



Environmental Policy UK

Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder / partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

Contents

Policy

A handwritten signature in blue ink, appearing to be "Javier Peiro".

Javier Peiro
Managing Director

Cheltenham, GL53 7JT

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1.0 Introduction

Urbaser began its activity in 1990 to provide value-added services to municipalities and local authorities in waste and environmental matters.

Over the next decade, the Company was strengthened by setting up specialized subsidiaries to cover the full spectrum of environmental services. Urbaser continued its process of national consolidation and diversification thanks, among other things, to the complete acquisition of Sertego, a division dedicated to the integral management of industrial waste. In recent years, there has also been an expansion in the commitment to R&D&I projects in the field of renewable energies.

Internationally, since 2009, the Company has been expanding thanks to the incorporation of companies in Mexico, France, Bahrain, Oman and India, among other countries. Since December 2016, Urbaser belongs to Firion Investments, in what represents the final push in the Company's international expansion phase, placing it among the world's leading environmental companies.

Today Urbaser has 659 million euros in resources, with more than 11 million tonnes of treated waste and more than 1,400 Gwh of electricity generated. We have a presence in 21 countries on four continents. Urbaser is a worldwide company, a network of more than 40,000 people dedicated to improving the living conditions of citizens all over the globe. Collection, management, treatment and recovery of waste, for conversion into resources. We guarantee access to basic natural resources such as water and minimise the environmental impact of human progress.

Our business strategy is underpinned by three objectives. Delivering on our objectives ensures that, as our business grows, we respond better to new demands whilst observing our ethical principles and our ongoing commitment to do business in a fair and sustainable way.

Urbaser Ltd was incorporated in 1998 in the UK and has been providing environmental services since then. Across the UK, Urbaser Ltd provides services to nearly 4 million residents, employs over 700 staff and handles more than 1 million tonnes of waste and recycling. We work closely with our customers to ensure that their waste is being managed and their services are being delivered in the correct way

1.1. General requirements

Urbaser Limited developed and implemented a Local -UK- Environmental Management System in order to enable the company to document its best business practices to better satisfy the requirements and expectations of the Client and other Stakeholders, and to improve the overall management of the company in terms of safeguarding the surrounding environment. The EMS of Urbaser Limited meets and exceeds the requirements of the international standards ISO14001:2015. This Policy describes the context of the organisation, arrangements, authorities, interrelationships, internal and external issues of the organisation and responsibilities of the personnel performing within the environmental system. The policy also provides references for all of the company's activities in order to ensure compliance of the necessary requirements of the standard.



2.0 Integrated Management System Scope

This Policy is part of the Corporate Management Manual of Integrated Management System (IMS) issued on the 28/02/2022. This policy ought to be the local/country extension of the Corporate Management Manual of Integrated Management System (IMS) and should be consulted in combination with the stated.

This Policy describes the organisation's Environmental Management System. It refers to the organisation's policies and describes how these are implemented and sustained throughout the organisation. The system core elements are described with reference to key organisational procedures. The bespoke integrated system will enhance performance and customer satisfaction through the effective application of its policies and procedures, controlling risks, minimise environmental impact of its operations and continual improving processes and operations in order to meet our client's expectations at all times, as well as its statutory and legal requirements. The EMS to all Urbaser Limited's services within the scope. This document forms the core of the company ethos and modus operandi for present and future endeavours.

Urbaser Limited provides the following services:

- Manual and Mechanical street cleaning for highways and other designated areas
- Refuse collection
- Ground Maintenance
- Recycling
- Graffiti removal
- Waste Treatment and
- Designing, construction improvement, and repair of commercial, industrial plant for public organisation
- WHRCs

The Urbaser Limited headquarters are based at the following address:

| |
|--|
| <p style="text-align: center;">First Floor, Westmoreland House 80 – 86 Bath Road Cheltenham, GL53 7JT</p> |
|--|

The other operational locations that falls within the ISO14001:2015 scope are as follow:

- Head Office
- London Borough of Waltham Forest
- Burnley
- Gosport
- St. Albans
- Windsor and Maidenhead
- Dartford
- Gloucestershire EfW
- North and East Hertfordshire
- Southwest Kent
- Wokingham
- Welwyn Garden City
- J&B working as part of Urbaser (with Corporate Policies being dictated from Urbaser and Local procedure implementing the Urbaser' certified system
- Sixfields (Northampton) HWRC (Main Office) , Walter Tull Way, Weedon Road, Northampton.
- Kettering HWRC- Garrard Way, Telford Way Industrial Estate, Kettering.



- Wellingborough HWRC-Paterson Road, on Finedon Road Industrial Estate, Wellingborough.
- Rushden HWRC-Northampton Road, East of Sanders Lodge on old A45 Road, Rushden.
- Ecton Lane (Northampton) HWRC-Lower Ecton Lane, Great Billing, Northampton.
- Brixworth HWRC - Scaldwell Road, Brixworth.
- Daventry HWRC-Browns Road, Off Staverton Road, Daventry.
- Towcester HWRC-Old Greens, Norton Road, Towcester.
- Corby HWRC-Kettering Road, Corby.
- Eden (Penrith)- Main Office-The Depot, Old London Road, Penrith, Cumbria.
- J&B - Windermere Road, Hartlepool, Middlesbrough.
- J&B -Monument Park, Washington, Sunderland.
- J&B Dockside Road, Middlesbrough, South Tees.
- J&B-Baltic Street, Hartlepool, Middlesbrough.
- Thorn Turn HWRC, Grendall Lane, Houghton Regis.
- Leighton Buzzard HWRC, Shenley Hill Rd, Leighton Buzzard.
- Biggleswade HWRC, Bells Brook, Lane, Biggleswade.
- Ampthill HWRC, Abbey Ln, Ampthill, Bedford.
- Crewe – Leighton Grange, Middlewich Road, Crewe.
- Esholt – The Avenue, Apperley Lane, Esholt.
- Willerby (including head office) – Albion Lane, Willerby.
- Ashcourt (HGVs based but no other personnel here) – 40 Foster Street, Hull.
- Selby Depot, Prospect Way Selby.
- Rigestate Industrial Estate, Station Road, Berkley.

2.1 The Purpose: Environmental Scope

The Purpose of Urbaser Limited's EMS is to ensure that the quality of its services continue to meet the highest standard demanded by the organisation and expected by its customers in order that processes and services are carried out in both safe and environmentally responsible manner. The intended outcomes of the EMS policy are:

- Procedure for the identification and assessment of environmental aspects and associated impacts
- Determination of professional competence and coordination of training actions
- Procedure of monitoring and measurement (including methodology for conducting service inspections).
- Enhance environmental performance;
- Fulfil compliance obligations;
- Achieve environmental objectives.

Urbaser Limited initiatives are aimed at improving the awareness of environmental sustainability with staff and stakeholders therefore the intended outcomes of the EMS are extended to include:

- The embedding of a culture of sustainability within the organization.
-

All Companies / Joint Venture shall perform an analysis of the applicability of the IMS requirements, considering internal and external issues, requirements of its stakeholders and services provided. It may consider, with justification, certain IMS requirements as not applicable, leaving documented evidence of this analysis in the MM-01-CORP-D01-Organizational Context and Stakeholder.

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To allow a better understanding of the Organization and the specific scope of the IMS, the **Company QHSE Director** must complete the records associated with this Policy, which are as follows, before starting to implement the IMS:

- **MM-01-CORP-D01-Organizational Context and Stakeholders:** brief presentation of the Company implementing the IMS, as well as a description of the internal and external context, and of the needs and expectations of stakeholders, which helps to understand the profile of the Company and its activities in greater depth.

At the corporate level, the **Corporate QHSE Director** will prepare the following record:

- **MM-01-CORP-D02-Scope of application:** containing the perimeter of all the countries/companies/centres included in the IMS, and the reference standards implemented in each case.

3.0 Normative Reference

| | Title | Version | File Name |
|-----|--|---------|-----------|
| [1] | ISO14001 Environmental Management Systems -Requirements with guidance for use | 2015 | N/A |
| [2] | ISO14004 Environmental Management Systems – General guidelines on implementation | 2016 | N/A |

Table 1 Normative of Reference

3.1 Definitions

The terms and descriptions used in this Policy are generally defined within ISO14001:2015:

- **Environment:** Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their environment
- **Risks and Opportunities** – Potential adverse effects (threats) and potential beneficial effects (opportunities).
- **Environmental aspects:** Element of an organisation's activities, products or services that can interact with the environment.
- **Compliance Obligations** – Legal requirements that an organisation has to comply with and other requirements that an organisation has to or chooses to comply with
- **Environmental impact:** Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's products or services.
- **Environmental management system (EMS):** The part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.



- **Internal audit:** Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS audit criteria set by the organisation are fulfilled.
- **Environmental objective:** Overall environmental performance goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.
- **Environmental performance:** Measurable results of an organisations management of its environmental aspects.
- **Environmental policy:** Statement by the organisation to its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.
- **Environmental target:** Detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
- **Interested party:** Individual or group concerned with or affected by the environmental performance of an organisation.
- **Organisation:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.
- **Prevention of pollution:** Use of processes, practices, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.
- **Top Management–** Person or group of people who directs and controls an organisation at the highest level. Top Management has the power to delegate authority and provide resources within the organisation.
- **Interested Party –** Person or organisation that can affect, be affected by, or perceive to be affected by a decision or activity.
- **Life Cycle –** Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.
- **Outsource –** Make an arrangement where an external organisation performs part of the organisation’s function or process.

4.0 The context of the organisation

Urbaser Limited is committed in defining our position in the marketplace. Analysing relevant factors arising from legal, political, economic social and technological issues influence our strategic direction and organisational context has aided in identifying all the external and internal issues that are relevant to the purpose of such activities. We analyse, monitor and review all the factors that may affect our ability to satisfy legal and statutory requirement whilst safeguarding the environment.

The Company has grouped all the environmental conditions and factors that may affect the business or be affected by its undertaking to achieve the desired outcome of protecting the environment and identifying new opportunities. Urbaser Limited has reviewed and analysed key aspects of itself and its stakeholders to determine the strategic direction of the company. This involves:

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- Enhancing the company's environmental performance;
- Fulfilling compliance obligations including legal and other requirements;
- Achieving environmental objectives;
- Embedding a culture of sustainability.
- Understanding our core and scope of management system;
- Identifying "interested parties" (stakeholders) who receive our services and have a significant interest in our company. These parties are identified in the document, and
- Understanding internal and external issues that are of concern to clients and their interested parties; also identified in the document

This information is then used by Top Management to determine the company's environmental strategic direction. This is defined in records of management review and periodically updated as conditions and situations change

4.1 Understanding the needs and expectations of interested parties

Urbaser Limited has determined the interested parties and what their needs and expectations are in relation to the EMS. The methodology used and outputs from the which includes the following:

- A Stakeholder Analysis to identify internal and external stakeholders with an interest in the EMS;
- A list of their specific needs and requirements to highlight which are compliance and/or voluntary obligations.

These outputs are used to inform the following sections of the EMS:

- Determining the Scope of the EMS;
- Establishing the EMS;
- Actions to address Risks and Opportunities – Compliance Obligations and
- Communications.

This process will be repeated every 5 years to review any new stakeholders who may have an interest in the EMS, what their requirements are and whether these are compliance obligations.

| Internal Issues | Organisational Characteristics | Environmental Conditions | Internal Interested parties |
|-----------------|---|--|---|
| | <ul style="list-style-type: none"> • Leadership Support • Resource availability • Key Skills • Technologies • Budget • Planning • Building | <ul style="list-style-type: none"> • On Site Pollution • Water Quality • Contaminated Land • Waste Disposal • Negligent Acts • Air Pollution • Land Reclamation | <ul style="list-style-type: none"> • Directors • Parent Company • Business Partners • Workers(Labour) • Representative (Unions) |



| | <ul style="list-style-type: none"> • Undertaking operations of street cleansing and Collection Activities • Biomechanical Waste Treatment • Energy from Waste | | <ul style="list-style-type: none"> • Staff / Family Members |
|-----------------|--|---|--|
| External Issues | Organisational Characteristics | Environmental Conditions | External Interested parties |
| | <ul style="list-style-type: none"> • Sector Standard • Corporate Standards • Legal Requirements • Banks • Local Authority / Politics • Social Perception • Locations of Sites • Social | <ul style="list-style-type: none"> • Climate Change • Severe Weather • Floods • Seismic Events • Fire • Vandalism | <ul style="list-style-type: none"> • Government Authorities Regulators • Customers • Local Communities • Insurers • Suppliers • Utilities Companies • Staff Dependant • Competitors • Contractors |

Table 2 Internal and External issues and stockholders

4.2 Determining the Scope of the EMS

In terms of physical space, the following locations comprise the entire workforce of Urbaser Limited in the UK:

- Head Office
- London Borough of Waltham Forest
- Burnley
- Gosport
- St. Albans
- Windsor and Maidenhead
- Dartford
- Gloucestershire EfW
- North and East Hertfordshire
- Southwest Kent
- Wokingham
- Welwyn Garden City
- J&B working as part of Urbaser (with Corporate Policies being dictated from Urbaser and Local procedure implementing the Urbaser' certified system
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- Daventry HWRC-Browns Road, Off Staverton Road, Daventry.
- Towcester HWRC-Old Greens, Norton Road, Towcester.



