



Environmental Sustainability Policy

Reviewed & Approved by: Company Secretary

Owning Department: Risk, Business Support

Version: 011

Classification: Commercial in Confidence

Business Areas affected by this Policy: All

Policy Approved By: Company Secretary

Summary of last change:

- Document signed by CFO
- Role titles updated
- Removal of reference to the Green Team

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1 Policy Statement

The KCOM Board recognises the importance of effective environmental management to both the Company and the wider environment.

We will comply with all applicable legislation and other relevant requirements associated with our environmental aspects and impacts.

We are committed to the continual improvement of all environmental aspects and impacts associated with our operations.

We are committed to the prevention of pollution in all that we do.

A sustainable approach to the development and provision of our products and services will be adopted where possible.

The Company is committed to these high environmental standards and we expect all employees to be familiar with and comply with the contents of this Policy, failure of which will be treated as a disciplinary matter.

A copy of this Policy and all material changes will be communicated to all employees and all persons working on or on behalf of the Company by whatever means are needed to ensure they understand and can comply with the requirements.

This Policy will be modified whenever necessary and will be reviewed at least annually.



Bill Halbert
Chief Executive
Date 14/05/2018

2 Reason for Policy

This policy relates to all Company sites, activities and projects, and all employees, contractors, visitors and members of the public at these sites. The policy also extends to non-Company sites / areas where employees are undertaking approved work activities.

This policy forms part of KCOM's Integrated Management System, ensuring that environmental management is effectively integrated within the daily management of the Company and is continuously developed and improved.

3 Environmental Strategic Aims & Objectives

KCOM aims to deliver environmental improvements on three levels:

- Universal - i.e. to act in a sustainable way that will protect our planet for future generations.
- Corporate - To comply with relevant legislation to avoid prosecution and to protect our corporate reputation. This in turn boosts our market segment and our bottom-line.
- Individual – Taking responsibility for how we contribute to the sustainability of the planet and how we help to promote the company's compliance and credibility. The individual benefits include enhanced job security and satisfaction

The following strategic aims and objectives have been agreed in order to achieve the above. These are delivered through an Annual Environmental Sustainability Programme containing operationally focused objectives and targets.

3.1 Strategic Aim 1 – To develop and maintain a proactive culture

Objectives

Ensure the seven 'C's' are implemented to facilitate a pro-active environmental culture and to continually improve our environmental sustainability and performance through:

- Effective **Control** of KCOM's environmental impacts
- Employees are **Competent** to undertake their roles from an environmental perspective
- Environmental **Co-operation** with all key stakeholders
- Environmental **Consultation** with all key stakeholders
- Clear and effective environmental **Communication** at all levels
- Effective **Co-ordination** of environmental activities and initiatives across the business
- **Checking** and reporting of environmental performance to ensure continual environmental improvement

3.2 Strategic Aim 2 – To uphold and build on legal compliance

Objectives

- Ensure the business is prepared for and is compliant with all relevant environmental legislation and associated schemes.
- Ensure effective audits of legal compliance are undertaken as part of the business's ISO14001 Environmental Management System and Registration.

3.3 Strategic Aim 3 – To focus on our environmental impacts, identify areas for improvement and measure performance

Objectives

- Review the business's environmental impacts via the Environmental Management System to ensure new and existing impacts are understood and managed effectively both at a site level and project level.
- Consider how we improve the measurement and monitoring of our CO2e emissions and other relevant contributing elements of this e.g. energy consumption both for internal and external projects.
- Embed agreed KPIs throughout the business in order to ensure ownership within the business.
- Ensure ongoing achievement of these KPIs via the annual Environmental Sustainability Programme.
- Ensure appropriate supporting measures are implemented to aid in the achievement of the overall KPIs.
- Review the overall impact of global climate change on the business's operations and activities.
- Ensure that Environmental sustainability is effectively integrated and supports the business Corporate Responsibility Strategy

Our significant impacts relate to energy consumption and waste.

