

Environmental Policy-Millennium Point Property Limited

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Reviewed by Peter Robinson 09-11-2021

1. Introduction

Millennium Point Property Limited opened in 2001 and is a statement building bordering the centre of Birmingham. It is a technology and entertainment centre used by the public.

Millennium Point Property Ltd has a duty to make this a safe place to work or visit, and to seek to make sure that it responds quickly where improvements are needed in its policies or practices.

Whilst there are named lead people for Environmental Compliance in all areas of our work, we must all be mindful that Management of the Environment is the responsibility of all of us. We have a duty of care for each other and those we come into contact within the business of Millennium Point Property Limited life, therefore it is very important that any concerns or incidents are reported quickly.

This Policy and the obligations and responsibilities required by the environmental management system have been communicated to all Millennium Point Property Limited employees.

The Policy is available to our tenants and public upon request and commits Millennium Point Property Limited: to

- Comply with all Environment Legislation, Regulations, Codes of Practice and Guidance Notes
- Ensure our activities are conducted in accordance
- Manage our activities to meet all relevant laws and regulations
- Set Environmental targets and maintain an improvement plan to address areas where measurement has indicated an improvement is necessary

Millennium Point Property Limited is committed to protecting the environment, and to this end has created and implemented an Environmental Management System (EMS) described in this document which conforms to the requirements of Environmental Management: Environmental Protection Act 1990

Environmental Policy Statement 2.

Millennium Point Property Limited commitment to the environment is set out in the Environmental Policy Statement. This is signed by the Millennium Point Property Limited Chief Executive Officer applicable to all employees and displayed in a prominent position of Millennium Point Property Limited Management offices.

The Senior management team of Millennium Point Property Limited is committed to reduction in respect of Environmental Impact by setting a Strategy to:

- Set targets, controls, and objectives to Millennium Point Property Limited environmental Impact.
- Minimise disturbance to the local & global environment, and to the quality of life in the local community.
- Take positive steps to reduce, reuse, recycle & conserve natural resources such as energy, water & raw materials.
- Minimise waste by evaluation of its operations and actively promote recycling.
- Meet or exceed all Environmental legislation that is applicable to Millennium Point Property Limited.
- Minimise emissions that may affect the local, regional and wider community.

Print name: Abbie Vlahakis

Signed: // Monaus Date: 9.12.2021

3. Legal Requirements

3.1 Register of Legislation

Millennium Point Property Limited has examined its activities and operations to determine which of them have an impact on the environment, and where possible the impact has been measured. A Register of Legislation is held within Millennium Point Property Limited Management system.

The Register of Legislation is reviewed annually by Millennium Point Property Limited external environmental consultants to identify any new or updated legislation that impacts the organisation and the register updated. Periodic legislation changes or other applicable environmental notifications are sent from WCM Solutions LTD to Millennium Point Property Limited for consideration. It is however the responsibility of Millennium Point Property Limited to ensure compliance with Statutory Legislation at all times.

The Register of Legislation is reviewed annually by the Director of Facilities (L.Degg) to accept any changes that may impact the organisation and to plan appropriate actions.

Analysis of the Register of Legislation determines the environmental aspects and impacts relating to Millennium Point Property Limited. The environmental aspects and impacts register are held in Millennium Point Property Limited management system.

Environmental aspects and Impacts assessment take place to:

- Emissions to Air
- Release to Water
- Waste Management
- Travel & Transportation
- Use of Raw Materials & Natural Resources
- Land Contamination
- Other Local Environmental & Community Issues

3.2 Objectives, Targets and Programmes

Millennium Point Property Limited sets environmental improvement objectives and targets in two ways.

- Where quantifiable targets may be set, such as the reduction of waste to landfill, a target is included in the EMS. A time scale for achievement is also recorded.
- Where the improvement requires significant investment in finance or resources, such as the changing the design of facilities to improve environmental performance, an Environmental Improvement Project is raised. These will be subject to the process for raising and justifying projects, including business case approval in accordance with Millennium Point Property Limited process. Monitoring and control will be via the normal reporting mechanisms.

