

Environmental management **policy**



How we address regulations, waste reduction and resource use to continuously improve our environmental performance.



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1. INTRODUCTION

1.1 Definitions

Employees	All staff, contractors, consultants and temporary workers of the Pacific Energy group of companies (Group).
Manager	An individual employee's direct supervisor/manager
CEO	Chief Executive Officer
Environmental Emergency	Any event that causes or has the potential to cause material harm to the environment.

1.2 General Statement of Policy

Environmental legislation states that the Group has an obligation to provide a safe working environment for all employees. Management is committed to understanding and minimising any adverse environmental impact resulting from its activities, while continuing to meet client expectations of quality and service, and providing a safe working environment for employees.

We believe that all employees and parties associated with the Group have an important role to play in achieving our environmental goals and therefore encourage concern and respect for the environment – each person has a degree of responsibility for environmental performance.

The Group will strive for compliance with all applicable environmental laws and regulations and, where no specific regulation exists, will adopt responsible standards in keeping with community expectations.

The Group will conduct its business with a commitment to protecting the quality of the environment. The Group will strive for continual improvement of its environmental performance through systematic management practice.

1.3 Purpose

The purpose of the policy is to ensure, as far as is reasonably practicable, that all employees of the Group take an active role in examining their environmental practices, and then determine how their impacts should be best be managed using creative and relevant solutions.

The Environmental Management Policy can assist the Group to both improve its environmental performance, and enhance its business efficiency, while ensuring that its performance within regulatory requirements.

The Group will use this Environmental Management Policy to:

- Minimise environmental liabilities
- Maximise the efficient use of resources
- Reduce waste
- Demonstrate a good corporate image
- Build awareness and knowledge of environmental concern among employees

- Gain a better understanding of the environmental impacts of business activities
- Increase profit by improving environmental performance through more efficient operations

1.4 Scope

This policy applies to all staff, contractors, consultants and temporary workers of the Group.

1.5 Enquires and Faults

Adherence to this policy will generally ensure compliance with the requirements of the Group and relevant legislation. However, there may be instances where inadvertent breaches could occur when in doubt, employees requiring assistance with interpretation of this policy, or who wish to report a breach of this policy, should contact the Group CEO.

2. POLICY

2.1 Policy Statements

The Group:

- commits to establishing and maintaining a formal environmental management system in accordance with this policy;
- will communicate the Environmental Management Policy to all staff, contractors, consultants, temporary workers, visitors, technicians and clients;
- will continually improve its business performance and conduct its operations in an environmentally responsible manner, clearly reflecting a commitment to fostering the sustainable use of Earth's resources;
- is committed to waste avoidance, waste reduction, reuse and recycling;
- aims to reduce its consumption of material and energy and to implement environmentally sound waste management practices. This includes eliminating unnecessary energy use, pursuing a program of energy conservation, and reviewing water usage;
- is committed to reuse materials wherever practicable;
- will promote schemes for the collection of materials appropriate or recycling;
- will seek to dispose of waste in environmentally acceptable ways, and will use any funds thereby generated to support environmental research;
- will distribute information in the most environmentally acceptable ways, and will use any funds thereby generated to support environmental research; and
- will distribute information in the most environmentally friendly manner possible.

2.2 Policy Objectives

Through implementation of this policy, the Group will:

- Incorporate environmental better practice into core business plans and management processes.
- Incorporate environmental better practice into all technological solutions, and the fit out and operation of offices and work sites.

- Minimise negative impacts we may have on the environment, through efficient use of resources, viable recycling strategies and reduction in emissions and waste.
- Schedule and conduct regular environmental audits of all operations to ensure waste and pollution are minimised or (where possible) prevented.
- Establish and maintain a commitment to continually improve environmental management. Specific objectives in relation to environmental performance will be set and regularly reviewed by management through established communication procedures.
- Cooperate with relevant authorities to ensure that applicable licences, approvals and permits are current
- Ensure adequate environmental assessment is undertaken in relation to new projects, asset purchases, sales and existing operations.
- Foster the initiation and ownership of environmental activities by all employees, thereby creating a strong, environmentally aware business culture.
- Encourage and equip employees and contractors with information that provides them with the opportunities to minimise environmental impact
- Inform and educate each employee or contractor of their accountability to control or minimise environmental impacts in relation to their duties.
- Ensure we work closely with our clients, suppliers, local communities, and other interested parties to continually improve our processes in environmental better practices.

