

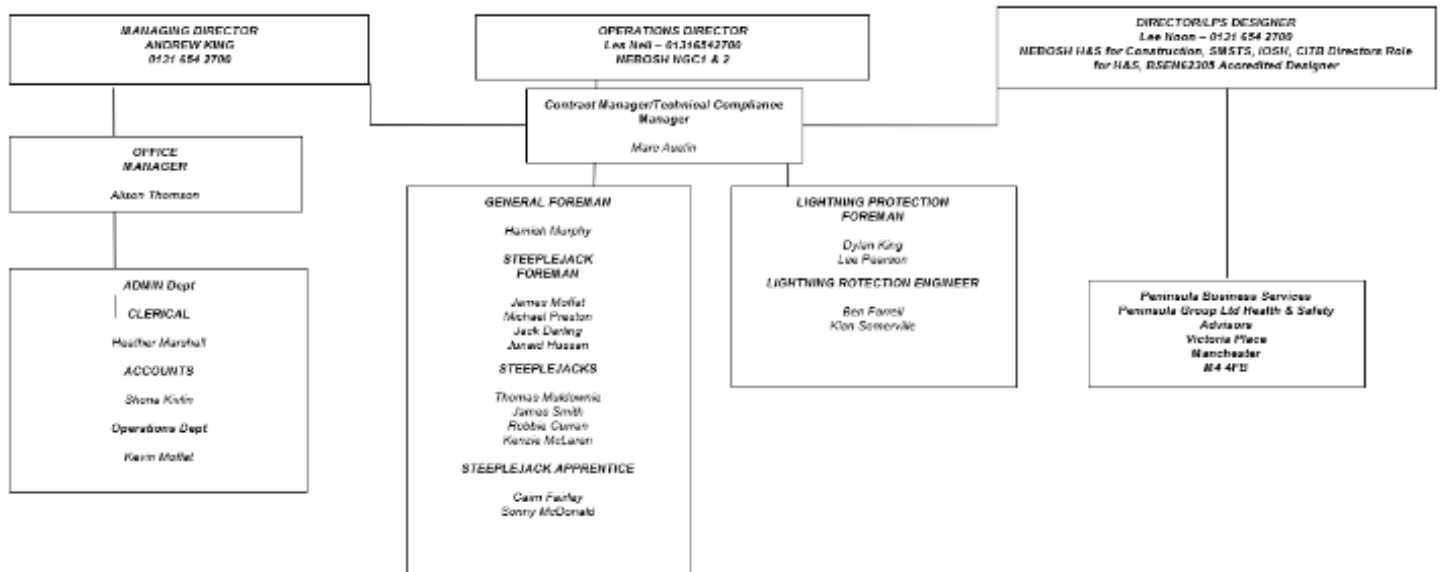


Environmental Policy & Procedures

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January 2025

Northern Steeplejacks (Edinburgh) Limited Environmental Management Structure 2025



ENVIRONMENTAL POLICY STATEMENT

As a company we endeavour to carry out all our operations in a clean, energy efficient and environmentally friendly manner.

It is our policy to re-cycle all materials where it is possible to do so; this includes aluminium, paint, stone, bricks, slates, etc.

Where materials have come to the end of their useful life, and recycling is not an option; these materials are disposed of in the correct manner, in accordance with current legislation and/or local guidelines.

All hazardous waste arising from our work, such as deposits from chimneys, is disposed of through specialist waste disposal agencies.

We ensure that our workforce is made fully aware of the company's environmental policy and all employees are encouraged to be pro-active in their approach to environmental matters.

Northern Steeplejacks (Edinburgh) Limited will comply with the requirement of current environmental legislation and approved codes of practice.

The Company will train employees with regard to the Policy and will strive to adopt the highest environmental standards from suppliers and sub contractors.

Director

Lee Noon has overall responsibility for implementation of the Company's environmental policy.

Implementation of Policy

The Operations Director, General Foreman, Steeplejack Foreman and Contracts Manager have responsibility to ensure that the Company's environmental policy is brought to the attention of all employees and that the requirements of the Policy are complied with wherever the Company operates.

Employees

All employees (Site, Managerial and Administration) are expected to comply with the Environmental Policy.

Solid Waste

Solid waste shall be reduced, re-used or re-cycled. When re-use or re-cycling is not feasible, solid waste shall be disposed of in the most environmentally responsible manner commercially available in accordance with:

- *The Control of Pollution (Amendment) Act 1989.*
- *The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulation 1991.*
- *The Waste Management Licensing Regulations 1994.*
- *The Special Waste Regulations 1996.*
- *The Environment Act 2021*

Other legislation and standards will be referred to on a task by task requirement

Control of Noise

Whenever possible, attempts should be made to eliminate noise.

If elimination of noise is not possible, noise levels should be reduced by making sure that the exhausts of compressors, generators and other plant are directed away from the sensitive areas.

