MODUS: *Environmental and Sustainability Policy*

Revision Number	Reason for Update	Date	Name
V1	Change of company logo	November 2008	Gary Payne
V2	Changes to management/ responsibilities	January 2010	Toby Benzecry
V3	Changes to group structure	March 2012	G Slatter
V4	Review	February 2014	G Slatter
V5	Review EMS Meeting	December 2014	G Slatter
V6	Review	December 2015	G Slatter
V7	Review	November 2016	G Slatter
V8	Review	July 2017	G Slatter
V9	Review	January 2018	G Slatter
V10	Review	January 2019	G Slatter
V11	Annual Review	January 2020	G Slatter
V12	Name amendment page 8	March 2020	K James

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1 Environmental Policy Statement

The Board recognises that the activities of the organisation impact on the environment, and Modus is committed to identifying and reducing those which are significant and developing improvements and opportunities where practicable. Modus are committed to responsibly choosing materials and components using sustainable sources where practicable.

This policy supports and sets a framework for our materials procurement. We will do this by:

- Complying with all applicable environmental and health and safety legislation.
- Not using any timber from species prohibited under CITES or from illegal sources.
- Encouraging the use of timber products from sustainable sources and the use of custody certification schemes such as FSC or PEFC.
- Encouraging the use of components or packaging with a low or zero Ozone Depletion Factor.
- Promoting the use of recycled products and materials or those containing a high recycled content.
- Promoting the use of durable materials and products with increased lifespan.
- Encouraging the use of materials with a low embodied energy/carbon impact.
- Encouraging the use of products that have low Volatile Organic Compounds (VOC) content.
- Encouraging the use of products using non-toxic materials & avoiding refrigerants with high Global Warming Potential.
- Purchasing white goods for use with EU Energy Label 'A' rating or international equivalent.
- Purchasing IT equipment with low energy usage technologies.
- Sourcing products and materials locally wherever practicable.
- Promoting use of biodegradable cleaning products.
- Promoting use of paper from sustainable or recycled sources.
- Encouraging the reuse of materials to minimise waste.

The Managing Director is responsible for the implementation, development and review of this policy and the associated standards and procedures.

Lindsay Dowden

For and on behalf of Modus Workspace Ltd.

January 2020

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Environmental Management

Introduction

This document sets out the policy, organisation and arrangements for environmental management and sustainable construction throughout Modus and its subsidiary companies. The management system is compliant with ISO 14001:2015

It describes the framework of the environmental management system used throughout the Company.

The system has evolved over a number of years and takes account of statutory obligations, the lessons of experience and the need for continuous improvement.

The documents that support the policy and describe the arrangements consist of:

- Environmental Aspects and Impacts

- Operating procedures

- Guidance

- Forms

We aim to use BREEAM and SKA assessment techniques to identify, control and minimise our impact on the environment. The objective is to ensure the control of environmental impacts from work undertaken by the Company.

The reduction and management of environmental impacts is a shared responsibility. All employees are required to work together to prevent reduce environmental impacts.

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Environmental Management System

