH assessments, "Environmental Site Handbook" and "Emergency Services" contact sheets.

All sites are to maintain suitable fire extinguishers and a suitably stocked first aid kit plus dust suppression systems, location detectors (CAT), spill kit and an appropriate range of personal protective equipment as required.

Company operatives will ensure that there is:

- Notification to Site Manager that an incident has occurred.
- Contact Emergency Services if required.
- Containment of Spillage of oil / fuel spillage within capabilities (limited to the use of spill kits earth bunds).
- Deployment of standard equipment to clear up non or low hazardous material containments.
- Protection of the drainage pathways to prevent pollution of drainage systems and ground or surface water.
- Provision of information about materials stored on site (all COSHH items either Hazardous or non-hazardous).
- Provision of information in relation to existing surface water drainage arrangements (i.e. pathways and gully locations, manhole locations – where known).
- Provision of COSHH data sheets and information for products and / or materials stored and / or use on site.
- Provision of Data sheets for spill kits and disposal of kit materials once used.
- Provision of Waste Transfer note requirements for all waste materials.

8.1 Site Manager reporting responsibilities:

Notify The Company that an incident has occurred and is being responded to. Confirm alert level as being:

Level 1 Incidents

Major environmental incidents such as major leaks, spills or releases of chemicals, dust or oils to the environment (air, water or ground); release of any substance which may cause illness or disease; unexpected major archaeological finds (e.g. burials); unexpected major damage to a listed building; incidents leading to a blocked watercourse; or harm or damage to protected species (e.g. badgers, reptiles); and suspected unexploded ordnance (UXO).

Level 2 Incidents

Environmental incidents that do not comprise a level 1 alert such as unexpected attendance at the site by an environmental officer from a local authority or statutory agency; breach in environmental compliance which does not comprise a level 1 alert; unexpected damage to trees, vegetation, watercourses or other environmental features; leaks, spills or releases of chemicals, dust or oils which are managed within the site boundaries; suspected archaeological remains or unexpected identification of contaminated land (or suspected contaminated land).

