



**ENVIRONMENTAL MANAGEMENT
SYSTEMS MANUAL**

to

BS EN ISO 14001

Cullimore Group of Companies

Head Office
Netherhills
Whitminster
Gloucestershire
GL2 7PD

Copy Holder : Master Copy

Copy Number : 1



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Amendments Procedure

All copies of this EMS Manual must be kept under full control to prevent the management systems from becoming unreliable. The following procedure will ensure that the EMS Manual remains current and valid.

- 1) All copies of the manual will be clearly numbered and the holder recorded.
- 2) Each page in the manual will individually numbered.
- 3) The Managing Director will be responsible for all revisions and additions being recorded.
- 4) Any employee may suggest changes but all changes must only be implemented under the authorisation of the Managing Director or designated signatory.
- 5) All changes must be recorded on the amendments register and the appropriate pages in each Manual amended.

Distribution List

Copy No.	Issued to	Person responsible	Date of Issue
1	Master Hard Copy	Managing Director	04/02/22



Table of Amendments					
Section Number	Page Number	Issue	Date	Description of Change	Authorisation
ALL	-	2	04/12/17	Revisions in accordance with ISO 14001:2015	AB
none	-	3	17/12/19	Revisions in accordance with ISO 14001:2015	AB
none	-	4	22/01/21	Revisions in accordance with ISO 14001:2015	AB
none	-	5	04/02/22	Revisions in accordance with ISO 14001:2015	AB



2. Introduction to the environmental management system

The Cullimore Group of Companies ("the Group") has generated this manual to help define its environmental management system (EMS), which has been established to demonstrate the Group's commitment to improving the environmental impact of its business activities and to better satisfy the requirements and expectations of its stakeholders.

The EMS has been designed to achieve the requirements of BS EN ISO 14001 and this manual reflects this international Standard in its structure and content. All the requirements of the Standard have been incorporated into the manual and the methodology, procedures and documentation of the EMS have been defined or referenced within the manual.

The manual is a guide to the EMS that is to be used by the staff of the Group to maintain its practices and procedures in a manner that assures conformity with the Group's environmental policy and BS EN ISO 14001. The interaction of the processes is described in 4.4.

3. Terms and definitions

All EMS terms used within the manual are defined within BS EN ISO 14001.

4. Context of the organization

4.1 Understanding the organization and its context

The Group operates in well-regulated processes such as mineral extraction, manufacturing and service and repair. The Group is committed to ensuring a high level of compliance with legal requirements and all other requirements to which it subscribes.

The internal and external issues that could affect the Group will be determined and maintained by top management in accordance with EMS procedure P13, and will be reviewed when significant changes occur.

4.2 Understanding the needs and expectations of interested parties

The needs and expectations of all interested parties, both external and internal, will be determined and maintained by top management in accordance with EMS procedure P13, and will be reviewed when significant changes occur.

4.3 Determining the scope of the quality and environmental management systems

This EMS covers the activities and functions performed by the defined operating areas within the Cullimore Group of Companies (the "Group"), incorporating Moreton C. Cullimore (Gravels) Ltd. and Cullimore Mix Ltd., included in the service scope definition:

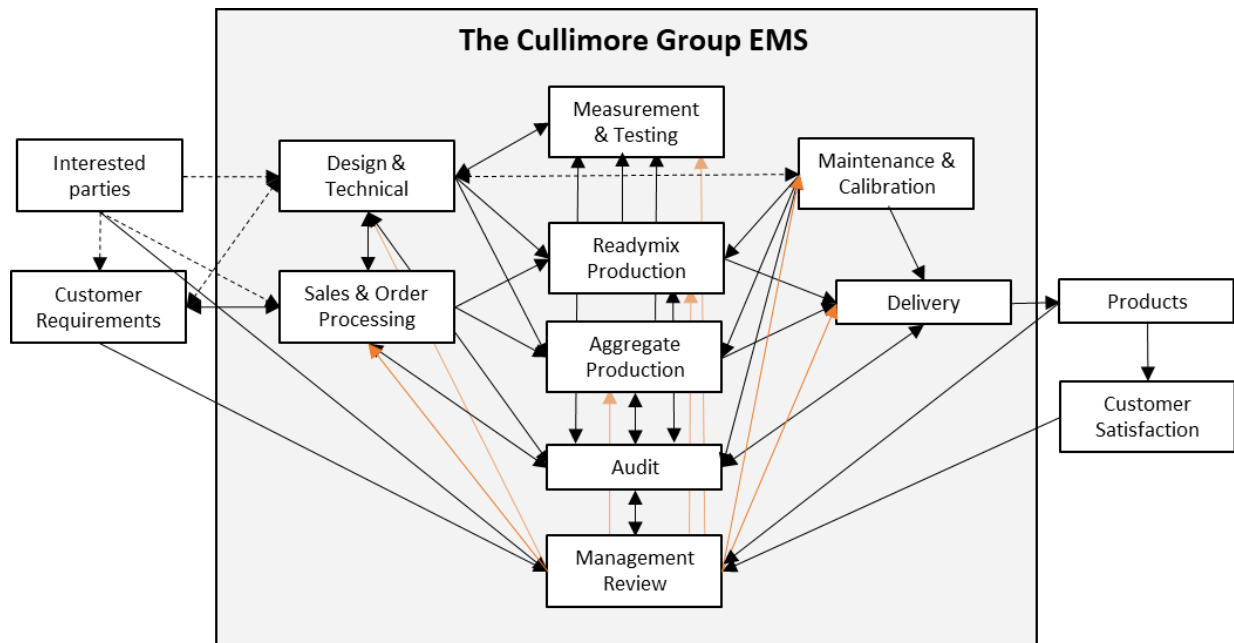
All activities involved in the process of concrete production, aggregate extraction and processing, inert waste, transport and general haulage and aggregate deliveries.

The EMS is designed to meet the requirements of BS EN ISO 14001 and all relevant compliance obligations.

The scope, including applicable locations, is available to all interested parties through the BSI Certificate of registration on the Group's website.

4.4 The environmental management system and its processes

The Cullimore Group EMS is established throughout the operational and management processes of the Company. The interactions of processes are described in the diagram below:





5. Leadership

5.1 Leadership and commitment

The Group's top management is committed to ensuring that the EMS is effectively implemented and will ensure that the environmental policy and objectives are compatible with the strategic direction and context of the organization.

Top management will attend periodic internal meetings at which the effectiveness of the EMS will be discussed, including the integration of the EMS into the business processes, resources, communication, intended outcomes and continual improvement.

5.2 Environmental policy

The Group's top management has established an environmental policy that reflects the nature, scale and environmental impacts of its activities. This policy, defined below, will be communicated to all persons working for or on behalf of the Group and will be available to interested parties through the Group's website.



CULLIMORE GROUP ENVIRONMENTAL POLICY STATEMENT

This Policy has been produced by the Directors of the Cullimore Group of Companies in order to ensure that the procedures and activities of the Group are carried out with the minimum of environmental impact and in compliance of all applicable legislation and all other environmental requirements to which the Group subscribes. Cullimore Group has a commitment to recycle the maximum amount of material that it collects and brings to the site for processing.

The Directors have implemented an Environmental Management System.

The Directors will instruct and encourage the employees and subcontractors to effectively use the resources available and minimise the use of raw materials, gas, electric, water and fuel and minimise avoidable pollution.

The Directors will design and implement training programmes for employees in order to increase and maintain awareness of environmental aspects, impacts and legislation.

The Directors will ensure that the company is prepared to deal with all incidents and emergency situations on the site and that suitable and effective training has taken place.

The Directors are determined to continually improve the service provided by the Cullimore Group and, by using expert knowledge, increase the quantity of material recycled at the site on an on-going basis.

The Directors will promote the setting of Environmental Objectives throughout all of the Company's processes in order to achieve the environmental goals set out in this policy. The objectives will be communicated to all relevant staff and will be reviewed on a regular basis.

All employees, visitors, suppliers and sub-contractors are encouraged to assist in enforcing this policy by following site rules and verbal instructions.

Signed.....

