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Environmental Management Policy

Authorised and Owned by:	Role	Signature	Date
Ryan Campbell	Managing Director	R. Off	15/01/2025



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1. Purpose

The purpose of this policy is to define the Environmental Management System (ISO 14001) used by Zenit and provide guidance to stakeholders of the environmental policies and ethos to applied by the company throughout its trading activities. There is also an inter-relation with the Quality Management System (ISO 9001: 2015) and Health & Safety Management System (ISO 45001:2018), which will use some of the Environmental Management System documentation and procedures to aid commonality across the Management System.

This policy documents the Company's policies and systems for the management of quality. It complies with the requirements of ISO 14001: 2015 and has the following purposes:

- Establish and maintain an effective Environmental Management System covering the implementation of our Quality Policy;
- Demonstrate to interested parties, our commitment in providing a consistent high standard of Environmental Management to all our customers' whilst striving to improve our overall quality performance;
- Identify and provide a guide to, the policies, procedures and work instructions, which assists
 in educating our staff in the Environmental Management System, structure and
 requirements;
- Provide a reference document for all staff whose activities may have influence on our Environmental performance;
- Assist in undertaking works compliant with the LRQA NERS, GIRS & WIRS schemes;
- Assist in the training of staff;
- Provide auditors with an understanding of the system, to assist them in the audit process.

This Environmental Management Policy has been compiled in accordance with the requirements of the ISO 14000: 2015 - Environmental Management Systems – Requirements.



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2. Scope

The requirement of this policy extends to all personnel working on behalf of Zenit who have been given the responsibility for implementing and maintaining the procedures and controls described, or referenced.

The scope of the Environmental Management System encompasses all the activities that are or could be undertaken by Zenit in the course of our business.

3. Abbreviations, Definitions & References

3.1. Definitions

Management System All the documents that the company uses to manage the

business

3.2. Abbreviations

QMS Quality Management System

EMS Environmental Management System

CMS Company Management System

NERS National Electricity Registration Scheme

WIRS Water Industry Registration Scheme

GIRS Gas Industry Registration Scheme

3.3. References

ZI-EMS002 Environmental Aspects Register

ZI-EMS003 Environmental Legislation & Regulations Register

ZI-EMS005 Environmental Aspects, Identification and Evaluation

Procedure

ZI-EMS008 Office Emergency Plan **ZI-EMS009** Site Emergency Plan

ZI-EMS010 Environmental Objectives and Targets Procedure

ZI-QMS008 Management Review Schedule

ZI-QMS011 Control of Non Conformances, Corrective and Preventative

Actions Procedure

ZI-QMS017 Objectives and Targets Register



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4. Introduction

The Company is committed to providing a high standard of service to our customers, whilst providing a good working environment for our employees. This policy is designed to help you and staff members to understand the requirements of the Company's Environmental Policy and system. By reading and understanding the contents of this policy you will be contributing towards achieving and maintaining standards in a positive quality culture. We all have a responsibility to co-operate with management, our customers, and our colleagues, to undertake our duties in a safe and proper manner and produce a service and product to meet our customers' requirements.

If you have any observations or concerns regarding quality, whether it is related to work being undertaken or information contained within this policy then refer the matter directly to the Managing Director.

With your commitment and co-operation quality can be managed effectively and to the benefit of all our staff, customers and third parties who may be affected by our undertakings.

This Environmental Management System works in conjunction with the Quality Management System.

5. Environmental Management System

5.1. General

This policy describes the core elements of the Zenit's EMS. This policy refers to procedures that describe specific requirements of the EMS in greater detail. Documented work procedures are established at the functional level as appropriate. Records providing evidence of various environmental activities and events have been established and maintained.

5.2. Documents

The documents within the EMS are regularly reviewed and improved to meet the needs of our business and that of our clients'. The documentation is tiered and consists of the elements in Figure 1.

5.3. Distribution

The distribution of controlled copies of this manual are recorded on the distribution list on the Document Issue Register attached to the front of the Master copy. Controlled copies will be identified either by the copy number being in coloured ink or stamped 'Controlled Copy' in coloured ink on the front cover.