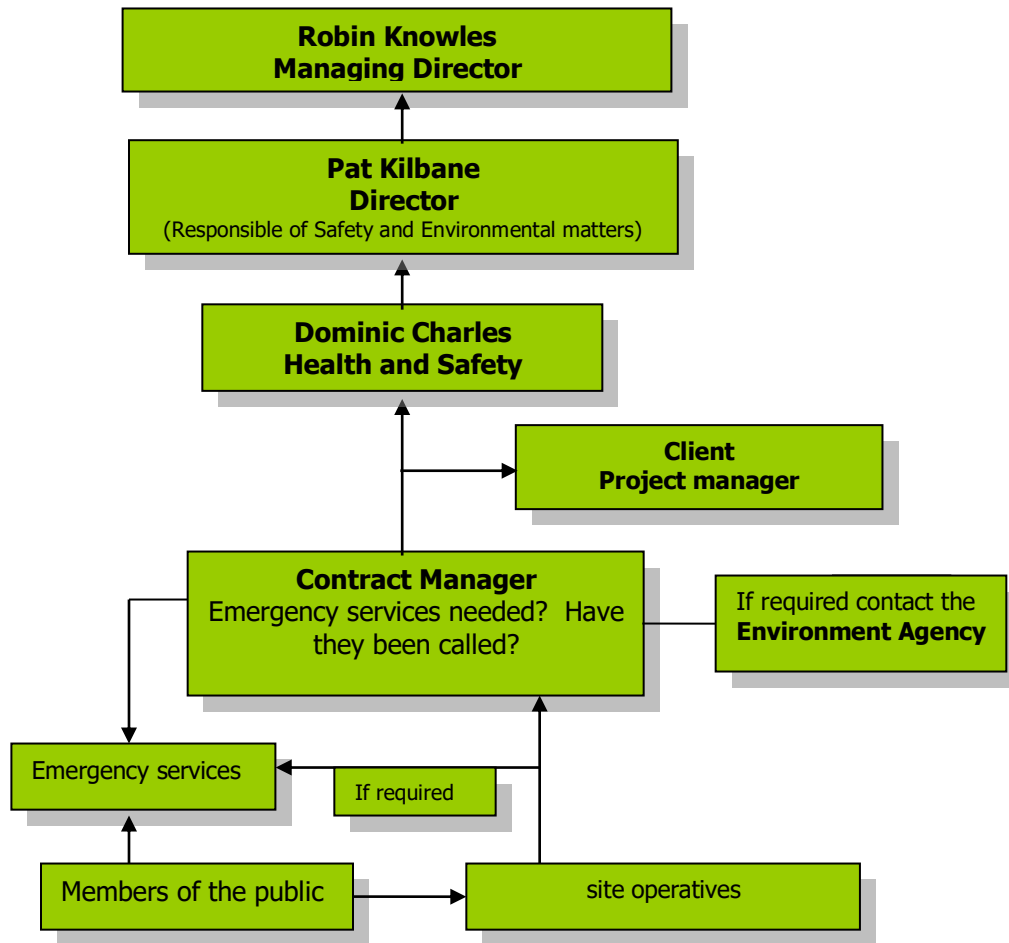
Level 3 Incidents

Complaints concerning any Health, Safety or Environmental aspect of the works. This could be specific to physical activities being carried out by the project team or their representatives (e.g. disruption to traffic caused by hoarding around a working site or complaints about noise, dust or lighting), or more general concerns regarding the scheme.

- Contact Client Project Manager. Identify the extent of any damage or pollution.
- Liaise and co-ordinate with Client (and other organisations) in response to the incident as applicable.

Reporting of incidents will be undertaken in accordance with the “*Incident Response Arrangements Procedure*” as shown in the diagram below).

8.2 Incident Response Arrangements and reporting lines



Emergency Service Telephone Numbers:

Service	Telephone
Fire / Ambulance / Police	999
Main Police Station	TBA
Nearest A & E Hospital	TBA
Client	TBA
The Health and Safety Executive	0845 300 9923
Environment Agency	0800 80 70 60
Thames Water Customer Centre (24hr)	0845 9200 800

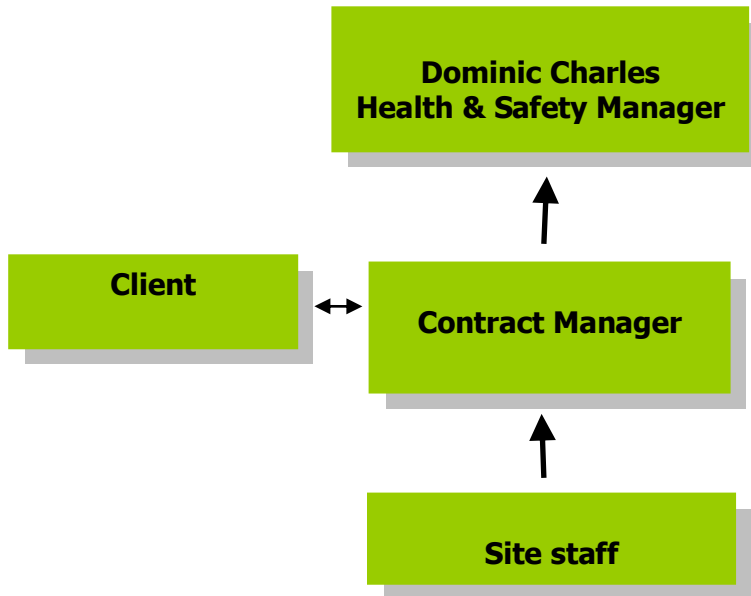
The following personnel can be contacted in the case of an accident/emergency:

Role:	Contact Name:	Mobile No.	Office No.
Managing Director	Robin Knowles		0207 313 4169
Director for Health Safety & Environment	Pat Kilbane	07540 495310	0207 313 4169
H&S Manager	Dominic Charles	07535 350179	0207 313 4169

9.0 NON-EMERGENCY REPORTING LINES

This H & S document is controlled electronically; any hard copies are un-controlled and due care should therefore be exercised to ensure that you are using the latest revision of the documents contained herein.

Minor Environmental Incidents and general reporting lines



10.0 LEGISLATION, REGULATION & OTHER REQUIREMENTS

Company and legislative requirements cover the following areas:

- (i) Statutory Obligations
- (ii) Industry Codes of Practice
- (iii) Clients requirements
- (iv) Non-regulatory guidelines

In order to determine the full extent and applicability of legislation, The Company has sought external communication with regulatory bodies such as the H.S.E., Council and Environment Agency.

