

ENVIRONMENTAL POLICY MANUAL



A dedicated member of the **AVR** Group



ENVIRONMENTAL POLICY MANUAL

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ENVIRONMENTAL POLICY MANUAL**GENERAL****RESPONSE TO AN ENVIRONMENTAL EMERGENCY**

An environmental emergency in the context of Fusion Group Limited Environment Management System is defined as an unplanned event, or series of events, which are likely to lead to damage to the environment. A typical example would be major oil spillage during oil transfer.

In such an emergency the first priority is to ensure the safety of any staff likely to be affected. As soon as it is clear that there is no danger to health, immediate action should be taken to minimise the effects, e.g. stop the pump / close the valve and attempt to contain the oil in the event of a major oil spillage. Applicable work instructions should be referred to as and when required, e.g. "GWI 204 Correct choice of spill kit grab bag work instruction" and "GWI 201 Oil diesel & FLT battery acid spill control & safe use of spill kits including DAMMIT X mats".

As soon as practicable the incident should be reported to the Group Compliance Director and a "GHS 078 Environmental Incident / Near Miss Report" should be completed and forwarded to Lisa Shelton. Where the Group Compliance Director will immediately advise the other Group Director(s) and applicable Line Manager(s) who will initiate any remedial action.

The Line Manager(s) shall decide and advise on the correct course of action, guided as applicable by the procedures contained in the EMS Manual, the Health & Safety Manual, and / or other approved work instructions / procedures / regulations / guidance documents.

Where necessary the Line Manager(s) shall seek advice from the Group Compliance Director. All major environmental incidents, near misses (i.e. occasions when an environmental emergency was narrowly avoided), or written warnings or prosecutions (involving environmental issues) will be reported to the Group Compliance Director.

Whilst the above relates primarily to an emergency involving release of oil, the general concepts apply to any environmental emergency, i.e.

- 1 - Consider any health hazard
- 2 - Refer to applicable work instructions & prevent further escape of the pollutant, if possible
- 3 - Contact the Group Compliance Director
- 4 - Carry out remedial work as instructed by the Line Manager(s)
- 5 - Inform all necessary parties including regulatory authorities as and when required

The Group Compliance Director may decide to visit the site to carry out an investigation of the environmental consequences of the incident / near miss, liaising with staff as appropriate. They may be able to assist with minimising the possibility of pollution, disposal of contaminated waste etc.

The direct telephone number for the Group Compliance Director is +44 (0) 1246 262205 or +44 (0) 7770 644 069



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PREFACE

The purpose of this EMS is to address the environmental impacts associated with the operations of Fusion Group Limited, thereby meeting our commitment to protect and improve the environment in the course of carrying out our business. The scope of the EMS covers the activities / operations within the office areas (Fusion House and the Technology Centre), the Manufacturing unit (Fusamatic Division), the Test Laboratory and the Warehouses (Global Distribution Centre and Bays 2 & 3).

The EMS will be monitored for continued compliance with ISO 14001, the international standard for environmental management systems.

The EMS is designed to address the environmental policy statement, a copy of which is shown on Page 6, through the EMS procedures. Any inconsistencies in these procedures should be brought to the attention of the Group Compliance Director.