ISO 14001:2015

Environmental Policy

Management Arrangements

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Planning
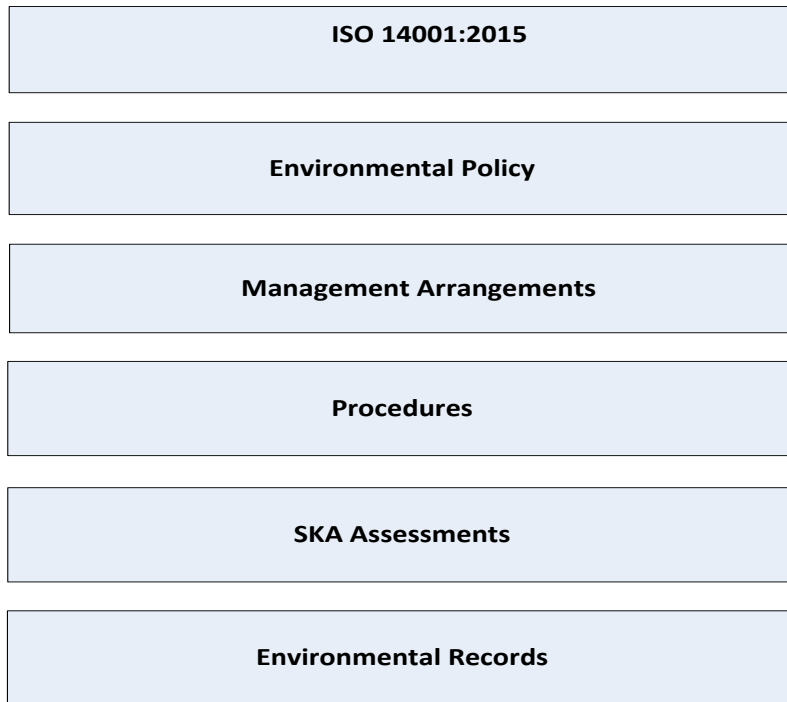
Environmental Impact Assessment and Control

The assessment of risks and impacts is a process that identifies environment hazards and aspects of a project or our daily business process. The Company environmental aspects and impacts form a central part of the management system. They are regularly reviewed and communicated.

The control of environmental risk together with the aim of sustainable design and construction starts at the design stage and are reviewed continuously throughout the work process.

Modus work closely with subcontractors and suppliers to ensure the aim of sustainable design and construction are effectively communicated and developed prior to the start of the work.

The Company maintains access to an updated list of regulations, good practice guides, codes of practice and other information relevant to environment management and sustainable design and construction.

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Environmental Management Responsibilities

Introduction

This section of the policy describes the Company organisation and responsibilities for environmental issues. Modus is committed to the principles of ISO 14001:2015. Sustainable design and construction are central to this principle.

The Board fully endorse the Company's environmental policy and will endeavour to provide strategic leadership and all necessary financial, technical and human resources to secure compliance with the policy. In particular:

- The Board accepts their collective leadership in providing environmental leadership for the company

- Each Board member accepts their individual role in providing environmental leadership for the organisation

- The Board will ensure that all Board decisions reflect their intentions, as articulated in the environmental policy statement

- The Board will ensure that they are kept informed of, and alert to, relevant environmental risk management issues

- Lindsay Dowden has been appointed as Director responsible for environmental matters, specific duties are delegated to others according to their function, experience and training.

This appointment in no way absolves the Board or any of its Directors from their collective or individual responsibilities.

Individual Responsibilities

The effectiveness of the environmental policy is dependent on the people who are responsible for ensuring that all aspects of work, whether in the office or on site, are carried out with due consideration to our sustainable business practices and with minimum risk to environment.

Director with Specific Responsibility for Environmental

1. Ensure the establishment of a corporate strategy and procedures to implement the Modus Environmental Policy and ISO 14001 management system.

2. Establish Company Board meetings as the principal forum for matters relating to environmental management and sustainability.

3. Discharge his responsibilities in accordance with current corporate responsibility guidance.

4. Provide support and resources to meet the requirements of the environmental policy.

5. Liaise with the Environmental Management Committee to review issues that may affect Company environmental policy.

6. Support initiatives that promote the development of 'best practice standards' at all Company work locations.

7. Ensure Directors are provided with sufficient information to enable them to make informed judgements about the level of compliance with statutory and Company environmental requirements being achieved at Company work locations.

8. Ensure that effective organisational structure and arrangements are in place to implement the requirements of this policy.

Board Directors

1. Know and promote the Company environmental policy and ISO 14001 management system.

2. Ensure that work is planned and carried out in accordance with statutory and Company environmental requirements.

3. Review environmental reports and address areas where deficiencies exist within their area of responsibility.

4. Attend Environmental Management meetings to review issues that may affect Company environmental policy.

5. Support initiatives that promote the development of 'best practice standards' at all Company work locations.

6. Promote communication and cooperation on environmental matters for all staff.

7. Support arrangements for funds and resources to meet the requirements of the Company environmental policy.

Pre-Contract and Commercial Managers

1. Read and understand the relevant parts of the Company environmental policy and ISO 14001 management system.

2. Make arrangements to ensure that the principles of sustainable design and construction are considered in the procurement process.

