

## MiCiM Environmental Directive

As stated in our policy MiCiM Ltd recognise that it has a responsibility to the environment beyond legal and regulatory requirements. To that end the following directive has been developed to detail our approach to managing environmental issues for our business.

This document comprises of three key parts and its overall purpose is to provide an overview of the MiCiM health and safety arrangements.

- 1. Statement of intent.** This is a declaration from the director of MiCiM responsible for the environment setting the companies aims and objectives.
- 2. Organisational Responsibilities.** This section details the environmental responsibilities for the company.
- 3. Arrangements for Environmental Management.** This focuses on the company's specific arrangements for various scenarios.

### Objectives for the Environmental Policy

- To protect the environment in which we carry out our operations and projects.
- To identify the responsibilities of all members of our staff.
- To promote a culture that the considers environmental impact of our operations and that of our sub-contractors and suppliers.
- To set out the records to be kept in order that targets can be set, measured and improvements made.
- The policy is to be read in conjunction with MiCiM's Sustainability Policy Statement

# MiCiM Ltd – Environmental Policy

## 1. Statement of Intent

MiCiM Ltd recognise that it has a responsibility to the environment beyond legal and regulatory requirements. We are committed to reducing our environment impact and continually improving our environmental performance as an integral part of our business strategy and operating methods.

### Responsibility

Sophia Flucker, is responsible for ensuring that this environmental policy is implemented, however all employees have a responsibility in their area to ensure that the aims and objectives of this policy are met.

### Policy aims

We endeavour to:

- Comply with all relevant regulatory requirements
- Continually improve and monitor environmental performance
- Continually improve and reduce environmental impacts
- Increase employee awareness

Recycling:

We will: recycle all items possible in our office and site locations.

Energy and Water

We will seek to: ensure all taps are turned off when not using, lights, computers, screens etc. will all be switched off when not in use.

Maintenance and cleaning:

We will: ensure our office locations and site welfare and office spaces are cleaned at least once a week.

### Monitoring and improvement

We will endeavour to:

- Record our waste away from the office and sites over which we have control, and where possible we will also record the percentage of re-cycled waste with a view to targeting improvements.
- Record mileage for our personnel attending site and where possible minimise their travel distances.
- Record and develop lessons learnt from the above and from any environmental issues recorded on sites over which we have control.

### Culture

We will:

Update this policy at least once annually in consultation with staff and other stakeholders where necessary.

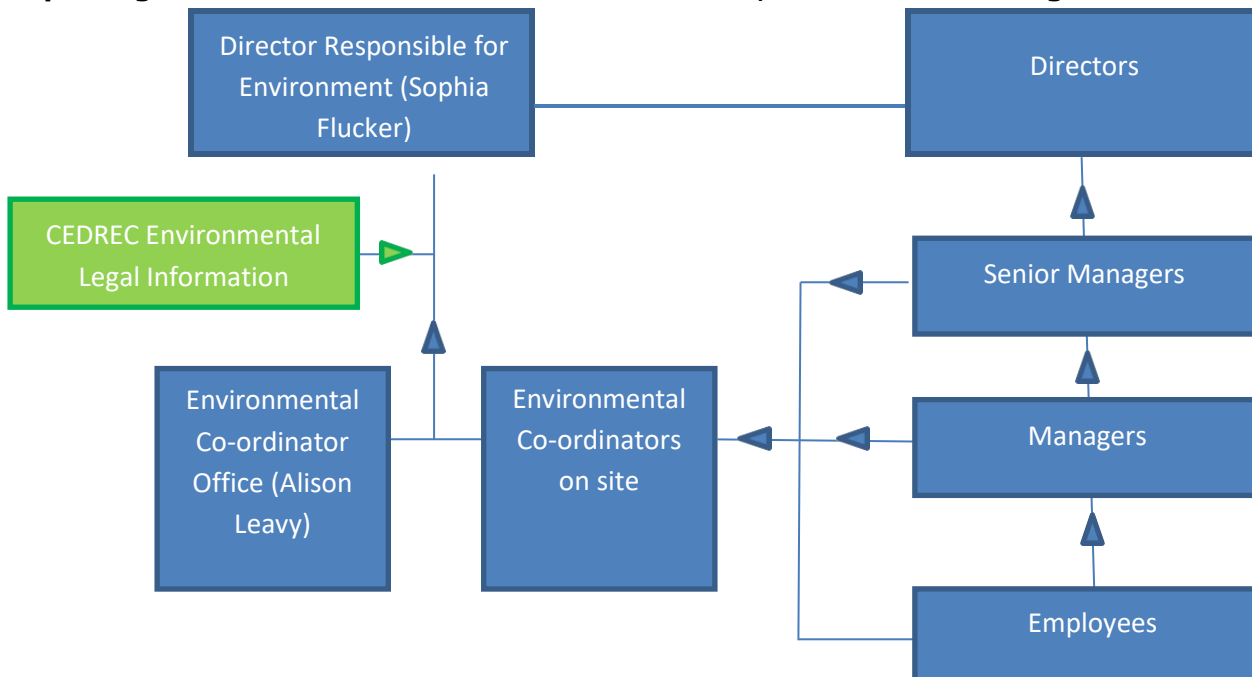


### Sophia Flucker

Director Responsible for Environment  
October 2024

## 2. Organisational Responsibilities

### Reporting structure for Environment and incidents, accidents and dangerous occurrences.



## Responsibilities

### Directors

The Directors have the same duties as Senior Managers (see below) however they are also responsible for the development and review of the company's Environmental policy and the co-ordination and implementation of all arrangements required to comply including ensuring adequate resource is appointed.

