

ENVIROMENTAL POLICY

Ian Venables Director	
Initial Issue Date	October 2010
Last Review Date	November 2015
Next review	October 2016

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Statement of Intent

Venables Associates (Venables) seeks excellence in every aspect of our business and is committed to minimising the environmental impacts of our business operations. In managing our operations, we will:

- Comply with relevant existing environmental legislation.
- Reduce the consumption of resources (Energy and water used in operating our premises).
- Promote awareness amongst our staff of the environmental impact of travel and encourage the use of relevant technology to reduce the need for travel.
- Endeavour to recycle waste, in particular paper, produced in offices where we have control of the relevant services. In buildings that are controlled by others, we will engage with landlords, or their agents, to ensure Venables standards are achieved where possible.
- Give due consideration to environmental issues in the acquisition, design and location of buildings, and apply CIBSE standards for building specifications, features and construction wherever possible.
- Ensure environmental criteria are taken into account in the procurement of goods and services as part of our commitment towards corporate responsibility in the supply chain.
- Strive to continuously improve our environmental performance.

To secure these objectives, we will:

- Allocate management resources for the effective direction and implementation of the environmental policy with the aim of achieving objectives and meeting targets
- Review our environmental policy on an annual basis, to take account of developments in environmental legislation and management and legislation, as well as the requirements and expectations of our clients and others with whom we do business.
- Set and monitor key objectives and targets of our environmental performance at least annually.
- Encourage proposed and existing suppliers to investigate and introduce environmentally responsible processes and products, and ensure that consideration is given to the cost and benefits of environmentally responsible alternatives.
- Ensure that suppliers' environmental credentials are considered in the supplier appraisal process and that, where appropriate, environmental criteria are used in the award of contracts.

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- Communicate internally and externally our environmental policy and performance on an annual basis.
- Communicate the importance of environmental issues to our commercial partners and staff, and encourage feedback regarding our environmental issues and concerns.
- Promote awareness amongst our people of environmental initiatives that Venables and they, as individuals, can become involved with.
- Encourage appropriate consideration of environmental issues in the professional services we provide to our clients.

This statement represents our general position on environmental issues and the policies and practices we will apply in conducting our business. The Environmental Policy is accessible to all staff via the internal Venables Intranet.

Roles and Responsibilities

Venables Environmental Organisational Structure

UK Board of Directors

Members of the UK Board of Directors are ultimately responsible for environmental management and performance within Venables, as well as taking ownership of the Environmental Policy. The Board also have the responsibility of ensuring Venables compliance with relevant environmental legislation.

QA Manager

The QA Manager is responsible for implementing the Environmental Policy and associated environmental management system, on a day-to-day basis.

Specific duties include:

- Assessing the environmental aspects and associated impacts of Venables activities;
- Reviewing the Environmental Policy and procedures;
- Ensuring compliance with environmental legislation relevant to Venables business operations;
- Developing and implementing a detailed programme of environmental actions with clearly stated performance objectives, targets and performance indicators;

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- Working with staff to assist in the implementation of environmental procedures and programmes;
- Providing feedback to staff on environmental performance;
- Liaising with contractors and suppliers, in conjunction with Venables staff, to investigate and implement ways of reducing Venables impact on the environment;
- Supporting procurement in engaging with contractors and suppliers with regards to investigating and introducing environmentally responsible processes and products, and ensuring that consideration is given to the cost and benefits of environmentally-responsible alternatives;
- Carrying out audits on new and existing suppliers;
- Carrying out audits on the progress and implementation of the programme of environmental actions;
- Receiving feedback and advising Directors and staff on environmental matters;
- Co-operating with clients of Venables in relation to the provision of environmental information; and
- Liaising with local authorities and governmental agencies on environmental matters.

Venables Employees

Our employees are expected to assist with the implementation of any environmental initiatives in their office (for example, the recycling programme) and to provide feedback regarding their environmental issues and concerns through the appropriate channels.

Procurement

Venables staff is responsible for ensuring that Venables commitment to corporate responsibility in the supply chain is fulfilled through:

- Liaising with the QA Manager for advice on pertinent information to elicit from suppliers when tendering for goods and services in order to make informed decisions;
- Reviewing information from suppliers in consultation with QA Manager;
- Working with QA Manager and suppliers to target areas for improving Venables environmental performance;
- Auditing suppliers' environmental performance, in conjunction with the QA Manager; and
- Working with our suppliers to advise on opportunities and encourage improvement.

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Arrangements

1. Review of policy

The QA Manager reviews Venables Environmental Policy on an annual basis, making amendments to the policy as required either by change of legislation and/or processes.

The UK Board of Directors reviews and endorses the Environmental Policy on an annual basis, taking into consideration any amendments suggested by the QA Manager.

2. Review of environmental legislation

The QA Manager conducts regular reviews of relevant environmental legislation. *Ad hoc* reviews are also conducted in response to the release of new legislation and/or regulations.

3. Review of environmental impacts

The QA Manager reviews Venables significant environmental impacts at least annually.

4. Environmental objectives and targets

The QA Manager reviews Venables environmental objectives and targets at least annually. These objectives and targets are reviewed and signed off by the UK Board of Directors and will be made available in the public domain on Venables website.

5. Consultation and communication in environmental matters

Venables is committed to consultation and communication with external stakeholders and employees with regards to environmental information, issues and concerns.

Provision of environmental information to clients of Venables

The QA Manager provides relevant information on environmental performance to clients in response to written request via their Venables Associates contact. This may take the form of tender questionnaires.