- Corby HWRC-Kettering Road, Corby.
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- Thorn Turn HWRC, Grendall Lane, Houghton Regis.
- Leighton Buzzard HWRC, Shenley Hill Rd, Leighton Buzzard.
- Biggleswade HWRC, Bells Brook, Lane, Biggleswade.
- Ampthill HWRC, Abbey Ln, Ampthill, Bedford.
- Crewe – Leighton Grange, Middlewich Road, Crewe.
- Esholt – The Avenue, Apperley Lane, Esholt.
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- Ashcourt (HGVs based but no other personnel here) – 40 Foster Street, Hull.
- Selby Depot, Prospect Way Selby.
- Rigestste Industrial Estate, Station Road, Berkley.

All the operational activities at the different sites are managed by local Contract Managers. New activities or new stakeholders are promptly taken into consideration for the update of the Aspect Register

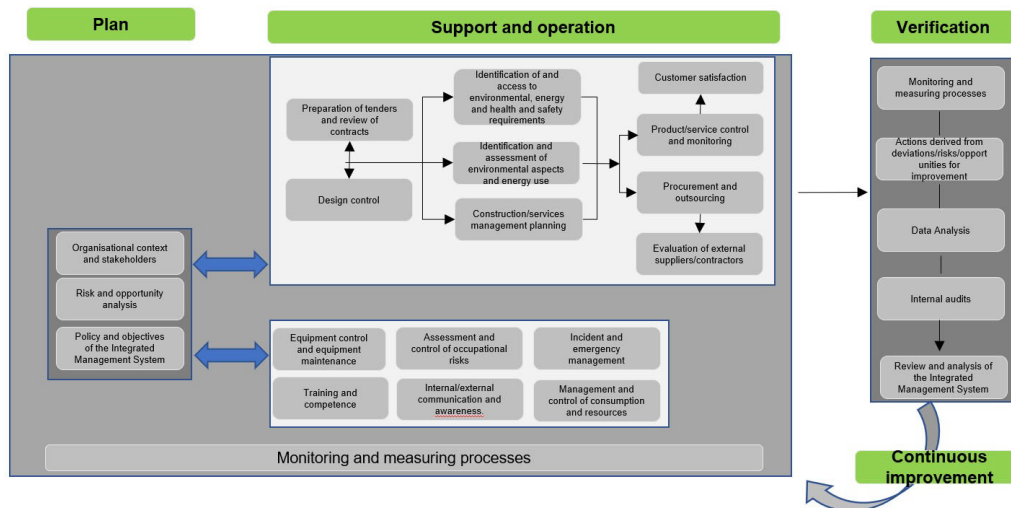
The output from the company's activities and the influencing internal and external factors are evident as an input to the consideration of Aspects, Risks and Opportunities and the action that we need to take to address them.

The following documented information will be kept and reviewed in order to describe and determining our organisational context

- Analysis of Environmental Hazards and statutory regulatory commitments
- Analysis of technologies and competitors to improve existing ones and benefit the environment
- Aspect Register
- Technical reports / consultancies from technical expert and consultants
- SWOT analysis reports or schedule for internal issue
- PESTLE analysis report or schedule for external issue
- Minutes of meetings with the Clients

4.3 Environmental Management System

The EMS has been established and has been maintained to the international standard ISO14001:2015. Continual improvement has been achieved via a Plan, Do, Check, Act framework. An Environmental Review is conducted every 5 years ahead of re-certification to determine any changes to the company which may affect the intended outcomes of the EMS. In addition, to meet the requirements of ISO14001:2015 the review will include an assessment to determine any changes to the internal and external context in which it operates and the changing needs and expectations of interested parties.



Picture 1: Interrelation of URBASER's Integrated Management System processes.

5.0 Leadership

Urbaser Limited Top Management are responsible for implementing the EMS which includes the development and deployment of the environmental policy and the environmental objectives. At Urbaser Limited Top Management now have greater involvement in the management system and ensure that the requirements of it are integrated into the organization's processes and that the environmental policy and objectives are compatible with the strategic direction of the organization. The environmental policy is a living documents at the heart of the organization. To ensure this remains so, Top Management are accountable and have a responsibility to ensure the EMS is made available, communicated, maintained and understood by all parties.

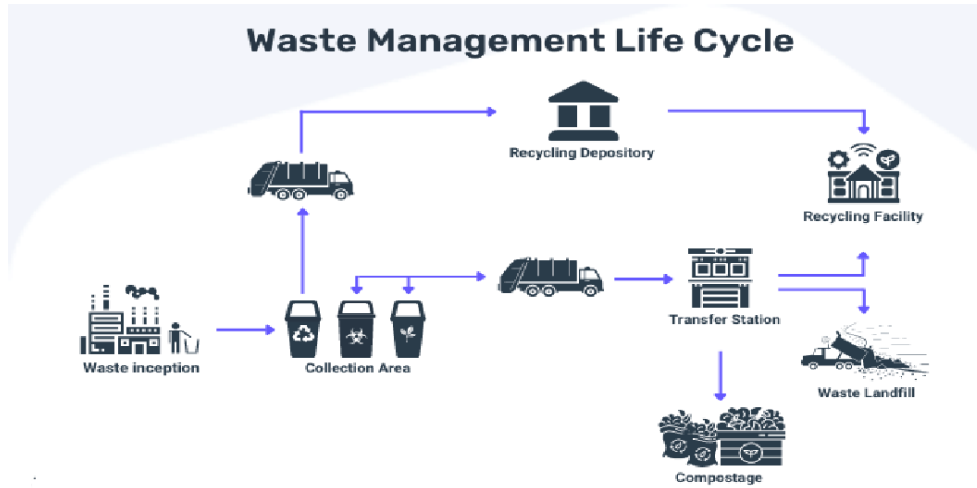
There is also a greater focus on Top Management to enhance customer satisfaction by identifying and addressing the environmental risks and opportunities that could affect this. Top Management will demonstrate consistent customer focus by showing how they meet customer requirements, regulatory and statutory requirements, and also how the organization maintains enhanced customer satisfaction.

In the same context, they have a grasp of the organisations internal strengths and weaknesses and how these could have an impact on the environment. Top Management provides the leadership and governance to all activities related to the lifecycle processes including defining the strategic direction, responsibility, authority and communication to assure the safe and effective performances.

The Phases of the statutory cycle or Management compliance to standards are also considered

Life Cycle Analysis

Phase 1



Phase 2

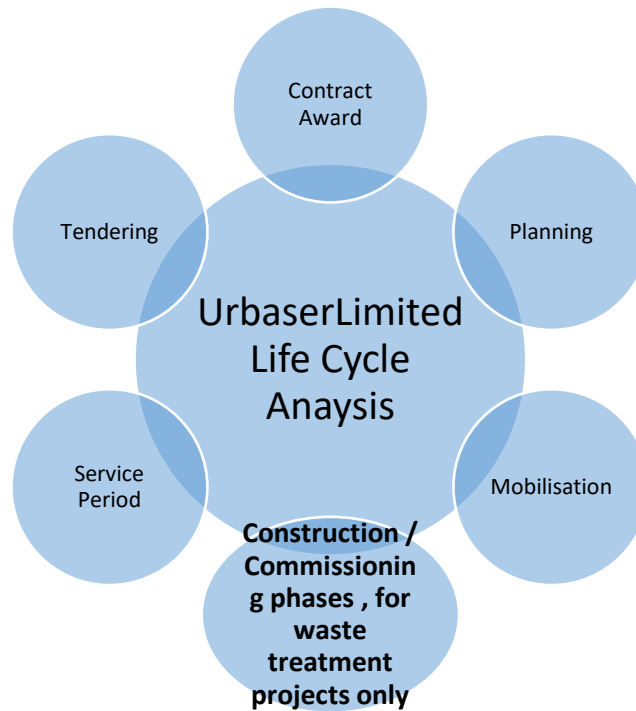


Figure 1 Urbaser Life Cycle analysis



Life Cycle Analysis Phases

Table 3 Life Cycle Analysis by Phases of Activities

| Phase | Mobilisation | Construction/Commissioning | | Service Period | |
|---|------------------------------|---|------------------------------|---|------------------------------|
| | Impact | Aspect | Impact | Aspect | Impact |
| Washing Vehicles, Reservoir waters. | Discharge To Water | Washing Vehicles, Reservoir waters. | Discharge To Water | Washing Vehicles, Reservoir waters. | Discharge To Water |
| Driving Vehicles including Company cars, LGV'S, Vans. | Emission to Air | Driving Vehicles including Company cars, LGV'S, Vans. | Emission to Air | Driving Vehicles including Company cars, LGV'S, Vans. | Emission to Air |
| Building of Waste treatment facilities and renting of Depot | Land Reclamation | Building of Waste treatment facilities and renting of Depot | Land Reclamation | Building of Waste treatment facilities and renting of Depot | Land Reclamation |
| Construction activities | Noise | Construction activities | Noise | Construction activities | Noise |
| Office Waste | Waste to Landfill | Office Waste | Waste to Landfill | Office Waste | Waste to Landfill |
| Waste Treatment | Vermin | Waste Treatment | Vermin | Waste Treatment | Vermin |
| Construction Activities | Impact on Local Biodiversity | Construction Activities | Impact on Local Biodiversity | Construction Activities | Impact on Local Biodiversity |

ISO 14001 Management System Process



ISO 14001 Process

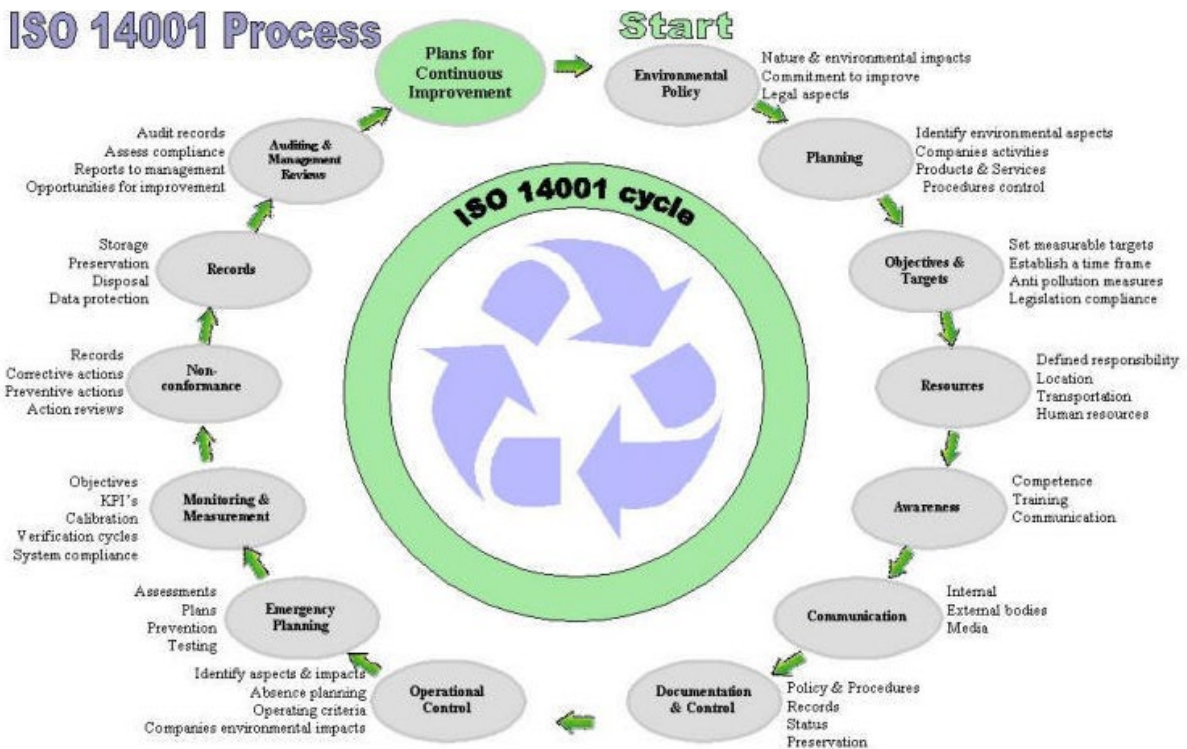


Figure 2 ISO 14001 Management System Processes

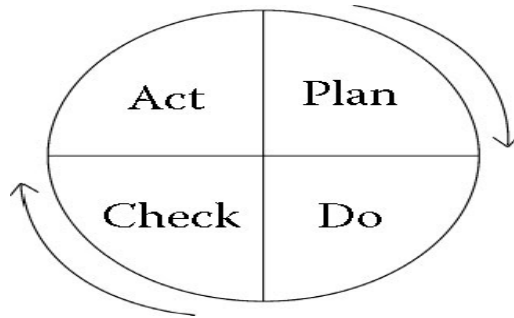
In addition, the governance activities include systematic verification of the effectiveness of our EMS by undertaking internal audits and analysing data.