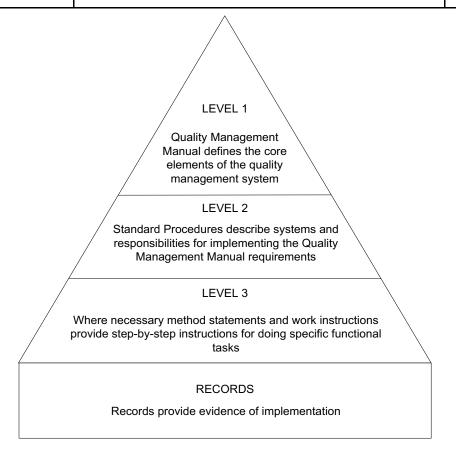
Copies not identified in this way are uncontrolled and will not be subject to any form of updating.



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5.4. Communication

The company procedure addresses communication of environmentally related information to employees and to third parties. Internal communication shall be sufficient to allow employees to understand their roles and meet their responsibilities within the EMS, and for management to lead and support the EMS. The external communication section covers how Zenit receives, documents and responds to communication requests from external parties (such as communication from regulatory agencies).

6. Planning

6.1. Environmental Aspects

Zenit determines the significant environmental aspects of its activities, products and services as per the Environmental Aspects, Identification and Evaluation Procedure.

Significant environmental aspects identified will be included within the Environmental Aspects Register.

We will not automatically communicate our identified environmental aspects and impacts. Any request for information relating to the company's identified environmental aspects and impacts will be considered by the Managing Director on an individual basis and will make an appropriate response to the request following due consideration.



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6.2. Legal & Other Requirements

The Environmental Legislation & Regulations register is used to record relevant legal and other requirements that may affect the company's activities. The register is subject to regular intervals against changes in current legislation. Other requirements will be reviewed on a contract by contract basis

The Managing Director is accountable for ensuring that staff have access to and awareness of all applicable environmental legislation applicable to their scope of work. This includes employing personnel or retaining outside assistance from persons who have training and experience in environmental legislation and standards appropriate to the scale and complexity of the work being undertaken.

Compliance to legal and other requirements will be assessed through audit, reviewing waste transfer notes and carrying out site assessments

6.3. Objectives & Targets

The system for identifying, setting and monitoring environmental objectives and targets is documented in the Environmental Objectives and Targets Procedure.

The company's environmental objectives and targets shall be recorded in the Objectives and Targets Register.

When an objective or target is not being met or may not be achievable within the given timeframe, this will be documented and new objective or target may be implemented after consultation with the relevant staff involved.

6.4. Environmental Management Programme

Environmental management programmes are used to document the methods to be used for ensuring that the objectives and targets are achieved and that there is commitment to continuous improvement.

Zenit uses or revises relevant procedures or parts of its EMS, including significant environmental aspects, objectives and targets and implementation programmes when necessary to address change (such as modified processes, the introduction of new equipment or materials) or new information (such as results of audits, management reviews or changes in legal requirements).



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7. Environmental Policy Statement

Zenit provides a one stop shop multi utility installation service for both domestic and industrial customers.

As a leading UK provider to the Utilities Industry, Zenit has a strong commitment to the prevention of pollution, the safeguarding of the environment and public health whilst carrying out our trade activities.

The Directors, Senior Management Team and employees are committed to an effective environmental management system (based on ISO 14001: 2015 standard) that will help Zenit accomplish its strategic business objectives.

To that end, Zenit shall:

- Commit to the prevention of pollution, reduction of waste, the reduction of consumable resources, and the promotion of recycling.
- Commit to comply with all applicable current legislation and other environmental requirements to which the company subscribes.
- Commit to promote environmental sustainability to our suppliers and sub-contractors.
- Strive to continually improve the environmental management through setting and reviewing environmental objectives and targets.
- Communicate all pertinent environmental issues and their environmental responsibilities to employees.
- Make the environmental programme an integral part of current and changing business strategies.

Implementing and communicating this policy and making it available to our customers in response to request and inquiries are primary management objectives.

Ryan Campbell Managing Director

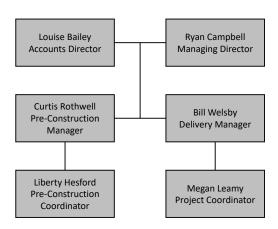


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8. Organisation & Responsibilities

8.1. Structure

Organisation Chart Roles & Responsibilities



8.2. General

All employees with specific responsibility for environmental management must ensure that these duties are carried out, satisfying themselves that individual responsibilities are properly understood, complied with and implemented. Environmental, Health and Safety support will be provided by external consultancy to Zenit in the interim.

