

Environmental Control | January 2023



Scope and Structure

All the activities undertaken as part of the Company's business are carried out in a controlled and legal manner, to ensure safety in operations, prevent damage and adverse environmental impacts. The management system structure allows us to meet and exceed the expectations of our customers and stakeholders, including regulatory authorities.

Veolia operates under an integrated management system that defines the business procedures, formulated to assist in meeting business objectives across the entire scope of Veolia's activities. The system is externally certified to ISO:14001 and therefore is subject to both internal and external audits to ensure compliance and to promote continual improvement. The Management System is an electronic platform, allowing widespread access across the business. The structure of the Management System revolves around Veolia Minimum Requirements and their associated toolkits, which are activity specific documents setting the minimum standards for Veolia locations that cover holistic risk.

In addition, there may be site specific procedures and working instructions which are maintained at site level, which can include matrices that demonstrate implementation of the management system.

All business representatives within Veolia work closely together to ensure that the information reflects a standardised and coordinated Veolia approach to the way we do business. Documents are regularly reviewed and communicated to employees and stakeholders.

Veolia is externally certificated to ISO 9001, ISO 14001, ISO 45001 and ISO 22301 and Competence Management System (CMS) by Lloyds Register who routinely audit a sample of sites to check compliance and adherence to the standards.

Certification details

Standard	Certification Number	Date of issue	Expiry Date
ISO 14001:2015 ISO 9001:2015 ISO 45001:2018 ISO 50001:2011 ISO 22301:2012 SSIP	10349301	1st April 2021	31st March 2024
Competence Management System - compost sites operating under an environmental permit	10405494	11th October 2021	10th October 2024

Environmental Aspects and Impacts

Veolia has a documented procedure to identify the operation's activities carried out on site, evaluate environmental aspects and impacts, and manage and minimise these where possible. Normal and abnormal operating conditions are considered, as well as direct and indirect aspects, incidents, potential emergency situations, and past, current and planned activities. Sites are required to review this annually or after any significant operational changes and amend accordingly.





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Objectives and Targets

Procedures are in place for the management, identification and review of objectives and targets. Sites are responsible for ensuring that specific targets are set, which both drive continual improvement on a site basis and contribute to overall strategic objectives.

Training and Competence

Veolia has a dedicated people development department that offers a wide range of training across the business, including Environmental Awareness and Environmental Permitting courses to enable managers and supervisors to responsibly manage sites in line with company procedures and legal requirements. COTC courses and refreshers are also offered to ensure technical competency standards are maintained. Further site based training is offered in the form of environmental updates examples include spill response, EWC codes and Hazardous waste changes.

Most permitted activities now operate under CMS and have transitioned away from CoTC to demonstrate technical competence.activities are now

All new staff are subject to a company induction which provides them with the tools to carry out their roles in a safe and competent manner

Reporting

Veolia uses AVA to monitor the environmental performance of sites and contracts. AVA enables trends to be identified and the appropriate action to be taken to mitigate and minimise environment related issues.

AVA is an internet based reporting system. This web-based tool allows all environmental accidents, incidents and near-misses to be reported by any user. There is also a function that allows for the reporting of any communication from an enforcing authority such as the Environment Agency including CAR reports. The system assigns an accountable person to take actions, in order to ensure continual improvement and appropriate controls are put in place.

Annual reporting is completed using our company wide global report, which contributes to the tracking and monitoring of our environmental and operational attributes.

Legislation

Veolia regularly reviews current legislation with industry groups, trade associations (ESA, CIA, and CIWM), regulatory bodies and internal staff to ensure that we are abreast of and implement appropriately any new legislative requirements that would affect our operations and our clients. This enables the review of new legislation, raising awareness and coordinating responses on draft legislation and consultations.

Veolia subscribes to CEDREC and Pegasus, a specialist organisation who translate complex laws into plain English for England, Wales, Scotland and Northern Ireland, providing expert relevant information that covers both Health & Safety





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and Environmental legislation. CEDREC's team of expert legal authors are able to provide a combination of legal expertise and practical experience thus offering a succinct overview of any relevant piece of legislation.

On an annual basis, permitted sites will undertake permit audits to ensure full compliance to the conditions thereof. In addition, all locations will undertake an Other Legal Requirements audit to ensure that legislative requirements are met.

Auditing

The Head of Assurance has the overall responsibilities for the auditing programme across Veolia, in order to ensure that all parts of the management system, quality, health and safety and environment are evaluated in terms of their adequacy and effectiveness and its compliance with legislation and regulatory requirements. The frequency undertaken in accordance with Veolia minimum requirements. Each year the head of assurance determines and agrees with the external certification body the program of surveillance audits.

Audit reports and associated tasks are logged onto our audit database (AVA) and notified to the relevant managers with a timescale for closure. Evidence is required from the site managers for these tasks to be closed out by the auditor in a timely manner. Audit findings are analysed by Managers in order to detect and eliminate potential causes of non-conformances and thus prevent recurrence, wherever possible.

Analysis of the audit findings are included in the agenda for each Site Management Review. All audit findings that have an impact on the integrity of the Management System are included in the agenda of the Corporate Management Review. All managers must implement any changes to local procedures or other documents found to be necessary as a result of audit findings.

Veolia sites are also subject to external audits from our certification body, Veolia's parent company, Regulators (e.g. HSE and Environment Agency) and customers.

Climate Change Adaptation

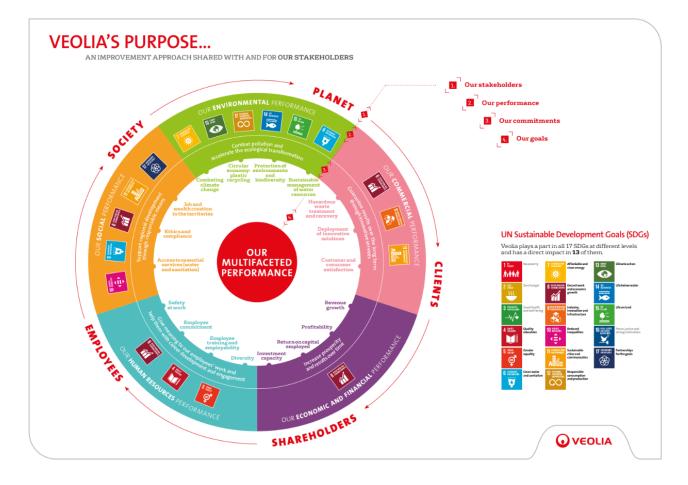
Climate change adaptation is at the heart of Veolia's core values through our approach to the group's ambition of ecological transformation. As well as this, our response to climate change is covered within our multifaceted performance strategy aligning our operations to UN sustainability goals.





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You will note in the planet segment, there is reference to climate change which encompasses both adaptation to climate change effects, but also helping reduce the impacts of climate change for our stakeholders. Lastly, our commitment to change adaptation is reinforced through our Environmental Sustainability and Environmental Policy Statement, which is endorsed at board level in the UK&I.

More widely, our head office team in Paris is to integrate prospective physical risk management into our risk management system; which includes climate risk as a focus for 2023 Our progress made over 2022 was described in the Universal Registration Document 2022.

At a site level, each will complete a specific site risk assessment, which will be in place prior to April 2024.

