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## 1.0 GENERAL

### 1.1 Introduction

Bakkavor Spalding (the 'Company') recognises that implementing an Environmental Management System (EMS) can improve environmental performance, reduce costs and liability, improve competitive advantage, improve compliance, reduce incidents, improve employee engagement, improve its public image, enhance customer trust, and support green investment.

An EMS details the processes that can be applied to all the identified impacts of an organisation, and therefore can be used to provide a structure for addressing the sustainability of an organisation and its services or products.

This EMS has been devised to enable the Company to formulate and implement a structured approach to environmental compliance and continual improvement.

The EMS has been designed to comply with relevant legislation, Bakkavor corporate and local policies, the ISO 14001 standard, and any other standards to which the Company chooses to subscribe at any time. An overview of the contents of the EMS is provided in this document; Sections 2.0 to 6.0.

### 1.2 Scope

The EMS applies to all operations, within the Spalding site boundary, relating to the manufacture of fresh prepared foods.


## 2.0 BAKKAVOR & SITE ENVIRONMENTAL POLICY AND OPERATING STANDARDS

The Bakkavor Group maintains an environmental policy; this is fully adopted by the Bakkavor Spalding site. The Group policy is included in the EMS as EN003a. This establishes the scope and top-level operating criteria for all sites within the Group. A Statement of Intent (EN003b) confirms the commitment of the Company to follow the Group policy at a site level.

The statement of intent shall be amended periodically in response to changes in corporate requirements (e.g. the Group policy), and in response to any significant changes to statute, stakeholder requirements, business changes or other relevant influences. In any event, the statement of intent will be reviewed at least annually following the annual Group policy review.

The Group policy, and the Statement of Intent, shall be published on site notice-boards, selected employee and visitor/contractor documents and are both publicly available upon request.

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### 3.0 ENVIRONMENTAL PLANNING

#### 3.1 Environmental Aspects and Impacts

Procedure EN004 sets out the approach taken to identifying the Company Aspects and Impacts.

The Environmental Aspects identified and assessed in the EMS are:

- Emissions to air, including particulate, liquid and gaseous materials;
- Noise and vibration;
- Emissions to water resources;
- Emissions to land; and
- Procurement and use of raw materials and natural resources, including energy and water.

This scope of environmental aspects shall be reviewed every 3 years, or in response to any relevant factors or operational changes within this review timeframe. It may also be reviewed following receipt of a substantiated complaint, or following actions taken in response to an environmental incident.

The assessment of environmental impacts from the identified aspects is undertaken for both normal and abnormal/emergency scenarios.

The assessment is undertaken by a suitably competent person, using defined environmental impact risk assessment procedures based on an evaluation of probability and severity of the actual or potential impact on local, national and global receptors and taking account of legal requirements, performance history and current standards of control.

The Aspects and Impacts Register is included in the EMS as Form EN004.

#### 3.2 Legal and Other Requirements


The Company shall follow procedure EN005 to identify and maintain knowledge about the legal requirements that are applicable to its operations at any one time.

Statutory requirements that relate to the operations carried out at the site shall be documented within the Legal Register, Form EN005. This specifies:

- The relevant site activity;
- The environmental compliance criteria, source and enforcement body; and
- Summary of control and monitoring requirements (i.e. its applicability to the site operations).

The accuracy of the Legal Register shall be maintained through a system of regular review, at least annually. As for the Aspects and Impacts Register, it may also be reviewed in

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response to any operational changes within this review timeframe, in addition to changes in legislation.

An assessment of compliance with the requirements identified by the Legal Register will be carried out on an annual basis. This may be carried out in conjunction with the annual review and records will be kept of any required corrective actions, timeframes and accountabilities for achieving compliance.

### 3.3 Environmental Objectives and Targets

As set out in procedure EN006, the Company shall, on the commencement of each financial year, establish and communicate a documented schedule of environmental targets. This shall be completed, verified and communicated to relevant parties by 1<sup>st</sup> February each year.

The environmental objectives set by the Company shall enable:

- Compliance with all environmental standards, emission limit values and operating conditions prescribed by United Kingdom legislation as assessed within the Company Environmental Compliance Register.
- Adoption of non-statutory standards and other appropriate Good Environmental Practices the site may choose to subscribe.
- Awareness and promotion of continual improvement in environmental performance throughout the Company, with customers, suppliers and other stakeholders.