8.3. Managing Director

The Managing Director is responsible for the environmental management planning activities of the business. They will:

- Ensure that adequate finances are allocated to ensure sufficient resources are available to facilitate the requirements of the environmental management systems
- Approve the environmental objectives for the Company
- Review the environmental performance of the Company against defined objectives at regular intervals
- Ensure that the environmental management system requirements are established, implemented and maintained in accordance with current legislation
- Ensure that standards have been set and maintained for planning, and periodically measuring, auditing and reviewing environmental performance
- Ensure that the significant environmental aspects have been identified and evaluated for the Company's activities
- Ensure that the Company's environmental policy is enforced

8.4. Account Managers

The Accounts Manager is responsible for ensuring the commercial aspects of the contracts are managed including:

Ensuring that the commercial aspects of the contracts are understood by the contract staff.



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- Ensuring that invoices and applications are accurately compiled and sent out to clients in a timely manner.
- Variations to contract are identified, costed, and agreed with the client.
- Capturing information and reporting on the profitability of the business and each contract.

8.5. Operations Personnel

The Operations Managers are responsible for their operational activities of the business including management of environmental, quality and safety. They will ensure that;

- Adequate resources are made available to ensure that the work activities can be carried out in accordance with the requirements of the environmental management system.
- Regular inspections of the activities at all work sites are carried out to assess the businesses performance in relation to the environment.
- The Company policy and the detailed arrangements concerning environmental matters are made known, implemented and maintained.
- Relevant environmental awareness is provided for new staff members.
- Staff members, contractors and visitors are aware of the environmental controls required for the activities that they are involved.
- A robust system for the maintenance of equipment and machinery is developed and implemented; ensuring a process for reporting defects in a timely manner is included.
- Environmental incidents and near misses are fully investigated and the findings reported to the Directors.
- He liaises with staff in relation to environmental issues.
- Immediate action is taken on any environmental risk which arises from our work activities.

8.6. Quality/Safety/Compliance/Environmental Advisors/Managers

Appointed Quality/Safety/Compliance/Environmental Advisors/Managers when engaged are contracted to:

- Provide updates to environmental and health and safety legislation.
- Maintain and update our environmental, quality and health and safety arrangements as changes occur to legislation and / or to our operations.
- Develop quality/environmental/safety plans as required.
- Develop Construction Phase Plans for site works where appropriate.
- Develop waste management plans where required.
- Carry out risk assessments or verify risk assessments carried out by our staff to ensure they are suitable and sufficient for the activities being carried out.
- Develop or verify method statements and safe systems of work for our activities.
- Carry out site health and safety inspections as directed by Sapphire Utility Solutions.
- Investigate our accidents / near misses in a manner appropriate to the incident involved and provide feedback and an action plan for improvements.
- Advise on suitable training required for our staff.
- Carry out management system audits as required to meet the various standards.
- Provide advice as required.

8.7. Team Leaders

A Team Leader is the senior member of the site team and is responsible for management of the activities carried out by the team under his control. They will ensure that;



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- They follow the requirements of the management system whist carrying out work for the Company.
- All necessary PPE is available and worn as required by the work being carried out.
- They do not use faulty equipment and report the faults to their line manager as soon as possible.
- They drive in a safe and proper manner on the public highway and obey all the speed limits in force on their route.
- They only use tools and equipment that they are trained to use.
- Where the Customer's environmental, safety or quality standard requirements are of a lower standard than that of Zenit's, Zenit standards will still be applied.
- Ensure that all incidents or near misses are reported to the Operations Manager and/or the Managing Director.

8.8. Operatives

The Operative is an essential member of the site team and is primarily responsible for ensuring that they follow the instructions of the Team Leader and does nothing to cause a negative impact on the environment, standard of workmanship or the safety of themselves or others. The Operative will ensure that;

- They follow the requirements of the management system whist carrying out work for the Company.
- All necessary PPE is available and worn as required by the work being carried out.
- They do not use faulty equipment and report the faults to the Team Leader immediately.
- They drive in a safe and proper manner on the public highway and obey all the speed limits in force on their route.
- They only use tools and equipment that they are trained to use.

Note: the above is an example as team leaders and operatives are not employed directly by Zenit.

8.9. All Staff

All staff have a duty to:

- Always observe company management system rules and co-operate with the company and their colleagues in matters of the environment, quality and safety.
- Not intentionally or recklessly misuse anything provided in the interests of environmental, quality or safety management.
- Report all incidents where there is potential to cause pollution or a negative environmental impact.
- Always use the equipment that is provided in the interests of environmental control.
- Report any shortcomings in the protection arrangements for environment, quality or safety

8.10. Training, Awareness and Competence

The Staff Training procedure addresses the competence and awareness required of Zenit employees.

