



ENVIRONMENTAL MANAGEMENT SYSTEM ISO 14001:2015

ENVIRONMENTAL POLICY

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Doc No:	WMS-002
Revision:	4
Date:	06.01.2022
Page:	Page 1 of 11

CONTENTS

Section	Details	Page
	Introduction	3
1	Environmental policy statement of intent	4
2	Organisation	4
2.1	General	4
2.2	Duties –Managing Directors	4
2.3	Duties –Director responsible for environment	4
2.4	Duties – Management	4
2.5	Duties – Employees	5
2.6	Duties – QHSE Manager	5
	Management organisational structure	6
3	Arrangements	7
3.1	General principles	7
3.2	Vehicles/Transport	7
3.3	Equipment	7
3.4	Purchasing	7
3.5	Storage of substances	8
3.6	Waste disposal	8
3.7	Waste storage	8
3.8	Waste transfer	8
3.9	Use of energy	8
3.10	Control of contractors	9
3.11	Environmental complaints	9
3.12	Recycling/reusing materials	9
3.13	Records	9
3.14	Packaging	10
3.15	Noise	10
3.16	Emergency arrangements/spillage control	10
3.17	Training/awareness	10
3.18	Monitoring – inspections/audits	10
4	Waste disposal procedures	11
4.1	General office waste/packaging	11
4.2	Dry waste	11
4.3	Confidential waste	11
4.4	Hazardous Waste	11

INTRODUCTION

We are proud that our Quality System meets the requirements of ISO 9001:2015 Environmental System meets the standards of ISO 14001:2015 and our Health and Safety systems meet the requirements of ISO 45001:2018.

As an established company with a forward thinking philosophy, we recognise and acknowledge the necessity of paying special attention to the conservation of the environment.

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 2 of 11

SECTION 1 ENVIRONMENTAL STATEMENT OF INTENT

It is in the interest of Watermark Systems UK Ltd to have a planned approach towards the prevention of pollution and reduction of waste, leading to a long-term reduction of costs, as prevention and reduction are more desirable and economical than damage repair after the event.

To this end, the Management Team are committed to complying with the requirements of ISO 14001:2015 and have already put in place a management system in accordance with this and the requirements of ISO 9001:2015 and ISO 45001:2018.

The company will control its activities to avoid causing unnecessary and unacceptable risks or adverse effects on the environment, in line with the requirements of the Environmental Protection Act 1990 and other relevant legislation, as far as is reasonably practicable.

Responsibility for the environment is ranked equally with that for the health and safety of employees, the general public, and others.

The Company will ensure that objectives are achieved by:

- Compliance with all legal and other requirements.
- Re-use or re-cycling of waste materials whenever possible, prior to disposal.
- Minimise the use of resources (Materials, Fuel and Energy) thereby reducing waste.
- Minimise all emissions ensuring compliance with all regulatory controls.
- Consideration of environmental effects and commitment to pollution prevention in all business decisions including the purchase of materials and/or equipment and the adoption of new technology/processes.
- Encouraging all third parties involved with our business to adopt a policy of environmental management.
- Provide adequate resources for the achievement of the policy objectives.
- Considering the Life Cycle Perspective with regards to Environmental Aspects

The nature of our activities places particular emphasis and demands on the competence and experience of the staff employed. High levels of responsibility and reliability are associated with all aspects of our work and a commitment to continued professional development and training exists to ensure that all staff are suitably competent and qualified to meet these requirements.

All new and existing personnel are made aware of the Environmental Policy either during ongoing training sessions or Company Induction. The Environmental Policy is also made available to interested parties on request.

The Managing Directors shall review this policy annually and ensure that the company consistently complies with current legislation and continually improves its environmental performance.



Signed:
Mike Roberts
Managing Director Watermark Systems UK Ltd

Date: 6th January 2022

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 3 of 11

SECTION 2 ORGANISATIONS

2.1 General

Every individual, regardless of position, has a duty to ensure that the activities carried out as part of their work have the minimal impact on the environment. This duty extends to the control of waste in such a way as to ensure illegal disposal, the conservation of energy by the reduction of wastage and the prevention of pollution by the control of spillages, emissions and discharges.

The Company undertakes to provide full instruction, training, information and supervision to enable all employees to play their part in meeting their Environmental duties.

2.2 The Joint Managing Directors

The Joint Managing Directors are ultimately responsible for the application of Environmental legislation and for establishing and achieving the Environmental Policy and objectives.