In addition, the directors will appoint an Environmental Co-ordinator for our office facility.

### Senior Managers

- Ensure all activities listed under Managers duties are undertaken on their projects.
- Ensure an Environmental Co-ordinator is identified and appointed on their projects.
- Ensure the effective implementation of the company Environmental Policy, and the MiCiM Environmental Directive.
- Have a general understanding of the duties required as an employer, premises controller and employee under the Environmental Protection Act 1990, Waste (England & Wales) Regulations 2011, Environmental Permitting (England & Wales) Regulations 2013 and Hazardous Waste Regulations 2005 to assist MiCiM in compliance with legislation.
- Promote and enforce high environmental standards with the aim to maintain a positive environmentally aware culture.
- Lead by example and promote the environment as a high priority for their projects.

- Investigate and report any incidents, accidents and occurrences on your projects project in line with the MiCiM process.
- Ensure that the MiCiM minimum standards are met and promote further training and development of your team.
- Ensure that regular environmental inspections/audits are undertaken, and actions taken as recorded.
- Interrogate the findings of internal and external inspections and audits completed within your projects/teams and taking actions to rectify any negative observations.
- Share any best practice improvements suggested or shortcomings with practices or processes regarding environmental management.
- Report immediately any activities involving or requiring involvement of the Environmental Health Officer (EHO) to the Director responsible for environment.
- Plan, manage and monitor all work activities to eliminate, or if unable to eliminate reduce and control risks to staff, contractors, clients and members of the public.
- Ensure effective communication of environmental issues and expectations throughout your teams/projects.
- Ensure all contractors are made aware of their responsibilities for environmental matters.
- Only utilise suppliers and consultants that are pre-qualified

### **Managers**

- Must request suitable Environmental advice and support if required.
- Assist the Environmental Co-ordinator to fulfil their duties.
- Must have a general understanding of the duties required as an employer, premises controller and employee under the Environmental Protection Act 1990, Waste (England & Wales) Regulations 2011, Environmental Permitting (England & Wales) Regulations 2013 and Hazardous Waste Regulations 2005 to assist MiCiM in compliance with legislation.
- Monitor and control the environmental aspects of the project including the management of contractors, and interface with the public and clients.
- Enforce the MiCiM Environmental Policy and Directives.
- Conduct site environmental inspections / audits and implement actions required from the findings.
- Only utilise suppliers and consultants that are pre-qualified with acceptable Environmental Policy and procedures. Request pre-qualification of new subcontractors if required.
- Promote a positive environmentally aware culture.
- Ensure that when observing any activities that could pose a significant risk to the environment, where possible the unsafe operation is stopped, inform senior management and record appropriately, providing support, assistance and advise where necessary.
- Alert the senior management of any improvements suggested or shortcomings with practices or processes regarding environmental management.
- Investigate and report any incidents/accidents and dangerous occurrences promptly to your senior manager in line with the MiCiM process.
- Ensure that Environmental issues are covered in the site induction with specific reference to those identified in the Environmental Plan.

### **Environmental Co-ordinator**

- Understand the application of the Environmental Protection Act 1990, Waste (England & Wales) Regulations 2011, Environmental Permitting (England & Wales) Regulations 2013 and Hazardous Waste Regulations 2005 and where these need to be managed in relation to the operation to which you are appointed.
- Assist MiCiM in compliance with legislation relevant to the company's business.
- Keep up to date with changes in current environmental legislation.
- Provide environmental input to the directors and operational staff though advise, guidance and support.
- Conduct environmental inspections/audits and prepare reports of MiCiM's operations recording remedial action/s required and following up on these actions.
- Where applicable conduct environmental inspections/audits and prepare reports of the operations of sub-contractors or trade contractors under MiCiM's control, recording remedial action/s required and following up on these actions.
- Ensure investigations into all near-misses, incidents, accidents and dangerous occurrences are conducted and recorded.
- Communication of environmental information across the company.
- To set an example by instigating and following best practice on site.
- To bring new techniques for improving environmental awareness and management to the attention of the director responsible for the environment.
- Assist operational staff in the review of high-risk method statements, provide appropriate assistance in assessing other method statements, and monitor their implementation where possible.

### **All personnel**

- Must request suitable environmental training, advice and support if required.
- To take reasonable care not to put yourself or other people at risk by what you do or don't do during your work.
- Set an example and demonstrate high environmental awareness and standards.
- To read and follow the Environmental Policy and Directive and any additional instructions provided. Request assistance if clarification is required.
- Assist the Environmental Co-ordinator in carrying out their duties.
- Cooperate with MiCiM on environmental matters.
- To always report to your line manager and concerns over environmental issues for any tasks you have been asked to do or you have been made aware of.

