

Environmental Policy - Full Edition

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1 Environmental Management System

Introduction to our Environmental Management System

1.1 The Steer Environmental Management System (EMS) comprises the Environmental Policy Statement; Roles and Responsibilities; associated Arrangements and Guidance for environmental management; and processes for Monitoring and Review (the Environmental Policy). Together these form the framework by which Steer manages significant environmental impacts concerning its activities, products, and services.

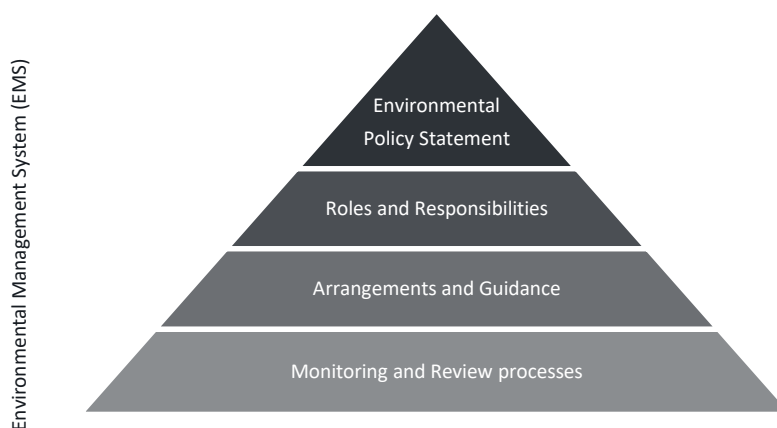
Environmental Policy Statement - Describes the Company's approach to environmental management and our commitment to achieving it.

Roles and Responsibilities - Sets out the responsibilities and authorities which collectively help ensure operational fulfilment of the EMS Policy, associated arrangements, and all legal and other requirements.

Arrangements and Guidance - Sets out actions and processes necessary to implement and maintain the EMS Policy and provides guidance to staff on how to meet the needs of our management system.

Monitoring and Review processes - Identify areas for improvement, or examples of good practice, to ensure the effective operation of the management system and continuous improvement.

Figure 1 Structure of Steer's Environmental Management System



2 Purpose and scope

Purpose

2.1 The purpose of the EMS is to:

- Understand organisational needs and the necessity for establishing environmental management policy and objectives
- Monitor and review the performance and effectiveness of the EMS
- Continually improve the organisation's environmental management

Scope

2.2 This Policy does not form a definitive account of all EMS procedures. Acknowledging the differing legal requirements of the regions and areas of business in which we operate, each office is required to establish its own location specific EMS procedures that comply with the Environmental Policy and all locally applicable regulations and standards.

2.3 Demonstrating the Company's commitment to environmental management and to seek to continuously develop and improve, the Steer EMS is based on the requirements of the International Standard for Environmental Management Systems, ISO14001:2015.

2.4 ISO 14001:2015 provides an international benchmark for Environmental Management. It provides a recognised framework within which we can develop and establish our approach to environmental management to manage significant environmental aspects that relate to our business activities, products, and services and to comply with the specific requirements for the ISO 14001 certification.

2.5 Where offices are independently certified, an accredited external auditor shall undertake periodic, independent reviews of our adherence to the EMS System to confirm certification.

2.6 All offices shall operate in accordance with the Environmental Policy irrespective of independent certification.

3 Environmental Policy Statement

Introduction

- 3.1 Protecting the environment is of fundamental importance to Steer, its employees, communities, customers, and stakeholders.
- 3.2 We recognise that there are aspects of our day-to-day operations that negatively impact on the environment and we are committed to conducting our business with the objective of minimising this impact through continuous improvement in our own environmental performance.
- 3.3 This is achieved through application of a robust EMS that ensures that our processes are carefully monitored, measured, and controlled to promote continuous improvement in our environmental performance.
- 3.4 As a global consultancy providing services to a variety of public and private sector clients, we are also in a position to contribute to positive environmental impacts through our client work with many of our commissions relating to initiatives designed to reduce the negative effects of travel for the population as a whole and help our clients reduce their own carbon footprints.

Our commitment

- 3.5 Our commitment is delivered throughout the Company's business activities employing the following principles:
- To recognise and comply with applicable legal and other requirements to which the Company subscribes which relate to its environmental impacts.
 - Integrate sustainability considerations into our business decisions.
 - Manage and minimise our environmental impacts through pollution prevention, waste reduction and minimising the consumption of natural resources.
 - Raise awareness of, communicate and encourage participation in positive environmental practices.
 - Commit to continuous improvement in environmental performance through the implementation of our EMS, and the establishment of measurable environmental objectives and targets.
 - Continuously monitor, review, and improve our environmental performance.
 - Measure our Carbon Footprint and take account of carbon management in our business decisions to reduce our contribution to climate change.