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Communication between Venables, QA Manager and Directors and staff

A number of opportunities exist within Venables for communication of environmental information, issues and concerns, as well as for providing feedback:

- The Venables Portal is an intranet site accessible to all Directors and staff. An environmental section on the Portal provides everyone with information regarding environmental issues as well as initiatives in which they can become involved in their professional and personal lives. An opportunity for feedback is facilitated through the Portal.
- Information regarding staff members' environmental responsibilities is included in the Operations Induction Pack.

6. Environmental training

Venables acknowledges the importance of training for staff with responsibilities in terms of the Environmental Management System. Reviews of training requirements will be conducted at appropriate intervals and training documented. New staff are given induction training on general environmental issues, including Venables Environmental Policy.

The QA Manager provides support and advice to staff with their environmental responsibilities.

7. Measurement and management of environmental impacts Emission of greenhouse gases

The emission of greenhouse gases as a result of business travel is recognised as Venables main impact on the environment.

Business air travel

A third party supplier provides travel services for Venables. The QA Manager is working with the Venables staff and its travel suppliers, to investigate and introduce, where possible, measures to reduce air travel and mitigate the impact associated with air travel.

Business rail travel

Venables recognises the contribution of business rail travel to greenhouse gas emissions. This method of travel will be considered before the authorisation of car transport.

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Business road travel

The QA Department is working with Venables Directors to investigate and introduce, where possible, initiatives to reduce road travel and mitigate the impact associated with road travel.

Current alternatives to business travel

It is recognised that as business for Venables increases, it is likely that travel to client sites will increase correspondingly. Therefore, Venables has introduced alternatives to travel, as well as suggestions for staff to follow in order to reduce their travel-related impacts.

- Our people are encouraged to travel by public transport where possible. If it is not possible, car-sharing is encouraged.

Consumption of resources

Energy Consumption

A third party supplier procures energy consumed by Venables business operations. This supplier is monitored as is, our overall energy consumption on a quarterly basis. This facilitates closer monitoring of energy usage and the identification of 'hotspots' of high energy usage which in turn allows for appropriate action(s) to be taken. The QA Manager is working with the Venables staff and Building Landlord, to investigate and introduce initiatives to reduce energy consumption where possible.

Water Consumption

A third party supplier procures water consumed by Venables business operations.

The QA Manager is working with the Venables staff and Building Landlord, to investigate and introduce initiatives to reduce energy consumption where possible. This facilitates closer monitoring of water consumption and the identification of possible leaks and 'hotspots' of high water usage which in turn allows for appropriate action(s) to be taken. The QA Manager is working with the supplier, as well as the Contract Manager, to investigate and introduce initiatives to reduce water consumption where possible.

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Paper Consumption

Venables recognises that the production of documents is necessary for its business but is committed to investigating ways of reducing the quantity of paper used. Measures include reducing the weight of paper used, defaulting printing to networked photocopier/printer/scanners and reducing the number of desk side printers. The QA Manager is working with the Directors to introduce initiatives to reduce paper consumption, where possible.

Waste reduction, disposal and recycling

Waste reduction

Packaging associated with the procurement of goods and services contributes to waste volumes within Venables. Therefore, Venables is working with its key suppliers to reduce the amount of packaging or change the type of packaging to facilitate recycling, where possible.

Waste disposal and recycling

All Directors and staff are expected to dispose of their waste in a responsible manner according to Venables policy. Venables requires waste to be separated (plastics, paper, bottles and aluminium cans) and will provide recycling containers in its offices for this purpose. Venables has engaged a third party supplier to collect the waste from each office, including hazardous waste (such as fluorescent tubes) and to dispose of it in a responsible manner, according to relevant legislation. Monthly waste disposal and recycling figures are prepared by the QA Manager.

General waste that cannot be separated is sent either for incineration or to landfill via the Local Authority. Venables is working on initiatives to reduce the amount of waste sent to landfill or for incineration, where possible.

Disposal of IT equipment: Mobile Phones, Printers, laptops, monitors and PCs

Business mobile phones that are faulty or obsolete are recalled by the Venables IT Manager. These phones are sent to Venables mobile phone supplier or registered charities and either re-conditioned and sold on, used for parts, or recycled according to the requirements of the Waste Electrical and Electronic Equipment (WEEE) directive. The

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QA Manager prepares reports on the quantity of mobile phones disposed of in this way on request.

Faulty or obsolete IT equipment (laptops, monitors, printers and desktops) is recalled by Venables IT Manager. These items are either re-configured and sold on, have parts removed to recondition other items, or recycled according to the requirements of the Waste Electrical and Electronic Equipment (WEEE) directive. The QA Manager prepares annual reports on the quantity of IT equipment disposed of in this way.

Toner Cartridges

Used toner cartridges are collected and disposed of by a third party supplier. Useful parts are reused to refurbish cartridges and the remainder is recycled. The QA Manager prepares quarterly reports on the quantity of cartridges recycled.

8. Audits

Periodic environmental audits will be carried out by the Q A Manager to ensure compliance with Venables environmental policy and with relevant regulations and legislation.

9. Suppliers' environmental performance

The QA Manager is working together with the Venables staff to ensure environmental considerations are taken into account when procuring goods and services as part of Venables commitment towards corporate responsibility in the supply chain. Questions regarding potential suppliers' environmental performance are included in tender documents. The information is scored and taken into account during the tender evaluation process. The environmental performance of key existing suppliers is reviewed at appropriate intervals.

10. Emergency preparedness and response

Venables has emergency procedures in place to manage *inter alia* the effects of weather, utility, fire and national security emergencies. These procedures form part of Venables Business Continuity Plan.



Signed:

Ian Venables – Managing Director

8th November 2015