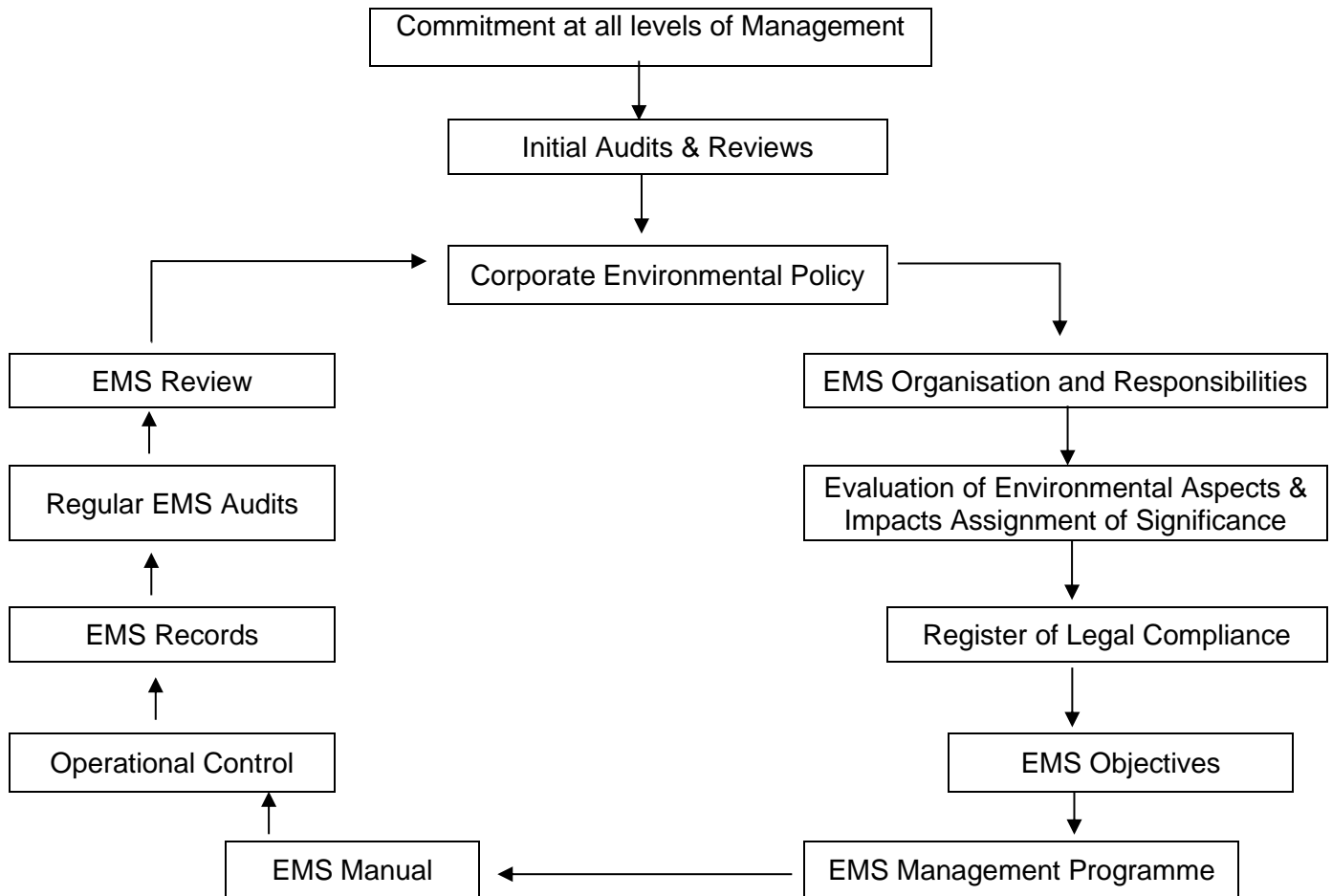
Mark Palmer, Managing Director of Fusion Group Limited is responsible for the environmental performance of the company.

There has not been any breach of environmental legislation or improvement notices issued against Fusion since the formation of Fusion Group Limited.

Fusion Group Limited has developed policies and objectives to protect the environment, reduce waste and manage the resources it uses in the most environmentally, cost effective manner. Examples of this are given on Page 6.

Fusion Group Limited EMS Co-Ordinator is Lisa Shelton – Group Compliance Director.

The diagram below illustrates the fundamental principles of establishing and operating the EMS.



It can be seen that the EMS starts with the company commitment to a Corporate Environmental Policy. Following initial audits and reviews, the EMS is established, broadly speaking, by working around the circle designating responsibilities, preparing registers of the main environmental aspects and impacts and relevant legislation, setting targets and establishing a management programme and procedures to meet these targets and comply with good environmental practices. The EMS is then maintained by a process of continually working round the circle to specify targets, record progress, audit and make changes as necessary. The requirement to set continual improvement targets and monitor progress to achieve those targets is a fundamental component of the EMS as specified in ISO 14001.

Two important aspects of the EMS are, firstly, that the Fusion Group Limited EMS is not optional, it is essential. In common with other companies in the UK we have to address environmental issues in order to ensure compliance with rapidly increasing environmental legislation and to secure the benefits of being seen to be an 'environmentally friendly' company. Secondly, the EMS has not been set up to remove responsibility from line management but to help them address environmental issues.

The effects of a successful EMS can be far-reaching, both in terms of environmental improvements and cost benefits. More efficient use of energy for instance brings a direct benefit in terms of reduced energy bills. We can all see benefits for ourselves, our children and their children resulting from a responsible approach to environmental improvement.



FUSION GROUP OF COMPANIES AND THE ENVIRONMENT

Fusion Group Limited is committed to a policy, in all its operations and on a continuous basis, of minimising its impact on the environment and adhering to all environmental legislation both in the spirit and to the letter of the law. To this end the company will aspire to maintain an environmental system in accordance with the requirements of ISO 14001 and take measures to incorporate environmental management methods into working practices.

The Group Compliance Director is the nominated Management representative for ensuring that the requirements of this standard are met and that areas for improvement are identified through the Internal Audit and Rapid Fire Audit systems. All Senior Managers are responsible for contributing to the implementation, execution and control of local environmental issues.

The Company is continually assessing the environmental aspects and pollution prevention of all areas of its operations and is endeavouring to ensure that these are carried out in such a manner as to make the most efficient use of energy, materials and natural resources; to prevent or minimise any adverse impact on the environment; and to comply with relevant statutory regulations and the requirements of all Stakeholders. This applies to the design of process plants and equipment as well as manufacturing, construction, distribution and other operational activities across the company.

