

[CONFIDENTIAL]

**Energy, Environment, Sustainability
& Waste Management (EESW) Policy
V1**

Owner – Group ESG

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INSPIRED THINKING GROUP

teamitg storyteq deployteq

Energy, Environment, Sustainability & Waste Management (EESW) Policy

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1 Introduction

ITG is an ISO14001, ISO50001 & Climate Partner Certified marketing technology business based in Birmingham, England. From our headquarters at Fort Dunlop, we supply digital and marketing support for UK and global businesses. We acknowledge that, as a marketing business, our direct operations contribute to emissions in the air, the use of energy and the generation of waste.

We recognise the importance of energy, environment, sustainability and waste management and the urgent need to protect and preserve our planet for future generations. This EESW policy outlines our commitment to minimise our environmental footprint and promote sustainable practices across all aspects of our operations. By adhering to this policy, we aim to contribute to a cleaner, greener, and more sustainable world.

2 Policy Statement

2.1 General Policy Statement & Aims of Policy

The objective of the EESW policy is to comply with all duties bestowed on ITG in accordance with the Environmental Protection Act 1990 and other relevant legislation.

The Company is committed to achieving energy, environment, sustainability, and waste management best practice throughout its business activities, wherever practicable. The Company recognises that economic growth and development, and a healthy environment, must be closely linked.

Environmental protection and sustainable development are responsibilities that government, business, communities, and individuals should strive towards. Where possible, energy and environmental management issues will be integrated with health and safety and other operational systems, in line with the overall business objectives of ITG.

ITG is aware of its energy, environment, sustainability, and waste management responsibilities, and is committed to the promotion of, and compliance with, environmental best practice, and to help contribute to a better quality of life for everyone, both current and future generations. This will be achieved by:

- Minimising our consumption of water, energy, and raw materials by implementing conservation measures throughout our operations. This includes efficient use of

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resources, recycling and reuse initiatives, and the promotion of sustainable procurement practices.


- Adopting responsible waste management practices throughout our operations. This includes implementing waste reduction strategies, promoting reuse and recycling and ensuring proper disposal of hazardous waste whenever applicable. We will strive to minimise waste sent to landfill and explore innovative solutions for waste management and recycling.
- Considering the effects our activities may have on the environment and minimising the environmental impact of work activities that are environmentally significant.
- Raising awareness about energy, environment, sustainability, and waste management issues and providing education and training opportunities to our employees, contractors, and stakeholders. We will promote energy, environment, sustainability, and waste management consciousness, encourage responsible behaviour, and empower individuals to make sustainable choices both at work and in their personal lives.
- Striving to prevent pollution by implementing measures that minimise or eliminate the generation of waste, emissions, and pollutants. This includes adopting technologies, practices, and materials that are environmentally friendly, energy-efficient, and sustainable.
- Identifying and reducing greenhouse gas emissions across our operations as part of our commitment to addressing climate change,. We will set measurable targets to reduce our carbon footprint which can be demonstrated by our climate-partner-certified-company status, for which further info can be found [here](#), and that we are also CDP respondents.
- Actively exploring renewable energy sources, energy efficiency measures, and promoting sustainable transportation options – This is demonstrated by the fact all UK sites are now powered by 100% renewable electricity sources as of Q3 2023 for which certificates are available upon request.
- Recognising the importance of preserving biodiversity and protecting ecosystems. We will take measures to minimise our impact on natural habitats and ecosystems, both within and beyond our operational areas. We will support initiatives that conserve biodiversity, promote sustainable land use, and protect

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endangered species, as demonstrated by the ITG Impact forest where we have planted 1 million trees, and for which further information can be found [here](#).

- Considering opportunities to make a positive contribution to the environment and sustainability in all activities.
- Reducing the impact of our activities on adjacent businesses and residents and behaving as a 'good neighbour'.
- Encouraging active participation from company staff at all levels in improving energy, environment, sustainability, and waste management performance.
- Minimising the environmental impact, for the life cycle (including disposal), of plant, equipment, and all physical assets under the control of ITG.
- Striving to improve our economic, environmental, and social performance (ESG), and integrating environmental and social factors in our management systems and programmes, and in our commercial decisions.
- Meeting the minimum requirements of relevant rules and regulations and exceeding them where practicable.
- Setting clearly defined objectives and targets addressing our energy, environment, sustainability, and waste management issues through internal and independent external reviews.
- Undertaking open dialogue on our energy, environment, sustainability and waste management programmes with our staff, customers, and other stakeholders.
- Working constructively with organisations that represent communities, society, and the environment.
- Regularly monitoring and reviewing our energy, environment, sustainability and waste management performance to identify areas for improvement. We will set targets, measure progress, and implement corrective actions to ensure the effectiveness of our energy & environmental management system. We will engage with stakeholders, seek feedback, and incorporate best practices to continually enhance our performance.