The company Health and Safety Manager monitors changing Environmental legislation, by attending local forums, liaising with regulatory bodies, and utilising environmental websites on the Internet.

The Company accept that we are responsible for monitoring and ensuring compliance with statutory and contractual requirements and this is effected by carrying out scheduled audits and site inspections.

11.0 CONTRACT AND LEGISLATIVE REQUIREMENTS

The Company will ensure that all necessary resources, equipment and training are put in place to manage all contracts in accordance with all Statutory Acts, Regulations and Standards without compromise for the duration of the contract.

The following principal legislation is applicable to the work scope:

Environmental Protection Act (1990)	<p>Relevant to projects which produce waste and dispose of waste off-site.</p> <p><i>Controlled waste will be produced on site.</i></p>
The Environmental Protection (Duty of Care) Regulations (1991)	<p>Relevant to projects which import, produce, carry, treat or dispose controlled waste.</p> <p><i>The Company will be considered the producer of waste on site therefore has a Duty of Care to ensure that waste does cause any environmental risk during its production, transport, or disposal.</i></p>
New Roads and Street Works act 1991 Highways act 1980	<p>Relevant to jobs that entail road closures/parking suspensions,</p> <p><i>The Company will ensure that relevant paperwork is in place with construction drawings before job started and that that jobs have correct opening and closing notices and noticing periods for road closures/parking suspensions</i></p>
Control of pollution act 1974 Noise and statutory nuisance act 1993 Clean air act 1993	<p>Applicable to site operations for this contract with regards to noise, vibration and emissions to air</p> <p><i>All vehicles used in the provision of the Service will comply with the Low Emission Zone emission standards for London.</i></p> <p><i>Site environmental risk assessments at each new site. Guidelines provided to minimise negative aspects.</i></p> <p><i>Full training provided in the methods of control.</i></p>
COSHH regulations 1988 Health & safety at work act 1974	<p>Control and assessment of exposure of people and the environment to chemicals.</p> <p><i>All hazardous substances have been subject to Risk Assessments.</i></p> <p><i>COSHH sheets & RA's are carried in all operational vehicles</i></p>
Water Act 2003	<p>This aspect of the act is concerned with the <u>removal (abstraction) of water</u> from sources of water other than sewers, for instance rivers, water tables, lakes etc.</p> <p><i>In the unlikely event that this becomes a requirement The Company will obtain the necessary Abstraction licence from the EA</i></p>
Water Resources Act 1991	<p>This aspect of the act is concerned with the <u>discharge of water</u> to controlled water sources other than foul sewers</p> <p><i>In the unlikely event that this becomes a requirement The Company will obtain the necessary Discharge consent from the EA</i></p>

12.0 THE SITE WASTE MANAGEMENT PLANS REGULATIONS 2008 (Revoked)

Should the client requests it The Company uses “Site Waste Management Plans” to monitor and measuring the quantities of waste generated, the means of the disposal and quantities of the various waste streams (e.g. for BREEM) the clients preferred system will be adopted.

13.0 DOCUMENT AND DATA CONTROL

All documents, as required, will be stored within our Environmental Management System.

The policy, objectives, plans; procedures and method statements for Environmental concerns are issued and communicated by controlled distribution of the system documentation.

All environmental documentation will be reviewed at the outset of each contract and reviewed if any significant changes occur throughout the duration of the works.

Records are held for the retention periods shown in the table below.

Documents	Retention Period
COSHH Records	5 Years
Site Induction Records	3 Years
Meeting Minutes	3 Years
Internal Audits	3 Years
External Agency (BSI) Audits	3 Years
Calibration Records	3 Years
Staff & Training Records	1 Year (after employment ends)
Site-Specific Environmental Checklists	3 Years
Environmental Aspects & Impacts Assessments	3 Years
Site Briefing Records	3 Years
Toolbox Talk Records	3 Years
Environmental Incident / Non-Conformance Records	3 Years
Site Inspection & Audit Records	3 Years
Accident records	10 Years
Asbestos Exposure records	40 years
Occupational Health Records	40 years

14.0 COMMUNICATION

(a) Means of Communication / Co-operation

The policy, objectives, rules and guidelines for environmental issues are communicated by distribution of the Environmental Management Policy/Plan, method statements, risk assessments and other relevant system documentation.