Regular Management Reviews ensure that our Environmental Management System is adequate and effective and that any necessary adjustments are made as a result.

Top Management are committed to implementing and developing the EMS and this commitment is defined by our corporate policies and objectives. Urbaser Limited ensures that our policies are understood, implemented and maintained at all levels of the organisation through policy statements and corporate level improvement objectives. Urbaser Limited communicate our mission, vision and strategy policies and processes through:

- Creating and sustaining shared value of fairness and ethical behaviour
- Establishing a culture of trust and integrity
- Encouraging commitment to quality
- Providing people with required resources training and authority's to act with accountability
- Inspiring, encouraging and recognising people's contributions

Leadership at Urbaser will also be established by using the principle set in the Deming Shewhart cycle of: **PLAN-DO-CHECK ACT**.



Plan: Urbaser Limited to establish organisational context and strategies. Determine regulatory and statutory commitments

Do: Develop policy and objectives, provide resources, assign process owners, focus on improving and achieving objectives. Address risk and opportunities

Check: review system and processes performances data ensure alignment is maintained between strategy and context

Act: Agree changes and improvements to maintain the integrity of the EMS

5.1 Environmental Policy Statement

Urbaser Limited is a waste management organization that provides the public sector market with a complete solution for waste treatment (including the designing and building of waste plants), waste collection, ground maintenance and street cleansing services. Urbaser Limited is committed to managing the environmental impacts associated with its operations in a responsible manner by the adoption of sound environmental practices. Urbaser's ethos is to be leaders in environmental management in all its business activities by reducing any negative impacts it has on the environment and wherever possible enhancing positive impacts. Top Management are committed to ensuring that the protection of the environment is firmly embedded in both the company strategies and the employees' risk based thinking approach.

To serve this purpose, Urbaser has designed and implemented an Environmental Management System (EMS) based on ISO14001:2015 that clearly defines its own environmental objectives and targets. This ensures that that any emissions from its activities or usage of natural resources are closely monitored, controlled and reviewed to provide continuous improvement to environmental performance and legal compliance.

The Local-UK -Environmental Policy will be delivered through the EMS and will ensure that Top Management at Urbaser Limited will:

- Include the consideration of Environmental issues in all business strategies and initiatives;
- Consider the wider global impact of all of our activities including the one of our suppliers and other stakeholders;
- Influence suppliers, contractors and clients with good environmental practice and ethos;
- Identify and minimise environmental risks in conjunction with relevant regulatory bodies and authorities, developing response plans as necessary;



- Install working systems that are built on good environmental practices, which also allows for changing environmental conditions;
- Commitment to maintain, review, audit and continuously improve a dynamic Environmental Policy and a EMS system that complies with all legal and other requirements as a minimum standard
- Use of Best Available Technology during operations at waste management facilities to ensure safe and reliable operations and to minimise impact on the environment and local community, addressing life cycle impacts and low carbon technologies to mitigate such impacts;
- Use materials and resource (such as energy and water) efficiently and recycle all materials where possible and prevent pollution;
- Making sure greenhouse gas emissions, energy use and water use are monitored through a programme of improvement to ensure maximum efficiency;
- Training employees and raising awareness with environmental procedures and responsibilities associated with their job role;
- Engaging with subcontractors and suppliers to ensure their systems and standards are in accordance with Urbaser’s Environmental Policy
- Ensuring activities are carried out working with local communities and minimising environmental nuisance to neighbours;
- Set the company’s targets and objectives will aim to minimise our emission to air, water and waste landfill. They will be reviewed on an annual basis.

This Policy statement is communicated to all personnel who may work with or on behalf of the Company and is available to the public via our website. Both the Environmental Policy and Policy statement will be reviewed and updated as necessary within a period of five years in the UK. The international policy will not be signed by the CEO as per internal instructions.

Javier Peiro
Managing Director

6.0 Planning

Planning – General Key Element of EMS that need Planning

Urbaser Limited delivers services of: Mechanical Biological Treatment, Energy from Waste, Waste and Recycling Collection, Street Cleansing and Grounds Maintenance. The service provision planning process for delivering the stated defines the strategy used to facilitate delivery of the continual improvement framework laid out in the company’s Policy Statement. The overall Environmental Management Plan is driven by the company’s identified significant environmental aspects and the associated risks and opportunities. It sets out overall Objectives, SMART Targets and Actions.

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The scope of Urbaser Limited’s risk and opportunities as per **PIN 8** management process include the assessment of the internal and external issues and the assessment of the needs and expectation of any interested parties in respect to environmental issue. Risk and opportunity management are undertaken as part of Urbaser organisation’s day to day operations and is captured the following hierarchy:

- Strategic level
- Programme level
- Department level
- Process level

Establishing such hierarchy for capturing risk and opportunities ensures that each is managed at the most appropriate level within our organisation. Typically, the following categories are assigned to each level in the hierarchy:

| | |
|---|---|
| <p>Business Environmental Hierarchy Strategic level</p> <p>Programme Level Department Level Process Level</p> | <p>Risk and Opportunities Budget and Profitability taking into consideration best practice for safeguard of the environment and sustainability</p> <p>Performance and Efficiency Resources and targets Evaluation and Assurance</p> |
|---|---|

Urbaser Limited has classified its risks as the amount of risk that we are willing to accept in pursuit of an opportunity or the avoidance of risk where each pertains to product and/or system conformity and which reflect the following consideration

1. Risk Management Philosophy per service
2. Capacity to take on or mitigate the environmental risk
3. Our objectives and respective stakeholders demands.

The general planning is broken down into controlled sections in this Policy to follow the structure of ISO 14001:2015 and is holistically considered to protect the environment while delivering the services to many Clients.

- Corporate Policies and Manual from Head Office in Madrid
- Policies and Procedures
- Identification of the environmental aspects of the business and its significant impacts at all stages
- Targets and Objectives
- Identification of all legislative and regulatory requirements
- Requirements and procedure for auditing (at least every twelve (12) months)
- Management structures and key responsibilities
- Suppliers and subcontractor auditing
- Identification of appropriate objectives and targets



- Environmental policy implementation and reviewing
- The use of procedures to facilitate the management functions of planning, control, monitoring corrective actions, and auditing and reviewing
- The necessary processes, documents and resources
- Training
- New hazards and re-assessment of the current ones on a regular basis.
- Significant environmental aspects are reviewed at the very least annually depending upon the introduction of new projects, technology, audits findings, change in legislation etc.
- Managerial Reviews
- Efficient use of resources and Materials.
- Procure material with a lower environmental impact (using RBE green specification as a guidance)
- Pollution prevention and safeguarding the surrounding environment
- Monitoring, measuring and reporting
- Technical Procedures and Waste Management Plan
- Certificate and Licences.

Urbaser Limited has established, documented, and implemented an Environmental Management System. The System applies to all the company's activities and has been developed in accordance with ISO4001:2015. Urbaser Limited has identified in its system, the methods and criteria needed to ensure the effective control, availability of all the necessary resources and the information needed to support and monitor its operations and reduce the adverse impacts on the environment deriving from its operations. Urbaser Limited monitors measures and analyses these processes and takes the necessary actions needed to achieve its environmental objectives and targets to demonstrate and guarantee continual improvement of all its processes. Our company Environmental Management System (which forms part of an integrate system) structure is shown and comprised in the figure below. It is composed of five levels.

Within the structure of the system, it is not permissible for a lower-level document or to negate the requirement of a higher one. Table

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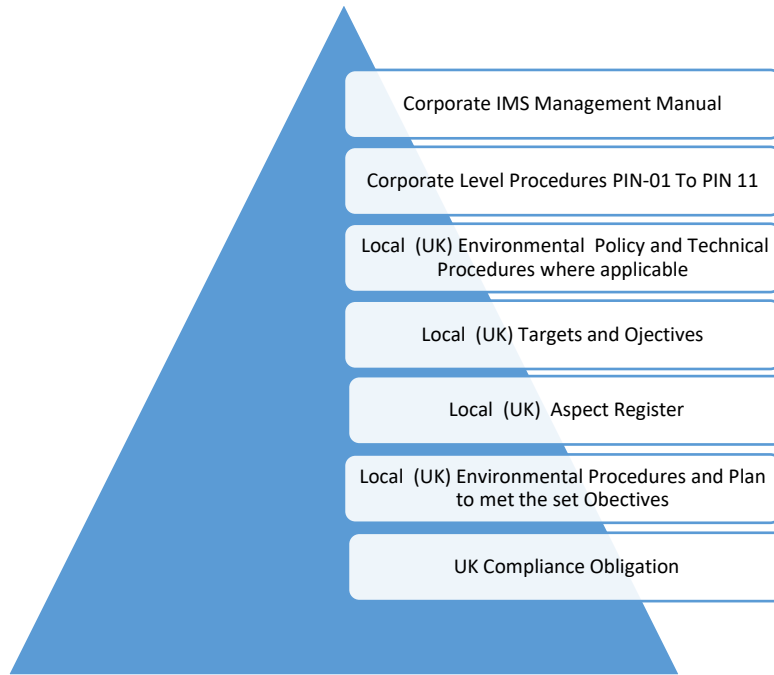


Figure 3 Local UK Environmental Management System

Technical Procedures of Reference

| | |
|--|-----------------------------------|
| International Corporate Manual | Issued by Madrid |
| Corporate Procedures | PIN1 to PIN 11 |
| ISO 14001 | EMS Plan |
| Quality Policy | Environmental Impact Control Plan |
| Health and Safety Policy | Emergency Plan |
| Standard Operating Procedures | Safe System of Work |
| Procedures tailored specifically for Operational site, will function as an implementation to this Policy . | Business Continuity Plans |
| Legal Register | Aspect Register |



6.0 a) IMS Corporate Procedures

b) PIN:

PIN-01-CORP CREATION AND CONTROL OF IMS DOCUMENTATION

PIN-02-CORP IDENTIFICATION AND EVALUATION OF LEGAL REQUIREMENTS

PIN-03-CORP ACTIONS DERIVED FROM DEVIATIONS, RISKS AND OPPORTUNITIES FOR IMPROVEMENT

PIN-04-CORP INTEGRATED MANAGEMENT SYSTEM AUDITS

PIN-05-CORP IMS MANAGEMENT REVIEW

PIN-06-CORP SERVICE MANAGEMENT PLAN

PIN-07-CORP EMERGENCY RESPONSE

PIN-08-CORP RISK AND OPPORTUNITY MANAGEMENT

PIN-09-CORP OBJECTIVES AND PERFORMANCE INDICATORS

PIN-10-CORP COMMUNICATION AND AWARENESS

PIN-11-CORP CUSTOMER REQUIREMENTS MANAGEMENT

Environmental Objectives and Targets

Urbaser Limited will establish and maintain documented environmental objectives and targets at each relevant function and level. The objectives and targets should be consistent with the environmental policy, have the commitment to comply with applicable legal requirements, pollution prevention, risk identification and continual improvement. Urbaser Limited will establish and maintain one or more programs for achieving its objective and targets. The program(s) must include: 1) designation of responsibility for achieving objectives and targets at each relevant function and level of the organisation; and 2) the means and timeframe by which they are to be achieved.

