



Environmental Sustainability Policy

Version 4.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	Dec 2022	Dec 2023	First Policy.
2.0	Rena Panesar	Dec 2023	Dec 2024	Updated.
3.0	Rena Panesar	Dec 2024	Dec 2025	Updated.
4.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated.



Environmental Sustainability Policy

Introduction

At Pathways LDN Ltd., we recognise our responsibility to protect and preserve the environment for present and future generations and are committed to conducting our operations in an environmentally sustainable manner so as to minimise our impact on the ecosystems and communities in which we operate.

By implementing this policy, we strive to:

- ✓ **Comply with Legal and Regulatory Requirements:** We will comply with all relevant environmental laws, regulations, and other requirements applicable to our operations. We will monitor changes in environmental legislation to ensure ongoing compliance and adapt our practices accordingly.
- ✓ **Promote Environmental Responsibility:** We will conduct our activities with a strong sense of environmental responsibility, taking proactive measures to prevent pollution, conserve natural resources, and minimise waste generation. We will provide the necessary training, resources, and support to enable team members to contribute to our environmental efforts and promote a culture of environmental stewardship.
- ✓ **Continuously Improve Environmental Performance:** We are committed to setting measurable objectives and targets to improve our environmental performance and will implement corrective actions to achieve our goals.
- ✓ **Foster Stakeholder Engagement:** We will engage and communicate with our clients, partners, suppliers and the communities in which we operate regarding our environmental performance and initiatives and will actively seek feedback and promote dialogue to address concerns and foster a culture of environmental awareness and responsibility.
- ✓ **Promote Sustainable Practices:** We will strive to integrate sustainable practices into our operations and supply chains and will seek to work with suppliers and partners who share our commitment to environmental responsibility.



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- ✓ **Communicate and Report Transparently:** We are committed to transparently communicating our environmental performance to our stakeholders and will seek to regularly review and improve our reporting practices.

Who and what this policy applies to

The areas outlined in this document apply to all operations of Pathways LDN Ltd. and to all staff members.

Roles and Responsibilities

Directors

Our Directors have overall responsibility for ensuring that:

- This policy complies with our legal and ethical obligations, and all those under our control comply with it.
- We seek to drive improvement and set realistic goals and targets to reduce our environmental impact.
- Progress towards goals and targets is regularly reviewed.

Management

- To ensure the day-to-day implementation of this policy and work towards the goals and targets set.
- At regular intervals, report to the Directors on progress within their area of oversight.
- To actively work to identify areas where there is the potential for carbon reduction.

Staff

- To read and abide by this policy.
- To undertake any additional training on environmental sustainability as required by us.



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- To do everything in their power to protect the environment and work in a sustainable way.

Policy

Legal and Other Statutory Requirements

Pathways LDN Ltd. shall establish, implement and maintain a procedure to identify legal requirements that are relevant to the business, as well as other requirements that we subscribe to relating to our environmental commitments (e.g., the requirements of our regulatory bodies, funders, etc.).

Evaluation of Compliance

To meet our commitment to compliance, Pathways LDN Ltd. shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements and other requirements that we subscribe to.

Communication

We shall ensure that this policy and related information on the subject matter are readily available to staff as a matter of course and to any stakeholder on request.

Anti-Greenwashing

Pathways LDN Ltd. is committed to transparency and will never engage in greenwashing. We will always be honest about our environmental efforts, ensuring our claims are backed by real, measurable actions while acknowledging areas for improvement.

Culture

At Pathways LDN Ltd., we promote a culture of teamwork and shared responsibility to meet our sustainability goals, and we will ensure that appropriate resources (training, time, funding, etc.) are made available to meet our goals and targets.

Putting environmental sustainability at the heart of our work, we will also foster collaboration and engage with our learners, employers, partners, funders, suppliers and stakeholders in a



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meaningful way to identify improvements, share best practices, and collectively reduce our environmental impact.