They will:-

- (a) Develop the Company's Environmental Policy and objectives;
- (b) Establish suitable arrangements to achieve the Company's Environmental objectives;
- (c) Regularly review the Company policy, arrangements and performance on environmental issues.

2.3 Directors with responsibility for Environmental Issues

The Directors with responsibility for Environmental issues are ultimately accountable for achieving the Company's Environmental objectives.

They will:-

- (a) Ensure that Management knows and accepts its responsibility for Environmental control, that it is equipped to play its part, that the requirements of the relevant legislation are applied, and that company rules and arrangements for environmental control are observed;
- (b) Monitor the Company's performance on Environmental issues;
- (c) Monitor the effectiveness of the Environmental Policy

2.4 Managers and Supervisor

Each Manager or Supervisor is responsible for achieving the company's environmental objectives and ensuring that the policy and procedures are followed by the employees under their control.

In particular the Managers or Supervisor will:-

- (a) Operate within all legal and company requirements relating to environmental matters applicable to their area;

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 4 of 11

- (b) Ensure that the company's environmental policy and objectives are implemented within their area of responsibility.
- (c) Ensure that adequate resources are allocated to environmental control matters;
- (d) Develop environmental objectives for their own departments;
- (e) Review the performance of their department on environmental matters;
- (f) Ensure that employees receive adequate information and instruction on environmental control matters
- (g) Clearly define procedures relating to environmental control and ensure that they are known and observed;
- (h) Ensure that environmental matters receive full consideration in production processes and operations, the purchasing of new equipment, the installation of new systems and the planning new operations and methods of work

In addition, the Managers or Supervisors, in carrying out their managerial duties shall :-

- Take immediate action to stop any practice or procedure presenting an environmental risk.
- Ensure that all personnel in their area of responsibility have the necessary information relating to environmental matters - ie disposal arrangements, emissions, control measures etc
- Report and deal with any deviations or failures in control over environmental matters
- Ensure that all systems and procedures put in place to control environmental issues are used and maintained.
- Understand and work within all legal and Company requirements relating to environmental issues.

2.5 Employees

All employees must:-

- (a) Comply with rules, procedures and instruction regarding correct disposal of waste;
- (b) Use the correct facilities provided for disposal of waste;
- (c) Not interfere with or misuse any equipment or facilities put in place to ensure that environmental pollution does not occur;
- (d) Report any failings in equipment and facilities provided for environmental control;
- (e) Assist in the investigation into any incidents where environmental control systems have failed;

2.6 Safety, Health, Environmental & Quality Manager (SHEQ) / Consultant SHEQ Manager

The SHEQ Manager & Consultant will advise Directors and other personnel on all aspects of environmental control and will report directly to the Joint Managing Directors. In addition, they are responsible for ensuring that all waste substances are disposed of in line with established procedures. They will liaise with the necessary staff to ensure that disposal is co-ordinated and conforms to the required arrangements with regard to records, transportation,

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 5 of 11

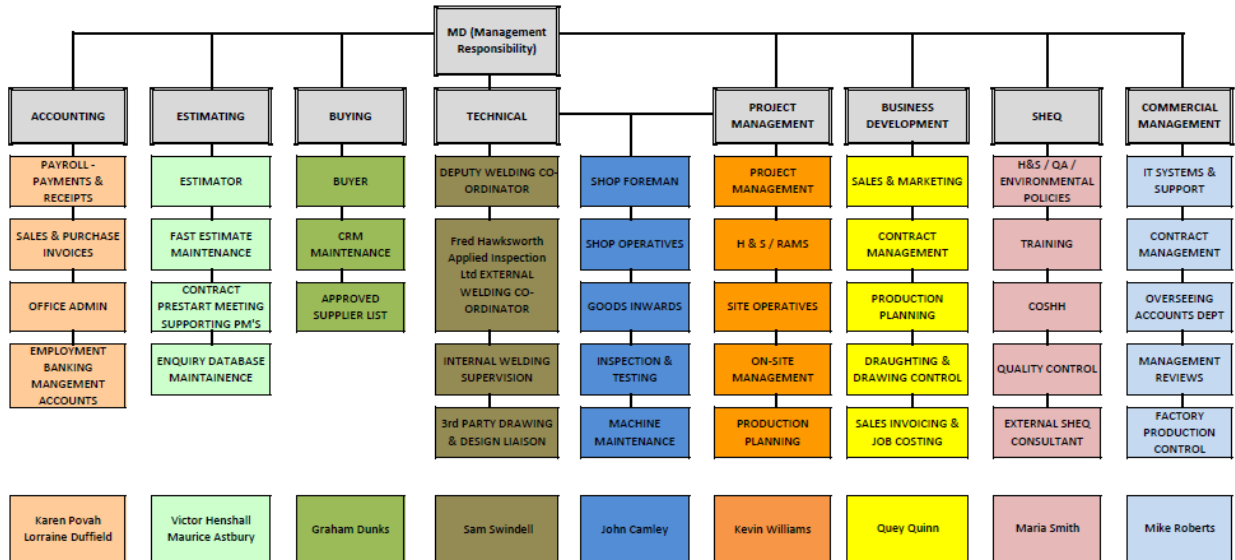
packaging etc.

