



Environmental Management System for 140 Aldersgate Street

Version 1.1

August 2021

Version Control

Version	Owner	Reviewer	Changes	Date	Next Review
1.0	Morgan Pierstorff	Mashudul Karim	Initial version produced by Green Mark	03/2020	03/2021
1.1	Morgan Pierstorff	Mashudul Karim	Added/updated information on ESG and Environmental Team	08/2021	03/2022

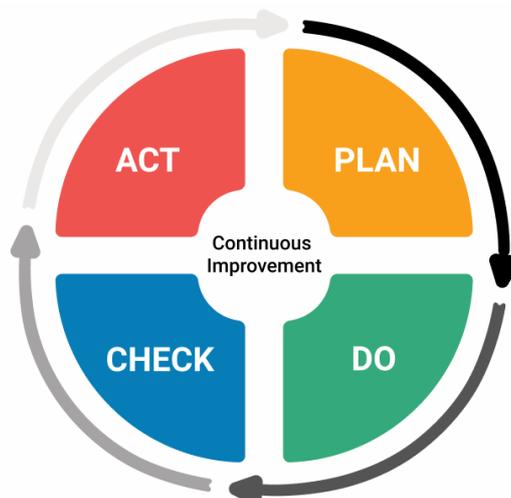
Introduction

Newable helps businesses grow through funding, advisory services and premises. We look to unleash the potential of SMEs from all around the UK in a sustainable and responsible manner. At the heart of this mission, is a set of values that transpires confidence to UK SMEs and enables them to have a positive impact on society. This Environmental Management System (EMS) details our commitment to increase the integration of sustainable practices across all aspects of our business and forms part of our Environmental, Social and Governance (ESG) policy.

We recognise that in pursuing our objectives there is the opportunity to consider and minimise the environmental impact of our activities via continuous environmental performance improvement. By exercising proper control over these activities, we will promote the use of sustainable resources and discourage wasteful or damaging practices. We are committed to complying with all applicable environmental legislation and to working with our staff, suppliers, partners and clients to promote environmentally sound practices and develop an ethos of environmental responsibility. We demonstrate this commitment by implementing the following EMS which operates on a Plan-Do-Check-Act (PDCA) cycle of continuous improvement.

The rationale for our commitment to environmental improvements includes:

- An understanding of the impact of our business activities on the environment;
- Our belief that sustainability is an essential ingredient in business success;
- Our desire to reduce our environmental footprint wherever practical.



Section A: Plan

Environmental Impacts

The environmental impacts of Newable are as follows:

- Utilities
 - Electricity – Supplied by the Grid for office activities.
 - Water – Supplied for office activities.
- Waste
 - General Waste
 - Dry Mixed Recycling
 - Organic Waste
 - Electrical Waste
 - Other Waste (e.g. Batteries and Printer Cartridges)
- Travel
 - Company mileage claims.
- Local Environment
 - Newable have no emissions that directly impact their local environment such as odour or noise.
- Suppliers, Partners & Clients
 - Indirect Emissions from procurement of goods or services

Our largest impacts are the utility usage and waste created by our offices, as well as indirect impacts from our suppliers, partners and clients. As such this policy will focus on controlling and reducing these.

Policy Aims

Based on the above impacts the following aims have been created. An overview of our aims can be found in the accompanying Environmental Policy, provided with the EMS.

- Governance
 - To comply with all applicable legislation, regulations and codes of practice.
 - To integrate sustainability considerations into all our business decisions.
 - To ensure all staff are aligned to our environmental aims.
 - Ensure continuous improvement of environmental practices.
- Utilities
 - Zero utility carbon emissions by 2030.
 - To reduce resource use where possible.
- Waste
 - To send no waste to landfill by 2030.

- To otherwise reduce, reuse and recycle waste where possible.
- Travel
 - Zero travel carbon emissions by 2030.
 - To reduce travel impact where possible.
- Local Environment
 - To maintain and improve our local environment and community.
- Suppliers, Partners & Clients
 - To make suppliers, partners and clients aware of our EMS and encourage them to adopt sound sustainable management practices.