Managing Director

04/02/21



5.3 Organizational roles, responsibilities and authorities

The roles, responsibilities and authorities have been defined with top management maintaining responsibility and authority in all aspects of the EMS unless specifically delegated, which will be appropriately communicated. An Environmental Representative has been appointed to maintain the EMS and reports to top management.

The Group's organisational structure is published and issued to all operating locations. Key roles and responsibilities are given in the following table:

Key roles and responsibilities:

EMS Manual Reference	Description	Primary & Management Responsibility	Secondary Delegated Responsibility
1	EMS Manual Control	Managing Director (MD)	Environmental Representative (ER)
4.1	Understanding the context of the organization	MD	-
4.2	Understanding the needs and expectations of interested parties	MD	-
4.3	Determining the scope of the environmental management system	MD	-
4.4	Environmental management system	MD	-
5.1	Leadership and commitment	MD	-
5.2	Environmental policy	MD	-
5.3	Organizational roles, responsibilities and authorities	MD	-
6.1	Actions to address risks and opportunities	MD	-
6.2	Environmental objectives and planning to achieve them	MD	All Managers
7.1	Resources	MD	-
7.2 & 7.3	Competence, training & Awareness	MD	ER
7.4	Communication	MD	ER
7.5	Documented information	MD	ER
8.1	Operational planning and control	MD	ER
8.2	Emergency Preparedness & response	MD	ER
EMS Manual Reference	Description	Primary & Management Responsibility	Secondary Delegated Responsibility



9.1	Monitoring, measurement, analysis and evaluation, including evaluation of compliance	MD	ER
9.2	Internal Audits	MD	Ind. Consultant / Internal Auditors
9.3	Management Review	MD	-
10.1	Improvement (general)	MD	-
10.2	Nonconformity and corrective action	MD	ER
10.3	Continual improvement	MD	-

6. Planning

6.1 Actions to address risks and opportunities

6.1.1 General

The Group has established a documented EMS, including this manual, environmental operating procedures and emergency procedures, in order that the Group's processes can be appropriately managed to ensure that the EMS can achieve its intended outcomes.

The risks and opportunities that could affect the Group will be determined and maintained as documented information by top management in accordance with EMS procedure P13, and will reviewed when significant changes occur.

6.1.2 Environmental aspects

The Group has reviewed the activities and working practices of the organization and has identified all its environmental aspects. The significance of the aspects has been assessed and procedures and programmes initiated to control or reduce the most significant aspects.

All the aspects will be periodically reviewed to re-assess their continuing significance and, where appropriate, the procedures and programmes will be updated. Reviews of the aspects will be reported to the Management Review Meeting.

The environmental aspects and impacts for each of the Group's locations and the criteria for determining their significance will be maintained as documented information in the Aspects Register.

6.1.3 Compliance obligations

The Group has identified all relevant legislation related to its EMS and recorded this in the Legal Register. The Group has established its compliance with the legislation



and will periodically review its compliance and whenever there is a change to the legislation or its legal permissions or consents. The reviews will be recorded in the Management Review Meeting.

The Group has also considered all other environmental requirements related to its EMS that the Group has subscribed to. Compliance with these requirements will also be established and will periodically reviewed or when changes to the requirements occur. These reviews will also be recorded in the Management Review Meeting.

6.1.4 Planning action

The Group shall primarily plan actions to address significant environmental aspects, compliance obligations and its risks and opportunities through the implementation of Environmental Procedures, Emergency Procedures and Environmental Objectives.

The evaluation of the effectiveness of planned actions will be achieved through internal audit and management review.

6.2 Objectives and planning to achieve them

6.2.1 Environmental objectives

The Group's policy is to establish objectives and targets covering the scope of processes throughout the organisation and are intended to be consistent with the environmental policy. For each objective and target, a programme will be established by which it is intended that the objectives and targets will be met and continual improvement achieved. Each objective will be communicated to the appropriate staff having influence over the achievement of the objective.

The objectives, targets and programmes will be maintained as documented information in the Objectives File.

6.2.2 Planning actions to achieve environmental objectives

Objectives set by managers will be recorded on the objectives form, which will stipulate what will be done, what resources will be required, who will be responsible, when it will be completed and how it will be evaluated.

