

POLICY

Environmental Policy

REF NO: POL 003

FIRST ISSUE: 08/04/2014

REVISION DATE: 31/03/2020

LAST REVIEW: 06/01/2021

REV NO: 05

Policy Statement

DAM Structures Ltd, incorporating DAM Solutions, (DAM) is a specialist steel fabricator and due to the nature of its business recognises the wide-ranging environmental implications its activities have in both the long and short term.

Protection of the environment in which we live and operate is part of the values and principles of DAM and care for the environment is one of our key responsibilities and an important part of the way in which we do business.

The successful implementation of DAM's Environmental Policy will be achieved through commitment and involvement of its employees and everyone working on behalf of the company.

It is therefore the policy of the company to:

- Comply with all relevant compliance obligations including environmental legislation, regulations and guidance;
- Protect the environment and prevent, where practicable, the pollution of land, air and water;
- Continually improve our Environmental Management System to enhance our environmental performance;
- Set and strive to meet environmental objectives to improve our environmental performance;
- Seek to minimise waste and maximize the efficient use of materials and resources;
- Manage, segregate, and dispose of all waste in a responsible manner;
- Identify training needs associated with our environmental aspects and provide training or take other action to meet these needs to promote an environmentally aware culture,
- Regularly monitor and communicate our environmental performance to our employees and other significant stakeholders;
- Develop our management processes to ensure that environmental factors are considered during planning and implementation;
- Monitoring and continuously improve our recycling performance through life cycle management
- Where practicable, DAM will assist our Clients' EMS performance by offering a buy back option for any temporary propping or steelwork that we supply

The policy statement will be regularly reviewed and update as necessary. The management team endorses this policy statement and is fully committed to its implementation.

Signed:  Phil Cook (CEO)

Date: 31/03/2020

Reviewed: 6th January 2021

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Environmental Management Policy

1.0 INTRODUCTION

The Environmental Management Policy is an umbrella document incorporating currently both energy management and waste management.

This policy applies to the premises of DAM Structures Ltd, DAM Solutions Ltd, and also covers the construction work undertaken at various sites. It is intended that the policy will enable all employees of DAM to comply with legislation, codes of practice and standards appertaining to the impact of company activities on the environment.

Responsibilities and safe working practices are identified to protect the environment and reduce the risk of contamination from the waste produced by company activities. Dependant on the individual needs of each contract, plans, method statements and risk assessments are developed and utilized as appropriate.

DAM also accept, where acting as a sub-contractor to a prime contractor, that our staff will abide by the policies of the prime contractor if the terms and conditions of the contract require us to do so.

This policy reflects the requirements of the following legislation:-

- The Health & Safety at Work Act 1974
- Management of the Health & Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health Regulations 2002
- The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009
- The Environmental Protection Act 1990
- Environment Act 1995
- Controlled Waste (E&W) Regulations 2012
- The Hazardous Waste (England and Wales) (Amendment) Regulations 2018
- Control of Pollution (Oil Storage) (England) Regulations 2001
- The Groundwater Regulations 1998
- Timber Regulations 2012
- The Waste (England And Wales) Regulations 2012 & The EU Waste Framework Directive 2015
- Waste Electrical and Electronic Equipment Regulations 2013 (WEEE)
- Waste Batteries and Accumulators Regulations 2009
- Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991
- Water Resources Act 1991

2.0 OUR INTENT

DAM recognises that it has a duty to protect the environment through energy conservation, the prevention of pollution, the prudent use of resources, and the safe disposal of all types of waste.

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DAM accepts that it must take all reasonably practicable steps to conserve energy, control emissions and dispose of waste safely at sites owned or operated by the company, and when sub-contracting at clients' sites.

In order to comply with this policy, and to ensure the Health, Safety and Welfare of employees and the public, an understanding of energy conservation and safe handling and disposal of waste is regarded as a basic requirement of all employees.