Management & Control

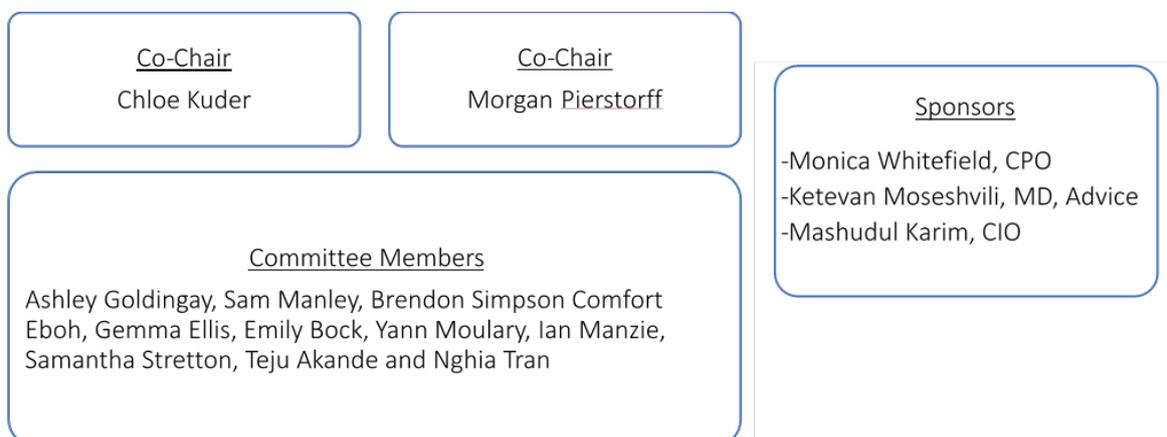
The Environmental Team, along with the signing director, hold responsibility for ensuring the contents of this EMS are upheld and implemented throughout the company. The chair(s) of the Environmental Team have overriding responsibility over the committee.

The following timelines will be adhered to for governance and review of the EMS:

- The Environmental Team meets on the **last Tuesday of every month**
- The Environmental Action Plan will be reviewed at **every** Environmental Team meeting
- The contents of this EMS are reviewed every **six months** and signed off by a company director

Environmental Team

The Environmental Team will meet monthly and record minutes of meetings. The committee shall use this EMS and accompanying documents to guide their strategy. The Environmental Team is shown below.



All staff within the Environmental Team will fully understand this policy and how it relates to the Green Mark Level 3 standard and the company ethos and values. Newable's Green Mark account manager is able to provide further knowledge and expertise when required.

Documentation

The following is a list of non-exhaustive documents and records that relate to the EMS and practices within. These are considered by Newable to ensure the effective planning, operation and control of processes that relate to significant environmental aspects:

- Directly Related to EMS:
 - Environmental Policy
 - Legislation & Compliance List (*Appendix A: Legislation & Compliance*)
 - Environmental Disaster Risk Assessment (*Appendix B: Risk Assessment & Business Continuity*)
 - Utility Tracking Reports (*Appendix C: Tracking Reports*)
 - Waste Tracking Report (*Appendix C: Tracking Reports*)
 - Travel Tracking Report (*Appendix C: Tracking Reports*)
 - Environmental Action Plan (*Appendix D: Environmental Action Plan*)
- Supportive Documents:
 - Environmental, Social and Governance Policy
 - Induction Pack
 - Procurement Policy
 - IT List
 - Minutes of Environmental Team Meetings

Section B: Do

Current Policies

In order to meet the objectives outlined above the following should be followed:

Governance

- We comply with all applicable legislation, regulations and codes of practice.
- We monitor and react to all changes in law.
- We aim to exceed minimum compliance wherever possible.
- All our staff are trained and monitored to work within the UK legal framework.
- We consider the environment in all our business decisions.
- We ensure all staff have access to this EMS and accompanying Environmental Policy.
- We regularly review and improve this EMS.