- a) Minimise pollution from operational activities
- b) Minimise the occurrence of environmental incidents
- c) Minimise water consumption
- d) Minimise energy use
- e) Manage the sites in an environmentally and socially considerate and accountable manner
- f) Comply with best practice site management principles
- g) Use all reasonable endeavours to achieve BREEAM Excellent certification for sites where applicable.;
- h) On-going Community liaison and engagement through the operation of visitor centre's where applicable.

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Environmental Aspects & Environment Impacts

The company obliges to keep in line with current legislation and meet the parameters set out in EA permits of its permitted sites in order to safeguard the environment. Urbaser Limited will consider environmental impacts at all stages of contracts, to this end the company has developed an Environmental Aspect Register in order to group, establish and identify any new potentially harmful effects to the environment deriving from its operations which can be categorised as follows:

- Mechanical Biological Treatment
- Energy from Waste
- Recycling
- Collection of Refuse and Recycling
- Street Cleansing
- Grounds Maintenance
- Management of Construction Activities.

Within the Environmental Aspect Register, assessment of the potential environmental impact of each aspect has been recorded. A scoring system has been used to identify the significance of each environmental aspect with regards to relevant current and past activities, products, services, planned/new developments. The scoring process also allows consideration of normal, abnormal and emergency operating conditions where these are considered applicable. Risks and opportunities across the life cycle of the aspects are also considered in the determination of significance.

Environmental hazard procedures describe how environmental aspects and impacts are assessed to determine those which have or can have significant impacts on the environment. This includes a review of the environmental aspects resulting from planned or new developments, or new or modified activities, products and services.

All significant impacts are managed within the system and form the basis of environmental objectives, targets and management programmes.

This process covers normal operating conditions, shutdown and start-up conditions and the realistic potential of significant impacts associated with reasonably foreseeable or emergency situations.

Environmental aspects register

Each identified aspect is recorded in the relevant section of the register with the following information:

- A description of the activity associated with the environmental aspect.
- A description of the aspect which interacts with the environment.
- A description of the environmental impact associated with the aspect.

Environmental aspects and impacts assessment

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The following process is used to assign a priority rating for each environmental aspect.

1. Score the likelihood of the aspect according to the criteria identified in Appendix A (Table 1).
2. Score the consequence of the aspect according to the criteria identified in Appendix A (Table 2).
3. Calculate a Priority Rating Score:

$$\text{Priority Rating Score} = \text{Likelihood} \times \text{Consequence}$$

4. Those with a Priority Rating Score greater than 15 are identified as significant, in addition to those which are subject to a legal requirement which are clearly identified on the register.

The ongoing suitability, adequacy and effectiveness of the Environmental Aspects Register is reviewed at least every six months and reported at the Management Review Meetings, or more frequently when required following a change in operations or environmental accidents and incidents. The register will be updated to reflect changing circumstances and issues of concern (Appendix B). The results of the review will be documented in the minutes of the meeting.

Management of significant aspects

All aspects identified as significant are managed within the EMS. Depending on the situation this can entail combinations of the following:

- Investigation and development of opportunities for further improvement
- Objectives, targets and programme for improvement
- Controls to maintain performance e.g. procedures or Safe Systems of Work.

New projects / developments

The environmental aspects of planned or new developments, or new or modified activities, procedures and services shall be assessed during project conception and design using the “Environmental Aspects Review of New Projects Flow Chart” (Appendix C).

A description of the environmental aspects of major new projects and developments is also included in the Supporting Statement of the Planning Application and in the Management Plan accompanying Environmental Permit applications.

Where significant changes in aspects are identified, for example from changes in operations, the Register of Aspects & Impacts will be updated and where appropriate the Objectives, Targets and Programmes amended to incorporate the new projects. The need to update the Register of Aspects & Impacts is considered at the six monthly Management Review meeting.

Environmental impacts during the Commissioning Period of Waste Treatment Projects



An aspects and impact register has been developed to identify the two key commissioning areas with potential to impact upon the environment. The QHSE Manager will update this register to reflect the activities undertaken as the project progresses.

- A. Cold commissioning will comprise the test of signals and safety systems, loop testing, instrument calibration, equipment testing including control equipment, valves, transmitters etc. storage and handling of consumables and residues and the monitoring of energy and resource usage
- B. Hot commissioning will comprise the incremental acceptance, processing and treatment of treatable Contract Waste throughout all the Facility, removal of treatment outputs, removal of Recyclates, monitoring of energy and resource usage.

Environmental impacts during the Services Period

The Aspects and Impact Register has been developed and encompasses the following:

Noises, odours, increased localized traffic, litter and fly tipping, flies and vermin
Emission to Air and Water, Energy and Resource Usage.

Possible environmental impacts during the Services and Commissioning Periods include:

- Impact upon the local community, general public, residents, local environment (flora/fauna/archaeology)
- Impact resulting from acceptance and treatment of treatable Contract Waste
- Impact resulting from the discharge of waste water
- Impact resulting from air emissions
- Impact from litter and fly tipped waste; and

Procedures are in place to ensure that no negative environmental impact arises from windblown and fly tipped litter when Waste is delivered to the Site and processed at Facilities. All of the company's impacts are measured, monitored, and reported.

Meeting the Targets and Objectives as per PIN 9

The Environmental Management Plan revolves around those elements of compliance to meet the pre-established targets and objectives:

- Energy/Carbon Reduction
- Potable Water Reduction
- Land Development & Refurbishments (including Biodiversity)



- Pollution Prevention
- Waste Management
- Sustainable Procurement
- Commuting and Business Travel
- Environmental Management System

The Targets and Objectives will be constantly monitored and audited for compliance and to ascertain progress of delivery and meeting of quantifiable targets.

The progress of the achievement of Targets and Objective will be discussed at the Monthly QHSE corporate meeting at HQ and Managerial meetings.

Compliance Obligations as per PIN 03

The QHSE Manager has identified the environmental legislation directly related to the significant environmental aspects as either 'relevant' or 'irrelevant' to the company's activities. The Legal Register is organised within the following legislation categories; Pollution, Air, Water, Waste, Land, Planning/Wildlife, Hazards, Safety, Nuisance, Standards, Energy & Climate Change. In addition to legal compliance the company has other sector level and stakeholder compliance obligations, and these are listed under the category 'Other Requirements'. The risks and opportunities associated with the company's compliance obligations are recorded in the Risk and Opportunity Register and Aspect Register and this is used to inform the Register and ensure adequate controls are in place to manage the risks.

It is the responsibility of the QHSE Manager to maintain and review the Pegasus Register, specifically:

- Determine whether a piece of legislation, amendment to current legislation or new legislation is 'relevant' or 'irrelevant'.
- Whether the company is compliant with the legislation and save comments describing how the requirements apply to the activities of Urbaser and what controls are in place to manage and mitigate the requirement and related environmental aspects;
- Other compliance obligations relevant to the sector and those that the Company has adopted
- Update the Register quarterly

A further element of compliance is shown in two corporate audits one aimed to the statutory compliance and called Management System audit 14001, and the other to legal compliance called Evaluation of Legal Compliance audit. Those two types of audits are performed at HQ and all operational sites.

The organisation is also obliged to establish and maintain procedures to identify and access legal and other requirements to which the organisation subscribes that are applicable to its activities. Legal requirements will cover environmental, health and safety, pertinent industrial regulations, and acts of parliament. A Pegasus legal register will be reviewed by the licence providers accordingly. Evaluation of compliance to legal and other requirements is done through specific audits along with other general audits seeking evaluation to legal

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compliance in specific fields of activities. Updates are carried out using the Online Pegasus Register. The evaluation to legal compliance audit is performed selecting the chief adverse activities (on yearly rotation) legal compliance along with what has not worked in previous years/months to ascertain lesson learned.

Compliance Obligations in terms of Consents, Licences, and Permits

Depending on the typology of the contract awarded permissions and licences for the Project will be achieved which may include the following:

- Environmental Permit
- Environmental Permit Exemption (where required for specific activities)
- Registration with Considerate Constructor Scheme
- Surface water discharge consent (as applicable to Site requirements)
- Trade effluent discharge consent (as applicable to Site requirement)
- Protected species licences (to the extent that any protected species found during or post construction require relocation)
- Registered waste carriers licence
- Temporary foul water discharge consents; and
- Abstraction Licence for the use of water hydrants.

7.0 Provision of resources

The Top Management have determined what resources are needed to implement and improve the Environmental Management System and address stakeholder satisfaction needs. Urbaser Limited ensures that these resources are provided in a timely manner. The implementation of the Integrated System was achieved with management commitment and with sufficient resources assigned to the task. To effectively maintain and continually improve the system, management determines and provides necessary resources as they are required.

Urbaser Limited determines and provides the resources needed:

- a) to implement and maintain the environmental management system and continually improve its effectiveness
- b) to enhance customer satisfaction by meeting customer requirements whilst safeguarding the environment

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Resource allocation is done with consideration of the capability and constraints on existing internal resources, as well as needs related to supplier expectations.

Resources and resource allocation are assessed during management reviews.

7.1. Organisation and reporting in connection with all work methods

Javier Peiro is the Managing Director of Urbaser Limited, a subsidiary of the Spanish organisation Urbaser SA.

7.1.1 Organisational Chart

The organisational chart shows all positions within the company's head office and how they relate to one other under the Environmental System.

7.1.2 Authority

All staff are allocated authority to perform their assigned duties and allocated responsibilities.

All staff share responsibility of identifying any noncompliance or possible improvements and are obliged to record these instances in order that corrective action may be taken, both to rectify the immediate situation and to prevent recurrence. The Managing Director continually reviews the company's resources to ensure that adequate staff, equipment and materials are available to meet customer requirements.

7.2 Management Commitment to the Environment

It is the policy of Urbaser Limited to comply with all relevant aspects of ISO14001/9001/18001. All personnel are required to familiarise themselves with the policy and procedures and implement these when necessary in their work. Management and personnel continually aim to achieve improvements to the quality system.

The management is committed to establishing and maintaining Environmental policies and objectives, providing regular feedback to all personnel on specific matters that affect the quality of the company's output. This shall include, but not be limited to, making staff aware of their relevance and the importance of achieving of the objectives of the environmental policy; ensuring that staff are made aware of any changes within the EMS including new or amended documentation methods / procedures and the outcome of internal / external audits. The personnel will be at all the time reminded of the importance of meeting customer, statutory and regulatory requirements.

7.3 Resource Management

Resource Management is the efficient and effective deployment of an organisation's resources when they are needed. Such resources may include financial resources, inventory, human skills, production resources, or information technology. These include discussions on functional vs. cross-functional resource HR (Human Resource) Management. At Urbaser Limited the allocation of human resources among various projects or business units, maximising the utilisation of available personnel resources to achieve business goals and performing the activities that are necessary in the maintenance of that workforce through identification of staffing requirements, planning and oversight of payroll and benefits, education and professional development, and administering their work-life needs.

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7.4 Roles & Responsibilities (list non comprehensive please check the Job Specifications or operating procedures)

All staff are allocated authority to perform their assigned duties and allocated responsibilities. The following provides a summary of the principal responsibilities of role. All staff share responsibility of identifying any non-compliance or possible improvements, and are obliged to record these instances in order that corrective action may be taken, both to rectify the immediate situation and to prevent recurrence.