2.3 Roles and Responsibilities

2.3.1 Group CEO

The Group CEO is ultimately responsible for ensuring that the Group adheres to its obligations within the law and within the confines of the desired parameters of AS/NZS ISO 14001.

The Group CEO will ensure that adequate resources are made available to meet environmental management aims and objectives to implement this policy, and that all levels of management are given the responsibilities and authority to ensure its success.

The Group CEO will ensure that all levels of management are responsible for the successful implementation of environmental policy and programs for which they have control.

2.3.2 Manager

Managers and Supervisors are responsible for the health and safety of employees and for members of the public, clients and other employees who are in their area of operation. In the area of environmental management, as with Occupational Health and Safety, the strongest message that can be sent to employees is when managers lead by example. This includes:

- Encouraging a positive workplace culture which includes environmentally friendly practices.
- Day to Day management of environmental issues within their area of responsibility.
- Ensuring all employees are given the opportunity to undertake environmental awareness training.
- Ensuring that agreed systems for consultation regarding all environmental issues are followed.

2.3.3 Employees

Employees will take reasonable care to:

- Undergo environmental awareness training as required by employer.
- Follow environmentally friendly work practices report environmental hazards in the workplace and make recommendations to management on how to reduce the level of risk.
- Avoid adversely affecting their own health and safety or the health and safety of others at work through any environmentally dangerous act.
- Comply with any reasonable instruction from an employer in relation to environmental management at work.
- Report environmental accidents and 'near miss' incidents to their manager as soon as is practicably possible after the event.
- Actively support the consultation process.

3. ENVIRONMENTAL MANAGEMENT

3.1 Approval and Licensing Requirements

The Group will ensure that it makes every effort to identify (through the environmental auditing and monitoring process) any legislation relevant to its activities. Where such legislation requires that permits or licences are to be obtained, the Group shall ensure that this is carried out within the legislative and regulatory framework.

3.2 Reporting

The Group will ensure that reporting requirements will be met under its requirements for implementation, monitoring and review of its Environmental Management Policy. Such as reporting will include:

- Monitoring (general and project specific)
- Non-compliance
- Corrective action
- Complaints management
- Auditing
- Pre-operational compliance
- Reports required by government agencies

Within the reporting framework, personnel responsible for such activities will be notified of their responsibilities, communication protocols, distribution of information, frequency of communication and document control procedures, with an emphasis on support to ensure the system is to the benefit of all.

3.3 Environmental Training

The Group employees will undergo general environmental awareness training to ensure they are aware of their obligations and responsibilities under the company's Environmental Management Policy.

Such training will (where applicable) include:

- Site induction.
- Familiarisation with the requirements of the policy.
- Familiarisation with the environmental controls.
- Targeted environmental training for specific tasks.

The requirement for additional or revised training will be identified and implemented through the monitoring and review system. Training records will be maintained throughout the process.

3.4 Emergency Contacts and Response

The Group will ensure that all employees are aware of a contact person for emergencies. An environmental emergency is any event that causes or has the potential to cause material harm to the environment. The procedures for this will include:

- Names and contact details for emergency personnel.
- Response personnel responsibilities.
- Contact details for emergency services (ambulance, fire brigade, spill clean-up services).
- The location of on-site information on hazardous materials, including Material Safety Data Sheets (MSDS) and spill containment materials.
- Instructions for the minimisation of damage when controlling and environmental emergency.
- Instructions and contact details for notifying relevant agencies or authorities.

4. IMPLEMENTATION

4.1 Risk/Environmental Impact Assessment

Types and levels of risk assessment vary, depending upon whether tasks are part of normal operations or are more site-specific. For general operations, an ongoing Environmental Impact Assessment shall be carried out on a regular basis, to ensure that new machinery or business practices take environmental risk into account. For site-specific work, each site shall undergo an Environmental Impact Assessment to ensure that operations on that site are compliant with local legislation and a site-specific Environmental Management Site Safety Plan will be prepared, where necessary.

4.2 Objectives and Targets

Environmental objectives and targets will be derived from consideration of the following:

- Initial Environmental Risk/Environmental Impact Assessment.
- Management review and environmental auditing.
- Environmental incidents.
- Relevant legislative and regulatory requirements.
- The Group Policies.
- The Environmental Impacts Register.
- Financial, operational and business requirements.
- The view of relevant interested parties.