3. Ensure that adequate financial provision for best environmental practice and sustainable construction is included in the tender and planning stages of any contract.

4. Ensure subcontractors and suppliers are made aware of project sustainability aims

Designers

1. Read and understand the relevant parts of the Company environmental policy and ISO 14001 management system.

2. Prepare designs with adequate regard to the environmental objectives of the management policy and sustainable construction objectives.

3. Identify opportunities to design out waste in the fit-out and to record the design solutions pursued in reducing material consumption and wastage.

4. Provide adequate information in or with the design for inclusions in tender documents to support sustainable construction.

Sales

1. Read and understand the relevant parts of the Company environmental policy and ISO 14001 management system.

2. Ensure the benefits of sustainable fit out are effectively communicated to potential clients

3. Promote the use of formal SKA assessment.

Project Managers

1. Read and understand the relevant parts of the Company environmental policy and ISO 14001 management system.

2. Ensure that all works are planned in accordance with the requirements of the environmental policy and that it is regularly reviewed to establish if improvements or additions are required.

3. Set project waste controls and targets. Ensure that all necessary site waste management plans are produced prior to commencing work on site.

4. Monitor the environmental performance on the projects under their control and take such action is necessary to remedy any shortcomings.

5. Ensure that employees under their immediate control are familiar with those parts of the policy and procedures which affect them or the activities in which they are engaged.

6. Ensure that the environmental policy and procedures are being implemented.

7. Arrange pre-contract meetings with contractors to discuss information required for inclusion in the SKA assessment

8. Where applicable, ensure the SKA assessment is valid and reviewed during the construction phase.

9. Ensure that the proper procedures are followed for the reporting and recording of all environmental accidents and incidents

Site and Construction Managers

Site and construction managers are accountable to their respective managers for ensuring that the works are planned and undertaken in such a way as to give foremost regard to the environment and sustainable fit out

1. Read and understand the relevant parts of the Company environmental policy and ensure it is brought to the notice of those under their control.

2. Confirm that the policy and procedures are being implemented by conducting environmental inspections.

3. Where applicable, ensure the SKA assessment is valid and reviewed during the construction phase.

4. Ensure through regular meetings with subcontractors that satisfactory arrangements for project waste management targets are in place and kept under review.

5. Record, report and investigate all environmental incidents and ensure that remedial measures are taken to avoid recurrence.

6. Ensure that environmental non conformities noted in project inspection reports are promptly remedied.

All Employees

1. All employees must comply with the requirements of this policy and cooperate with the objective of sustainable design and construction.

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Consultation and Communication

Consultation

The Company considers co-operation and consultation between individuals, employees and other stakeholders as integral to controlling risks to environment.

It therefore promotes co-operation in order to generate the added benefits that arise from the involvement of all parties. The Company will establish an environmental forum to ensure environmental is a priority driver for the business.

Communication

The Company creates and maintains awareness of the importance of environmental issues by the use of written, verbal and visual communication.

Various mechanisms exist within the Company for the dissemination of environmental information.

These include:

1. The Environmental Policy
2. ISO 14001 management system
3. Posters, newsletters and other information on the project notice board
4. Briefings and tool box talks
5. Company environmental literature

Environmental Management Committee meetings are held periodically. Discussion of environmental issues is encouraged at all levels within the Company.

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Document Control

Copies of all environmental documents are available both electronically and in hard copy. The controlled copy of all documents is the electronic copy; all employees have access to electronic copies of the environmental documents.

It is the responsibility of the holder of any hard copy document to ensure they are working from the latest version of the document and to destroy any old documents or mark them superseded.

The system is reviewed in accordance with ISO14401 and quality control procedures.