Communicating our policy

- 3.6 This Policy shall be communicated to all employees and shall be made available to all contractor's suppliers and interested parties.



Hugh Jones, CEO

Dated: December 2022

4 Responsibilities

4.1 This Environmental Policy has been approved by Steer's Board of Directors. It applies and is implemented across all of Steer's operations. The principal accountabilities and responsibilities associated with this policy are:

Table 2 EMS responsibilities by role

Role	Responsibilities
Board	<p>The Board sets policy and scrutinises company-wide approaches and performance providing direction and advice as is necessary. The Board is responsible for:</p> <ul style="list-style-type: none"> • Endorsing the Environmental Policy; • overseeing EMS programme performance; and • ratifying any significant changes to Environmental and associated policies.
Chief Executive Officer (CEO)	<p>The Chief Executive Officer is accountable for the compliant operation of this Environmental Policy and the overall framework for its execution. The Chief Executive Officer is responsible for:</p> <ul style="list-style-type: none"> • Fostering the aims and objectives of the Environmental Policy; • approving the EMS objectives; and • provision of human and financial resources so as to ensure that legal requirements placed upon Steer are fully complied with.
Chief Operating Officer (COO)	<p>The Chief Operating Officer is accountable for the operational fulfilment of this Environmental Policy through the proper and compliant execution of the associated operational policies. The Chief Operating Officer is responsible for:</p> <ul style="list-style-type: none"> • Overseeing and ensuring that the Company is operating in accordance with the Environmental Policy; • ensuring that systematic review of programme performance is undertaken on a regular basis as part of Management Review; and • ensuring allocation of human and financial resources for the effective operation of Environmental Policy and the EMS programme in each legal jurisdiction.
Head of Facilities, Health & Safety and Environment	<p>The Head of Facilities, Health & Safety and Environment advises the Company on matters of environmental compliance and best practice and provides support and direction on Environmental Policy implementation. The Head of Facilities is responsible for:</p> <ul style="list-style-type: none"> • Ensuring that EMS requirements are established, implemented, and maintained; • regularly reviewing the Environmental Policy and ensuring that the necessary changes are made; • setting environmental objectives, targets, and programmes; • coordinating internal audits; • reporting on the performance of the EMS to the Chief Operating Officer for review and as a basis for improvement; and • providing leadership to the Sustainability Working Group.

Role	Responsibilities
Regional Directors, Business Unit Heads and Office Leaders	<p>Deployment of human and financial resources for the effective operation of EMS Policy within their business or function;</p> <ul style="list-style-type: none"> ensuring that the Environmental Policy is properly implemented in their respective business unit, office, or function; ensuring that any regulations, codes of practice or guidelines that relate to the environmental aspects of their respective office, function or departmental activities, products, or services, are properly identified and maintained; and ensuring implementation of Company environmental initiatives.
Sustainability Working Group	<p>The Sustainability Working Group (the Group) shall seek to champion environmental change and advise the Head of Facilities and Chief Operating Officer on issues and options on the continuous improvement of environmental sustainability at Steer. Group responsibilities include:</p> <ul style="list-style-type: none"> Reviewing of objectives, targets, and programmes for environmental management; promoting positive transformation and effective implementation of environmental initiatives; monitoring and championing implementation of environmental initiatives; consulting with our people on environmental matters and escalating issues and observations from key stakeholders; promoting environmental awareness amongst employees; and reviewing reports on environmental issues, metrics agreed, complaints and non-conformity, and suggesting on corrective and preventative action.
Office Managers and Facilities personnel	<p>Office Managers and Facilities personnel have administrative duties to co-ordinate environmental management arrangements in their respective offices. Responsibilities include:</p> <ul style="list-style-type: none"> Ensuring the Environmental Policy and associated local office arrangements are made available to all employees at that operating location, and are effectively communicated to employees at induction, through training and periodic updates; co-operating with the Head of Facilities in environmental audits and implementing corrective action if necessary; and maintaining records and documentation associated with policy implementation.
All Employees	<p>All employees are responsible for:</p> <ul style="list-style-type: none"> Working in accordance with the documented environmental procedures and guidance; and reporting any problems or concerns associated with environmental issues related to Company operations to their Personal Supervisor, member of the Sustainability Working Group or to the Facilities Team.

5 Planning

Introduction

- 5.1 Steer is committed to establishing effective plans to meet its environmental objectives, fulfil its compliance obligations and play its part in the protection of the environment.
- 5.2 As part of this commitment, the organisation has established an Environmental Management System (EMS) which complies with the requirements of the ISO14001 international standard.
- 5.3 In line with these requirements, it is essential that our environmental objectives are consistent with our policies, measurable where practicable, communicated effectively within the organisation (and outside where appropriate) and updated as part of the EMS management review process.