Managing Director

- Approval of the EMS
- Management Review
- Design Control
- Supplier Selection & Purchasing
- Contract Management & Control
- Training
- Ensuring that the EMS is reviewed
- Disciplinary procedures
- Financial Decision
- Strategy and Marketing
- Environmental security
- Ensuring the availability of resources essential to establish, implement and maintain an EMS
- Defining roles allocating responsibilities and accountabilities and delegating authorities

Quality Environmental Health and Safety Manager (ISO9001 Management Representative)

- Internal Audit
- Resolution of EMS Discrepancies
- Control & Maintenance of the EMS
- Documentation & Change Control (EMS Documents)
- Environmental Safe System at work
- Risk Assessment implementation and Review
- Ensuring that a QHSE system is established and maintained
- Environmental Management
- Managerial Review
- Environmental Monitoring
- COSHH Assessment
- Policy ownership
- Evaluation of Environmental Performances
- Evaluation of Individual Performances
- Fire plan evacuation and procedures
- Environmental trend analysis
- Further administrative requirement

Commercial Director / Head of Legal Department

- Planning and Co-ordination
- Control of record and contract for legal compliance

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- Legal advice
- Reviewing legal register
- Project Concession (Agreement)
- Funding agreements
- Development agreements
- Guarantees and supporting security
- Professional appointments
- Commercial issues arising in connection with project financing, property matters, planning & environment
- Document Control and process management

Financial Director

- Control of Finance, Accounts and Operations
- Training
- Supplier Selection and Purchasing
- Supports the Board in the preparation of budgets and financial reports, including income statements, balance sheets, tax returns and reports for Government regulatory agencies
- Contributes to the achievement of the company objectives by providing advice and guidance on financial strategy
- Oversees all accounting procedures and systems used by the Company
- Meet with the Board of Directors regularly to keep them informed and to offer direction
- Review reports and analyse projections of sales and income against actual figures and suggests methods of improving the planning process
- In conjunction with the Board, assess the long term financial trends and review prospects for future growth of income and new service areas
- To ensure the Company meets its financial and legal responsibilities

Project Managers / Business Development Manager

- Plan and prioritise contract opportunities in order to achieve agreed business aims, especially managing personnel and productivity
- Development Strategy
- Manage pricing and margins according to agreed aims
- Maintain and develop existing and new customers through appropriate propositions to optimise quality of service, business growth and customer satisfaction
- Use customer and project contract activities tools and systems, and update relevant information held
- Respond and follow up enquiries using appropriate methods
- Monitor and report on market competitor activities and provide relevant reports on information
- Communicate and negotiate internally and externally using appropriate methods to facilitate development of profitable business and sustainable relationship
- Attend and present at external customer meeting and internal meetings
- Attend training and develop knowledge, technique and skills
- Adhere to all relevant company policies
- Ensuring that life cycle costs are assessed during tenders;

Administration

- Client Database Administration
- Checking of Sales Orders
- Allocation of Purchase Order Reference Numbers

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HR Manager

- Ensuring that payroll is administrated correctly and on time
- Strategic decision making of the company with regard to HR
- To Support Managers in the recruitment of personnel
- Evaluation of performances in conjunction with the Quality Manager

Project Engineer

- Assisting in producing Steering Committee papers
- Monitoring and reporting on bid costs, highlighting material vacancies from budget
- Develop the Project task list, delegating responsibilities for delivering each element of the submission, ensuring task list is complete
- Develop and maintain meeting schedule
- Implement document control procedures
- Support the Project Director in the bid submission process
- Manage processes between the Company and the Client
- Maintain and update as necessary relevant documentation
- Preparing draft regular projects status reports for Project Director

Through the Corporate IMS documentation, the roles and responsibilities of the members of the Organization are attributed and the authority and relationships between all personnel who manage, perform, review or decide on tasks and/or resources related to quality, occupational health and safety, environment and energy management are known, with the aim of meeting the defined objectives. Next, the organizational structure defined for the IMS is defined, which establishes relevant positions to achieve an adequate implementation of the system, whose main functions and responsibilities are

| RESPONSIBLE | ROLES AND RESPONSIBILITIES IN RELATION TO IMS |
|---|--|
| Chief Executive Officer | <ul style="list-style-type: none"> • Approve the Corporate Policy on Quality, Health and Safety, Environment and Energy, as well as other specific policies in these areas, as deemed appropriate. • Ensure the dissemination of the Policy and Objectives in order to motivate all workers to achieve them. • To provide the necessary resources to the Organization to achieve an adequate implementation and maintenance of the IMS. |
| Documentary Framework Committee | <ul style="list-style-type: none"> • Review and disseminate relevant IMS documentation. |
| Members of the Steering Committé | <ul style="list-style-type: none"> • Disseminate, within their area of responsibility, the IMS Policy and Objectives defined by the Organization. • Review and approve (when applicable, according to the established flows), new procedures or new versions of existing ones, related to the IMS matters that fall under their area of responsibility, as well as ensure their compliance. |

| RESPONSIBLE | ROLES AND RESPONSIBILITIES IN RELATION TO IMS |
|--|---|
| Country Director | <ul style="list-style-type: none"> • Manage the responsibilities that apply to them in the areas of Quality, Environment, Occupational Health and Safety and Energy. • Collaborate to promote among the workers under their responsibility, the correct implementation and maintenance of the IMS. • Ensure that the workers in their charge have sufficient training and information in the matters of application of the IMS, for the development of their activity in a safe and sustainable manner. • Propose improvements in the aspects related to the IMS that are applicable to its area of action. |
| Corporate Directors of other Areas different from QHSE | |
| Corporate QHSE Director | <p>Same functions as the previous block, and additionally:</p> <ul style="list-style-type: none"> • To act as the person responsible for matters related to the IMS at the Corporate level and the Management's representative for these matters within the framework of the IMS. • Ensure that the management system is established, implemented and maintained in accordance with the requirements of the applicable international reference standards (ISO 9001, ISO 14001, ISO 45001 and ISO 50001). • Report to top management on the performance of the IMS for review, including recommendations for improvement. • Maintain relations with the external company in charge of certification. • Ensure the support of other departments of the Organization when necessary. • Ensure that the necessary economic and personnel resources are allocated to ensure the proper functioning of the IMS. • Promote continuous improvement of the IMS and the Organization's performance in the aspects related to the IMS. • Promote awareness of the need to ensure compliance with customer requirements, legal requirements and other requirements associated with the activity in the IMS matters, at all levels of the Organization. • Coordinate the actions before the Public Administrations in IMS matters. • To request assistance in all that he/she considers necessary for the performance of his/her duties, from the Managers and Technicians of his/her Department, as well as from the Energy Management Department. When the QHSE Department appears in any document as being in charge of assuming a certain responsibility or signing a certain register, these functions will be assumed by the Managers and Technicians designated by the Corporate QHSE Director, according to the functions attributed to each of them, or assumed by the Corporate QHSE Director himself. |
| Director of | |
| other | <ul style="list-style-type: none"> • Ensure compliance with those aspects of the IMS that apply to it. |

| | |
|-----------------------------------|--|
| Corporate | <ul style="list-style-type: none"> To offer support for the correct development of the activities related to their area. |
| Areas | |
| Country and Company QHSE Director | <ul style="list-style-type: none"> Ensure compliance with those aspects of the IMS that apply to it. To provide support for the correct development of activities related to QHSE, especially supporting the Contract Managers of those companies in which they have assigned responsibilities. Represent, collaborate and report when appropriate, to the Corporate QHSE Director on the implementation, evolution and maintenance of the IMS. |
| QHSE Specialist | <ul style="list-style-type: none"> Ensure compliance with those aspects of the IMS that apply to it. To provide support for the correct development of activities related to QHSE, especially supporting the Operations Managers of those companies in which they have assigned responsibilities. Collaborate with the QHSE Country/Society Manager to ensure proper coordination and management of IMS related tasks. Represent, collaborate and report when appropriate, to the Corporate QHSE Director on the implementation, evolution and maintenance of the IMS. |
| Contract Manager | <ul style="list-style-type: none"> To disseminate, within the area of his/her responsibility, the Policy and Objectives defined for the Organization. Ensure that IMS procedures are properly implemented. Ensure compliance with those aspects of the IMS that apply to it. Collaborate with and inform, when appropriate, the QHSE Country/Society/ QHSE Specialist, on the implementation and maintenance of the IMS. Ensure that records associated with the IMS are completed, archived and maintained. Evaluate the effectiveness of corrective actions, if necessary. |
| Internal Auditors | <ul style="list-style-type: none"> Communicate and clarify audit requirements to auditees. Typify the findings made during the audit in the different categories (deviations, observations and opportunities for improvement). |
| RESPONSIBLE | ROLES AND RESPONSIBILITIES IN RELATION TO IMS |
| | <ul style="list-style-type: none"> Prepare the audit report. Ensure the confidentiality of the information obtained. Act with objectivity. Propose improvements whenever necessary. |
| Other Staff | <ul style="list-style-type: none"> Ensure compliance with those aspects of the IMS that apply to it. Active participation in the continuous improvement process through suggestions for improvement and implementation. Ensure, based on the information and training received, compliance with the preventive measures related to their job. Immediately communicate, as established, any situation that they consider may present a risk to their safety and health, to that of third parties or to the environment. |



7.5 Competence Awareness and Training

Top Management ensures that it provides sufficient staffing for the effective operation of the management system, as well its identified services.

Staff members performing work that may affect the quality of the services are competent on the basis of appropriate education, training, skills and experience. The documented procedure *PDR - Competency Framework* defines these activities in detail.

Training and subsequent communication ensure that staff are aware of:

- a) the Environmental policy;
- b) relevant Environmental objectives;
- c) their contribution to the effectiveness of the management system, including the benefits of improved performance;
- d) the implications of not conforming with the environmental management system requirements.

Urbaser Limited ensures that any personnel performing works that may affecting service or quality are fully capable to carry out the tasks relative to their job description. To ensure competence of our personnel, job descriptions have been prepared identifying the qualifications required for each position that affects service quality. Appropriate qualifications, along with required training, and previous experience in the role provide the competence required for each position. Qualifications are reviewed upon hire, when an employee changes positions or the requirements for a position change. Human Resources maintain records of employee qualifications. If any differences between the employee's qualifications and the requirements for the job are found, training or other action are taken to provide the employee with the necessary competence for the job. All employees are trained on the relevance and importance of their activities and how they contribute to the achievement of the quality objectives.

A Training Matrix has been developed and is continually maintained by the Head of QHSE Department or delegated to sites where appropriate. The Matrix identifies the training requirements for an individual necessary to undertake their specific role in the company. Furthermore, it is also used as a tool to record an individual's continuous professional development and it is also considered as a tool to ascertain gaps in operative's role, hence the need of further training. This gap identification is usually performed by the QHSE and HR manager. The Matrix is utilised throughout an individual's development within the Company:

- On induction – On successful employment to the Company, the QHSE Manager will utilise the Training Matrix to ensure that an individual has the necessary training and qualifications necessary to perform the role for which they have been employed. Where shortfalls are identified, a programme of training will be developed and engaged to ensure the necessary competence and qualifications are attained. The Matrix will be updated in order to document all additional competencies / qualifications attained by an individual.
- Through variation in responsibilities / change of role – In instances where the responsibilities of a role are varied or if an employee's role within the Company changes, the Training Matrix will be consulted to identify any additional training requirements necessary for an individual to conduct their role. Where



shortfalls are identified, a programme of training will be developed and engaged to ensure the necessary competence and qualifications are attained. The Matrix will be updated in order to document all additional competencies / qualifications attained by an individual.

- To record Continuous Professional Development – The Company encourages individuals to take advantage of training opportunities, where relevant, and offers the opportunity to study for an appropriate professional qualification. Where professional qualifications, over and above those necessary to perform an individual’s role within the Company, are attained, such qualifications shall be recorded within the Training Matrix.

In conjunction with the HR document called PDR, this Policy describes competency of individuals as follows

| | | | |
|---------------------|--|--------------------|------------------------------|
| Knowledge | The Information we possess | What we Know | |
| Skills | Our ability to perform a physical or mental task | What we can do | |
| Competencies | How we behave while performing our work task | How we go about it | Capability/Competency |

Urbaser Limited ensures that any personnel performing works affecting service or quality are fully capable to carry out the tasks relative to their job description. To ensure competence of our personnel, job descriptions have been prepared identifying the qualifications required for each position that affects service quality. Appropriate qualifications, along with required training, provide the competence required for each position. Qualifications are reviewed upon hire, when an employee changes positions or the requirements for a position change. Human Resources maintain records of employee qualifications. If any differences between the employee’s qualifications and the requirements for the job are found, training or other action is taken to provide the employee with the necessary competence for the job. All employees are trained on the relevance and importance of their activities and how they contribute to the achievement of the quality objectives.

7.6 Communication as per PIN 10

Urbaser Limited has establish and maintain procedures with regard to its environmental aspects for internal and external communication between the various levels and functions in the organisation, and receiving, documenting, and responding to relevant communications from external parties. Urbaser Limited will demonstrate management commitment to the safety of its employees and the environment; deal with concerns and questions about significant environmental aspects; Raise awareness on environmental policies, objectives, targets and programs; inform internal and external interested parties about EMS and performance as appropriate. Energy saving procedures will be cascaded down via Memo and or PowerPoint.



7.7 External Communication

Urbaser will make environmental aspects of projects part of weekly team meetings, design team meetings and project meetings. Where Site controls dictate it, a specific environmental meeting will be held.

Personnel engagement in this EMS Plan and the EMS will follow the health and safety consultation model and include group toolbox talks as well as confidential reporting, an open door policy and a culture of openness and honesty. Notice boards will also have regular updates on environmental performance and Site specific issues.

The QHSE Manager (or designates) will deal with external organisations such as the EA and the environmental health officer. Where liaison is required with the wider community, this will come under the remit of the Local Contract Managers.

