

ENVIRONMENTAL POLICY

Hughes | Gardner Ltd is committed to making sure that its activities are consistent with best practice within its industry and with relevant legislative and regulatory requirements, and fully accepts the need to protect the environment for the benefit of society and will make environmental considerations an integral part of its business activities.

The company's Environmental Policy will be reviewed regularly to make sure that it continues to meet or exceed current standards. Our commitment means that all staff at every level of the company will strive to meet minimum standards, as set by the company from time to time, for:

- Recording the use of raw materials and other supplies
- Recording the safe and environmentally acceptable disposal of waste materials
- Finding new methods of waste disposal that are more environmentally acceptable than existing methods
- Reducing energy usage to a minimum level, where possible
- Advising customers on the company's environmental policy and the best practice that may have an impact on the environment.
- Assessing suppliers' compliance with the company's environmental policy
- Maintaining a „good neighbour“ approach to the local community and aim to support local environmental initiatives where possible
- Carrying out environmental impact assessments as part of any new initiative on the part of the company

As part of this environmental policy, the company will appoint an employee or director to act as an environmental officer. They will be responsible for implementing this policy and for its effective communication to all staff, customers and suppliers.

Hughes | Gardner Ltd will:

- Set and review realistic targets to ensure that we are continually improving our environmental performance.
- Undertake our activities consistent with good environmental practice so as to prevent pollution.
- Maintain compliance with the relevant applicable environmental legislation.
- Communicate and consult with staff on environmental matters.
- Ensure that staff recognise that consideration of the environment is integral to its work activities and that each staff member has a personal responsibility to maintain high standards of environmental care.
- Carry out environmental impact assessments of work activities at the planning stage with aim of keeping resource consumption, waste and pollution to a minimum,.
- Manage its estate, equipment and stock with environmental considerations in mind; and
- Seek to ensure that's its suppliers, contractors, business partners and customers take their environmental responsibility seriously

Reviewed January 2022

ENVIRONMENTAL PROTECTION

Waste and the Duty of Care

The Duty of care is covered in Part 2 of the Environmental Protection Act 1990. The Duty of Care applies to anyone who produces or imports, keeps or stores, transports, treats or disposes of waste. It also applies if they act as a broker and arrange these things.

The Act defines the following:

Pollutants as

- Solid wastes discharging onto land
- Liquid wastes discharging onto land or into water
- Discharges onto the atmosphere
- Noise in the community

Controlled waste as:

- Waste from households
- Waste from industry
- Commercial waste

Special waste as:

- Controlled waste that is so hazardous that it can only be disposed of using special procedures. Examples would be where there is a high risk to life or liquids with a flash point of 21°C or less.

A multi-pronged approach to pollution control has been taken in the Act, which covers:

- Air Pollution Control (APC) dealing with discharges into the atmosphere and includes noise in the community but not levels of noise within a workplace. The local authorities enforce this.
- Integration Pollution Control (IPC), which encompasses control of pollution of the atmosphere, water and the ground and is enforced by the Environmental Agency (EA).
- Disposal of waste to controlled sites enforced by local and county authorities through waste regulatory bodies.
- Other nuisance matters affecting the local community are enforced by the local authority and include matters such as statutory nuisances, stray dogs, supermarket trolleys etc.

The Company will take all reasonable steps to keep waste safe. If we give waste to someone else, we will ensure they are authorized to take it and can transport, recycle or dispose of it safely.

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The Company will:

- Stop waste escaping from our control and store it safely and securely. We will prevent it causing pollution or harming anyone.
- Keep it in a suitable container. Loose waste in a skip will be covered.
- We will check, if we give waste to someone else, they have authority to take it.
- We will describe the waste in writing. We will fill in and sign a transfer note for it and keep a copy. To save paperwork, the description of the waste can be written on the transfer note.

Environmental Regulations

The United Kingdom subscribes to and is bound by international agreements and protocols. Such agreements are voluntary and can be viewed as 'soft law'. However, once ratified by a signatory country, they must become national laws. Because of the global nature of many environmental issues, international agreements play a significant role in the development of environmental controls. The European Union (EU) as a whole agreed the Montreal Protocol of 1987 and amendments tabled at the Rio de Janeiro conference of 1992. They are being implemented by an EU regulation aimed at phasing out the use of substances that deplete the ozone layer, notably CFCs.

EU regulations have direct applicability and are binding on Member States in their entirety. Another EU regulation covers waste shipments and it; together with its UK manifestation 4 are aimed at controlling the movement of designated waste materials between Member States. It also covers the movement of wastes between Member States and OECD co-signatories of the Basle Convention, which established the requirements for the control of such movements. A central feature of these particular agreements is the definition of 'wastes'. The international agreements classify waste into 'Red', 'Amber' and 'Green' wastes.

- Red wastes are the most hazardous and include articles, substances and other wastes contaminated with polychlorinated biphenyl (PCB); asbestos and lead anti-knock compound sludges.
- Amber wastes include antifreeze fluids, used blasting grit, waste alumina, arsenic waste, lead acid batteries, phenols and other substances considered to pose a degree of environmental risk.
- Green wastes are, naturally, more extensive and include the following categories:

Metal and metal alloy wastes in metallic non-dispersible form
Other metal-bearing wastes arising from melting, smelting and refining of Metals
Wastes from mining operations in non-dispersible form
Solid plastic wastes
Paper, paperboard and paper products waste
Glass waste in non-dispersible form
Ceramic wastes in non-dispersible form
Textile wastes
Rubber wastes
Untreated cork and wood wastes

Signed *J F Hughes*

Managing Director

Date *April 2024*