The progress of these environmental improvement tasks shall be reviewed at the Millennium Point Property Limited Executive Team Board Meeting

4. Organisational Roles and Responsibilities

Millennium Point Property Limited has set up a management structure and has allocated responsibilities for environmental activities so that there is effective management of the Environmental Management System (EMS).

4.1 The Chief Executive Officer

The Millennium Point Property Limited Chief Executive Officer (CEO) has overall responsibility for the policies and activities of the organisation. The CEO has the ultimate responsibility for setting environmental objectives and targets and authorises the Millennium Point Property Limited Environmental Policy.

4.2 The Executive Team

All members of the Executive Team are committed to the Millennium Point Property Limited Environmental Policy. They are responsible for ensuring that they and their Staff & Volunteers are aware of the requirements of the EMS and if necessary, undertake training that is required for the specific environmental responsibilities of each job.

4.3 Director of Facilities

The Millennium Point Property Limited Director of Facilities is responsible for ensuring internal audit assessments of the effectiveness of the EMS and for setting the period of audits. The Director of Facilities is also responsible for ensuring audits are completed and any actions arising are documented and closed in a timely manner. All aspects of COSHH compliance are also within the Director of Facilities Management remit. The Director of Facilities is also appointed to act as the management representative with responsibility for ensuring that the requirements of Environmental Standards are implemented and maintained.

4.4 Health & Safety Manager

The Millennium Point Property Limited Health & Safety Manager shall act as the responsible person on site in the absence of the Director of Facilities and carry out the duties delegated to him

4.5 All Staff & Volunteers

All staff & Volunteers of Millennium Point Property Limited have a responsibility:

- To take reasonable care for the Environment while working for Millennium Point Property Limited and to use all available systems and procedures to help reduce Millennium Point Property Limited environmental impact.
- To co-operate at all times with Millennium Point Property Limited to ensure company compliance with Statutory Regulations.
- Not to intentionally or recklessly interfere or misuse any article provided by Millennium Point Property Limited in the interests of the Environment as this may result in disciplinary action being taken against the individual.
- To report any Environment risk or hazard identified in the workplace to their immediate line manager or a member of Millennium Point Property Limited directly.

5. Arrangements for Carrying Out the Policy

5.1 Competence, training, and awareness

To ensure that Millennium Point Property Limited staff are competent and have sufficient information to carry out their work safely Millennium Point Property Limited provides the following:

- All staff and new recruits receive general Environmental induction training on joining the company.
- A copy of this 'Environmental Policy' is provided within the induction process.
- Staff where required are trained in the specific Environmental aspects presented by their jobs. Where specific training needs are identified, suitable training will be provided by Millennium Point Property Limited. Training must be sourced and approved by Director of People, Learning & Development for suitability. Records of training given must be recorded, with records maintained by the People, Learning & Development.
- Contractors who regularly work on Millennium Point Property Limited will receive induction on This Environmental Policy and on the Environmental aspects relevant to the tasks to be performed.
- •Suppliers whose processes and deliverables are likely to have a potentially significant adverse Environmental impact will be assessed for competence that their Environmental impact is being minimised and pollution prevention measures are in place.

5.2 Consultation and co-operation

Millennium Point Property Limited recognises the need for consultation with its employees and utilises a system of employee engagement during the new starter induction process identifying Environmental activities. Information regarding Environmental issues can also be found within Millennium Point Property Limited Management System, with regular updates conveyed to all staff & volunteers. All Millennium Point Property Limited Staff & Volunteers are encouraged to report and discuss any concerns they may have regarding Environmental aspects with their immediate line manager, Any member of Millennium Point Property Limited Management or the Director of Facilities.

5.3 Communication, participation, and consultation

The Director of Facilities is responsible for receiving, indexing, and responding to communications from external interested parties on Environmental subjects including complaints and requests for information. Decisions on communication will be recorded. The Director of Marketing, Communications & Events is responsible for all communications released regarding Environmental issues.