Furthermore, the Company is proactive and encourages its suppliers and subcontractors to adopt sound environmental practices.

Signed: *Mark Palmer*

Date: 09.12.2024

Managing Director

The Environmental Policy and this Policy Statement is reviewed at least annually at the Management Review Meetings.

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Environmental Objectives & Targets

Objectives and targets are set and documented in HSEP07 Carbon Reduction and Carbon Footprinting Policy.

New targets shall be set as and when targets are achieved in order to ensure continual improvement in respect of each objective, HSEP07 Carbon Reduction and Carbon Footprinting Policy should be update accordingly. These will be reviewed at the Management Review Meetings and as part of the Achilles Carbon Reduce approval.

Any queries relating to the EMS manual content or the Carbon Reduction and Carbon Footprinting Policy should be directed to the Group Compliance Director.

Status, Revisions and Distribution of the Environmental Manual

The responsibility for the review, updating, approval and distribution of the manual lies with the Group Compliance Director.

Revisions to the manual are made in line with the document control procedure PRO 001.

Proprietary Information

This document contains proprietary information belonging to Fusion Group Limited, and may neither be wholly or partially reproduced, nor disclosed without the prior written permission of Fusion Group Limited. The Environmental Policy is available publicly via the company website. Hard copies of the Environmental Policy can be obtained from the Group Compliance Director upon request.

ORGANISATION AND RESPONSIBILITIES

Management Responsibilities

The responsibilities and authorities of key personnel with regard to the Environmental Management System are detailed below.

Managing Director

Responsible for setting policies, objectives and targets in line with the Leadership Team.

Group Directors

Responsible for commitment and support for the Environmental Management System.

Departmental Managers with Responsibility for Environmental Issues

Responsible for ensuring compliance with the environmental policy and supporting the establishment and maintenance of the Environmental Management System.

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EMS Co-Ordinator – Group Compliance Director

Responsible for:

- Maintaining the Environmental Management System to ISO 14001 standard
- Maintaining the Environmental Management Manual and establishing responsibilities
- Liaising with key staff involved in the operation of the EMS
- Ensuring a risk based audit programme is in place
- Monitoring environmental incidents and advising if necessary on environmental consequence
- Providing or obtaining expertise on environmental queries and issues
- Advising on requirements for, and organising / conducting, environmental training
- Monitoring progress towards improving Fusion Group Limited environmental performance
- Overseeing and verifying environmental improvement, resulting from the operation of Environmental Improvement Targets

Divisional Managers

Responsible for the implementation and maintenance of relevant requirements of EMS procedures and implementation of environmental improvement measures within all divisions. Responsible for the return of data as required by the Group Compliance Director.

Purchasing Personnel

Responsible for ensuring that company policy takes account of environmental considerations and of Suppliers and Contractors environmental qualifications and supplying data regarding the purchase of environmentally-sensitive products as requested by the Group Compliance Director.

HR / Group Compliance Director

Responsible for ensuring that environmental issues are properly considered in the formulation and execution of training courses including environmental awareness training and that adequate job training records are maintained.

Group IT

Responsible for ensuring that EMS-related data held on the corporate computer network is maintained and secure. Responsible for advising on matters relating to information technology as required.

All Employees

Notwithstanding management's responsibility for the environment as a whole, each individual is responsible for their work and the impact their activities have on the environment. Individuals shall perform their work using the approved procedures, work instructions, systems and materials and will give due attention to the environment in carrying out all work activities. Any employee may be called upon to supply environmental data or assist in implementing environmental improvements.

All employees are encouraged to report environmental problems (including potential problems) and any suggestions for environmental improvement to their direct Line Manager.

Organisation Charts

Sections of Fusion Group Limited management structure are shown on GQ030.



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PROCEDURE REFERENCES

Within Fusion Group's Business Management System, the following documented group procedures will be applied and address clauses of international standards:

- Pro 001 Document Control
- Pro 002 Control Of Non-Conformities
- Pro 003 Quality Records
- Pro 004 Audits
- Pro 005 Corrective Action
- Pro 006 Preventive Action
- Pro 007 Training
- Pro 008 Communication
- Pro 009 Emergency Preparedness and Response
- Pro 010 Project Management
- Pro 011 Supplier Approval and Assessment Procedure
- Pro 012 Context Of The Organisation
- PRO013 Capital Expenditure Request Procedure
- PRO014 Communication of New Products and Product Approval Updates
- PRO015 Planned Preventative Maintenance Legal Statutory Inspections
- PRO016 Preservation, Handling and Assessment of Stock
- PRO017 Engineering Project Management
- PRO018 Sales and Operations Planning
- PRO019 New Product or Component Approval Procedure
- PRO020 Ordering & BRT Process for Traded Goods
- PRO021 Calibration
- PRO022 Measuring and Monitoring Resources

APPROVED BY: <i>Mark Palmer</i> Managing Director	REVIEWED BY: <i>Lisa G Shelton</i> Group Compliance Director
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