3.3.1 Energy Consumption

We are committed to responsible energy management and will utilise energy efficiency schemes, methods and technologies throughout our premises, processes, plant and equipment by:

- Reviewing and improving our working practices
- Building energy management and awareness into the decision making process
- Delivering effective energy management information to all areas of the business and regularly reporting performance and benchmarks
- Raising employee awareness through training and communication
- Maintaining awareness and understanding of all new and emerging low carbon technologies

3.3.2 Waste

We are committed to responsible waste management and aim to reduce, reuse and recycle waste generated through our premises, processes, plant, equipment and projects by:

- Reviewing and improving our working practices
- Building effective waste management and awareness into the decision making process
- Implementing effective Site Waste Management Plans where appropriate
- Delivering effective waste management information to all areas of the business and regularly reporting performance and benchmarks
- Raising employee awareness through training and communication

3.4 Strategic Aim 4 – To extend focus beyond our organisation and into employee’s home and to other stakeholders such as suppliers and customers

Objectives

- To develop and maintain the ‘Greener Me at Home’ culture in order to enhance KCOM’s overall environmental influence inside and outside of the workplace
- To work with our customers to assist them in achieving their environmental sustainability objectives and targets.
- To develop and maintain improved environmental management and performance through our Partners and Suppliers

4 Performance Monitoring

As part of our Annual Environmental Sustainability Programme, our Environmental Sustainability Operations Team (ESOT) will agree specific objectives and target and monitor progress against these objectives and targets in a monthly ESOT operational call.

Quarterly ESOT Programme Meetings are also held to ensure the overall strategic direction is maintained. Progress against the business’s overall Environmental KPIs are also monitored through the above mechanism. Achievement against these KPIs is formally reported in the KCOM’s Annual Report and Accounts.

5 Responsibilities

All employees have environmental responsibilities and these must be understood in order to ensure our policy’s effective implementation.

The responsibilities of various categories of people are defined in section 4.1 below.

In addition, a number of specialist groups have been formed to provide further environmental focus across the business and these are identified in 4.2 below.

5.1 Environmental Responsibilities

5.1.1 The Main Board

- The Company’s Board of Directors has ultimate executive responsibility for environmental sustainability across the business.

- The Directors will ensure that environmental issues are fully considered in all relevant Board decisions.
- The Board have delegated operational responsibility for environmental sustainability to the Executive Chairman however they retain overall accountability.

5.1.2 CEO and CFO

The CEO and CFO is responsible for:

- Delegated executive management of its environmental function on behalf of the Board of Directors.
- Ensuring compliance with the Company's environmental legal responsibilities and duties.
- Ensuring that environmental matters are considered within the context of all board decisions.
- Ensuring that as part of the overall Environmental Management System, an appropriate Environmental Sustainability Strategy and Policy are developed that reflect Board priorities and that they receive Board approval.
- Ensuring that the necessary resources are made available to enable effective compliance with the Environmental Sustainability Strategy and Policy.
- Ensuring that a positive working environmental culture is in place and remains effective.

5.1.3 Company Secretary

The Company Secretary is responsible for:

- Risk management for the business through compliance with Financial Reporting Council Guidance and ensuring environmental risks are effectively controlled.
- Ensuring that environmental performance of the business is regularly reviewed by the board.
- Ensuring that the board is kept informed of and alerted to, relevant environmental risk management issues including any significant environmental failures, and the outcome of the investigations into their causes.
- Ensuring that an Environmental Management System is established, implemented and maintained in accordance with ISO14001:2004.
- Providing advice to the business in the preparation of environmental budgets.
- Working with the HSE team to ensure the development and maintenance of an appropriate Strategy and, Policy and a supporting Programme and related initiatives in order to ensure their delivery
- Working with the HSE team to ensure that Senior Management:
 - The development of the overall Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives
 - Understand and fulfil their Environmental responsibilities in relation to the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives

- Consider environmental sustainability when making decisions in their areas of responsibility; and
- Implement arrangements to support the Environmental Sustainability Strategy, Policy and supporting Programme and other related initiatives with any variations required to reflect conditions specific to their businesses/functions.

5.1.4 HSE Manager

The HSE Manager is responsible for:

- Working with the Company Secretary to ensure that Senior Management:
 - Understand and fulfill their environmental responsibilities in relation to the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives
 - Consider environmental sustainability when making decisions in their areas of responsibility; and
 - Implement arrangements to support the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives with any variations required to reflect conditions specific to their businesses/functions.
- Advising on new legislation and changes to existing legislation relating to the environment and assessing and advising on the implications for the business.
- Generating progress reports for the Company Secretary at quarterly intervals highlighting implementation and progress against agreed environmental plans and programmes including data on the KCOM's Environmental Key Performance Indicators for the relevant period
- Ensuring the ISO14001 Environmental Management System continues to remain effective and that it integrates with the KCOM Integrated Management System.
- Analysing the results of internal audits to ensure appropriate corrective and preventive action is implemented.
- Providing advice on best practice and new techniques in relation to the environment.
- Providing informed advice and support on environmental issues.
- Providing support for the development and implementation of a programme of training in relation to environmental legislation and related responsibilities and obligations.
- Representing the Company with relevant enforcement authorities as may be required and providing advice and support in respect of any legal proceedings on environmental matters