7.8 Operating Procedures

These documents describe the actual processes and controls applied to all of the company's activities. Procedures and policies are recorded on a master document list. Current operating procedures exist for:

- HR department
- Legal Department
- Accounts
- Quality/Environmental and Health and Safety
- Method Statements
- Environmental Plans
- Standard Operation Procedures form different operational sites
- Environmental Induction

7.9 Document Control & Control of Records as per **PIN-01**

Urbaser Limited has established and maintains procedures for the control of all documents required for the QMS. Procedures exist for the approval of documents to ensure that they are adequate to issue. The procedures ensure that documents are traceable, that current document revision status is identified, and that relevant current versions are available in the areas where they are needed to maintain effective operation of the system. The documents have to be at all the time legible and easy to identify and retrievable with date of issue and date of amendments where applicable, maintained in an ordinate fashion and retained for a specific period of time, documents which originated externally are similarly identified and controlled. Records are established and maintained to supply evidence of compliance with defined requirements and the successful achievement of the QMS. Records are to be legible, identifiable and easily located. Document procedures have been established which define the controls required for identification storage protection, retrieval, loss, damage, deterioration and disposal.

Document control applies to all documents that are used by the Integrated System or any work within the scope of Urbaser's activities. All such documents are known as 'controlled documents' and every publication, check list and form will display a unique document registration, using the guidelines published by Urbaser S.A.U. in Regulation 0.

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Control of Records concerns the controlled storage and movement of records, which are the records of all the work and communications relating to any work in the scope of accreditation. (Examples are test reports, letters to clients, quotations, planning and meetings records relating to the work and any syllabuses or documents that are being kept as a record of what document applied at the time of the work). Records must be held secure for confidentiality of clients and personnel.

Document control concerns the issuance of the correct and current documents, such as standards, training syllabuses, blank forms or workbooks. Issue of documents and forms is controlled by computer system access permissions, which is set and maintained to mirror authorisation of each person.

Document approval and issue the master versions of all templates are stored in secured access areas of the office computer system. Site documents like Integrated Manual and procedures along with HSE guidance will be supplied electronically by means of UBS Keys. In case such keys are lost documents will be available via internet, all required documents and forms must be available to the persons who require them. The QHSE Manager is responsible for carrying out issue and distribution of documents and forms, and for collecting superseded and obsolete issues. The Integrated manual from Madrid must be immediately available for all management, quality staff and project controllers. Control of all issues is made effective by use of Document Issue Records which include one for sites to ensure that all sites storing documents for use are updated promptly.

Document Review

External documents are checked at least annually for current version being up to date. This is done by using information from or contacting the supplier of the document.

Internal documents: All are reviewed at least annually for appropriateness of use, layout and content. They may be for example be modified to accommodate difficulties or errors made in use or to accommodate system design modifications. The standards to which the quality system is applied and policies within the quality system must be observed before making changes.

The review is also to check compliance with the standard. It must be carried out by a person knowledgeable and experienced about the work and current quality procedures. Schedules and records for reviews are kept in electronic folders. The QHSE Manager implements the review and persons or positions who were issued or previously reviewed a document will often review the same documents. The issuing function is displayed at the foot of all documents and forms (display on labels is optional.) Further specific requirements of the review may apply. The review schedules and forms are kept as electronic records only.

Any review of audit programmes must include a review of all aspects of the current ISO 9001:2015 and the usability of the scheduling system. The document review file will contain or point to the schedules for the reviews. The QSHE Manager and the Director are the only authorities within Urbaser that are permitted to ameliorate/replace/change both Quality and Technical documents.

Document Compilation and Authorisation

Obsolete forms: Obsolete forms are removed from the system and destroyed or archived on a regular basis. This is carried out by QHSE or Office Manager. One copy of each obsolete document is kept and clearly marked as obsolete or superseded as appropriate. The QHSE or Office Manager ensures that this is completed by using the document issue registers and recording the return and destruction or transfer to archive as is the case for each document.

Document and form identification

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Documents must be uniquely identified with date of issue and version number. In the case of forms this is normally using the form / document registration system given in Appendix A. The system is also used for documents produced from templates (such as survey and test reports).

In addition all documents and forms are to include the following:

- The issuing authority
- Page number

The above policy also applies also to any forms and documents that are electronic only in format, including forms in a database or spreadsheet program.

Where possible (not a requirement) templates should also display their storage location. The table below shows the particular configurations of the above requirements applied to the various documents.

| Type of Document | Unique Identification Format | Format of number of pages display |
|----------------------|---|--|
| Environmental Policy | Individual pages to display Title of Document, No. & title of section, page issue number (historic issue count for that page), and date of issue. | Numbered as page number within the section. 'Page x of y' where x is the sequential page count and y is the total number of pages in the section |

Document changes

Review of changes to documents

Any changes to all documents and forms relating to any accredited activities are reviewed by the QHSE Manager. Approval of all documents for accredited work areas is carried out by the QHSE Manager. Any altered or new documents must show that they are a new issue by one of two means. 1) For the Quality Policy and revised documents each page should show the issue date with new version number, 2) For new documents and forms a new Form/ Document Registration Number is applied containing a date section that indicating the start date of authorisation for use.

Coding format for documents

Templates of the various document types detailed below are available for use by all staff and are accessed via the shared area.

Policy

Codification example:

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| CODING | DOC. TYPE | No. | CORPORATE / (COUNTRY / COMPANY / WORK CENTER) | TITLE | VERSION | FINAL CODING |
|---|-----------|-----|---|-----------|---------|------------------------|
| POL - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo. | POL | 01 | UK | INSURANCE | V1 | POL-01-UK-INSURANCE-V1 |

Procedure: depending on its contents:

- ✓ Administrative Procedure (**PA**):

| <i>Codification example:</i> | | | | | | |
|--|-----------|-----|----------------------------|-----------|---------|-----------------------|
| CODING | DOC. TYPE | No. | CORP / (COUN / COMP / CEN) | TITLE | VERSION | FINAL CODING |
| PA - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo. | PA | 01 | UK | INSURANCE | V1 | PA-01-UK-INSURANCE-V1 |

- ✓ Systems / IT Procedure (**PS**):

| <i>Codification example:</i> | | | | | | |
|--|-----------|-----|----------------------------|---------|---------|---------------------|
| CODING | DOC. TYPE | No. | CORP / (COUN / COMP / CEN) | TITLE | VERSION | FINAL CODING |
| PS - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo. | PS | 07 | UK | SYSTEMS | V1 | PS-07-UK-SYSTEMS-V1 |

- ✓ QHSE and Energy Procedure:

- PIN (Integrated)





- **PCA** (Quality)
- **PMA** (Environment)
- **PSS** (Health and Safety)
- **PE** (Energy):

| Codification example: | | | | | | |
|--|-----------|-----|----------------------------|--------|---------|-----------------------|
| CODING | DOC. TYPE | No. | CORP / (COUN / COMP / CEN) | TITLE | VERSION | FINAL CODING |
| PI - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo. | PIN | 02 | UK | ENERGY | V1 | PIN-02-UK.-ENERGY- V1 |

✓ Innovation Procedure (PI):

| Codification example: | | | | | | |
|--|-----------|-----|----------------------------|--------------------|---------|---------------------------------|
| CODING | DOC. TYPE | No. | CORP / (COUN / COMP / CEN) | TITLE | VERSION | FINAL CODING |
| PI - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo. | PI | 01 | UK | CORRECTIVE ACTIONS | V1 | PI-01-UK-CORRECTIVE ACTIONS- V1 |

Instructions / Protocols: INS / PRT:

Depending on the content of the regulation, the following acronym will be added to INS / PRT: Administrative (A; for example, INSA o PRTA), System (S), QHSE and Energy (IN, CA, MA, SS and E), Innovation (I).

| Codification example: | | | | | | |
|---|-----------|-----|----------------------------|--------|---------|------------------------|
| CODING | DOC. TYPE | No. | CORP / (COUN / COMP / CEN) | TITLE | VERSION | CODING |
| PRTxx - No. - CORP/(COUN/COMP/CEN) - TITLE - VNo. | PRTA | 01 | UK | VALVES | V1 | PRTA-01-UK-VALVES - V1 |

Records and Documents:



| CODING | DOC CODIFICATION TO WHICH THEY BELONG | D + No. | DOC. TITLE |
|---|---|---------|--------------------------------------|
| Pxx - No. - CORP/(COUN/COMP/CEN) - DNo. - RECORD TITLE | PA-14-UK | D14 | LOSS INVOLVING DAMAGE TO PROPERTY |

7.10 Infrastructure

The Top Management of Urbaser Limited identify, provide and maintains those facilities that are needed to achieve service conformity. These include adequate workplaces and associated welfare facilities, the necessary equipment (both Hardware and Software) and all the support services.

7.11 Accommodation and Environment & Environmental security

Applies to all locations used for any managerial function, storage of records Environmental security must be applied to the permanent facilities. The users of the buildings and the vehicles are the persons responsible.

Conditions requirements:

The following times should be reviewed for environmental security following any changes to personnel structure and management or building security arrangements.

- Day time unoccupied
- Day time occupied (regarding both welcome and unwelcome visitors)
- Night time
- Vacation periods and weekends
- Temperature to be comfortable

The following types of premises should be considered against each of the above time periods.

- All office areas and all entrances and exits at the head offices
- Any site offices

8.0 Operations



The Company has grouped its identified significant environmental aspects into categories. An overarching environmental management operational procedure has been created for each of the summary categories;

- **Use of Natural Resources**
- **Sustainable Procurement**
- **Land Development & Buildings**
- **Waste Management**
- **Travel / Transport**
- **Pollution Prevention**
- Water Pollution

The environmental management operational procedures document the approach the Company uses to manage and mitigate its' significant environmental aspects within the company's Environmental Management System (EMS), to ensure the company's operations are controlled to meet:

- Environmental commitments relevant to the aspect category;
- Environmental Management Plan namely Targets and Objectives;
- Compliance Obligations

The requirements of the environmental management operational procedures and any changes to procedures are communicated to;

- Relevant staff as specified in the Training Needs Analysis;
- Contractors where considered relevant to their activities;
- Consultants where considered relevant to their Project.

The relevant environmental management operational procedures are also applicable to outsourced processes including those undertaken by contractors, the level and extent of control or influence is defined within the relevant procedure.

Where applicable a life cycle approach is taken within the operational controls so that the environmental impacts at each stage can be controlled or influenced. The controls are defined within the relevant procedure.

8.1 Emergency preparation and response as per **PIN 7**

All Urbaser Limited employees shall be trained on how to behave and respond in an emergency situation. All necessary information shall be readily available and posted at appropriate locations in both the head office and on sites. The standard requires the organisation to establish and maintain procedures to identify the potential of and the responses to accidents and emergency situations, and for preventing and mitigating the environmental impacts associated with them. Upon appointment Urbaser employees are inducted on environmental hazards within their roles and how to react in case of an emergency rising. Copy of this training is held on the employee's training files.

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The QHSE Manager of Urbaser conducted examinations of its operations and identified the potential emergencies below:

- Fire
- Spills
- Emissions
- Pollution of the environment
- Accidental discharge to water.
- Accidental discharge to land
- Disaster preparedness
- Car accident

Emergency preparedness plans and procedures have been established and describe what steps need to be taken for responding to accidents and emergency situations and to prevent and mitigate any environmental impacts associated with them. Each site needs to perform two Testing per year one must include the Fire Risk Assessment Review the other will be chosen from the above list e.g spillage procedure testing. The above list may not apply to all sites, but the two testing rule must be adhered to.

8.1.1 Pollution Prevention Environmental Management Procedure

The procedures detail the relevant steps that must be taken to prevent pollution to air, land or water. On top of bespoke Business Continuity Plans at each location we also have local Emergency Preparedness procedures with all relevant details of action to take and number to contact in the event of an environmental emergency.

Records of environmental incidents, near-misses and non-conformity with the environmental management operational procedures are documented in the Alcumus Database. In the event of an incident, non-conformity or near miss, members of staff involved or witnessing the incident are responsible for completing the forms and updating the database. The form must then be sent to the QHSE Manager who is responsible for investigating environmental incidents, near-misses and non-conformity reports to establish root cause.

9.0 Performance Evaluations

9.1 Monitoring and measurement of processes

In an effective organisation, assignments and projects are monitored continually. Monitoring means consistently measuring performance and providing ongoing feedback to employees and work groups progress in reaching set goals. Regulatory requirements for monitoring performance include conducting progress reviews with employees where their performance is compared against their pre-set goals and standards operating procedures. Ongoing monitoring provides the opportunity to check how well employees are meeting predetermined standards and to make changes to unrealistic or problematic standards. By monitoring continually, unacceptable performance can be identified at any time during the appraisal period and assistance provided to address such performance rather than waiting until the end of the appraisal period when summary rating levels are assigned.