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Signed:	Date: 29/09/2023
	
Simon Ward ITG Group CEO	

2.2 Scope of Policy

This policy applies to all activities carried out by ITG employees at all sites.

3 Responsibilities

3.1 CEO & Director Responsibilities

CEO & Director Responsibilities include:

- Accepting, formally and publicly, their role in providing energy, environment, sustainability & waste management leadership in their organisation.
- Ensuring that all decisions reflect energy, environment, sustainability & waste management intentions, as articulated in the energy, environment, sustainability & waste management policy.
- Recognition of their role in engaging the active participation of their staff in improving energy, environment, sustainability & waste management performance.
- Ensuring that they are kept informed of, and alert to, relevant environment & sustainability risk management issues.
- Nominating a 'competent' individual under their control, to carry out the role of Health, Safety & CSR Manager to be responsible for day-to-day energy, environment, sustainability & waste management.
- Ensuring adequate resource is available with regard to energy, environment, sustainability & waste management.

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- Responding to all reasonable requests with regard to disclosing energy, environment, sustainability & waste management information relating to the business.
- Ensuring the Company has a comprehensive, up to date, energy, environment, sustainability & waste management policy that meets statutory obligations.
- Ensuring that policies contain a demonstration of their personal commitments by inclusion of a signed and dated policy.
- Reviewing the policies to ensure that they remain comprehensive, relevant, and up to date.
- Assigning duties to key personnel to apply the policies throughout the Company.

3.2 Health, Safety & CSR Manager Responsibilities

Health, Safety & CSR Manager responsibilities include:

- Working closely on a day-to-day basis with the operational/senior management teams. They will bring to the Health, Safety & CSR Manager's attention significant areas where appropriate action needs to be taken and recorded.
- Carrying out periodic health, safety, energy and environmental inspections and risk assessments, and discussing any matters which arise with relevant persons.
- Assisting with the development and implementation of risk/impact assessments, codes of practice, work instructions or any safe systems of work.
- Assisting with the delivery of training where necessary.
- Ensuring that any problems relating to energy, environment, sustainability, and waste management are dealt with by the relevant team members and in an adequate timeframe.
- Ensuring that energy, environment, sustainability, and waste management issues are part of the agenda and discussed at ESG (Environment, Social & Governance) committee meetings.
- Executive powers to stop all necessary operations, and to withdraw plant and equipment from site if there is imminent risk towards the environment, and immediately inform the appropriate CEO, Director, or Senior Manager.

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- To investigate and produce reports on all environmental incidents. To make recommendations to prevent recurrence and inform the appropriate CEO, Director, or Senior Manager as soon as possible.
- Liaising with representatives of the Local Environmental Agency and bringing to the attention of the CEO, Directors or Senior Managers issues that may affect the company's activities.
- Undertaking regular reviews of corporate activities and identifying potential aspects/impacts on energy, environment, sustainability, and waste management matters.
- Reviewing the objectives and statement of the energy, environment, sustainability, and waste management policy as necessary with the management team.
- Ensuring that the principles of the waste management hierarchy are followed at all times where practicable.
- Ensuring adequate waste receptacles are in place at all sites, for the correct separation of waste types as applicable to each site.
- Ensuring waste-related documentation is maintained and that all waste that is removed from the site is handled by appropriately licensed waste contractors.

3.3 Employee Responsibilities

Employee Responsibilities include:

- To complete, implement and follow all training regarding energy, environment, sustainability, and waste management matters provided by the company.
- To develop a personal concern for the energy, environment, sustainability, and waste management.
- To report any concerns relating to energy, environment, sustainability, and waste management matters to their line manager and/or the Health, Safety & CSR Manager.
- To co-operate on all matters relating to energy, environment, sustainability, and waste management.

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- To raise opportunities for improvement regarding energy, environment, sustainability, and waste management matters to line managers and/or the Health, Safety & CSR Manager.
- Dispose of waste into the correct waste channels.

4 Objectives & Targets

4.1 Objectives

During 2023/24, ITG aims to:

- Set GHG reduction targets that are science based.
- Conclude all recommendations where practicable that are highlighted by independent third-party organisations such as ESOS, Ecovadis, etc.
- Promote the uptake of the company provided hybrid/electric vehicle salary sacrifice scheme.
- Promote uptake of the company provided cycle-to-work scheme.
- Improve Ecovadis rating against the previous assessment.
- Reduce energy consumption by introducing initiatives such as LED lighting installation programmes, and by adjusting the operational hours of air handling systems.
- Provide and mandate environmental/sustainability training to employees.
- Look to increase sites powered by renewable sources.
- Investigate tracking of office consumable consumption.
- Investigate system or process for enabling selection of ICT equipment based on its sustainability score.
- Reduce general waste generation and promote waste reuse and recycling.