The company acknowledges that as a responsible employer it has a duty to protect the environment. The company will maximise the use of resources by minimising material and energy wastage and increasing the use of recycled materials.

The appropriate financial and personnel resource will be made available to implement this Policy, and all necessary steps, including auditing compliance, will be taken to ensure that the Policy is understood, implemented and maintained at all levels.

The Policy will be reviewed annually and revised as necessary.

The Policy shall be brought to the attention of all employees, suppliers and contactors and copies are available to the general public, regulatory authorities and purchasers of the company's services.

DAM's Environmental Policy Statement is displayed at our premises.

3.0 Environmental Strategy

The aim of this strategy is to turn the company's Environmental Policy into practice.

3.1 Strategy

The strategy has been devised and must be followed to achieve the Policy objectives. The company strategy is to:-

- 3.1.1 Take into account all activities, including those parts which are considered to be efficient
- 3.1.2 Fix a baseline to ensure improvements to be evaluated, determining first what regulations and standards are relevant and secondly what technological and product developments have occurred recently which might now be appropriate to introduce
- 3.1.3 Record raw material and energy usage along with waste recycling, etc.

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- 3.1.4 Seek opportunities to turn waste into profitable by-products or to recycle and explore the possibility of more effective and economic methods for waste disposal i.e. steel buy back scheme
- 3.1.5 Ensure that contractors and suppliers comply with the Company's environmental standards
- 3.1.6 Explore whether energy and raw material usage and the production of waste could be further reduced
- 3.1.7 Provide such training as is necessary to ensure, so far as is reasonably practicable, that employees, visitors, contractors and clients are not exposed to environmental risk
- 3.1.8 Monitor performance and make sure there is regular review

4.0 RESPONSIBILITIES

4.1 **The Managing Director** has overall responsibility for:

- 4.1.1 All aspects of environmental management within DAM and in compliance with this Policy.
- 4.1.2 To appoint competent persons to advise the company on matters relating to specific energy management and environmental issues.
- 4.1.3 Ensuring staff comply with the policy.
- 4.1.4 Ensure that the policy is reviewed regularly
- 4.1.5 Shall ensure that the appropriate training is given to all staff involved in energy conservation and pollution control
- 4.1.6 Shall ensure that all staff involved are aware of the benefit of energy management and dangers associated with pollution and the handling of hazardous waste.
- 4.1.7 Shall ensure that a 'suitable and sufficient' risk assessment is carried out on all work activities associated with the handling and disposal of hazardous waste.

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- 4.1.8** Shall ensure that all staff involved are provided, where necessary, with adequate protective clothing and training to conform to the relevant legislation and codes of practice.
 - 4.1.9** Shall ensure, where appropriate, that all staff involved with pollution control are subject to occupational health
 - 4.1.10** Shall ensure disposal of 'hazardous' waste is carried out by an approved contactor
 - 4.1.11** Shall keep records of staff training.
 - 4.1.12** Shall ensure that any 'incidents' such as spillages, etc. are documented on a company Incident report Form.
 - 4.1.13** Shall ensure that all staff are aware of and comply with this policy.
 - 4.1.14** Shall be the senior management lead for the Environmental Management System.
- 4.2 The Operations Director** is responsible for:-
- 4.2.1** Ensuring good environmental management at Head Office and in the Factory.
- 4.3 Site Managers** are responsible for:-
- 4.3.1** Ensuring good environmental management during work conducted at customer sites
- 4.4 The SHEQ Manager** is responsible for:-
- 4.4.1** Managing the company Environmental Management System (see QDOC 000 IMS Manual for EMS responsibilities)
 - 4.4.2** Providing advice and guidance to the company re. environmental management
 - 4.4.3** Monitoring company performance re. environmental management
 - 4.4.4** Investigating any environmental incidents
 - 4.4.5** Managing the Environmental Management System on a day-to-day basis.