Environmental objectives

- 5.4 Objectives will be based on a clear understanding of our requirements, including those from interested parties, and will take in to account the results of environmental aspects and impacts assessments, and risk and opportunity assessments carried out at various levels within the organisation.
- 5.5 To assess whether the EMS is working as intended, it is essential that clear objectives are defined and a system of monitoring and measurement established to record progress against targets.
- 5.6 As part of the EMS management review process, objectives are regularly set, reviewed, and updated in the following major areas:
 - Effectiveness: generally, how well the organization’s EMS serves to protect the environment
 - Capability: the knowledge, skills and experience available, mainly internally but also, to some extent, externally to the organization
 - Cost: financial resources required to maintain and improve the EMS
 - Resource utilisation: how effectively organizational resources are employed
 - Risk reduction: the degree to which known risks are addressed to within acceptable limits
 - Other: appropriate objectives that don’t fall into any of the above areas
- 5.7 In discussion with the management team and based upon documented requirements, Steer will define specific annual objectives that relate to environmental management and promote continuous improvement.
- 5.8 Achievement against these objectives will be tracked as part of regular management reviews of the EMS.
- 5.9 All offices will work towards the achieving of these common objectives by developing Local Office Environmental Action Plans (LEAPS).
- 5.10 Achievement against LEAPS is tracked as part of regular Sustainability Working Group reporting.

Environmental Aspects and Legal Requirements

- 5.11 The environmental aspects that relate to our primary business activities and buildings shall be determined by understanding the life cycle of each, and their corresponding potential and actual environmental impacts.
- 5.12 A documented process will be used to identify those aspects that have a real or possible significant impact on the environment, so that they can be effectively managed on an ongoing basis.
- 5.13 Environmental aspects that pose a significant impact to the environment shall be adequately controlled at a local level through the implementation and maintaining of local office environmental action plans (LEAPS) that aim to reduce impact through continuous improvement.
- 5.14 Environmental aspects shall be periodically reviewed and kept up to date by the Head of Facilities, supported by the Sustainability Working Group, taking into consideration any planned new developments or new or modified activities, products, or services.
- 5.15 All applicable regulations, codes of practice and guidelines that relate to the environmental aspects of business activities, products or services shall be identified and maintained in each office.

Approach to managing risks and opportunities

- 5.16 Risk and opportunity management will take place at several levels within the EMS, including:
- those associated with significant environmental aspects and impacts;
 - environmental planning – risks to the achievement of environmental objectives; and
 - organisation-wide risk and opportunity management.
- 5.17 High-level risk and opportunity assessments will be reviewed on an annual basis, or upon significant change to the business environment.

6 Implementation and Operation

Roles, responsibilities, and resources

- 6.1 Commitment to the protection of the environment extends to all levels of the organisation and will be demonstrated through this Environmental Policy, the roles and responsibilities pertained in it and the provision of appropriate resources to establish and develop an effective Environmental Management System.

Competence, Training and Awareness

- 6.2 Information and training shall be provided to promote awareness of EMS objectives, targets, operational controls and arrangements for communication and consultation.
- 6.3 Basic training needs have been identified as follows:

Induction

- New starter inductions shall be provided for all new employees, and temporary workers to communicate company and local arrangements for environmental management.
- Induction records outlining the training topics covered shall be maintained in each office.

Job specific competence and training

- Roles where specific environmental competencies, level of training or qualification is required, shall be identified by those who have responsibilities for managing people or functions.

Communication

Internal communication

- 6.4 The Environmental Policy shall remain available to all employees via the Company intranet site and shall be brought to the attention of new employees and temporary workers by way of new starter induction of which completion is mandatory.
- 6.5 All other related information such as objectives, targets and programmes, shall also be made readily available to employees through existing internal communications channels.

Making suggestions or raising concerns

- 6.6 Those with enquiries, suggestions or complaints regarding the Environmental Policy or any environmental issues are encouraged to report these via existing channels including the Sustainability Working Group, Staff Forum or to the Facilities Team.

External communication

- 6.7 Communications from interested parties relating to matters of Environmental Policy shall be dealt with in the first instance by the Head of Facilities, Health & Safety and Environment.

EMS Documentation and Document Control

- 6.8 Documents relating directly to EMS implementation shall be appropriately logged, reviewed, revised, and approved by the Head of Facilities, Health & Safety and Environment.
- 6.9 Subsequent EMS arrangements for each office shall be managed at a local level.