4.3 Environmental Control Plans and Maps

As appropriate, control plans and maps will be formulated as an aid in the identification of areas of risk and/or incidents. Such plans and maps will form part of site-specific and general Group information.

5. MONITORING AND REVIEW

5.1 Environmental Monitoring

By means of regular management review of objectives and targets, the Group will ensure that a process of continual improvement is achieved. Improvements are to be aimed firstly at those areas where the environmental risk is greatest and, where possible, such improvements are to be quantified to enable clear monitoring of results. Measurements of improvements will, where possible, also include an analysis of cost benefits, cost justification and ramifications.

5.2 Possible Adverse Effects on Other Areas

When setting objectives and targets, the Group will consider the possible effects on other areas. Should there be a possibility of any adverse impacts on other areas, employees or persons responsible for those areas are to be included in discussions and in the decision-making process.

5.3 Corrective Action

The Group will take corrective action where applicable as a result of the above process.

5.4 Environmental Management Policy Review

Environmental Management Policy and Procedures will be reviewed in line with the Group Policy review system (see clause 7.2).

6. GENERAL ENVIRONMENTAL GOALS

As well as those environmental impacts that will be identified as a result of the Environmental Impact Risk Assessment, the Group's general environmental goals revolve around the subject of waste minimisation.

A waste management strategy for the company's administrative operations has been formulated and implementation/reinforcement is an ongoing process as follows:

GOALS	STRATEGY	PERFORMANCE INDICATOR
Minimisation of waste disposal through use of a recycling process	<ul style="list-style-type: none"> - Workplace segregation of recyclables - Reuse equipment and furniture 	<ul style="list-style-type: none"> - Reduction in waste disposal and collection - Larger quantities of recyclables collected
Reduce stationery needs	<ul style="list-style-type: none"> - Continued review of stationery needs and applications 	<ul style="list-style-type: none"> - A cost saving in the purchasing of stationery and consumables
Reduce water, electrical, gas and other fuel consumption	<ul style="list-style-type: none"> - Reduce water consumption in all areas of business - Reduce the use of power in idle machinery and equipment - Reduce the use of emissions in active vehicles, machinery and equipment - Consider carbon offset measures - Build energy and water efficiencies into new projects 	<ul style="list-style-type: none"> - A cost saving in water and renewable power bills (electricity, gas, petrol, diesel) - Marketing advantage: Corporate responsibility is becoming a vital ingredient for business success.

7. POLICY IMPLEMENTATION

This policy is to be implemented through the procedures and arrangements established under the Group Environmental Management Program.

7.1 Breach of this Policy

Breach of this policy could harm the Group's ability to achieve environmental obligations. Failure to comply with the principles of this policy, or of the support procedures and forms, could result in appropriate disciplinary actions. Additionally, individuals may be subject to loss of Group access and privileges.

7.2 Policy Review

The CEO will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

This policy will be reviewed annually by 20 December.

7.3 Dissemination of Policy

A copy of this policy will be provided to each employee upon commencement of employment and additional copies will be made available upon request.

7.4 Related Documents

7.4.1 Forms

- (i) EM – Environmental Management Process

7.4.2 Legislation

- (i) Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)
- (ii) Environmental Protection Act 1986
- (iii) Environment Protection and Biodiversity Conservation Regulations 2000 (Commonwealth)
- (iv) AS/NZS ISO 14001:2016 Environmental management system - Requirements with guidance for use (ISO 14001:2016)



Jamie Cullen
Group CEO

18 December 2023

8. ELECTRONIC APPROVAL RECORD

DATE OF AUTHOR	AUTHOR ROLE	NAME
30/11/2017	HR Services Manager	Mandy Macaskill
DATE OF REVIEW	REVIEWER ROLE	NAME
18/12/2023	Chief People, Culture & Sustainability Officer	Kaye Butler
DATE OF APPROVAL	APPROVER ROLE	NAME
18/12/2023	Chief Executive Officer & Managing Director	Jamie Cullen

9. DOCUMENT AMENDMENT RECORD

DATE OF CHANGE	REVISION	CHANGE EFFECTED
Unknown	1.0	New document.
08/04/2015	2.0	Formatting
11/04/2017	3.0	Review and Update
30/11/2017	4.0	Updated.
07/10/2020	5.0	Updated.
22/06/2022	6.0	Document numbered and formatting
15/12/2021	7.0	Approved.
20/12/2022	8.0	Approved.
18/12/2023	9.0	Approved.
23/01/2024	10.0	Updated cover page.