



SEMCO
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Environmental Policy

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1.0 Purpose and Scope

This policy sets out how SEMCO manages its environmental impact and the responsibilities of everyone working for or on behalf of SEMCO.

SEMCO recognises that its activities affect the environment through the use of materials and energy, transport, waste generation and emissions associated with modular manufacture, delivery and installation. SEMCO is committed to preventing pollution, protecting the environment and continually improving its environmental performance across its operations and supply chain.

This policy applies to all employees, directors, agency workers, temporary workers, contractors and subcontractors, and to all sites and operations under SEMCO's control, including the Avis Way factory, offices, storage, delivery and installation activities and construction site works.

SEMCO holds ISO 14001 certification. The environmental management system operates within the framework of the BMS Manual the Legal Register and the Aspects and Impacts Register.

2.0 Our Commitments

SEMCO will:

- Comply with environmental legislation, planning conditions and client requirements, and demonstrate compliance through records, inspections and corrective action
- Prevent pollution and minimise environmental harm, implementing controls to avoid spill, contamination, dust and noise and unnecessary emissions, and respond rapidly to incidents
- Apply the waste hierarchy — prevent, reduce, reuse, recycle, recover, dispose — and plan works to reduce material waste, packaging and rework
- Monitor energy and fuel consumption, improve efficiency, and prefer lower-carbon options
- Aim to use responsibly sourced and lower-impact materials, and work with suppliers to reduce embodied carbon, packaging and transport impacts
- Protect local environments and biodiversity, taking proportionate measures to protect habitats, manage site runoff and avoid harm to wildlife, trees and waterways
- Provide segregated waste streams, use licensed waste carriers, and retain duty of care documentation as evidence
- Ensure staff and relevant subcontractors understand their environmental responsibilities, site controls and reporting requirements
- Set objectives, track performance, investigate nonconformities and implement corrective and preventive action

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3.0 Environmental Objectives

Objectives are set by the Board, reviewed at every Management Review and updated annually. The current objectives are:

Objective	Measure
Carbon neutral construction by 2030	Scope 1 and 2 operations certified carbon neutral by third-party verification, including reduction and offset. Energy use and business travel measured monthly
Reduce factory material waste	Percentage of material waste against material purchased, reported monthly
Maintain diversion of waste from landfill	Percentage of waste diverted from landfill, evidenced by waste transfer notes
Reduce energy consumption at Avis Way	Consumption per unit of output, reported monthly from supplier data
Zero environmental incidents	Reportable environmental incidents in any 12-month period, target zero

Progress is reported at every Management Review. Where an objective is not on track, a corrective action is raised and tracked to close-out.

4.0 Environmental Aspects and Impacts

SEMCO maintains an Aspects and Impacts Register identifying the environmental aspects of its activities, the associated impacts, their significance, and the controls applied. It is reviewed at least annually and whenever activities, materials or legislation change. The most significant aspects are:

- Use of raw materials, including timber, steel, insulation and finishes, and the embodied carbon associated with them
- Production waste and offcuts
- Energy consumption at the factory and offices
- Fuel use by plant, forklifts, vehicles and module transport
- Use and storage of hazardous substances, including adhesives, sealants and solvents
- Noise, dust and nuisance affecting neighbours at Avis Way and on site
- Ground disturbance, runoff and biodiversity impacts during site works
- Design decisions determining lifecycle carbon and end-of-life outcomes
- Climate-related risks including flooding, overheating, severe weather and supply chain disruption
- Food waste

5.0 Operational Controls

5.1 Waste

- Waste is segregated at source in the factory and in site compounds, into labelled streams
- Waste is transferred only to authorised carriers and facilities. Carrier registration is verified before appointment and re-checked periodically
- Waste transfer notes and, for hazardous waste, consignment notes are completed for every movement and retained in ArchDesk
- Hazardous waste streams are identified, stored separately in suitable labelled containers, and disposed of through approved routes
- Offcuts are reused wherever practicable, and material ordering is planned to reduce waste at source – Offtake partners are sourced wherever possible