7 General Arrangements

Waste Management

- 7.1 Steer are committed to the protection of the environment through the implementation of an effective and sustainable waste management programme.
- 7.2 We believe that the key to successful management of environmental matters, recycling and waste is to provide the facilities that will minimise effort and maximise benefit to our employees and stakeholders.
- 7.3 Steer are committed to working with employees, contractors, and service providers to raise awareness of environmental issues and aim to minimise the risk of pollution or harm to health by disposing of waste appropriately and responsibly.
- 7.4 Steer offices will manage waste in a way that complies with and where possible, exceeds all statutory requirements and codes of practice.

Emergency Preparedness and Response

- 7.5 Suitable emergency arrangements shall be developed, implemented, and maintained to ensure effective management of significant environmental risks in each operating location so that prompt action can be taken in the event of an emergency.
- 7.6 Further information on management of emergencies can be found in the Company Health and Safety Policy and associated local arrangements.
- 7.7 Emergency management arrangements shall be reviewed periodically (at least annually) and after the occurrence of any environmental emergency.

8 Continuous improvement of the EMS

Sustainability Working Group

- 8.1 The Sustainability Working Group (the Group) seek to champion environmental change and advise the Head of Facilities and Chief Operating Officer on issues and options on the continuous improvement of environmental sustainability.
- 8.2 The Group is comprised of an Executive Director Sponsor (the Chief Operating Officer), Head of Head of Facilities, Health & Safety and Environment, and representatives from the Company.
- 8.3 Group responsibilities include:
- reviewing of objectives, targets, and programmes for environmental management;
 - promoting positive transformation and effective implementation of environmental initiatives;
 - monitoring and championing implementation of environmental initiatives;
 - consulting with our people on environmental matters and escalating issues and observations from key stakeholders;
 - promoting environmental awareness amongst employees; and
 - reviewing reports on environmental issues, metrics agreed, complaints and non-conformity, and suggesting on corrective and preventative action.
- 8.4 Recommendations made by the Sustainability Working Group in relation to opportunities or needs for improvement can be actioned in any of the following ways:
- Taken forward by SWG reps for further discussion in their local offices or with specific user / working groups
 - Taken forward by the Head of Facilities for further discussion with employee groups such as the Staff Forum
 - Taken forward by the Head of Facilities as part of Management Review
 - Taken forward by the COO directly to the Executive and if needed, the Board.

Reporting and communicating performance

- 8.5 Reports of environmental performance shall be submitted no less than annually to the Board and shared with the Trustees; to demonstrate commitment to continuous improvement and due regard to the protection of the environment and minimise pollution and other adverse effects.
- 8.6 Periodic updates on environmental performance and progress against objectives and targets shall be reported in Sustainability Working Group meetings and performance results shared with the company no less than annually.

Audit and Review

8.7 It is vital that regular reviews take place of how well environmental management processes and procedures are being adhered to. This will happen at three levels:

1. Structured regular management review of conformity to policies and procedures
2. Internal audit reviews against the ISO14001 standard by the audit team*
3. External audit against the standard to gain and maintain certification to ISO14001*

* In those offices that have undertaken external audit and have acquired certification

Reporting and communicating performance

8.8 Reports of environmental performance shall be submitted no less than annually to the Board and shared with the Trustees; to demonstrate commitment to continuous improvement and due regard to the protection of the environment and minimise pollution and other adverse effects.

8.9 Periodic updates on environmental performance and progress against objectives and targets shall be reported in Sustainability Working Group meetings and a summary of performance shared with the company.

Management Review

8.10 Management Reviews shall be conducted no less that at six-month intervals by the Head of Facilities, Health & Safety and Environment with topics being discussed in advance with the Sustainability Working Group.

8.11 EMS performance results and any recommendations for improvement shall then be put forward by the Head of Facilities, Health & Safety and Environment to the Chief Executive Officer and Chief Operating Officer.

Topics addressed at Management Review shall include (but are not limited to):

- Results of Environmental Policy review.
- Review of legal compliance and compliance with other requirements.
- Review of environmental aspects of activities.
- Findings of the internal audits.
- Review of nonconformities and the status of corrective/preventative actions.
- Areas for improvement identified with respect to environmental performance.
- Changing circumstances including developments in legal and other requirements, business activities and premises.
- Identifying the need for modification of any parts of the EMS.
- Follow-up action from previous management reviews.

8.12 Findings from the Management Review shall be recorded and retained by the Head of Facilities, Health & Safety and Environment.

Policy Review

8.13 Management Review shall include Environmental Policy review considering any legislative or organisational change. Proposed changes in content shall be recommended by the Head of Facilities, Health & Safety and Environment and if minor in nature, ratified by the Chief Executive Officer.

8.14 Any significant changes to Environmental Policy will undergo Board approval before being communicated to employees or other interested parties.

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Steer project/proposal number

Project number

Client contract/project number

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Distribution

Employee and interested parties

Version control/issue number 3

Date December 2022

steer