Performance monitoring for the services under this EMS Plan will be completed across all the environmental and sustainability elements. Urbaser will compile a separate BREEAM where appropriate in order to monitor the

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performance scoring for achieved credits and the actions required to achieve necessary credits. This information will be subject to inspection and audit if required and the Project's senior management will review this data and ensure that best practice is identified and any underperformance addressed with a recovery plan.

Urbaser will ensure that environmental KPIs are completed for contracts which may include:

- Number of environmental near miss incidents
- Number of minor incidents
- Number of intermediate incidents
- Number of major incidents
- Complaints received on the Project
- Points under the Considerate Constructor Scheme
- Environmental spills
- Supply chain performance scores
- Nonconformance raised on environmental inspections
- Environmental audit non-conformance
- BREEAM Site impacts including:
 - Water consumption arising from Site activities
 - Waste
 - Energy usage
 - CO2 emissions from Site activities
 - CO2 emissions from transport to and from the Site
 - Air pollution
 - Water (ground and surface) pollution

9.2 Analysis of data

As well as monitoring activities the Top Management of Urbaser Limited will collect and analyse data to determine system suitability and effectiveness so that improvements can be made. The data analysis will provide information on customer satisfaction and dissatisfaction, conformance to customer requirements, process and product characteristics their trends, and suppliers. Data demonstrating the suitability and effectiveness of the EMS as well as that used to evaluate the continual improvement of the EMS is presented and reviewed during Management Review meetings. As per **PIN 11**

Analysis of date will include: customer satisfaction levels, conformity of products to requirements, characteristics and trends of processes and products including opportunities for preventive action, Environmental Monitoring, Audits Trends, and Accident Types. As per **PIN 11**

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9.3 Environmental monitoring

Urbaser Limited will ensure that environmental monitoring and reporting is carried out on a regular basis during the contract period. Environmental Monitoring will allow the company to ascertain whether the parameter set by the EA and other contractual obligations have been met. Environmental incidents and near misses will be collated and investigated.

Where physical interaction is being measured (noise, dust), background readings will be established to ensure that comparisons of generated activity are accurate.

Environmental monitoring and reporting will take place and may involve some of the following:

- Environmental inspection forms
- Field inspections by managers for Method Statement compliance
- Dust monitoring via bespoke electronic equipment
- Noise monitoring via bespoke electronic equipment
- Water discharge quality (where a consent licence is in place)
- Silt buster checklist (where used for wheel wash control or surface water pumping)
- Sustainability action plan; and

The emissions control system for new waste treatment facilities built from scratch will be fully compliant with the Best Available Techniques (the "BAT") requirements. Urbaser Limited's key monitoring obligations for emissions to air and water will be carried out in accordance with the requirements of EA Sector Guidance Note IPPC S5.06 ("Guidance Note for the Recovery and Disposal of Hazardous and Non Hazardous Waste").

The nature of these necessary emissions control systems will be agreed with the Planning Authority through the Planning Application for the Facility and with the EA through the Permit Application.

9.4 Control of monitoring equipment

Urbaser Limited will ensure that at all operational sites all equipment used to monitor compliance of all environmental requirements identified within the EMS are calibrated prior to use on Site and that on-going checks are made and recorded in line with manufacturers' recommendations or after any damage or misuse.

Urbaser Limited will ensure that any specialist equipment is hired from approved suppliers and accompanied by the relevant records and certificates to demonstrate testing and calibration. Where specialist testing equipment is utilised, certification from a UKAS certified organisation will be required.

9.4.1 Environmental statutory requirements, evaluation of compliance as per-PIN 2

Urbaser Limited will comply with environmental legal and statutory requirements, to this end Urbaser Limited has implemented a Legal Register where all the legislation to follow in order to comply with legal requirements are compiled and reviewed twice per year or sooner if the case requires it. There are also a number of audits that help ascertain evaluation of compliance to standards and legislation during the course of the year. Those audits are normally performed by the QHSE Manager or designate.

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9.5 Audits as per PIN 4

Urbaser Limited plans, implement and maintain a system of internal audits at planned intervals to ensure compliance of the IMS with the Organization's own requirements and with the International Standards of reference. Likewise, the Organization must plan external audits to ensure the maintenance of the Certifications under the International Standards of reference. The Company QHSE Director, as decided, shall prepare annually the PIN-04- CORP-D01 IMS Audit Program, which shall include the companies and work centers to be internally audited, trying, as far as possible, to internally audit the scope of the Country or Company's certificate in a 3-year cycle

All aspects of the Environemtnal System are audited within each calendar year with some audits being carried out more often where appropriate. Planning and implementation of audits is the responsibility of the QHSE Manager. The audits are scheduled yearly in advance. Procedures are given on the specific audit forms in most cases, otherwise refer to the associated procedures or policy in the procedures Policy or quality Policy for the subject concerned (for these a general audit form is used). Refer to 'Safety System Audits'.

| TASK / ACTIVITY | RESPONSIBLE |
|--|----------------------------------|
| Create IMS Audit Programme PIN-04- CORP-D01 | Country or Company QHSE Director |
| Execution of internal audits | Audit Team |
| Prepare IMS Internal Audit PIN-04- CORP-D02 | Audit Team |
| Inform to Contract Manager about audit process | Audit Team |

The Country or Company QHSE Manager will send a copy of the IMS Audit Program PIN-04-CORP-D01 to the Corporate QHSE Director so that he/she has basic information on internally audited sites and external audit scheduling. Extraordinary internal/external audits may be carried out when a serious problem is detected that may affect the IMS, or when significant changes occur in the Organization that make it necessary (in the applicable regulations, in the Policy or derived from the result of previous reviews that make it advisable). The audit team will visit the facilities or conduct remote internal audits and review the documentation associated with the IMS. As a result of the audit, the IMS Internal Audit Report PIN-04-CORP-D02 will be prepared, where deviations, observations, opportunities for improvement and audit notes will be reflected. The audit team will send a copy of the IMS Internal Audit Report PIN-04-CORP-D02 to the Contract Manager and, once signed by him/her, to the Country or Company QHSE Director. Print off the forms as and when required rather than re-copy previous copies in order to ensure you are using the latest version. Audits cover all aspects of ISO9001:2015 by covering all areas of this Environmental Policy . Annual reviews of policies and of audits include this aspect.

The audits are scheduled yearly in advance. Print off the forms as and when required rather than re-copy previous copies in order to ensure you are using the latest version. Audits cover all aspects of ISO 14001 covering all areas of this Policy. Annual reviews of policies and of audits include this aspect. The Auditor will give consideration to the necessary degree of parallel or vertical coverage during the audit. Audits are carried out as far as possible only by



staff independent of the audited activities and must be authorised Environmental procedures themselves as carried out by QHSE Manager will need to be carried out by a person suitably knowledgeable about procedures and their aims and objectives. When audit findings cast doubt on the effectiveness of the operations then Corrective Action will be carried out (see 4.9). Follow-up check audits and / or other monitoring checks will verify and record the implementation and effectiveness of the corrective action taken. Check audits required are scheduled on the appropriate audit. For re-check audits it may be necessary to make special visits to site. The QHSE Manager receives all completed audits and decides what if any corrective actions are required.

In addition, Urbaser Limited will establish and maintain programmes and procedures for periodic audits of the EMS in order to determine whether the EMS in place conforms to planned arrangements for environmental management and that procedures are being implemented and maintained properly. These audits will also provide information on the results of the inspections to the project senior management team for review.

The audit procedure will define the following:

- Scope of the audits
- Frequency of audits
- Audit methodologies
- Responsibilities and requirements for conducting audits; and
- Communication of the audit results.

All audit reports and associated action plans will be reviewed by the QHSE Manager / Managing Director, who are responsible for ensuring that appropriate resources are made available to address any issues of non-compliance and checking that observations that will lead to improvements in the provision of Services have been made.

| | |
|--------------------------------------|--|
| Internal environmental audits | <p>Internal audits will be undertaken by to ensure that standards are met and exceeded.</p> <p>The Sub-Contractors and other key suppliers will also be audited</p> <p>Operational audit frequency will be determined initially on the basis of risk and results of previous audits/monitoring will be used to review on-going audit frequency</p> <p>Sub-Contractors will undergo the same auditing regime of internal operative in both frequency and audit methodologies.</p> |
| Internal Regulatory Compliance Audit | <p>An annual regulatory compliance audit will be undertaken by an independent adviser</p> <p>The purpose of this audit will be to assess compliance with site environmental permits and other consents or licences identified in the register of legislation</p> |
| Independent environmental audit | <p>An independent audit will be undertaken by an independent external auditor against ISO14001:2015</p> <p>Initial audits of this nature will be to certify the EMS against the standard and subsequent surveillance audits are anticipated one-two times per annum for on-going compliance.</p> |



| | |
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| Considerate Constructors Audit | <p>Site assessments by the Scheme Monitor will be undertaken to provide a subjective assessment of how the Site is performing against the Scheme's Code during construction where applicable.</p> <p>Assessment reports and improvements will be reviewed by Top Management and appropriate actions taken if required</p> |
|--------------------------------|---|

9.6 Subcontractor audits

Subcontractors should carry out their role in training their own personnel at least as well as Urbaser. Environmental improvement procedures and effective management regimes will help ensure that subcontractors are compliant with the Urbaser EMS.

Urbaser Limited will conduct two types of audits on subcontractors

- Suitability Audit
- Scheduled Annual Audit.

A Suitability audit is carried out upon appointment of the operatives/companies to which the work is subcontracted. In both cases Urbaser Limited will audit:

- Technical competence
- Qualification
- Training
- References
- Membership of professional bodies
- Accreditations
- Legal Status
- Pending Legal Proceeding
- Term and Condition of Engagement
- Logistic and Equipment.

The scheduled audit will review the works carried out as well as a review of the suitability audit outcomes.

In both cases the operatives/companies will have to adhere to the environmental and quality policies and sign an agreement that they will work according to company's safe working methods throughout out the life cycle of the project.

Upon appointment the operative/company subcontracted for a specific job, will be audited by Urbaser (to our standard and procedures) at least three times per year.

Urbaser Limited policy requirements of the appointed Subcontractor will be based on the following principles:



- Quality monitoring of subcontractors
- Sufficient Subcontractor Management
- Ensuring adequate quality improvement arrangements are in place to cover all training offered, including any that is subcontracted
- Working in partnership with the subcontractor, sharing responsibility for quality improvement
- Complaints procedures
- Ensuring responsibilities are clearly defined, agreeing the division of responsibilities, for example: Regularly monitoring environmental improvement arrangements of the subcontractor to ensure that they are working
- Working with subcontractors to review the effectiveness of their improvements
- Holding live performance data that is regularly reviewed with the subcontractor (often monthly) to show overall performance
- Share good practice identified by Urbaser and other subcontractors
- Ongoing joint self-assessment events with subcontractors, sometimes as a group if more than one subcontractor
- Ensuring that the contract with the subcontractor clearly outlines environmental improvement expectations
- Communicating with subcontractors frequently
- Building a relationship of mutual trust.

| Subcontractor Audit Policy | | |
|--------------------------------|---|---|
| Environmental improvement tool | Main contract holder | Subcontractor |
| Procedures and internal audit | Checks and agrees that the subcontractor's procedures and internal audit system are at least satisfactory, covering key areas and monitors their use. | Uses its own procedures for the key stages of the training process and use its own internal audit system |
| Feedback | Checks and agrees that the subcontractor's procedures to obtain feedback, produces what is required for self-assessment and quality cycle. Occasionally obtains own feedback from learners/participants | Own feedback system that produces core feedback required by main contractor and leads to environmental improvements |



| | | |
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| | who receive training from the subcontractor | |
| Self-assessment | Reviews the subcontractor's self-assessment and uses it in own self-assessment. Along with subcontractor plays an active part in validation of findings. | Thorough self-assessment process either separate or combined with main contract holder |
| Development or action plans | Routinely reviews progress of plans with the subcontractor, on at least a quarterly basis. | Effectively uses plans to manage improvements to its subcontracted provision and reviews and updates them at least quarterly. |
| Observation | Samples and carries out joint observations with the subcontractor to quality assure their observation system. | Has its own system for observing subcontracted training and progress reviews. |

9.7 Management Review as per PIN 5

General

The review assesses the continuing EMS suitability, adequacy and effectiveness, identifying opportunities for improvements and required changes. Records are maintained for each management review meeting. A hard copy set of minutes is also retained and archived.

