In accordance with the Group Environmental Policy, EMR has environmental management systems (EMS) in place to ensure effective management of environmental risks, with the objective being that any environmental impacts are minimised or negated completely.

EMR's head office and multiple sites across the UK are formally certified with ISO14001. Although (a) site may not fall directly under this ISO14001 certification accreditation, all sites apply the EMR Integrated Management System (IMS) which follows a strict ISO format. As a consequence, the management of the site will fall under the same management systems controls regardless of certification.

The generic ISO structure of the EMS contains the following:

(ISO Clause 4) Context of the organisation

Legal register – Up to date schedule of current and future environmental legislation which impacts on EMR operations.

Interested Parties / Regulatory requirements – EMR works to develop pro-active constructive relationships with all regulators, including consideration of potential impacts on sensitive receptors

British Metals Recycling Association (BMRA) - BMRA membership is open to metals recycling companies of good standing that have been in business for at least two years. The BMRA is dedicated to meeting the needs of its members, keeping them informed about upcoming issues and regulations while helping them overcome specific problems and challenges.

(ISO Clause 5) Leadership

EMS responsibilities – Operational Manager led with support from Regional SHE Managers / Specialist

Environmental Policy - Our core business is recycling large quantities of metals and other valuable commodities from a range of post-consumer, municipal and industrial sources. EMR recognise that operations have the potential to impact the environment and affect the amenity of others who work and live alongside us. EMR's Senior Leadership demonstrate commitment to effective environmental management and ensure that all personnel are aware of the Company's environmental aims and objectives through the delivery of ongoing training and internal communications

(ISO Clause 6) Planning

Environmental Risk Assessments – Identifying source, pathway, and receptor routes for potential environmental impact at any particular site subject to EMR operations.

Objectives and Targets – met by four main strategic pillars and meeting the following SHEQ objectives:

All employees understand the concept of SHE Perfect Day, IRBs are conducted and actions are rolled out with reference to Environmental Sustainability & Governance.

Making every day a SHEQ Perfect day – ensuring no impacts on the surrounding environment and maintaining environmental permit compliance.

All employees understand the Stop Work programme and all incidents documented on Incident Management System.

All employees are responsible for safety and environmental compliance.

Every site manager to identify, understand and focus on reducing top 5 Critical Environmental risks.

(ISO Clause 7) Support

EPP's / Training – (Environment Protection Procedures) – EMR's bespoke procedures for environmental management, from Duty of Care to the maintenance of Interceptors. These reflect current legislative requirements and best operational practice, having regard for guidance issued by the environmental regulators.

EMR Communications – These include legislative updates and incident updates via TBT's and delivered through regular site huddles. These are supported through quarterly site SHE meetings and wider Management Review Meetings (MRM).

(ISO Clause 8) Operation

Check-sheets – Daily, weekly or monthly check lists (depending on risk) for operational staff to use to ensure that all pollution prevention systems have been checked and are in place.

Emergency Plan - In order to facilitate a fast and effective response in an emergency plan will be documented and followed for each EMR site. The document forms part of the environmental management system held on site and is formed with the following sections:

- Overview of the activities & infrastructure
- External/Internal Contacts
- Chemical Product & Waste Inventory

- Nearby sensitive receptors
- Utility Isolation Points
- Fire-Fighting Equipment

Incident reporting systems – Any incident, complaint etc. is to be reported to the environment function using this mechanism. EMR operate a substantial incident reporting procedure which is

regularly audited to ISO specification/requirement (further detail can be provided where required).

FPP / DMP – where regulation requires, approved Fire Prevention Plans (FPP) and Dust Management Plans (DMP) will form part of any site EMS and regulated via site environmental permits. If not required within permitted conditions, EMR strives to adhere to FPP guidance in ensuring that any fire emergency is prevented, but if such an emergency does occur that the event will be short lived and contained.

Site Specific Management Plan / Working Plan

Alongside the above, each EMR permitted facility benefits from a bespoke 'Management Plan' (previously known as a working plan). The structure of this plan will take the following basic format:

- Location & Nearby Sensitive Receptors
- Technical Competent Management
- Site Infrastructure, Engineering & Maintenance
- Waste Acceptance/Rejection/Despatch
- Waste Classification
- Training
- Environmental Monitoring

- Operational Hours
- Site Plan
- Site Security, lighting and access
- Waste Handling, Storage and Treatment
- Emergency Response Procedures
- Nuisance Control
- Environmental Reporting & Notifications

(ISO Clause 9) Performance evaluation

Internal and external environmental audits and inspections are scheduled on a regular basis as part of the group audit plan, with non-conformances arising tabled. Review of the EMS is an intrinsic part of these audits, reflecting on continual improvement (see clause 10).

Environment Agency reporting – At sites regulated by the EA, all site depots are required to report any occurrences to qualified SHE Specialist staff.

(ISO Clause 10) Improvement

Best practice guidance – EMR operates in conjunction with 'best practice guidance' reflecting on new/updated legislation, internal guidance and codes of practice which is supported through our membership of the British Metal Recycling Association (BMRA)

Continual improvement and technology development

The management of the EMS is the responsibility of the Operational Manager, receiving support from the Group SHE Specialists whom are qualified environmental professionals. Support is also available from EMR's wholly owned environmental consultancy, Mayer Environmental Ltd.