The Contracts Manager will liaise with the SHEQ Manager and Site Foreman in relation to Method Statements and programme

The Site Foreman will deal with site issues wherever possible. This is covered in more detail under Consultation with people on site. During the course of the work the Site Foreman will communicate with the Contracts Manager on progress and completion and may at anytime request further guidance and help.

Site Supervisor are encouraged to collate and give the Contracts Manager any feedback resultant from the works. The Contracts Manager will discuss feedback with all other key personnel at management meetings.

Tool-Box-Talks are held by the Supervisor or by the Contracts Manager and attended by all employees. The meetings are held in accordance with pre-determined agenda's which, may take the form of generic CITB topics, company tool box sheets, risk assessments and any other literature considered relevant i.e. results of audits, inspections and accident/incident findings.

(b) Meetings

The Company will attend all progress and other meetings requested by the Client. In addition The Company will hold monthly management meetings.

The agenda for such meetings includes as a minimum Safety, Environment and Quality management systems and policies. These meetings will be conducted between senior management staff.

(c) Control / Arrangements for Service Supply Partners

Service Supply Partners will attend a pre-start meeting with the contract team, where specific environmental arrangements for their work, site rules and information required from the Service Supply Partners will be discussed and confirmed. Service Supply Partners will be required to implement procedures, which enable environmental information to be communicated to relevant employees.

When on site, Service Supply Partners will be required to provide evidence that environmental information contained in risk assessments and method statements has been communicated to relevant employees and any other people that may be affected by the works, prior to commencement of the particular operation. Service Supply Partners must also advise The Company of works they intend to sub-let.

The Company will ensure that all staff and Service Supply Partners are advised of any changes in Regulations and Standards that may affect their work.

All Service Supply Partners will be advised of their duty to assist The Company as the Principal Contractor in the preparation of Method Statements, Risk and COSHH Assessments requisite of the Construction Design and Management Regulations 2015.

(d) Information for Contractors and Visitors

All sites will have a site safety board that will display the salient safety and environment policy and notification of hazards for that site. It will be the responsibility of the Foreman to ensure that the relevant site-specific hazards are shown on the site safety notification board. These notices and policies will be brought to the attention of all staff, Service Supply Partners, and visitors to site by the Foreman.

Service Supply Partners and visitors will be further briefed by the Foreman to ensure that everyone is aware of the hazards on site and those associated with the methods of working. The Foreman will also check certification, equipment and PPE for suitability before allowing anyone on site. The Foreman will then ensure that the “Foreman briefing book” and the “Site visitor’s book” is completed and signed. The Foreman will be responsible for ensuring that persons failing to conform to the above requirements are prohibited from entering site.

15.0 GUIDE TO GREEN PURCHASING**Purpose**

The purpose of this Guide is to provide information and support within the framework of our Environmental Management System (EMS) that will improve the sustainable use of resources.

By following this guidance we will demonstrate that our purchasing decisions will be environmentally friendly.

Where possible we will endeavour to purchase locally recyclable and environmentally preferable products as long as they perform satisfactorily and are available at a reasonable cost.

What Are Our Goals?

To reduce our environmental impact thee following the best practice guidelines below.

Waste

Purchasing decisions where practical shall be made in the context of the waste hierarchy;

REDUCE – Less in the first place and avoid waste.

i.e. purchasing in bulk to reduce packaging and printing prints double sided where possible.

REUSE - Using the same item more than once, and extending the useful life of products and equipment before replacing an item

RECYCLE - Purchase products that contain recycled materials or those that have or can be re-manufactured.

Climate Damage

- Purchase energy
- efficient products – check that energy rating/efficiency is the best available for the cost
- Purchase materials and products that are free of toxic or polluting materials.
- Purchase goods that have not been transported long distances.

Habitat Destruction

Purchase paper/wood obtained from certified recycled, salvaged or renewable sources.

Pollution

Purchase products and materials that will not release toxic substances that can pollute water, land or air at any stage of their life cycle

What Are Our Objectives?