Any aspects that have been identified as having a significant residual impact, in the Aspects and Impacts Register for the corresponding financial year, will be assigned an Objective and Target. These will be augmented with other site Objectives and Targets. The annual Objectives and Targets will be recorded on Form EN006.

The Company will establish and undertake environmental improvement programmes to improve environmental performance of the site and to achieve its environmental objectives and targets.


The scope, tasks, timeframes and responsibilities for any environmental improvement will be defined in each case, and progress reviewed periodically to ensure that the goals of the improvement plan are achieved within an appropriate timescale. Objectives may be adjusted in the light of such reviews.

## 4.0 IMPLEMENTATION AND OPERATION

### 4.1 Resources, Roles, Responsibility and Authority

The Company shall ensure suitable and sufficient resources are available for establishing, implementing, maintaining and improving the EMS.

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The Company will appoint a suitably qualified senior manager who has defined responsibilities and authority for ensuring the EMS is established, implemented, maintained and reviewed.

Senior site management shall define, allocate and document environmental responsibilities and authorities of management and operational personnel for environmental management, controls and compliance. Provisions shall be made for visitor and contractor controls.

Specific responsibilities are set out in each procedure in the EMS; key roles and responsibilities are consolidated in procedure EN007.

## 4.2 Competence, Awareness, and Training

The Company will maintain systems for the identification of competence, awareness and training requirements of employees and contractors in relation to environmental tasks and performance.

Procedures will be maintained and recorded for ensuring these requirements are met, to provide information and instruction about how activities must be conducted and the implications of failure to comply with environmental policies and operating procedures.

This will include:

Induction / Basic Awareness Training: All newly appointed personnel will receive a brief overview of Company Environmental Policy, the main environmental aspects of site operations, the general rules, and good practices associated with environmental performance on site.


Management Training: Middle and Senior management on site shall receive training in more detailed environmental issues including legislation, Company Policy and Objectives, the structure and intentions of the EMS, environmental aspects relating to the site and their operational and management responsibilities for ensuring compliance and continual improvement. This will be achieved by attending IOSH environmental management system or NEBOSH Environmental Certificate, with in-house training.

Activity-Specific Training: Subject to training needs evaluation, staff will receive instruction in operational controls and EMS system procedures as relate specifically to their work activities. This will include advice regarding the implications of non-compliance with control / behavioural requirements.

Contractor & Visitor Awareness: Contractors / visitors shall be provided with site environmental operating instructions and, for works which may present a significant environmental impact, an environmental impact assessment detailing suitable controls and responsibilities.

Training and appraisal systems relating to environmental requirements will be integrated with, and administered through, Company training and appraisal protocols under the management of site Human Resources department.

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A training matrix will be maintained, that identifies the core requirements for specified roles. This is included in the EMS as Form EN008.

### 4.3 Environmental Communications

Effective, documented, procedures have been established for effective communication of relevant environmental information within the Company. Provisions shall be in place for environmental communications with other interested parties including statutory bodies, customers, and business partners, and selectively to the public within the realms of confidentiality.

This is set out in procedure EN009.

### 4.4 EMS Documentation

As set out in procedure EN015 the EMS, and associated documents, shall be documented on the Company's IT systems, with paper copies of documents being printed only where required. Where paper copies of relevant documents exist, these shall be suitably controlled to ensure that only the latest / current version is available or in circulation.

Procedures and instructions relating to environmental compliance may be presented in stand-alone EMS documents, or within other media relating to operations management, including product quality assurance and occupational health and safety systems.

All EMS documentation shall be clearly legible and unambiguous, giving all necessary information to enable correct application by trained employees / users. This includes the use of text, diagrammatic, photographic, and audio-visual media.

Documents shall be accessible to relevant employees.

Procedures shall contain references to directly associated documentation and should make reference to the relevant environmental standard or impact via their statement of purpose.


### 4.5 Document Control

A system of document control shall be maintained for all specifications, work instructions, process control, and records. This is set out in procedure EN010.

The system will ensure that:

- New or revised documents are issued only to specified, relevant personnel;
- Obsolete documents are removed from circulation, with one copy archived and all others destroyed;
- Documents are uniquely indexed (document reference and version), dated and authorised. All pages will be numbered sequentially;
- A circulation log is maintained to identify the number and location of documents issued;

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- Restrictions on photocopying will be communicated clearly;
- Archived documents will be marked clearly as such; and
- An up-to-date master register will be maintained to identify all current and withdrawn documents.