Breakers should be fitted with mufflers. Compressors and generators should run with the covers closed and silencers should be maintained on mobile plant.

All equipment should be regularly maintained to prevent noise from loose bearings and leaky compressed air hoses and joints.

Emissions to Air

Where activities require statutory registration i.e. asbestos removal, will be undertaken by suitably qualified and registered sub contractors.

Fires will not be used to dispose of waste unless specifically authorised by the local enforcing authority. Any airborne material e.g. dust, smoke, vapour etc, will be minimised to prevent secondary pollution of land or water.

Hazardous Substances

The use of hazardous substances shall be regularly reviewed for need and monitored to ensure that toxicity and volume are minimised.

Hazardous substances, including wastes, shall be handled and disposed of in accordance with the best prevailing industry practice.

Liquid Waste

Liquid waste shall not be discharged in a manner that adversely impacts the ground, water or air.

Transport

Minimise the environmental impact of logistics, whether owned or sub contracted taking into account such factors as mode of transport, vehicle efficiency, fuel type, driving style and journey planning.

Audit/Monitoring

Audit/inspections will be carried out by Peninsula Business Services Ltd, Riverside, New Bailey Street, Manchester, M3 5PB during their regular Health and Safety Audits.

Notes on the distribution, amendment and control of this Policy

- 1. The following rules apply to the distribution, amendment and control of this Policy.*
- 2. The issue and control of this handbook is the responsibility of the Operations Director.*
- 3. No other individual other than the Directors of the Company has the authority to issue or amend these documents.*
- 4. Controlled copies of this handbook are allocated to named individuals (as per the list of controlled copyholders) in order to ensure compliance and control and for training and information purposes.*
- 5. Uncontrolled copies may be issued for internal use for the purposes of staff awareness training.*
- 6. Uncontrolled copies may be issued for external use for the purpose of procurement of new business, or as part of a tender submission orSSIP attainment.*
- 7. Uncontrolled copies of the office environmental sections may be available for reference locally for visitors and sub contractors.*
- 8. In all cases it is the responsibility of the Health and Safety Director to ensure that any amendments to this section are advised to those affected.*

Legal & Other Requirements

Northern Steeplejacks Edinburgh Ltd will establish and maintain a procedure to identify, and have access to, legal and other requirements to which the Company subscribes, directly applicable to the aspects of its activities or services.

Objectives & Targets

Northern Steeplejacks Edinburgh Ltd will establish and maintain documented environmental objectives and targets at each relevant function and level within the Company. Consider the legal and other requirements, significant environmental aspects, technological options, financial, operational and business requirements. Ensure consistency with the environmental policy, including the commitment to prevent pollution.

Environmental Management Programme

- We will establish and maintain a programme for achieving objectives and targets.*
- We will designate responsibility for achieving objectives and targets at each relevant organisational level.*
- We will establish the means and time frame by which targets and objectives are to be achieved. If a project relates to a new development, and new or modified activities or services, the programme shall be amended where appropriate to ensure that environmental management applies to such projects.*

Structure & Responsibility

Northern Steeplejacks Edinburgh Ltd will define, document and communicate roles, responsibilities and authorities to facilitate effective environmental management.

- We will provide resources essential to the implementation and control of the environmental management system, including personnel resources and specialised skills, technologies and financial resources.*
- We will ensure that the environmental management system requirements are established, implemented and maintained in accordance with the Company policy and procedures as well as the standard.*
- Northern Steeplejacks Edinburgh Ltd will report on the performance of the environmental management system for review by the Company's Directors and as a basis for improvement of the environmental management system.*
- We will appoint specific management representatives who will have defined roles, responsibilities and the authority to ensure that the environmental management system requirements are established, implemented and maintained in accordance with the policies and procedures and the standard.*
- Employees will report on the performance of the environmental management system to operating management for review, and as a basis for improvement of the policy and procedures.*

Training, Awareness and Competence

- We will Identify training needs and requirements of all personnel whose operational tasks may create a significant impact upon the environment.*
- Establish and maintain procedures and practices to make employees at all levels aware of the importance of conforming to the environmental policies and procedures, and the requirements of the Company's environmental management system.*

- *We will make all employees aware of significant environmental impacts, actual or potential, of their working activities and the environmental benefits of improved personal performance.*
- *Ensure all employees know their roles and responsibilities in achieving conformance to the environmental policy and with the requirements of the environmental management system including emergency preparedness and response requirements; this may vary from site to site.*
- *All managers are to ensure that all employees are aware of the procedures.*
- *Make clear the potential consequence of departure from specified assigned procedures.*
- *Facilitate access to legal and other requirements to which the organisation subscribes, directly applicable to the environmental aspects of its activities and services.*

Communication

- *We will establish and maintain procedures for internal communication between various levels and divisions of the Company.*
- *At all times we will receive, document and respond to relevant communications from external parties regarding environmental aspects and the environmental management system.*