5.1.5 Executive Vice Presidents, Chief Marketing Officer and Chief Information Officer

The Executive Vice Presidents, Chief Marketing Officer and Chief Information Officer are responsible for:

- Ensuring that appropriate budgets are prepared for their units / functions to facilitate implementation of the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives

- Co-operating through the Board to facilitate coordinated implementation of the Company's Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives
- In respect of their operational areas.
 - Ensuring that employees in their areas of responsibility understand and fulfill their responsibilities for the environment and where necessary ensuring the arrangement of appropriate training.
 - Committing reasonable resource to ensure effective environmental management in respect of their operational areas.
- Ensuring that environmental sustainability is fully considered when making decisions.
- Ensuring environmental issues are regularly reviewed in Management Meetings and Team Briefings as appropriate

5.1.6 Directors & Heads of Function

Directors & Heads of Function are responsible for:

- Allocating resource as far as is reasonably practicable to ensure compliance with the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives
- Ensuring that Managers understand and fulfill their responsibilities for the environment, and where necessary identifying and arranging for appropriate training.
- Ensuring that environmental issues are given sufficient consideration when making decisions in their areas of responsibility.
- Notifying the HSE Team of any changes to current activities which may have a significant environmental impact at the earliest possible stage i.e. planning, to ensure that an effective assessment of the impact is undertaken in conjunction.
- Ensuring effective communication, understanding and implementation of the Environmental Sustainability Policy, supporting Programme and other related initiatives
- Releasing employees to attend necessary training and encourage participation in the development of policies, arrangements procedures, and environmental working practices associated with work activities they undertake.

5.1.7 Managers

Managers are responsible for:

- Ensuring all employees receive environmental induction and other appropriate training as is necessary in compliance with environmental related Regulations
- Ensuring all employees receive, understand and act upon information, instruction, and supervision as is necessary in order that they can undertake their role in an environmentally compliant manner
- Ensuring that environmental sustainability is given sufficient consideration when planning and making decisions in their areas of responsibility
- Identifying and managing budgetary requirements in their areas of responsibility to ensure compliance with environmental legal requirements and agreed KPIs
- Ensuring that workplace and work practice inspections and checks are regularly undertaken in their areas of responsibility

- Implementing both existing and any new specific arrangements, procedures and environmental working practices to ensure compliance with the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives
- Allocating tasks appropriate to the individuals' capabilities and environmental training
- Ensuring environmental incidents are appropriately reported and investigated promptly and that any corrective or preventive actions are taken as appropriate
- Ensuring that environmental performance in their areas of responsibility is assessed, monitored and reviewed in order to continually improve on performance

5.1.8 Non-people Managers

Non-people managers are responsible for ensuring that environmental sustainability is given sufficient consideration when making decisions e.g. financial or technical, in their areas of responsibility as these decisions may have an effect on the environment

5.1.9 Supervisors / Team Leaders

Supervisors / Team leaders may be assigned certain tasks by their Manager to enable those managers to fulfil their responsibilities as identified above; however the responsibility itself is not delegated

5.1.10 Employees

Individual employees must:

- Carry out their assigned duties and tasks in accordance with the Environmental Sustainability Policy and relevant arrangements, environmental working practices and Company rules and instructions
- Not interfere with or mis-use anything provided in the interests of the environment or to do anything likely to endanger the environment
- Co-operate fully with their Manager or any other person on environmental matters so far as is necessary to enable any statutory duty or requirement to be performed or complied with.
- Make full and proper use of all equipment provided to protect the environment
- Familiarise themselves with the location of emergency spill kits in their areas and relevant emergency arrangements at the sites were they are based
- Report any known defects in equipment or systems that they believe is or may become the cause an environmental incident
- Report situations in which they believe there are circumstances at work that pose a serious environmental risk
- Report environmental incidents or near misses promptly and co-operate with any investigations

5.2 Environmental Specific Groups

5.2.1 Environmental Sustainability Operations Team (ESOT)

The ESOT is a cross-functional team with the remit of ensuring that the Environmental Sustainability Strategy, Policy, supporting Programme and other related initiatives are

implemented effectively from an operational perspective and that the programme aligns with the company's overall ISO14001:2004 Environmental Management System.

6 Sanctions

Failure to comply with this policy will be investigated and managed in accordance with the Company's Disciplinary Policy.

7 Contacts

The HSE team should be contacted in relation to this policy.

8 Review Arrangements

The Company Secretary will review the policy at least annually or sooner if significant changes occur.