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Emergency Preparedness and Response

The Company will establish and maintain procedures in environmental plans for its response to emergency situations that may be applicable to individual Projects or work locations.

These will address the issues of immediate response, communications with all parties and the mitigation of further likely illness or injury.

Review of Procedures

The procedures in the relevant environmental plans will be reviewed as part of the standard review process or after an environmental incident or emergency to draw from any lessons learnt.

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Performance Measurement, Monitoring and Reporting

Performance Measurement and Monitoring

Whilst it is recognised that all employees and subcontractors have a responsibility for monitoring environmental performance a formal system of monitoring is required to ensure standards are achieved and maintained. The Company has established procedures to monitor and measure environmental performance on a regular basis. These procedures provide for:

- Monitoring of the extent to which the Company environmental objectives are met
- Proactive measures of performance that monitor compliance with Company environmental procedures and legislative requirements
- Reactive measures of performance to environmental incidents and other evidence of poor environmental performance
- Recording results of monitoring and measurement sufficient to facilitate subsequent corrective and preventative action analysis

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Reporting Environmental Matters

The Company places prime responsibility for ensuring environmental performance of its activities on line management. This is accomplished by the monitoring of site operations and activities by Site Managers Project Managers, External Advisors and Directors reports.

Site and Construction Managers are required to monitor the health and safety performance of subcontractors as part of their daily activities.

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Incidents, Non-conformance, Corrective and Preventive Actions

Incidents

The investigation and reporting of incidents resulting in an adverse environmental impact or dangerous occurrences is carried out by line management in conjunction with the environment policy and procedures

The prime objective of investigation and reporting is to provide open, honest and comprehensive information on the immediate and underlying causes of incidents such that recurrences can be prevented.

Non-Conformances and Observations

The term non-conformance is considered to be any deviation from standard practices, procedures, regulations, management system performance that could directly or indirectly lead to damage to the environment or other deviation from the specified requirements.

It is recognised that the majority of non-conformances will be raised as observations as part of regular inspection of the site. Many minor non-conformances noted on site will be resolved immediately. For more serious non-conformances, a time scale shall be set for appropriate remedial action to be taken.

Corrective Actions

Procedural corrective actions will be identified, taken and, if necessary documented procedures modified.

For continued failure to action items noted on a report or very serious incidents that would be regarded as a disciplinary offence The Director responsible is advised and the incident noted in Environment meeting minutes

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Environmental Records

Environmental incident and compliant logs are kept in accordance with ISO 14001

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Audit of the System

The Company will set an audit programme compliant with ISO14001-2015 to determine the level of implementation, adequacy and effectiveness of the environmental management system. The audit programme will be reviewed annually.

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Construction Environmental Risks

All parties involved in the project endeavour to prevent environmental incidents occurring. Some of the ways in which this can be done are:

- Conducting environmental site inductions
- Site Waste Management Plans
- Promoting methods of work to reduce project environmental impacts and waste minimisation.
- Environment inspections or reviews, which will be carried out by Modus Divisional Directors or other senior management

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Schedule of Supporting Documentation

Environmental Procedures		
1	ENV-P01 Legislation Register	
2	ENV-P02 Waste Management and Minimisation	
3	ENV-PO3 Timber Procurement Procedure	
Environmental Guidance		
1	ENV-G01 Waste Management Guidance	
2	ENV-G02 Noise Nuisance Guidance	
3	ENV-G03 Dust and Airborne Nuisances Guidance	
4	ENV-GO4 Pollution Prevention Guidance	
5	ENV-GO5 Energy, Resource and Material Guidance	
6	ENV-G06 Transferring Waste Guidance	
Environmental Forms		
1	ENV-F01 Site Waste Management Plan	
2	ENV-F02 Project Management Plan Energy Efficiency	
3	ENV-F03 Project Management Plan Noise and Vibration	
4	ENV-F04 Project Management Plan Pollution	
5	ENV-F05 Project Management Plan Flora and Fauna	