Environmental Management System Documentation & Document Control

- *Establish and maintain information, in paper or electronic form, to describe the core elements of the management system and its interaction within the Company.*
- *Describe the relationship between the Quality System and the Environmental System. Provide direction to related documentation.*
- *Establish and maintain procedures for controlling all documentation required by the standard. Ensure that documents can be located, periodically reviewed, and revised as required by the Company and approved by authorised officers of the Company.*
- *Make available current versions of relevant documentation at all locations where operations essential to the effective functioning of the environmental management system are performed.*
- *Promptly remove obsolete documents at all points of issue and points of use or otherwise assure against unintended use within the Company. Identify any obsolete documents retained for legal and / or knowledge preservation purposes.*
- *Ensure documents are legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period.*
- *Establish and maintain procedures and responsibilities for the creation and modification of various types of documents.*

Operation Control

- *We will identify operations and activities that are associated with significant environmental aspects in line with the Company's policies, procedures, objectives and targets.*
- *We will plan these activities, including industrial cleaning, office cleaning, and all other services provided by the Company in order to ensure that they are carried out under specified conditions. This will be achieved by establishing and maintaining documented*

procedures to cover situations where their absence could lead to deviation from the Company's environmental policy, procedures and the objectives and targets.

Emergency Preparedness and Response

- Establish and maintain procedures to identify potential for, and respond to, environmental accidents and emergency situations, and for preventing and mitigating the environmental aspects that may be associated with them.*
- Review and revise, where necessary, emergency preparedness and response procedures, in particular, after the occurrence of environmental accidents or emergency situations.*
- Periodically test such procedures, where practicable.*

Monitoring & Measurement

- Establish and maintain documented procedures to monitor and measure, on a regular basis, the key characteristics of operations and activities that can have a significant impact upon the environment.*
- Record information to track performance and implement audits that verify conformance to objectives.*
- Calibrate and maintain monitoring equipment where necessary and retain records according to established Company procedures.*
- Establish and maintain documented procedures for periodically evaluating compliance with relevant environmental legislation and regulations.*
- Identify and have access to legal and other requirements directly applicable to the environmental aspects of services provided and materials used.*

Records

- Establish and maintain documented procedures for the identification, maintenance and disposition of environmental records including training records and the results of audits and reviews.*
- Ensure environmental records are legible, identifiable and traceable to the activity or service involved.*
- Store and maintain environmental electronically in our cloud servers*
- Maintain records, as appropriate, to demonstrate conformance to the requirements of the standard.*

Environmental Management System Audit

- Northern steeplejacks Edinburgh Ltd will establish and maintain programmes and procedures for periodic environmental management systems audits.*
- We will determine whether or not the environmental management system conforms to planned arrangements for environmental management, including the requirements of this relevant standards*
- Determine if the system has been properly implemented and maintained.*
- Provide information on the results to management.*

- *Base audit programme and schedule on the environmental importance of the activity concerned and the result of previous audits.*
- *Cover the audit scope, frequency and methodologies as well as the responsibilities and requirements for conducting audits and reporting results.*

Management Review

At intervals it determines, senior management reviews the environment management system to ensure its continuing suitability, adequacy and effectiveness- by:

Ensuring necessary information is collected to allow management to carry out this evaluation. This review shall be fully documented.

Addressing the possible need for changes to policy, objectives and other elements of the environmental management system in light of the audit results, changing circumstances and the commitment to continual improvement.

Environmental system documentation integrated and shared with the documentation may include:

- *Process information*
- *Organisational Charts*
- *Operational Procedures*
- *Operational Emergency Plans and Procedures*
- *Works Instructions*
- *Records / Documents*

Environmental procedures and works instructions may be maintained and stored in electronic form or in hard copy.

Internal Quality Audits

Internal audits of Northern Steeplejacks Edinburgh Ltd's Environmental Systems are required by relevant company procedures and standards to ensure that the system is performing as planned by the Company. The internal audits verify that the Company employees work to the specified documented procedures.

Internal audits are not surprise visits. They are conducted according to a published schedule. Each division, region, contract or site to be audited will receive notification of the time, date and scope of the internal audit. Internal audit frequencies depend upon the importance of the service or contract being audited.

What Northern Steeplejacks Edinburgh Ltd Audits will look for

- *Employee knowledge of the Company's environmental policy*
- *Employee knowledge, access and adherence to procedures and works instructions*

- *Employee knowledge of significant environmental aspects specific to their operation or contract.*
- *Documented objectives and targets for how the Company will strive to continually improve performance on significant environmental aspects.*
- *Training Records*
- *Monitoring and measuring of significant environmental aspects.*
- *Emergency preparedness and response procedures*
- *Documentation control procedures.*

For and on behalf of Northern Steeplejacks Limited:



Signed:..... Date: 9th January 2025

Lee Noon – Director