Utilities

- Utility usage for all utilities is monitored using tracking spreadsheets. These spreadsheets will be updated monthly and are found in Appendix C: Tracking Reports.
- We reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping.
- We seek to purchase electricity from a supplier committed to renewable energy, and aim to maximise the proportion from renewable energy sources, whilst also supporting investment in new renewable energy schemes.
- We minimise electricity use with LED lighting and motion/ambient lighting sensors where possible.
- We do not run heating and cooling systems simultaneously, keeping heating levels between 18-21C and do not cool below 24C, according to government guidelines.
- We minimise the use of water, e.g. through the use of efficient electric showers.

Waste

- Waste usage is currently monitored by a third-party company, this will be integrated into internal tracking spreadsheets, which will be updated monthly, and are found in Appendix C: Tracking Reports.
- We ensure chemicals are stored, used and disposed of with full COSHH compliance.
- We aim to follow the 5 R's principle with regards to waste production: Refuse, Reduce, Reuse, Repurpose and Recycle.

- We minimise our use of paper and other office consumables, for example by double-siding all paper used, and identifying opportunities to reduce waste.
- We have a paper-free policy wherever is practical.
- We use electronic invoicing systems.

Travel

- Company mileage is monitored using a tracking spreadsheet with benchmark targets set. This spreadsheet will be updated monthly and is found in Appendix C: Tracking Reports.
- We encourage our employees to walk, cycle and/or use public transport to attend meetings, site visits etc., apart from in exceptional circumstances where the alternatives are impractical and/or cost prohibitive.
- We include the full costs of more sustainable forms of transport in our financial proposals, rather than the least cost option which may involve travelling by car or air. Where the only practical alternative is to fly, we will include costs for full air fares, including offsetting where possible, in our financial proposals.
- We avoid physically travelling to meetings etc., where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and make efficient timing of meetings to avoid multiple trips. These options are also often more time efficient, while not sacrificing the benefits of regular contact with clients and partners.
- We reduce the need for our staff to travel by supporting alternative working arrangements, including home working etc., and promote the use of public transport by offering Season Ticket loans.

Local Environment & Community

- We aim to undertake voluntary work with the local community and provide 5 annual volunteer days for each employee with options of participating in green schemes.
- We regularly communicate with our direct neighbours and provide clear channels of communication to discuss issues that may arise.
- We strive to act in the best interests of the shareholders and make sure corporate management acts in the best interest of the community in which it operates.
- We will not pollute or cause health issues through our business waste or other by-products for those living in the communities in which the business operates, this includes the wildlife that may live in nearby areas such as canals or rivers.
- In the case of weather changes that could affect the business, e.g. flooding or power failure, our staff are able to work from home.



Suppliers, Partners & Clients

- We will promote CSR initiatives in areas including environmental preservation and human rights throughout the entire supply chain by working closely with suppliers, processing vendors, customers and distribution companies.
- We work with our suppliers to improve sustainability performance throughout all our activities, working with Green Mark in encouraging them to gain environmental accreditation. And adopt similar environmental practices.
- We encourage our suppliers, partners and clients to share the same sustainable and environmental values as ourselves.
- Supplier sustainability is a factor in procurement decisions.
- We purchase items locally and ethically where possible.
- We have mains feed water coolers rather than bottle fed coolers eliminating the need for plastic containers and transport for delivery.
- We buy in bulk where possible to reduce packaging and transport miles.

Section C: Check

Reviews

Environmental Team Meetings

During the monthly Environmental Team meetings this EMS and accompanying documents will be reviewed and performance measured. The EMS is designed as a live system, recording ideas, actions and opportunities. Environmental Team meetings will serve as reviews of the Environmental Action Plan and current policies within the 'Do' section of the EMS.