- To review quality, environment and purchasing criteria and develop processes to support the application of this policy
- To review purchasing specifications, tender documentation and contracts for compliance with this policy and with suppliers.
- Seek to influence manufacturers to comply with this policy
- Establish a staff education programme for the implementation of this policy
- Ensure that staff have access to recycled product information
- Establish a system to monitor and report on the outcomes of this policy

When Choosing a Supplier

Preference will be given to suppliers who:

- Can demonstrate their commitment to the environment;
- Have a good track record for quality and environmental performance;
- Meets the relevant quality and environmental standards for a particular product or service;
- Have a waste reduction strategy; and/or
- Have an environment management system.

16.0 OPERATIONAL CONTROL

The Company have established arrangements to ensure the effective application of control measures, wherever they are required to manage operational risks, fulfil the environmental policy and comply with legal and other requirements.

Documents utilised to manage aspects of Environmental operations include:

- Environmental Policy Statement
- Environmental Management Plan /Policy
- Task Specific Method Statements and Risk Assessments
- Contract Specific Documents
- Management of Waste Streams/Waste Transfer Notes
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INTRODUCTION

Knowles Holdings Limited has always tried to ensure that we take into account the impacts that our operations may have on the environment and try to work in an environmentally friendly manner that satisfies our clients, our neighbours and our own people.

Although not yet accredited we look to maintain an auditable Environmental management System to a standard of ISO 14001 which is recognised and respected throughout the world and we intend to continue to improve our environmentally friendly approach in everything that we do.

To help with this we have produced this booklet, which contains a full copy of our published “Environmental Policy”, as well as a number of useful “Toolbox Talk” training leaflets to support our employees working on sites.

We welcome any ideas for further improvement from all members of staff.

Please take the time to read this booklet as it is important that you are aware of its content.

ENVIRONMENTAL POLICY STATEMENT TO ISO 14001

The Knowles Holdings Limited Board of Directors recognise that concern for the environment should be an integral and fundamental part of the business. We are aware of the impact of our day-to-day operations on the environment; our objective is to balance the need to achieve our business aims with an effort towards sustainable environmental improvement, which can be measured and monitored on an ongoing basis.

Company management have a specific responsibility for policy development, coordination and evaluation of performance. The environmental policy will be maintained and upheld by the designated managers to meet the commitment. Environmental aspects of our processes and activities will be effectively managed in order to protect the health & safety of our employees, customers and the public whilst contributing to the future wellbeing of the environment.

We will undertake to provide the necessary training and support to all employees to ensure that they understand and are able to fulfill the relevant aspects of the policy in their day-to day work. The policy shall be publicly available. We are committed to minimising the impact of our operations on the environment by means of a programme of continuous improvement and in particular will:

- Set clear objectives and targets with the aim of ensuring continual improvement of the company's environmental performance and management system.
- Conduct operations to ensure compliance with all relevant environmental legislation.
- Conduct operations to comply with other requirements.
- Show a continual commitment to the prevention of pollution through the use of operational controls, training and risk assessment;
- Make efficient use of resources, reuse rather than dispose where possible and promote the use of recycled materials.
- Improve waste management and reduce waste to landfill by 5% year on year with the specific aim to restrict the use of single use plastic on site.
- Continually aim to minimise energy consumption by 5% per year through effective energy management and use of modern equipment.
- Reduce wherever practicable the level of uncontrolled atmospheric emissions.
- Manage and control effluent discharges arising from our operations.

The system provides a framework for quality objectives through regular Management Review.

Appropriate resources will continually be made available to ensure that the environmental policy is implemented in full through managerial vigilance and regular audit and review.

Signed by:



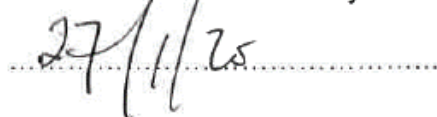
Name:

Patrick Kilbane

Position:

Director for Health & Safety

Date:



Environmental TBT1 - SPILL CONTROL

WHAT?

Accidental releases of oils and chemicals from construction sites make up a large number of pollution incidents that occur each year.

Many spillages can be prevented. It is important that everyone on site knows how to control a spill to minimise its impact. Would you know what to do?