The evaluation of objectives will be reviewed at the Management Review Meeting.

7. Support

7.1 Resources



The Group's top management shall ensure that adequate resources are available in order that the EMS can successfully be established, implemented, maintained and improved.

7.2 Competence

The Group shall ensure that any person performing tasks, for it or on its behalf, that have a potential effect on the EMS is competent on the basis of appropriate education, training or experience.

The training needs of all staff will be assessed in relation to the organisations EMS and the appropriate training planned and executed. Training needs will be recorded as part of the Management Review Meeting.

All training in relation to the EMS shall be recorded and a register of training maintained.

7.3 Awareness

The Group shall provide environmental awareness training to all persons working for it or on its behalf to ensure all persons understand the importance of conformity with the environmental policy and the procedures and requirements of the EMS.

Significant environmental aspects and related actual or potential impacts associated with their work will be communicated to those persons through specific procedures and emergency procedures.

7.4 Communication

7.4.1 General

The Group has established a procedure for communications relevant to the EMS, P14. This procedure documents on what, when, with whom and how the Group will communicate, taking into account its compliance obligations.

Appropriate documented information will be retained as evidence of the Group's communications.



7.4.2 Internal communication

The Group will ensure that it maintains effective communication of its EMS to all staff through awareness training, issue of relevant procedures and the implementation and feedback of objectives, targets and programmes. Top management will encourage the reporting of any incidents, near misses and opportunities for improvement from any members of staff, contractors and visitors.

7.4.3 External communication

The Group will ensure that any communications received from external bodies with regard to its EMS will be reviewed and actioned by authorised staff and will be recorded in the Management Review Meeting.

The Group will ensure that all external communications arising from compliance obligations are actioned as required.

Details of the Group's environmental policy will be made available to interested parties on through the Group's website.

7.5 Documented information

7.5.1 General

The Group has established documentation to meet the requirements of BS EN 14001. These include:

- The EMS Manual
- The Aspects Register (including aspects significance)
- Environmental Procedures Manuals (including Emergency Response Procedure)
- Objectives file
- Legal Register
- Documented information necessary to ensure the effective planning, operation and control of processes.

7.5.2 Creating and updating

The Group will ensure that all documented information will be created in appropriate format and media and suitably identified and approved. Documented information shall be reviewed for its suitability through the internal audit process.

7.5.3 Control of documented information

The Group will ensure that the documents of the EMS are adequately controlled. The following documents will be controlled in order that the current status of the documents are maintained and that revisions are correctly authorised and distributed:

- EMS Manual
- Aspects Register
- Legal Register
- EMS Procedures
- EMS Emergency Procedures

All documented information generated by the EMS must be controlled in order that they are available for retrieval as required.

The Environmental Representative will be responsible for ensuring that all EMS documented information are identifiable and stored in a manner such that the information is preserved, secure and readily retrievable.

The Environmental Representative will be responsible for ensuring that output documented information from the EMS are retained for a minimum of three years.

8. Operation

8.1 Operational planning and control

The Group has identified the processes and operations that are associated with its significant environmental aspects and has established documented procedures for each significant aspect.

The procedures have been implemented to ensure the adequate control of the process or operation to prevent the deviation from the environmental policy, objectives and targets.

The procedures will be issued or communicated to all relevant operatives, including suppliers and contractors, whose operations influence the significant aspects.

The procedures will be controlled documents and the master copies will be held in the Aspects Register.

All the procedures will be reviewed periodically and updated in relation to aspects significance and the objectives, targets and programmes. The review of procedures will be recorded at the Management Review Meeting.

8.2 Emergency preparedness and response

The Group has reviewed the processes and operations of the organization and identified potential emergency situations and potential accidents that could have an impact on the environment. An emergency procedure has been established and implemented for each potential emergency situation or accident.

In the event of an emergency, the Group will take the necessary response to prevent or mitigate any adverse environmental impact.

The procedures will be controlled documents and will be held in the Environmental Procedures Manual.

The emergency procedures shall be periodically reviewed and following any emergency incident, to assess the effectiveness of the procedure. Where practicable, the emergency procedure shall be tested subsequent to implementation and following any change to the operations resulting in revision to the procedure. The review of procedures will be recorded at the Management Review Meeting.

9. Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

The Group has established procedures for monitoring and measuring key characteristics and activities of its operations that could have a significant environmental impact. Where practicable, these will be incorporated into the organization's environmental objectives and targets.

Where monitoring and measurements are undertaken, the Environmental Representative will ensure that any equipment used is calibrated or verified and documented information of such maintained.

9.1.2 Evaluation of compliance

The Group will regularly evaluate its compliance with its legal requirements and all other requirements to which it subscribes through a review of the Legal Register and associated documented information.

The evaluation will be carried out at least annually, the results of which will be recorded as documented information and will be reviewed at the Management Review Meeting.



9.2 Internal audit

9.2.1 General

Internal audits will be carried out at regular intervals and will be structured such that each area of the Group's EMS is audited at least annually.

9.2.2 Internal audit programme

The Environmental Representative will be responsible for the planning of audits and the audit plan will be recorded.

The Managing Director will be responsible for appointing auditors to conduct the internal audits. An auditor may not audit aspects of the EMS maintained by himself/herself, these must be audited by a third party who is competent in environmental auditing.

Each element of the EMS will be checked against the procedure in place to ensure that its requirements and the environmental policy and objectives are being met and that the overall purpose of the procedure is being fulfilled.

The auditor will record any variation from the procedure or nonconformity and the Environmental Representative will be responsible for circulating the actions to the appropriate personnel. The Environmental Representative will be responsible for ensuring that corrective actions are completed and signed off.

Any nonconformity identified will be assessed for its impact on the EMS.

The Environmental Representative will be responsible for maintaining documented information of audits and corrective actions and for their presentation at the Management Review Meeting.

9.3 Management review

The Group's top management shall review the organisations EMS at least annually. The Management Review Meeting will record the reviews of the EMS, either carried out at the meeting or at prior meetings. In so doing, the adequacy and effectiveness of the EMS shall be assured.

The agenda of the Management Review Meeting shall include:

- Progress of actions from previous minutes
- Changes to internal and external issues
- Changes to needs and expectations of interested parties, including compliance obligations

- Review of environmental aspects
- Changes to risks and opportunities
- Review of objectives and targets
- Nonconformities and corrective actions
- Results of monitoring and measuring
- Evaluation of compliance with legal and other requirements
- Results of internal and external audits
- Resources, roles, responsibilities and authorities, including training needs
- Complaints and other communications from interested parties
- Review of procedures and emergency procedures
- Opportunities for continual improvement

The output of the Management Review Meeting will include:

- Review of the continuing suitability, adequacy and effectiveness of the EMS
- Continual improvement opportunities
- Need for changes to the EMS, including resources
- Actions, if necessary, if environmental objectives have not been achieved
- Opportunities to improve the integration of the EMS into the business processes
- Any implications for the Group's strategic direction

Documented information of the Management Review Meetings will be retained.

10. Improvement

10.1 General

The Group will identify opportunities for improvement across all its processes and, where appropriate, establish environmental objectives to capitalize on the opportunities.

10.2 Nonconformity and corrective action

The Group has established a procedure for the identification of actual and potential environmental nonconformities and the implementation of corrective actions. Top management will encourage the reporting by staff of any environmental nonconformity or near miss through the use of the Health & Safety and Environmental Incident Reporting Form.

Should any nonconformity occur, the organisation will take the necessary action to mitigate any environmental impact. All nonconformities or near misses will then be investigated to identify its cause and whether similar nonconformities could occur elsewhere in the Group. The appropriate corrective action will be implemented, including any changes to procedures or other documented information in the EMS,



to avoid any recurrence. All actions will be appropriate to the magnitude of the problems and the environmental impacts encountered.

All corrective will be reviewed subsequent to their implementation to ensure their adequacy in maintaining the compliance of the EMS.

Occurrences of nonconformity or near misses and their resulting corrective actions will be recorded as documented information and reviewed at the Management Review Meeting.

10.3 Continual improvement

The Group will aim to achieve continual improvement through the identification of opportunities, implementation of objectives and subsequent review of their effectiveness.