Information supplied in response to requests for information will be limited to the Environmental Policy (this document). No details concerning any environmental aspects will be provided unless required by statutory authorities.

The requirements of the EMS are communicated to staff through training and the distribution of operating processes and work instructions. Any matter requiring immediate attention is notified to Staff & Volunteers by email.

5.4 Emergency preparedness and response

Possible emergency situations have been identified and procedures written to take control of the situation and to reduce any consequential business and environment impact. The procedures are part of the overall organisation.

Millennium Point Property Limited is responsible for ensuring the following plans are updated and current.

- Business Continuity Plan
- Business Risk and Impact Analysis

These are to be found within Millennium Point Property Limited Management System.

The following emergency preparedness procedures can also be found within the Millennium Point Property Limited Management System.

The plans are:

- Fire
- Spills

6. Monitor and review

A review of all environmental performance shall be carried out by at the Executive Team Board Meeting to ensure its continuing suitability for the needs and objectives of the organisation, and its adequacy and effectiveness.

The Director of Facilities shall provide a quarterly report covering the following topics for review:

- Internal audit.
- Participation and consultation.
- Communication from external parties.
- Environmental performance.
- Investigations, corrective & preventative actions.
- Legislation update.
- Recommendation for improvement.

The relevant outputs of the Management Review shall be made available to all Millennium Point Property Limited Staff & Volunteers.

6.1 Documentation

The EMS is structured by means of the following:

- Environmental Policy
- Register of Legislation
- Aspects & Impacts Register
- Operating Processes

6.2 Control of Documents

Processes have been implemented for identifying and controlling all the documents which comprise the documented EMS, so that:

- They are reviewed, maintained and authorised before release.
- Made available to all Millennium Point Property Limited Staff & Volunteers who need access.

All documents generated receive a unique number issued by the Director of Facilities.

6.3 Operational Control

Processes have been defined where they are needed to ensure compliance with this Policy and to control areas of significant environmental impact.

The following Operating Procedures relate to the control of operations: Processes identified within the Millennium Point Property Limited system

- Waste Handling and Segregation
- Environmental Management System Review
- Emergency Preparedness (Fire & Spills).

Work Instructions

- Waste Contractor Management
- Utility Control, Monitoring and Analysis
- Drainage and Housekeeping
- Control of Substances Hazardous to Health (COSHH)

7. Evaluation

7.1 Performance Measurement and Monitoring

The following activities are monitored and recorded monthly and recorded.

Utilities Monitoring

- Electricity
- Gas
- Water

7.2 Evaluation of Compliance

Regular Audit of the Register of Legislation is used to ascertain whether and how new and updated legislation affects the company. An external resource specialising in the area of Environmental Health and Safety compliance WCM Solutions LTD advises Millennium Point Property Limited in identifying new and updated legislation that may be applicable to the company. Legislation changes

are recorded within the EMS. It is the duty of Millennium Point Property Limited, not its advisers to ensure Statutory Compliance is maintained at all times.

7.3 Incident Investigation, Non-Conformity, Corrective Action and Preventative Action

Any non-conformance or incident with environmental significance is recorded and investigated. Steps are taken to control any impact caused, and when appropriate and depending on the seriousness of the incident, corrective or preventive action is taken to prevent a recurrence.

7.4 Internal Audit

Internal environmental audits are to be carried out to determine that the EMS has been properly implemented and maintained and that it conforms to the requirements of Statute Law and Regulations.

Audits are risk based as directed by the Director of Facilities and Management Review.

Audit Reports are written and recommendations for corrective or preventive actions are made and agreed when necessary which are implemented and followed up via audit committee meetings.

Audit findings and actions taken are reported via the Environment, Health & Safety report which is reviewed by the Board at Millennium Point Property Limited Executive Team Board Meeting.

8. Maintaining This Policy

The policy will be reviewed periodically to take account of any changes to legislation, regulations or working procedures. This should be conducted annually as a minimum from the date of issue. Following review, the policy shall be submitted to the Millennium Point Property Limited Board for approval and signature by the CEO