WHY?

- **Minimise potential harm:** Spills spread very quickly and lead to environmental harm.
- **Avoid Prosecution:** Fines and clean-up costs can be expensive
- **Public Relations:** Avoid negative publicity for the company and our clients and maintain our workload.

DO

- STOP WORK immediately
- If spillage is flammable, extinguish all possible ignitions sources.
- IDENTIFY the source of pollution and stop further spillage.
- CONTAIN the existing spillage – on land use earth/sand to construct a bund around the spill to stop it spreading.
- Use booms to contain oil spills that have already entered a watercourse.
- CONTACT your Line Manager.
- Put on appropriate PPE – typically rubber gloves & boots.
- PROTECT sensitive areas (e.g. watercourses or surface water drains – use drain covers or use earth/sand to construct a bund).
- CLEAN UP the spill. Use absorbent granules/pads to mop up spills. Large pools of oil or spills which cannot be absorbed should be removed by gulper.
- DISPOSE of all contaminated materials (soil/absorbent materials) correctly – those containing substances such as oil, diesel or paint will be hazardous waste. Ensure any contaminated water is taken to an appropriately licensed disposal site.
- DO NOTIFY your line manager of actions taken.

DON'T

- DON'T ignore it! STOP WORK and ACT immediately.
- DON'T hide the incident - ensure you report it and implement controls.
- DON'T ever hose a spill into the drainage system. Always use absorbent materials.
- DON'T allow people or machines to travel through and further spread the spill



Environmental TBT2 – DUST CONTROL

WHAT?

Dust, emissions and odours can annoy neighbours and may cause health risks at high concentrations.

WHY?

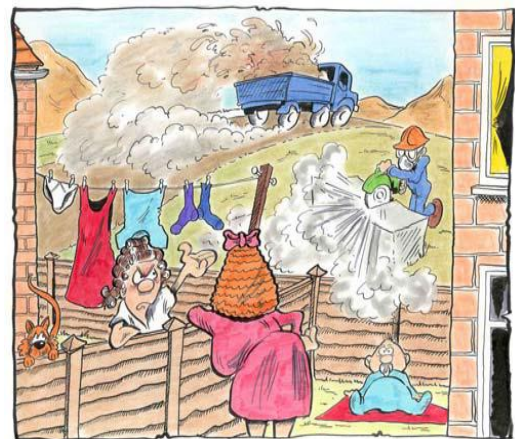
- **Avoid nuisance to neighbours:** Dust can settle on neighbours' properties and give rise to local dispute. Poorly controlled emissions and odours from plant or works may give rise to valid complaints.
- **Avoid programme delays:** The Local Authority has the power to stop works if dust is causing a nuisance. Dark smoke from plant and fires are illegal.
- **Avoid health problems:** Dust may cause eye irritation or make asthma worse.
- **Avoid impact on ecology:** Dust can damage the ecology of a watercourse and affect plant growth, including crops.

DO

- Keep surfaces swept and damp down with water at regular intervals.
- Minimise drop heights into muck-away vehicles and onto conveyors.
- Ensure cutting and grinding operations are adequately shielded or wetted.
- Use local dust capture with drilling and breaking machines.
- Sheet over the backs of lorries carrying dry materials off site.
- Use the wheel wash, for appropriate vehicles, if one is provided on site.
- DO store fine, dry materials within buildings or provide adequate protection from the wind.
- Store bulk cement and bentonite in silos.
- Position silos and stockpiles away from residential areas or watercourses.
- Clean up or damp down any spillage of dry, dusty materials.
- Notify your Line Manager if work activities are causing poor air quality.
- Remember that mud dries out to become dust so also control mud.

DON'T

- DON'T burn materials on site without approval from your Project Manager. Permission is required first from the Environment Agency.
- DON'T use poorly maintained plant. Black smoke may give rise to poor health and can cause a nuisance.
- DON'T leave plant running if not in use.
- DON'T ignore sources of poor air quality, notify your line manager.
- DON'T ignore complaints.



Environmental TBT3 - NOISE AND VIBRATION

WHAT?