WATERMARK SYSTEM UK LTD

ORGANISATIONAL STRUCTURE

WATERMARK SYSTEMS UK LTD ORGANISATIONAL CHART
Last Updated: 20/07/2021

Doc Ref: BMS-002 Rev L



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Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 6 of 11

SECTION 3 ARRANGEMENTS

3.1 General Principles

Environmental issues will be managed in the same way as any other aspects of business - i.e. planning, control, reviewing etc. As with health & safety however, a number of arrangements specific to the management of environmental matters will operate within the business.

3.2 Vehicles/Transport

The company is dependant on reliable transport in order to fulfil the contractual arrangements associated with its operations. Lorries and vans are used every day to transport personnel and materials to and from sites. As such a significant amount of fuel and other materials associated with the use of vehicles are consumed resulting in a reduction of natural resources and the emission of polluting exhaust gases.

The company shall minimise this environmental impact by selecting vehicles which are efficient and ensuring that routes are planned to minimise the distances travelled. Use will be made of route planning software, where appropriate.

It is recognised that efficiency of operation of vehicles is only achieved by regular maintenance and careful monitoring. The company therefore, shall operate an effective vehicle maintenance programme which will be overseen by the appointed vehicle and plant maintenance contractor as required.

To ensure that drivers ensure minimal environmental impact from their use of the vehicles, driver awareness training shall be carried out. This training will include the environmental consequences of driving techniques, including heavy acceleration, etc and unnecessary engine idling.

In support of this policy, all sub-contractors will be expected to control their use of vehicles in similar ways.

3.3 Equipment

Watermark System UK Ltd uses a large variety of plant and equipment whose operation has a significant impact on the environment. Most equipment used on site is powered by diesel other than small power tools and hand tools that are powered by either LPG or petrol.

Office equipment comprises mainly computers, photocopiers, communication equipment, etc.

The company shall ensure that all equipment used is up to date and energy efficient and operated in a manner which minimises its environmental impact, e.g. switched off when not in use, or powered down automatically. Where appropriate, maintenance schedules will be put in place to ensure operational efficiency. Hiring companies shall be consulted with regard to the condition and maintenance of the hired equipment and only companies which supply suitable equipment shall be engaged.

3.4 Purchasing

Watermark System UK Ltd recognises that environmental considerations need to be included in all purchasing decisions in order that over-ordering, and associated waste, along with inappropriate selection do not contribute to the environmental impacts of the company's operations.

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 7 of 11

When consumables, equipment, materials, etc are purchased, consideration shall be given to the environmental affects created by the use or operation of the item. Recycled road surfacing materials and aggregates, low voc/water based solvents, recycled/low density paper, low energy systems, etc, shall be considered.

3.5 Storage of substances

Quite a few substances used by the company present a significant environmental threat. LPG, Oils, Paints, Greases, Fuels, and Solvents etc are well contained. However, these are stored (on site) in such a way as to ensure that if they are accidentally released, i.e. container damaged, then they are contained sufficiently to prevent contamination of land or water courses. This containment will usually take the form of sealed bunding (trays, doubles skinned tanks, etc).

If appropriate, spillage containment kits shall be made readily available on all sites.

3.6 Waste disposal

Most waste produced by the company comes under the category of controlled waste – general household type waste and building waste. Within the site areas Hazardous Waste may be generated from the use of hazardous substance – Paints, fuels, solvents, oils, batteries, etc. Waste produced on site is generally disposed of in conjunction with a subcontractor for waste removal.