Zenit identifies the training needs and competencies that are required by our staff, and ensures they are made aware of their roles and responsibilities with respect to those activities relating to the environment, quality, and safety.



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Employees are briefed in:

- The importance of conformance with the environmental, quality and safety policy and procedures.
- The significant environmental impacts (actual and potential), of their work activities and the environmental benefits of improved personal performance.
- Their roles and responsibilities in achieving conformance with the environmental, quality and safety policies and procedures, including emergency preparedness and response requirements.
- The potential consequences of departure from specific operating procedures.

Relevant employees shall have the appropriate training, competence, and awareness so that their activities are conducted in a manner consistent with the management system.

8.11. Emergency Preparedness and Response

The Company has established an emergency plan to identify and respond to scenarios that are reasonably foreseeable. The plan defines and draws upon the cross functional expertise necessary to take into account, mitigating the impact and related issues such as worker health and safety, media relations, insurance and reporting requirements

The emergency response procedures are reviewed regularly, particularly after a related incident or the planed testing of the procedure and revised as necessary.

9. Checking & Corrective Action

9.1. Monitoring and Measurement

All of the work areas including the offices and workplaces will be subject to regular inspections and internal audits. The inspections and audits will be combined with the health and safety inspections and internal audits and will be submitted to the Management Team on a combined form.

Operational control procedures control the activity being measured. The procedures include checks to ensure that relevant operational controls are being followed.

Performance monitoring and measurement information is periodically reported to the Managing Director as part of the review.

Conformance to the Company's environmental objectives and targets is monitored through the Management Review process.

9.2. Non-Conformance, Corrective and Preventive Action

The Control of Non Conformances, Corrective and Preventative Actions Procedure defines the arrangements for handling, investigating, mitigating impacts, correcting and preventing reoccurrences of non-conformances. Changes in documented procedures, due to corrective actions will be recorded and implemented.

Non-conformances include the failure to conform to ISO 14001, applicable legislation and other requirements, EMS procedures, operational controls and work instructions, environmental incidents



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and recommendations from external reports. A critical element of corrective action taken, appropriate to the problem and impact, is to avoid recurrence of the problem.

9.3. Records

The company captures all changes to any documentation within the Works Management System via the Change Request Form. If changes are made, the document will be updated in alignment with version control and captured in the Management System Register.

9.4. Environmental Management System Audit

Zenit EMS is periodically audited which addresses audit the scope, frequency, methodology and responsibilities. EMS audits evaluate and verify conformance to planned arrangements and to the requirements of the standard, and ensure that the EMS is effectively implemented.

The audit results are presented to the MD & senior management for review at management review meetings.

10. Reporting

10.1. General

<u>All</u> environmental incidents large or small that may occur as part of work activities and require attention (cleaning up spills, oil leaks to ground or water, etc.) shall be managed and reported in accordance with the Office Emergency Plan and Site Emergency Plan.

All incidents are to be reported to the Senior Management Team immediately by telephone once the initial problem has been contained. The incident report found at Annex A of the Office Emergency Plan and Site Emergency Plan is to be completed upon return to Zenit or at the end of the working day (which ever comes soonest).

Environmental Incident information will be reviewed by the Senior Management Team to identify any trends and areas for improvement.

10.2. Near Misses

Incidents whereby there was no pollution or environmental damage are classed as 'Near Miss' incidents.

Near miss incidents must be reported to the Senior Management Team, particularly if environmental damage or degradation was narrowly avoided. It will provide valuable information and will allow remedial measures to be introduced to prevent re-occurrence and potential incident.

10.3. Environmental Agency Reportable Incidents

Management will check when an incident has been reported to them if the incident requires to be communicated to the Environment Agency.

10.4. Communication of Results

Any findings of the incident report and investigation will be disseminated throughout the workforce by way of notice board, emails and safety alerts.



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11. Review

The Company periodically reviews the suitability, adequacy, and effectiveness of the EMS as defined in Management Review Schedule. The management review can be integrated with regular senior management business reviews that occur on a more frequent basis.

The management review process may also address the environmental issues associated with changes in the volumes of work, new equipment and processes, and the related changes to policy, objectives or other elements of the environmental management system.

12. Document History

This document will be reviewed at regular intervals and updated accordingly. The details of the revisions will be identified and recorded.

Revision	Details of Revision/s	By Whom	Date
А	First draft	W Welsby	08/01/2024
В	Yearly re-review	R Campbell	15/01/2025
С			
D			
Е			
F			
G			
Н			