Construction one of the leading sources of noise complaints made to Local Authorities. Something is considered 'noisy' when the sound is unwanted by the listener. Noise and vibration emissions can disturb local residents and give rise to complaints and delays. Noisy activities include: excavation, tunnelling, concrete cutting, piling, using un-silenced generators and concrete pours.

WHY?

- **To act as a good neighbour:** avoid complaints and maintain good relations with the local community.
- **To avoid programme delay:** The Local Authority have the power to stop works if noise from the site is causing a nuisance.
- **To avoid fines:** Failing to meet noise constraints can result in fines.
- **To avoid structural damage:** vibration may cause structural damage.
- **To comply with contractual requirements.**
- **To prevent harm to wildlife:** Noise can disturb wildlife as well as humans.

DO

- If possible, restrict noisy activities to certain times of the day.
- Adhere to working hours. Some sites are only consented to work at certain times.
- Plan deliveries. Arrange routes and times to minimise nuisance to the local community.
- If possible, keep noisy plant away from public areas.
- Minimise drop heights into hoppers, Lorries and other plant.
- Use local screening where necessary. Noise can be reduced if a screen is placed between plant and a nearby sensitive location i.e. house. Screens can be straw bales or ply board.
- DO use silenced generators and tower lights where necessary.
- DO keep acoustic doors and hoods on plant closed – it does make a difference!
- DO contact your Line Manager if you are in doubt.

DON'T

- DON'T undertake noisy works during the evening, at night time or very early in the morning if it can be avoided!
- DON'T leave doors and hoods open on plant.
- DON'T leave plant running unnecessarily.
- DON'T use poorly maintained plant.
- DON'T ignore complaints from the Local Community.
- DON'T undertake activities that could cause damage to nearby structures through vibration unless approved by your line manager.

Environmental TBT4 - WATER POLLUTION via SILT

WHAT?

Silt is the term used for very fine particles of soil.

Silt mixed with water in the form of mud, can be washed off construction sites into nearby watercourses and drains.

Pollution by silt can be caused by: rainwater runoff from uncovered areas of the site, pumping out and dewatering of excavations, tunnelling operations and cleaning of ditches and drains. Proper planning will prevent these pollution incidents.



WHY?

- **Avoid environmental harm:** High levels of silt suspended in water can suffocate fish by blocking their gills, can remove essential oxygen from the water and can kill plants, animals and insects living in the water by stopping sunlight reaching them.
- **Avoid environmental harm:** Silt often combines with other contaminants such as oils and chemicals potentially causing greater pollution than silt alone.
- **Avoid prosecution:** Because of the potential for harm, it is illegal to allow silt to enter a watercourse or drain. Silt pollution spoils the appearance of watercourses, is easily traceable to the site from where it originated and, in the past, and has been a major cause of prosecution.

DO

- Only discharge silty water into designated settlement systems.
- Check that site drainage and settlement systems are working - discolouration may indicate high pollutant loading.
- Stop pumping and contact your manager if you think a problem is arising.
- Ensure that all hard standings are kept clean – notify your manager if an area is silty or is covered in mud.
- Notify your manager immediately if you see silty water entering a watercourse or drain and do try to stop it or divert it away by, for example, using sand bags.

DON'T

- DON'T dewater any excavation without getting permission from your manager.
- DON'T pump silty water directly into rivers, ditches or surface water drains.
- DON'T strip land of vegetation unless it is absolutely necessary – vegetation reduces silt run-off.
- DON'T store soil, stone or similar materials within 10 metres of watercourses or drains.
- DON'T dig a grip to release ponded water to a watercourse or drain.

Environmental TBT5 - STORAGE OF WASTE

WHAT?

Allowing waste to escape into the environment not only causes nuisance to neighbours and generates a poor public image it is illegal.

WHY?

- **Avoid prosecution:** It is the duty of all waste producers to prevent their waste escaping into the environment.
- **Reduce costs:** Segregation of waste into separate containers leads to lower costs by;
 - reducing landfill tax costs by preventing the cross contamination of wastes;
 - maximising the potential for reusing and recycling materials;
 - making it easier to see how much of each type of waste is being produced and hence where efforts to reduce waste need to be targeted

DO

- Keep sites tidy and collect up any waste regularly.
- Use waste containers or skips suitable for the type of waste being stored.
- Use skips with lids or cover them with sheets or nets to prevent dust and litter being blown out.
- Check that containers and skips are not corroded or worn out to minimize the risk of accidental spillages or leaks.
- Mark waste containers clearly with their intended contents and ensure labels on containers are kept in good order.
- Segregate waste before putting it into the designated containers.