The company shall dispose of all waste in line with the requirements of current legislation. Hazardous Waste shall not be mixed with controlled waste, and all necessary documentation and regulatory requirements associated with the disposal mechanism shall be addressed – waste transfer notes, consignment notes, notification, waste production registration etc.

3.7 Waste storage

To minimise the potential for contamination of land or incorrect disposal routing, all waste shall be contained in appropriate skips, tanks, bins, bags or other suitable containment whilst awaiting disposal. Where necessary, skips shall be sheeted or otherwise secured to prevent the waste blowing from the skip or being removed/scattered by intruders to site. Liquid wastes shall be contained in appropriate IBCs, tins, drums, etc of adequate strength suitably banded and palletised to facilitate collection and avoid damage.

3.8 Waste transfer

As part of its operations, the company is required to transfer waste from site to a suitable disposal facility. In line with the requirements of the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (as amended), the company is registered with the Environment Agency and authorised for this transfer of waste. When transferring the waste, appropriate steps shall be taken to prevent the waste from falling or blowing from the vehicle, by the use of sheeting and/or other suitable securing method.

3.9 Use of energy

Watermark System UK Ltd does not use a significant amount of energy while carrying out its operational activities. However, the Directors recognise that the minimisation of energy usage not only saves the company money, but indirectly reduces the impact of its operations on the environment. Therefore, the Directors shall monitor the use of energy by the company and put in place systems to reduce the usage to a minimum – temperature control, automatic power-down systems, encouraging the switching off of lights and equipment when not in use, efficient building structural considerations, etc.

The energy sources utilised at the main office comprise gas and electricity and the consumption is metered and recorded.

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 8 of 11

Site activities mainly involve the use of Diesel driven plant and some LPG/petrol driven small plant. Restricted usage of the plant is encouraged and all operators are trained to a recognised standard to ensure most efficient use.

In order to minimise indirect energy usage, e.g. in the manufacture of consumables, the company shall minimise wastage and use appropriate technology. E-technology shall be used for the transfer of data and information wherever possible to minimise the use of paper, inks, etc. Similarly information shall be stored on media which is less demanding on resources.

3.10 Control of contractors

All contractors used by the company shall be assessed and appraised in order to ensure that their environmental policies are compatible with those of Watermark Systems UK Ltd. This assessment shall be carried out in conjunction with the health and safety assessment.

Where contractors are found to have inadequate environmental policies and/or operations, Watermark Systems UK Ltd shall either refrain from using the contractor, or ensure that the contractor's arrangements are brought in line with the companies environmental requirements.

3.11 Environmental complaints

The Directors Responsible for the Environment shall record all environmental complaints submitted to them by customers, main contractors, the general public or local authorities and shall ensure that the complaints are fully investigated and corrective and preventive actions taken to address the findings. All complaints shall be reviewed regularly and environmental policies and procedures amended appropriately.

3.12 Recycling/reusing materials

Materials used in both the administrative and operations functions shall be recycled and/or reused where possible. In particular, the material waste generated from site works shall be recycled where possible.

Paint and associated solvents shall be re-used/recycled where practical and where this is not possible they shall be brought back to the yard for recycle through a third party.

Office paper shall be reused where possible or placed in a recycle bin. Scrap printouts shall be retained and used as general note paper.

Empty inkjet cartridges, toner cartridges, and other printer/copier consumables shall be returned to the supplier where possible to facilitate refilling/reuse.

Other initiatives shall be developed in line with the continual improvement aspect of the company's environmental policy.

3.13 Records

All records generated as part of the environmental management arrangements operated by Watermark Systems UK Ltd, e.g. waste transfer notes, consignment notes, assessment forms, complaints, training records, disposal contracts, etc shall be held in appropriate files within the main office in Derby. The SHEQ Manager shall ensure that the records are stored such that they remain legible, are readily retrievable and are retained for the required time period

Enforcement notices and contract non-conformities associated with environmental issues shall be filed appropriately and used to develop and improve the company's environmental management system.

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 9 of 11

3.14 Packaging

In carrying out site activities, very little packaging is used directly by the company other than when products are bought in with external packaging such as additives and when securing loads to a vehicle. However, the Directors recognise that the use of packaging is an environmentally sensitive area and shall ensure that whenever packaging is required for the movement of materials, equipment, etc, consideration is given to the materials used, the quantity used and the disposal arrangements necessary. Liaison with suppliers shall be carried out in order to ensure that packaging is minimised and where necessary environmentally appropriate. Pallets and other reusable packaging shall be returned to the supplier or other re-user.