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4.5 Employees

- 4.5.1** Shall be familiar with the Policy and procedures appertaining to energy conservation, waste management and pollution control.
- 4.5.2** Shall report dangerous environmental incidents to their Line Managers as soon as they are identified and assist with the incident report form.
- 4.5.3** Shall wear protective clothing in accordance with the policies in force in their respective workplace, and on-site.
- 4.5.4** Shall be responsible for their own hygiene.
- 4.5.5** Shall co-operate with the employer in meeting objectives.
- 4.5.6** Shall ensure that the nature and dangers of the waste are known to the collectors, handlers, disposers, etc.

5.0 ENERGY MANAGEMENT

Fossil energy resources are finite and diminishing. DAM understand that energy management is the key to ensure these valuable resources are not squandered.

Fabrication facilities like DAM consume large amounts of electricity due to energy intensive production processes and operations and we are committed to exploring opportunities to reduce the environmental impacts which are within our control.

Similarly, diesel used to power machinery should be stored correctly and used as efficiently as practicable. The diesel receptacles are double banded and locked as safeguards to prevent spillage and misuse.

5.1 Energy Management statement

The Company is committed to reducing energy costs by:-

- 5.1.1** Bringing about improvements in energy consumption through energy efficiency initiatives
- 5.1.2** Completing all maintenance/repair work that is causing energy to be wasted as a matter of priority

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- 5.1.3 Purchasing all fuels and utility services at cost advantageous prices
- 5.1.4 Educating staff through training and awareness campaigns on energy efficiency practices
- 5.1.5 All new equipment purchased by the company will be assessed in terms of energy consumption and in compliance with our Purchasing Policy.
- 5.1.6 Deliveries to sites via articulated vehicles are kept to a minimum, by agreeing with our clients timed delivery slots and ensuring sites have the capacity to unload deliveries at the times stated. This will reduce the amounts of standing time on site, and thus carbon emissions through unnecessary transport and unexpected deliveries.

6.0 WASTE MANAGEMENT

6.1.1 **General Waste**

7.1.1 **Household Waste** – Black plastic bags should be used for general household waste.

6.1.2 **Paper, cardboard and packaging etc** – Should be stored in a dry place for recycling purposes. Paper, cardboard and packaging is compacted before begin removed for recycling.

6.1.3 **Building Waste** – Building waste and other waste associated with service provision. DAM Structures Ltd employees should adhere to the on-site skips designed for the waste produce through our construction activities. Timber, Metal, Plastics, empty and/or part used receptacles (such as paint tins), etc. must be segregated correctly through disposal to the correct skip ready for collection and disposal. Recycling principles will be utilized wherever possible.

6.1.4 **Surplus Equipment** – When equipment is no longer required by the company, the appropriate Manager shall request that the item(s) is sold subject to a suitable offer. If no suitable offer is received, it may then be scrapped and disposed of as described in accordance with this Policy.

6.1.5 **Scrap Metal** – Ferrous scrap i.e. steel should be placed in identified skips, and will be stored until a sufficient quantity can be collected for recycling.

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- 6.1.6 Confidential Waste** – Paper containing confidential or sensitive information must be shredded then recycled.
- 6.1.7 Bottles and Aerosol Cans** – unbroken bottles and aerosol cans must be placed into CLEAR plastic bags, sealed and disposed of correctly. N.B Clear bags are used to enable disposers to see what materials they are handling. Bottles and aerosol cans are disposed of in landfill sites.
- 6.1.8 Glassware** – Glassware, including bottles, must be put into a cardboard box. The box should be sealed and marked “Broken Glass”. The box is then placed inside a CLEAR plastic bag and left for collection by the disposers for recycling.
- 6.1.9 Trade Waste** – DAM Structures Ltd have a contract in place, with BIFFA, for the collection of disposal of trade waste. This is collected weekly, and is sorted in the collection bins.
- 6.1.10 Oxypropane Receptacles** – DAM Structures Ltd have a contract in place for the exchange of empty receptacles for full ones. Appropriate storage of these receptacles must be maintained at all times. Please refer to the local on-site arrangements for storage guidance