DON'T

- DON'T throw materials into the wrong container.
- DON'T contaminate one waste type with another.
- DON'T give waste away, all waste taken off site needs to be accompanied by paperwork.
- DON'T damage covers over or bunds around any skips or containers.
- DON'T burn or bury waste – it's illegal.



Environmental TBT6 - STORAGE and USE OF PETROL, DIESEL and OILS

WHAT?

Petrol, diesel and oils inappropriately used, stored or disposed of can give rise to pollution of the environment; these substances are generally released into the environment through spillages during delivery or use or through waste materials spills.



WHY?

Avoid prosecution: If pollution is caused then prosecution may follow.

Petrol, diesel and oil are all highly harmful to plants, animals and humans. The cost of clean-up and legal proceedings following a spillage incident far exceeds the cost of putting proper control measures in place.

DO - Storage

- Store bulk petrol, diesel and oil in bunded tanks and store smaller containers on drip trays that have 110 % capacity of the largest container and keep them covered to keep out rain.
- Store petrol, diesel and oil away from drains or surface watercourses.
- Always put lids on any containers after use.
- Ensure that all containers are undamaged.

Do - Use

- Use the automatic shut off “pistol grip” delivery systems when refuelling from tanks or mobile bowser – do not tamper with the shut off system at any time.
- Return spare fuels and oils to proper storage areas.
- Ensure that all refuelling is constantly attended and only undertaken at least 10m away from watercourses and drains.
- Lock the mobile bowser or storage tank after use.
- Use drip trays under all static plant and during refuelling from mobile plant.
- Use funnels when refuelling small plant and equipment to avoid spillages.

Do - Disposal

- Ask your manager what to do with waste oil, petrol and diesel prior to any disposal.

DON'T - Storage

- Refuel or store oils within 10m of watercourses or drains.
- Leave bunds and drip trays to overflow.
- Leave refuelling hoses outside bunds after use.
- Use high pressure delivery systems to fill small containers.
- Leave refuelling operations unattended at any time.
- Leave containers open when unused.
- Leave containers in an area where they can be damaged.
- DON'T ignore spillages.

DON'T - disposal

- DON'T pour petrol, diesel etc. down drains or gullies.
- DON'T dispose of petrol, diesel or oils by setting fire to them.



Environmental TBT7 -

Washing down plant and machinery

WHAT?

Washing down plant and machinery, hosing down concrete truck mixers or degreasing engines can all lead to serious pollution incidents if it is not properly carried out.

The resulting dirty water should not be allowed to enter surface water drains or road gullies, which generally discharge directly into local streams, rivers or soakaways.

Careful consideration must be given to where washing down is carried out.



WHY?

- ❑ **Avoid environmental harm:** Dirty washing and rinsing water may contain dislodged mud, grease, oils, detergents, cleaning agents or toxic chemicals and materials that can kill fish and other aquatic life and which may also seriously affect the surrounding environment.
- ❑ **Avoid prosecution.** It is an offence to allow polluting matter such as silt, cement, concrete, fuel, oils, cleaning chemicals and detergents to enter a watercourse or a drain.
- ❑ **Cost.** The cost of cleaning up a pollution incident far exceeds the cost of putting proper control measures in place.

DO

- ✓ Ask your manager if there is a place specially designated for washing down plant and machinery
- ✓ Only use these designated wash down areas whenever they are provided
- ✓ Ensure that any wash down slurry or residue is contained and cannot enter drains or watercourses
- ✓ Check with your manager before using degreasing or cleansing solutions– don't just assume they can be used
- ✓ Report to your manager any washing down that may cause a pollution incident.

DON'T

- ✗ DON'T wash down before finding out the proper place in which to do it
- ✗ DON'T wash down directly into watercourses or surface water drains
- ✗ DON'T allow dirty wash down water to go down roadside gullies
- ✗ DON'T wash down near material or storage areas or immediately next to working areas
- ✗ DON'T use any more water than is necessary – reduce waste.