## 4.6 Operational Control

The Company will identify, through the environmental aspect and impact assessment and legal compliance assessment, those operations which do, or could, have a significant environmental impact and are associated with the delivery of Company environmental objectives and performance requirements.

The Company will plan, document and closely manage these activities to ensure these are effectively controlled by:

- Designing and implementing documented systems of work to prescribed operating criteria and procedures based on prevention and minimisation of environmental impacts;
- Establishing and integrating compliance standards into Company management systems and standards; and
- Establishing procedures for the control of goods and services used by the Company and communicating relevant requirements to suppliers.

## 4.7 Emergency Preparedness and Response

The site management shall identify the potential for, and necessary response to, accidents and emergencies capable of presenting significant environmental impact(s).

The assessment of emergency scenarios forms part of the environmental aspect and impact assessment for areas and activities and the type and severity of potential harm. These shall be documented within risk assessment documentation. Identification of general emergency situations is contained within the site emergency management systems and is considered as pre-requisite controls.

Necessary controls and procedures shall be designed and implemented to eliminate or minimise the risk of emergency scenarios and the resultant risk of pollution.


## 5.0 CHECKING AND CORRECTIVE ACTION AND MANAGEMENT REVIEW

### 5.1 Monitoring and Measurement

As set out in procedure EN013, the Company will monitor and / or measure legal compliance, all significant impacts and performance against environmental objectives and targets. Documented schedules, procedures and associated record-keeping provisions, will be devised and implemented for all monitoring, testing and audit activities.

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The Company shall ensure that all environmentally critical measurement / monitoring procedures provide accurate and timely information. Specific provisions relating to the accuracy and calibration of monitoring and test equipment include:

- The use of properly calibrated testing / monitoring equipment, registered on site;
- Frequency of calibration will be based on the criticality and purpose of the monitoring / measurement being undertaken and knowledge of any drift or inaccuracies of the measurement equipment over time;
- Calibration will be against a known standard that can be traced to a National Standard;
- All calibration procedures and results will be recorded, with details of actual readings shown; and
- All laboratories and test procedures will be accredited to the necessary 3<sup>rd</sup> Party Accreditation Standard.

## 5.2 Evaluation of Compliance

The Company will formally assess its compliance status against relevant legislation and other standards to which it subscribes on an annual basis, as a minimum.

## 5.3 Non-conformity, Corrective, and Preventive Action

As set out in procedure EN014, all non-conformances against prescribed environmental standards, including statutory notices, audit observations and procedural compliance, shall be investigated by a competent person. This shall include establishing responses to mitigate environmental impacts and initiating corrective or preventative action.

Non-conformances and their corrective actions shall be documented on appropriate records.

Periodic management reviews of non-conformances and their associated corrective action status shall be undertaken as part of the EMS performance review processes.


A system shall be maintained to record and investigate all complaints and, where these are justified, to devise and implement solutions to minimise the impact or recurrence of any issue.

Complaints may be recorded as non-conformances, to ensure appropriate follow up is undertaken.

## 5.4 Internal Audit

A documented schedule of internal audits shall be carried out by competent auditors to determine the currency, accuracy, effectiveness and compliance status of the EMS, to:

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- Determine that the EMS conforms to planned arrangements for complying with necessary legal and company environmental standards;
- Ensure that the EMS has been properly implemented and maintained;
- Ensure that observations from audits are reported to relevant management and staff to ensure that compliance is maintained; and
- Ensure that non-conformances are addressed in a proper, timely manner to restore compliance and minimize environmental impacts.

Environmental performance indicators may also be incorporated in other inspections and audits within the site for ease of completion, consistency and additional reinforcement of environmental standards and improvement opportunities.

## 6.0 MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

A management review will be undertaken annually to assess performance of the EMS, and to drive the process of continual improvement. This review will involve senior site management and will include the assessment of the following criteria:

- Environmental performance - the extent to which targets / objectives have been achieved and the cause of any shortfalls;
- Results from audits, non-conformances and complaint history;
- The effectiveness and continuing suitability of the EMS in relation to performance, changing conditions, and information; and
- Stakeholder requirements and industry best practice information

Observations and conclusions, incorporating any action points, must be recorded and communicated to relevant parties for action within specified time-frames, followed up as appropriate to ensure completion.

**NOTE: THIS DOCUMENT IS UNCONTROLLED WHEN PRINTED – PLEASE CHECK THAT YOU ARE READING THE LATEST VERSION**

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