Current Environmental Actions

Waste

We strive to minimise waste wherever possible, and our priority is always as follows:

Reducing

- ✓ Considering whether the procurement is necessary in the first instance.
- ✓ Choosing high-quality equipment, appliances, etc., that will last the test of time.
- ✓ Ensuring that our equipment, appliances, etc., are serviced at regular intervals to prolong their lifespan.
- ✓ Opting for multi-use items rather than single-use plastic or paper alternatives.
- ✓ Avoiding printing wherever possible – we opt for digital communications wherever possible.

Reusing

- ✓ Refurbishing and repairing equipment, etc., where practicable rather than replacing it.
- ✓ Donating or selling appliances, equipment, etc., that are no longer suitable for business use but have not reached the end of their life.
- ✓ Using refillable ink cartridges and other consumables wherever possible.

Recycling

- ✓ Promoting recycling at our office/centre and installing additional segregated recycling bins.



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- ✓ Utilising reputable waste management companies whose aim is to reduce the amount of waste reaching landfill.
- ✓ Ensuring that hazardous materials and waste electrical and electronic equipment are safely disposed of at our local recycling centre.

Recovering

- ✓ Where practicable, purchasing items that are reclaimed or made from recycled materials to close the loop on waste recovery.

Energy and Water Waste

At Pathways LDN Ltd., we:

- ✓ Take the energy efficiency of new equipment, appliances, etc., into account when purchasing them.
- ✓ Consider the energy and water footprint of each piece of equipment, appliance, etc., we intend to purchase.
- ✓ Switch off lights and electrical equipment when not in use.
- ✓ Make the most of natural light, heat and cooling breeze at our office/centre so that we can lessen our energy consumption.

(In fact, we champion our landlord's environmental policy, which encourages tenants to be more environmentally sustainable.)

Procurement

At Pathways LDN Ltd., we:

- ✓ Favour suppliers who:
 - Commit to sustainability and carbon reduction wherever possible. Even down to our hosting and software services, we choose providers who commit to net-zero.



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- Have sourced, manufactured and/or treated their goods in the most environmentally sustainable way. E.g., products that have been recycled or made using renewable resources.
 - Package and transport their goods in a way that will have the least impact on the natural environment. E.g., using minimal and/or recyclable packaging and transporting using low-carbon means.
 - Are local to our business. Not only does this help our local economy, but it also shortens transportation routes, meaning less reliance on fossil fuels.
- ✓ Avoid suppliers who have been prosecuted for breaking the law in relation to environmental breaches.

Our Operations

At Pathways LDN Ltd., we:

- ✓ Wherever possible, we use cleaning products and other chemicals that are free from harmful substances that could pose risks to human health or the environment.
- ✓ Ensure that waste is stored safely and securely so that the risk of spillages is minimised.

Transportation

At Pathways LDN Ltd., we:

- ✓ Operate a cycle-to-work scheme.
- ✓ Minimise the need to travel where possible by advocating:
 - Home working; and
 - Remote and virtual meetings/teaching sessions/IAG sessions, etc.
- ✓ Where travel is unavoidable, we:
 - Advocate the use of public transport wherever practicable; or
 - Encourage car sharing; and



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- Encourage staff to carefully plan routes and advocate eco-friendly driving habits to minimise fuel consumption.
- ✓ Do not believe in owning or leasing fleet vehicles, which reduces the resources required to produce and operate such vehicles.
- ✓ Choose local suppliers and partners who source/manufacture products locally and use local labour.
- ✓ Buy in bulk wherever possible to reduce our carbon footprint.

Future Environmental Actions

At Pathways LDN Ltd., we strive to be a socially responsible business and acknowledge that we can and must do more.

Therefore, to show our commitment to going further and making a real impact, we will:

- ✓ Calculate our CO2 footprint by the end of 2026 to know where we are starting and to identify where the greatest gains can be made.
- ✓ Train our staff on environmental sustainability, energy and water stewardship.
- ✓ Identify local and national carbon offsetting schemes which we can actively support.
- ✓ Complete a procurement analysis to drive a more robust and sustainable procurement strategy.
- ✓ Set up an environmental working group to explore how we, as a progressive business, can do more.

In addition, we will aim to regularly publish our starting point and any progress made – after all, we are committed to continuous improvement and being accountable for our actions.