3.15 Noise

The activities of the company do generate raised noise levels on site, the Directors shall ensure that any plant, equipment or activity which generates noise is used or carried out in such a way as to minimise this environmental impact. Noise suppression systems associated with plant and equipment shall always be used and plant movements shall be carried out in such a way as to minimise the noise generated.

3.16 Emergency arrangements/Spillage control

The Directors shall ensure that emergency arrangements are put in place on sites and at the main offices and yards to deal with emergency conditions in order to minimise the potential for environmental damage. The main area for such damage is associated with fire. Therefore, appropriate fire control arrangements will be established within the offices, yard and on sites to prevent fire.

The emergency arrangements shall address the method of containing and controlling the fire should one break out. These arrangements include the provision of smoke detectors within office buildings, the installation of fire extinguishers and the training of office personnel in the fire control systems. Security systems shall be installed to prevent arson by intruders. No materials shall be stored within the office which could generate harmful emissions in the event of a fire.

Site emergency arrangements vary dependent on the contract conditions, but as a minimum the company shall ensure, that fire control equipment – extinguishers - are available on site and that flammable materials are stored in appropriately labelled containers.

A spillage control kit – absorbent granules/'socks' – shall be made available in situations where significant volumes of harmful liquids are held on stock, e.g. fuels, oils etc mainly stored in the yard.

3.17 Training/awareness

In order to ensure that this policy is successfully implemented throughout the company, appropriate awareness training in the environmental aspects and impacts of the company's operations shall be carried out for all employees and, where appropriate, contractors. This training shall be included in the company employment induction package. Records of the training shall be maintained.

3.18 Monitoring – inspections/audits

In line with its policy of pro-active monitoring to prevent harm, the managers shall regularly inspect the site activities to ensure that the work is being carried out in such a way as to minimise the operational impacts. The inspections shall examine waste control, material storage, equipment conditions, etc.

An audit of the company's environmental management arrangements shall be carried out and any non-conformity addressed. The company shall liaise with its environmental consultant on a regular basis to ensure that the Directors are kept up to date with environmental legislation requirements and current best practice.

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 10 of 11

Introduction

The SHEQ Manager is responsible for the correct disposal of all waste material from the office, yard and on all sites. The disposal methods shall be in line with the requirements of:-

- **Environmental Protection Act 1990 – Part II**
- **Environmental Protection (Duty of Care) Regulations 1991**
- **Controlled Waste Regulations 1992 (as amended)**
- **Hazardous Waste Regulations 2005 (as amended)**
- **Control of Pollution (amendment) Act 1989**

Waste generated by the Company is classified as either:

- general office waste and packaging materials, cardboard, tissues, plastic
- dry waste - metal, building waste, etc
- confidential waste - paperwork, drawings, contracts, etc
- Hazardous Waste - specific hazardous materials

4.1 General office waste/packaging

General office waste shall be placed in trade waste bin. Paper / recyclable waste is to be placed in the separate trade waste bin, both of these will be collected by Veolia.

Where possible packaging waste shall be returned to the suppliers or utilised for any storage or material movement requirements. No clinical or Hazardous Waste shall be placed in the general waste bin.

4.2 Dry waste

Dry waste shall be segregated within the yard area using the allocated collection skips and then taken to an approved, licensed, authorised disposal company. The waste transfer note shall be completed by the appropriate representatives of the company and the waste disposal company, all disposal records must be retained.

Site Waste - appropriate liaison and arrangements shall be made with the main contractors, where applicable, to ensure that disposal from a communal skip is carried out in line with legislative requirements.

4.3 Confidential Waste

All confidential waste (documentation – letters, drawings, agreements, etc) shall be shredded and bagged and disposed of via the paper waste route – see above.

4.4 Hazardous Waste

Substances designated as hazardous under the Control of Substances Hazardous to Health Regulations (COSHH) are disposed of as Hazardous Waste, eg some solvents, batteries, fuels, sealants, etc. Such substances shall only be disposed of by waste disposal companies authorised to handle Hazardous Waste as defined. The necessary documentation required under legislation shall be completed by the relevant parties in the specified manner and within the specified timescale.

Doc No:	WMS-002
Revision:	4
Date:	06..01.2022
Page:	Page 11 of 11