The non-exhaustive objectives of these reviews are:

- Review the content and appropriateness of the EMS and Environmental Action Plan in light of good practice.
- Provide a critical evaluation of progress against the environmental objectives and targets.
- Review the data gathered against environmental performance indicators and seek to establish whether this represents poor, typical or good practice.
- Use the information gathered to decide on future environmental actions and targets.
- Decide upon prioritised next steps within the action plan.

If new actions are required to be added to the action plan, the following process shall be followed:

1. Suggestion within committee meeting.
2. Review suggestion within meeting.
3. Added to Environmental Action Plan.
4. Necessary stakeholders engaged.
5. Plan for implementation is developed within the Environmental Action Plan.
6. Implementation (either full implementation or ongoing steps until full implementation).

Management Reviews

A full Management Review of this EMS will take place every six months and will be conducted by the Environmental Team. The review is intended to determine whether the EMS is suitable, adequate and effective for its intended purpose. The following items of relevance to the EMS are extracted from the agenda for the meeting:

- Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organisation subscribes.

- Communication(s) from external interested parties, including complaints.
- The environmental performance of the organisation.
- The extent to which objectives and targets have been met.
- Status of corrective and preventive actions.
- Follow-up actions from previous management reviews.
- Changing circumstances, including developments in legal and other requirements related to its environmental aspects.
- Recommendations for improvement.

Measure, Benchmark & Target

Newable is currently in the process of obtaining electricity and fuel usage data. Waste data for the whole building has been obtained by the landlord but currently no data specific to Newable is recorded and a system for this will be put in place. All resources where we have view of variable consumption including electricity, transport fuel from mileage and waste are tracked at least monthly using spreadsheets found in *Appendix C: Tracking Reports*. The Waste Tracking Spreadsheet will include tracking of printing and cleaning products. Initial travel and electric tracking has been shared in our baseline SECR report with future reporting being governed by a centralised tracker tool to be rolled out by Green Mark the end of 2021.

Tracking documents are as follows:

- Utility Tracking
 - Electricity Tracking
- Waste Tracking
- Travel Tracking

Section D: Act

Environmental Action Plan

Newable's Environmental Action Plan can be found in Appendix D: Environmental Action Plan. These actions will guide the pathway by which Newable will reach the goal of Carbon Neutrality by 2030, as well as sending no waste to landfill. The actions also outline the roadmap required to reach ISO 14001.

All actions are categorised in one of the following three areas; short-term (<3 months), medium-term (3 - 6 months) and long-term (6 months+). All actions are intended to be future actions rather than ongoing procedures, which are included in the 'Do' section of this EMS. Where actions arise, new sections can be added to this plan as required. Actions may also result in changes to this EMS.

Appendices

Appendix A: Legal & Compliance

Included within the EMS folder as *Appendix A – Newable Regulatory and Corporate Governance Landscape*

This is supported by our recently published ESG Vision and Report. All other ESG related policies are provided in Appendix A.

Appendix B: Risk Assessment & Business Continuity

Included within the EMS folder as *Appendix B – Newable Disaster Recovery*. This is not a full Business Continuity Plan but acts as an Environmental Disaster Risk Assessment and the most likely and significant impact of an Environmental Disaster on the site is identified as *loss of access or power failure*.

Appendix C: Tracking Reports (to be replaced by centralised environmental tracking tool)

- Utility Tracking
 - Electricity tracking will be consolidated into our group tracking document. For now, the past year reporting is included in our baseline SECR report. This file and the draft centralised tracker tool are included within the EMS folder in *Appendix C*.
- Waste Tracking
 - Included within the EMS folder as *Appendix C – Newable Waste Tracking*.
- Travel Tracking
 - Travel tracking will be consolidated into our group tracking document. For now, the past year reporting is included in our baseline SECR report. This file and the draft centralised tracker tool are included within the EMS folder in *Appendix C*.

Appendix D: Environmental Action Plan

Included within the EMS folder as *Appendix D – Newable Environmental Action Plan*.