Non-Compliance

Non-compliance not only undermines our commitment to sustainability but can also lead to environmental harm and legal penalties.

Therefore, staff members found to be disregarding sustainable practices, such as improper waste disposal, overuse of resources, or failure to adhere to eco-friendly procedures, may face disciplinary actions.

Suppliers and partners who fail to meet our standards may also face termination of contracts or working agreements.

Monitoring and Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

Appendix A: Water and Energy Stewardship

Water Stewardship

Water Leaks

In the UK, more than 3 billion litres of water¹ are lost through leaky pipes per annum.

At our office/centre, we will:

- Without delay, ensure that internal leaking water pipes, taps, etc., are repaired and/or replaced.
- Report to the utility company any known water mains leaks we identify.

Workplace and Home Usage

A study conducted in 2020 revealed that a single person in the UK could use up to 149 litres of water a day at home and 50 litres whilst working in the office.

¹ Source:

<https://www.utilitybidder.co.uk/our-services/business-water/environmental-damage-of-global-water-waste/>



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At Pathways LDN Ltd., we will:

- Turn off taps when not in use.
- Use the minimal amount of water required (in food and beverage preparation, when cleaning, etc.).
- Use energy-efficient lightbulbs that use less water consumption at the electricity production plant.

Even working from home, our team members can save water by:

- Turning off taps when not in use.
- Only use the water needed to make a hot drink, wash up, etc.
- Switching from baths to showers.
- Ensuring that dishwashers and washing machines are filled before use.
- Not using sprinklers to water gardens/collecting rainwater, and using that to water instead.

Physical Purchases

It is important to ensure that we are not generally wasteful when considering the water footprint of purchases.

Water can be wasted in the manufacturing process in three ways:

Blue Water Footprint: The amount of surface water and groundwater required (evaporated or used directly) to produce an item.

Green Water Footprint: The amount of rainwater required (evaporated or used directly) to make an item.

Grey Water Footprint: The amount of freshwater required to dilute the wastewater generated in manufacturing to maintain water quality, as determined by state and local standards.

At Pathways LDN Ltd., we will limit procurement, especially of the following products:

- Smartphones, laptops and any item that uses computer chips.
- Paper.
- Plastics – particularly single-use.



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The Water Savings

By implementing the above, we can save:

Item	Water Saving ²
Smartphone	Up to 3,400 gallons to manufacture
Laptop	Up to 400 gallons of water
Paper	Up to 8 gallons per notebook sheet
Single-Use Plastic Bottles	Up to ¾ of a gallon per bottle

Energy Stewardship

New research by the digital energy services company eEnergy estimates that 30% of all energy that is currently wasted comes from commercial buildings across the UK, which costs businesses £33.9 billion annually.

Using as little as possible:

It may sound obvious, but using power sparingly is the biggest way to save energy. Think turning off lights and equipment when not in use (turning off electrical items at the socket rather than leaving them on standby³), keeping areas at a comfortable⁴ and constant temperature, using natural light and light-coloured walls to illuminate spaces, opening windows to allow cool air to circulate or using reflective or cooling blinds to keep the space cool.

Buying low-energy appliances:

Energy labels tell you how much energy the appliance uses, allowing you to compare it to similar appliances. This can help you find appliances that use the least amount of energy.

² From

<https://stacker.com/stories/2592/how-much-water-it-takes-create-30-common-items>

³ Appliances left on standby can still use up to 50% of the energy they use when in operation.

⁴ Reducing the heating control by just 1°C can cut fuel consumption by between 3 and 6%.



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Energy-efficient devices may cost more, but they save both energy and money in the long term.

Change old lightbulbs to low-energy use alternatives⁵, and avoid portable electric heaters, portable air conditioners and other heavy-energy use appliances wherever possible.

Service equipment and gas installations regularly to avoid inefficiency.

Choosing and supporting renewable energy:

Adopt renewable energy sources such as solar, wind, hydroelectric, and geothermal for electricity generation, and even if you don't have the means to implement these at home, choosing energy providers who invest in renewable energy goes a long way towards reducing your carbon footprint.

⁵ LED bulbs can help you save as much as 80% on lighting costs due to the lower energy rating.