Below are a selection of the QHSE topic discussed at the Yearly Managerial Review:

1. Results of Internal Audits
2. Customer satisfaction and Feedback from interested parties
3. Performances of Staff
4. Status of Preventive and Corrective Actions
5. Follow up actions from previous Management Review
6. Changes in internal and external issues that are relevant to and that could also affect the environmental system
7. Recommendation for Improvements
8. Improvement of the effectiveness of Environmental Management systems and processes
9. Resource needed and adequacy of resources
10. Evaluation of compliance with applicable legal requirements and with other requirements to which the organisation subscribe
11. The results of participation and consultation
12. Relevant communication from external interested parties, including complaints
13. The environmental performance of the organisation
14. Changing in circumstances, including development in legal and other requirement related to its environmental aspect
15. Policy reviews
16. OH&S performance of organisation
17. The extent to which the objectives have been met
18. Status of incident Investigation



19. Changing in circumstances, including developments in legal and other requirements related to Environmental Systems
20. Recommendation for Improvement
21. Environmental performances
22. Policy and Objectives
23. Continual opportunity for Improvement
24. The effectiveness of action taken to address risks and opportunities
25. The performances of the external providers
26. Monitoring and measuring results

9.8 Purchasing services and supplies

It is Urbaser policy to use, as far as possible, suppliers certified by a third party to a recognised international standard such as ISO14001:2015 or equivalent. This applies to all products or services used that may affect quality of work undertaken in relation to our method(s) of work. The manufacturer and supplier standard must be able to ensure consistency of product is consistent and notification to any changes. Any such changes will mean that tests need to be carried out on the revised specification. Suppliers and supplier information is detailed in Supplies Register which gives the item specification requirements and generally also the item or catalogue number. If a company has accreditation by external bodies e.g. BSI or is a large multi-storey franchise e.g. B& Q, the stated does not need to be audited since accounts and procedures are already audited by certified body. A further requirement is that for some items, re-occurring checks are required after periods of storage to ensure the items are still fit for use.

Procedures:

If items or services need to be purchase from supplier not presently inserted on the current Supplier Register, a quote from three different pre –audited and qualified suppliers should be submitted for consideration. The best option will fall on the best quality/environmental status/price relation.

A purchase order must be raised prior to the item or service being delivered /purchased, and the Purchase Order must be authorised from the Finance Director and or the Director.

9.9 Subcontracting

Subcontracted work will only be given to competent and qualified persons /companies.

Subcontractors will be audited for suitability. Sub-contractors approved by the above process are added to the hard copy file named Subcontractor Register.

Whenever a subcontractor is used the client must be informed in writing that a subcontractor is to be used and for what. The clients approval should also be obtained and preferably in writing where possible.

- Urbaser Limited is responsible to the client for the sub-contractors work except in where the client or a regulatory authority specifies which subcontractor is to be used.

Subcontractor Register must show all sub-contractors used for any type of accredited work. The register must also be reviewed and updated periodically in order to re-assess the continued approval of accreditation status and use of each sub-contractor listed. This will be carried out annually.

10 Improvement

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General

The QHSE Manager uses a range of the performance evaluation tools recommendations for improvement and to achieve the intended outcomes of its environmental management system. For example, recommendations may emerge from the QHSE Corporate Committee, findings raised in internal audits, evaluation of compliance audits and change in scope or legislation.

10.1 Non-conformities & complaints

Whenever any aspect of work or other requirement documented by the EMS is not conformed to then this should be reported to the QHSE Manager. The QHSE Manager creates a Non-Conformity Report in the Non Conformities database. All applicable sections are completed. The QHSE Manager maintains the database contents and oversees the operability of the program. With reportable non-conformity and any errors found in any situation such as an error noticed by another member of staff, complaints from clients or other sources then an assignment of Corrective Action is almost always applicable. In the case of complaints from clients the Managing Director should be informed.

The complaint letter or transmission should be cross-referred in the Non-Conformity Report together with the information that will enable it to be re-found for assessment.

Non-conformities and complaints should be reported and processed quickly.

Non-conformities may include members of staff not carrying out their duties. Where this is within the EMS any member may inform but a more senior member investigates and decides on actions. The Managing Director will be informed by report where appropriate.

10.2 Corrective action

Corrective action follows up non-conformity reporting and is applied when analysis of the non-conformity indicates a possible reoccurrence or there is general doubt about the compliance of operations with in-house procedures. Causes are determined and actions are then decided upon. Corrective action aims to reduce the likelihood or re-occurrence.

The Corrective Action Report is used to document the corrective action required and other helpful information.

10.3 Selection and implementation of corrective action

The QHSE Manager will make his recommendation known and records it on the Non-Conformity report. The Managing Director or QHSE Manager can decide that a Corrective Action is required, and that person will select and implement the action(s) to eliminate the problem to prevent reoccurrence. Cause Analysis, details of employees, activities, documents, procedures, records, results and reports examined should be identified and recorded. Cause analysis is documented on the Non-Conformity report and aims to the correct corrective action to be deployed. The corrective action and timescale allocated for discharge will be appropriate to the seriousness and the risk of the non-conforming work identified. Where investigations reveal deficiencies in company procedure the appropriate environmental system documentation will be updated and all relevant employees informed. Additional audit(s) in the area(s) of deficiency may be appropriate, as directed by the QHSE Manager.



10.4 Monitoring of corrective actions

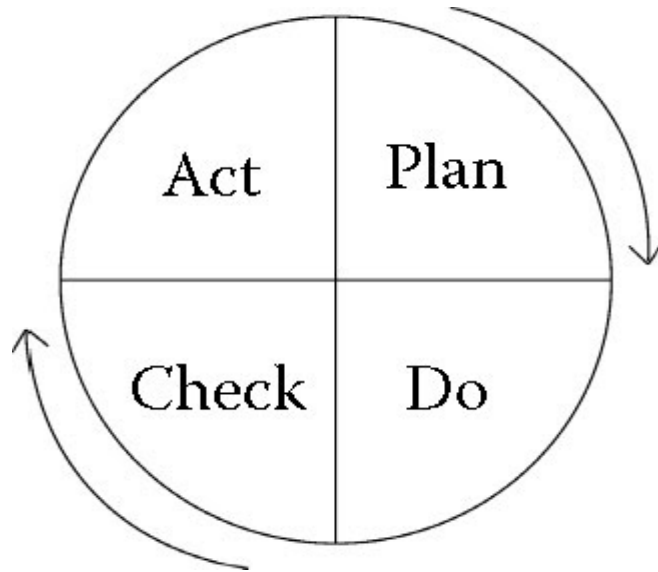
Corrective actions are to include planning and scheduling for follow-up monitoring. These are pre-assigned to the persons(s) required to do the monitoring or checks. These follow-up checks may be in the form of audits not presently forming part of the existing Audit Programme unless the audits happen to be pre-scheduled for the desired time period, though additional audits may be appropriate. If a non-audit check is to be carried out, then details are written of the checks made and findings in the monitoring section of the corrective action report. If space is insufficient, then clear reference as to where continuation is should be made. This may be on the reverse side of the sheet. If an audit or number of audits is / are scheduled as a means of carrying out and recording such monitoring then the monitoring space on the corrective action report must refer to the schedule and location on the schedule of such audit and name the audit type (specific audit procedure name). The additional audits may be check audits wherein the relevant parts of the full audit procedure are carried out and these check audits may be programmed more than once in advance in order to prevent re-occurrence or obtain improved evaluation of any further action that may be required. The QHSE Manager is responsible for finalizing and verifying audits including associated corrective actions being complete.

10.5 Continual improvement

Urbaser Limited will continually improve the effectiveness of the EMS through use of the policies, objectives, audit results, analysis of data, corrective and preventive actions and management review. Continual improvement activities will be reviewed during management review meetings and will be documented on the Corrective Action form. Continuous improvement, in regard to organisational quality and performance, focuses on improving customer satisfaction through continuous and incremental improvements to processes, including by removing unnecessary activities and variations. The plan–do–check–act cycle (Figure 1) is a four-step model for carrying out change. Just as a circle has no end, the PDCA cycle should be repeated again and again for continuous improvement.

When to Use

- The model for continuous improvement.
- When starting a new improvement project.
- When developing a new or improved design of a process, product or service.
- When defining a repetitive work process.
- When planning data collection and analysis in order to verify and prioritise problems or root causes.
- When implementing any change.



Procedure

1. Plan. Recognise an opportunity and plan a change
2. Do. Test the change. Carry out a small-scale study
3. Check. Review the test, analyse the results and identify what you've learned
4. Act. Take action based on what was learned in the check step. If the change did not work, go through the cycle again with a different plan. If you were successful, incorporate what was learned from the test into wider changes. Use what was learned to plan new improvements, beginning the cycle again



APPENDIX A SCORING THE SIGNIFICANCE OF ASPECTS AND IMPACTS

Table 1: Scoring the likelihood of aspects

| | | |
|-------------|---|---|
| Frequent | At least once a day | 5 |
| Occasional | At least once a month | 4 |
| Foreseeable | At least once a year | 3 |
| Possible | An incident which may occur | 2 |
| Unlikely | An incident which is extremely unlikely to occur. | 1 |

Table 2: Scoring the consequence of aspects

| | | |
|------------|---|----|
| Very High | Causes substantial environmental damage Causes a breach of legislation and / or Substantial potential to decrease eco-efficiency and / or Causes complaints or become subject of serious concern to stakeholders | 10 |
| High | High environmental impact and / or Likely to cause future breach of legislation and / or Likely to decrease eco-efficiency and / or Likely to cause future complaints or become a subject of serious concern to stakeholders | 7 |
| Moderate | Medium environmental impact and / or Small potential to cause a breach of legislation Small potential to decrease eco-efficiency Small potential to cause complaints or concern to stakeholders | 5 |
| Slight | Slight environmental impact Controlled by legislation but unlikely to cause a breach and / or Unlikely to decrease eco-efficiency Unlikely to cause complaints or concern to stakeholders | 3 |
| Negligible | Negligible environmental impact Not controlled by legislation No opportunities for increasing eco-efficiency No risk of complaints or concerns to stakeholders | 1 |



APPENDIX B FACTORS CHANGING THE SIGNIFICANCE OF ASPECTS AND IMPACTS

| DECREASE RATING | INCREASE RATING |
|---|---|
| Decreased likelihood or probability of occurrence | Increased likelihood or probability of occurrence |
| Increased use of environmentally sound alternatives to current practices. | Increased quantity of waste or material consumption. |
| Increased knowledge of an impact. | Increased toxicity of materials |
| Increased maintenance of processes and other activities. | Reduced knowledge of an environmental impact. |
| Increased compliance with legislation, codes of practice etc. | Failure to maintain records of an environmental impact. |
| Increased records of an environmental impact. | Increased risk of complaints. |
| Increased environmental control of storage facilities. | Reduced control over an environmental aspect. |
| Improved accident training. | Increased waste production. |
| Improved monitoring. | Reduced monitoring. |
| Reduced consumption of materials | Lack of compliance with legislation. |
| Reduced waste production | Non-compliance with procedures. |





APPENDIX C: EXAMPLES OF ENVIRONMENTAL ASPECTS FOR NEW PROJECTS

| <i>Environmental Aspect</i> | <i>Environmental Impacts</i> |
|--|-----------------------------------|
| Air | |
| CO ₂ , CH ₄ , N ₂ O, fossil fuels | Global warming |
| CFCs, halons, other chlorinated compounds | Ozone depletion |
| SO ₂ , NO _x , NH ₃ , | Acid emissions |
| Volatile organic compounds (VOCs) | Low level ozone formation |
| Water | |
| Organics | Oxygen demand |
| Phosphorus and nitrogen compounds | Eutrophication |
| Chemicals affecting potable water supply | Water taste |
| Loss of Habitat | Ecosystem disturbance |
| Land | |
| Landfilled waste | Methane gas, loss of habitats |
| Incinerated waste | Air emissions |
| Hazardous substances | Ground contamination |
| Resources | |
| Minerals / raw materials | Depletion of natural resources |
| Energy | Air emissions, resource depletion |
| Water | Depletion of natural resources |
| Other | |
| Visual | Nuisance to local residents |
| Dust | Nuisance to local residents |
| Odour | Nuisance to local residents |
| Noise / vibration | Nuisance to local residents |