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5.2 Pollution Prevention

- Fuels, oils, adhesives and solvents are stored in designated areas and kept secure
- Spill kits are provided at the factory, on sites and in vehicles carrying fuels or chemicals
- Any spill is contained immediately, cleaned up, and reported as an environmental incident

5.3 Nuisance

- Working hours are controlled, and neighbours are notified in advance of particularly noisy operations
- Dust suppression measures are applied during site works, and roads and compounds are kept clean
- External lighting is directed and controlled to limit light spill
- Complaints from neighbours or the public are recorded, investigated and responded to, and reported at Management Review

5.4 Energy, Transport and Carbon

- Energy use is monitored monthly, and equipment is shut down when not in use
- Deliveries are consolidated and routes planned to reduce mileage; idling is avoided
- Module transport is planned to minimise abortive movements
- Lower-emission plant and vehicles are preferred at the point of replacement

5.5 Procurement and Design

- Timber is sourced with evidence of legal harvesting, and FSC or PEFC certified material is preferred, with due diligence records retained
- Suppliers are assessed for environmental performance at pre-qualification, and environmental obligations are included in subcontract terms
- Design decisions consider lifecycle performance, durability, embodied carbon and end-of-life reuse, and are reviewed through the Mission Control gate process
- Packaging is minimised and take-back schemes used where available

6.0 Site Environmental Management

Before work starts on any site, the site-specific environmental requirements are reviewed and implemented in the Site Management Plan meeting — planning conditions, permits, ecological constraints, drainage consents, protected species and client requirements — and included in the construction phase plan, method statements and site induction. Compliance is monitored through site inspections and project reviews.

7.0 Environmental Incidents and Emergencies

Any spill, discharge, pollution incident, or complaint of nuisance must be reported to the Site Manager or Production Manager immediately, and to the CEO the same day.

- Stop the activity and contain the release where it is safe to do so
- Prevent it entering a drain, watercourse or the ground
- Record what happened, when, what was released and how much
- The CEO and relevant Department Manager makes any notification required
- The incident is recorded, the root cause investigated, and corrective action agreed and tracked

Environmental emergencies are covered by the Business Continuity and Emergency Management Plan, which addresses spill, fire and flood response.

8.0 Supply Chain Expectations

Subcontractors and suppliers working for SEMCO must:

- Comply with environmental legislation and with SEMCO's site environmental controls
- Evidence lawful waste management arrangements, including transfer documentation
- Control dust, noise, emissions and pollution arising from their works in line with RAMS
- Manage hazardous substances and waste through approved routes
- Comply with ecological and planning constraints applicable to the site
- Report any environmental incident to the Site Manager immediately

9.0 Responsibilities

Role	Responsibility
CEO	Owner of this policy. Accountable for environmental performance, for the Aspects and Impacts Register and Legal Register, for objectives and resources, and for notifying the regulator where required
Production Manager	Waste segregation, storage and pollution prevention at Avis Way, energy and plant controls, and factory environmental inspections
Site Managers	Site-specific environmental controls, waste management, spill response, nuisance control and subcontractor compliance
Contracts Manager	Ensures environmental obligations are identified at mobilisation and included in subcontract terms
Technical Manager	Ensures design decisions reflect lifecycle performance, embodied carbon and material selection commitments
Procurement	Supplier environmental assessment, timber legality due diligence and approved waste contractor verification
All individuals	Follow environmental controls, segregate waste correctly, avoid unnecessary energy and material use, and report incidents and near misses immediately

10.0 Monitoring, Training and Review

Environmental performance is monitored through inspections, waste and energy data, incident and complaint records, internal audit and Management Review. All staff receive environmental awareness briefing at induction, and those in roles with specific environmental responsibilities receive additional training. Records are retained in ArchDesk.

11.0 Related Documents and Review

- Health and Safety Policy · Equipment Use Policy · Quality Policy · Company Vehicle Policy
- Aspects and Impacts Register · Legal Register · BMS Manual · SOP Manual
- Business Continuity and Emergency Management Plan · Carbon Reduction Plan

This policy is reviewed at least annually by the CEO and adopted by the Board and additionally following any environmental incident or change in legislation.