**Note:**

Refusal or failure to comply with the Company Health and Safety Policy will be considered a serious disciplinary offence.

### **3. Arrangements for Environmental Management**

#### **Document issue and control**

MiCiM have various policies, standards and environmental management support. These policies, standards and systems have been created with input across all levels to achieve the best outcome regarding our environmental impact.

This document will be reviewed if there is a significant change to the business or how it operates and/or at intervals not exceeding one year.

Environmental information, updates and policy changes are to be issued to all employees by email, with a read receipt asking for confirmation that the email has been read.

#### **Application**

Environmental practices will differ between our offices, projects and depending on our role, however MiCiM will adopt and implement as a minimum the standards set out in this policy.

Where MiCiM enters into a joint venture or any variation of this, with one or more other entities, this policy will remain the basis of our Environmental Management standards. Authorisation at director level will need to be obtained if the policy is to become redundant during a joint venture operation.

#### **Planning, hazard identification and control**

Planning is the most important element of effective risk management.

At all work places MiCiM senior management and management must assess risk in accordance with legislation and record significant findings. MiCiM promote the use of the nine Principles of Prevention when planning work:

1. Avoid risks
2. Evaluate unavoidable risks
3. Combat risks at source
4. Adapt work to the individual, especially the design of places of work
5. Adapt the place of work to technical progress
6. Replace dangerous articles, substances, or systems of work by non-dangerous or less dangerous articles, substances, or systems
7. Use collective protective measures over individual measures
8. Develop an adequate prevention policy
9. Give appropriate training and instruction to employees

MiCiM has developed an Environmental Risk Assessment which must be reviewed and completed prior to any works commencing on site. All issues identified in this risk assessment that MiCiM have control over and that require management and control in the course of our operations will be added to an Environmental Plan specific to the area of operations. The Environmental Plan will identify the receptors and the management processes to be followed to remove, reduce and control the hazards.

As a minimum in all locations over which MiCiM have control we will:

1. Identify ways to Reduce, Reuse and Recycle waste arising from our operations.
2. Identify and put in place waste stream segregation and recycling.
3. Try to influence all stakeholders on our projects to adopt the best possible environmental standards.
4. Monitor and record our use of Power and Water. We will over time set KPI's for these metrics and targets for each of our projects.
5. Monitor and record the distance travelled and means of transport for staff, sub-contractors and deliveries to our projects. We will over time set KPI's for these metrics and targets for each of our projects.
6. Monitor and control Noise, Dust, Vibration and any other pollutant to minimise our environmental impact.

## **Implementation and Operation**

### Training

MiCiM will provide appropriate training and awareness for each position and specific responsibilities. Employees and contractors are to alert MiCiM if they believe further training is required.

### Operational control

The Company will maintain environmental standards and best practice guidance for known and foreseeable risks to ensure, so far as is reasonably practicable, that the minimum legal standard is met, by effective control and counter measures where risks exist.

Due to the varying company activities staff will need to take into account the best application of control measures dependent on the specific scenarios.

Environmental advice, and assistance can be made available from MiCiM whenever desired.

Specific hazard control will be enforced for high risk items identified in the Environmental Risk Assessment as set out in the Environmental Plan.

Further hazard identification and control measures must also be considered during work activities, including but not limited to, exposure to noise, dust, vibration, COSHH, foul and surface water disposal and flushing activities.

## **Emergency Procedures**

Periodic testing will be conducted for emergency arrangements. These arrangements will be identified in each work place assessment. These may include but are not limited to; emergency spill response etc.

These plans will include identifying the emergencies, nominated personnel to manage the situation, actions to be taken and equipment required, process for raising alarms and evacuation.

These workplace emergency procedures will be communicated during inductions and safety briefings.

These procedures will be reviewed annually or after a significant change.

## **Performance and monitoring**

MiCiM will monitor environmental performance in all areas of our operation and projects over which we have control, these will usually be those where we are appointed as principle or main contractor. We will ensure so far as is reasonably practicable; the hazards are identified, and controls are implemented and effective, the environmental policy requirements are being met, and lessons are being learnt.

MiCiM will ensure there is sufficient supervision and/or management to monitor Environmental performance, including contractor performance.

All projects will have regular inspections and audits including visits by directors, these may result in reports being produced and issued for action by the projects team.

All individuals will be consulted periodically regarding environmental measures, and performance, with the aim of improving the standards and practices used under MiCiM control.

## **Accident/incident reporting**

As specified within individual's responsibilities MiCiM has standards for reporting all incidents/accidents and dangerous occurrences, ensuring they are investigated, recorded and review appropriately. This may include an inspection and report by an outside consultant.

The Environmental Co-ordinator will report all environmental incidents, accidents and dangerous occurrences to the director responsible for the environment immediately and also advise the relevant local or national authority.

All incidents/accidents and dangerous occurrences are subject to investigation. This allows MiCiM to report these issues accurately to any stakeholders, such as clients, contractors and the local and national authorities.

Investigating and recording these events allows MiCiM to collate data to establish methods to improve performance, once analysed this information will be made accessible to staff as appropriate.