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4.2 Targets

To achieve our aims, we have set ourselves the following targets for 2023/24:

- Reduce energy consumption by 2% by Q2 2024.
- Increase year-on-year uptake of hybrid/electric car through the salary sacrifice programme by 1%.
- Increase year-on-year uptake of cycle-to-work scheme by 1%.
- Achieve an Ecovadis score of 74 or higher.
- 80% of sites to be powered from renewable sources by 2025 and 100% by 2030.
- 80% of employees to have conducted mandatory environmental & sustainability training by the end of 2024.
- Create initial ESG/Sustainability report and publish on company website.
- Reduce general waste generation by 1%.

5 Energy Management

5.1 Overview

ITG, as part of its Environmental, Social and Governance (ESG) framework must consider energy management and its consumption in all business operations and services it delivers to clients and that of any suppliers it may use.

This policy aims to lay down the basis of the group Energy Management System (EnMS) and what the objectives and scope are across the group and all office locations.

ITG will incorporate the Plan-Do-Check-Act (PDCA) Cycle in order to form the basis for the EnMS as described within ISO 50001.

- **Plan:** understand the context of the organisation, establish an energy policy and an energy management team, consider actions to address risks and opportunities, conduct an energy review, identify significant energy uses (SEUs) and establish energy performance indicators (EnPIs), energy baseline(s) (EnBs), objectives and energy targets, and action plans necessary to deliver results that will improve energy performance in accordance with the organisation's energy policy.

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- **Do:** implement the action plans, operational and maintenance controls, and communication, ensure competence, and consider energy performance in design and procurement.
- **Check:** monitor, measure, analyse, evaluate, audit, and conduct management review(s) of energy performance and the EnMS.
- **Act:** take actions to address non-conformities and continually improve energy performance and the EnMS.

5.2 Purpose

The purpose of this policy and the EnMS is to define and measure energy performance across the group. Energy performance is a concept relating to energy efficiency, energy use and energy consumption.

Energy performance will be measured using energy performance indicators (EnPIs) and energy baselines (EnBs) that will enable ITG to demonstrate the workings and context of the EnMS.

The key objectives of the EnMS will be:

- Define how the EnMS will be delivered within the organisation and the scope of the system.
- Document and engage with key interested parties and stakeholders.
- Risk assess and treat any risks above tolerance.
- Ensure top management approve objectives and are kept informed of progress and any potential risks.
- Define EnPIs and EnBs across the group.
- Identify and document any challenges that may restrict measurement of energy levels.
- Continually improve and maintain the groups EnMS and associated performance indicators.

5.3 Plan

5.3.1 Organisation

The scope and boundaries of the EnMS will focus on the key areas that are managed and measurable using the current system, this will primarily focus on the items listed below:

- Fort Dunlop, Birmingham
- London, 10 Bloomsbury Way
- Cowshed

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- Capture Studio, Tamworth
- Home working
- Commuting
- Business travel

This list is not exhaustive and will be continually extended as the measurement of energy performance grows.

The day-to-day management of the EnMS will be conducted by the Group Sustainability Manager and overseen by the Group ESG team lead.

5.3.2 Interested Parties

A log of identified interested parties can be found [here](#), detailing their needs and expectations with regards to the Energy Management system. ITG will endeavour to influence external interested parties and their energy usage in with the service provision offered.

The EnMS and the associated ISO 50001 certificate will be managed by the group ESG team and reported to top management.

Reporting will be conducted in line with the group risk management framework, reported on and documented annually with a select committee of ITG group board members.

Any reports and findings can be found here – [ITG Group ESG Hub](#)

The [Group Business Governance and Risk Management Framework](#), will use an asset-based risk-assessment framework to identify any risks, and measure any associated actions within a risk treatment plan.

The management of applicable legislation will be documented and referenced within the [Group Legal and Regulatory policy](#), this will also form part of the risk assessment criteria as part of the governance system and assessment

5.3.3 EnMS Measurements

The following measurements will be used in the EnMS to measure performance:

EnPI – Energy Performance Indicators will be measured in kWh (kilowatt hours).

EnB – Energy baselines will be established over a measurable annual review; analysis will be conducted to set baselines on static behaviour and relevant variables.

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SEU – Analysis based on the EnPI and EnB will be used to identify any significant energy usage (SEU) across the group.

Based on these measurements, an action plan will be established for each measurable area within the group to improve efficiency and energy performance.

5.4 Do

This section is about the instigation of the EnMS and establishing the framework that will allow for the measurement of energy performance, associated baselines and continual improvement, through documented action plans.

5.4.1 Action Plans

Action plans will be documented on the EnMS Monday.com board managed by the group sustainability manager.

They will be based on measurements and agreed objectives in order to drive continual improvement and efficiency.

5.4.2 Operational and Maintenance controls

The EnMS operations will be documented on the EnMS Monday.com board but with the principle of monitoring and reducing any SEU events or advancing efficiency.

5.4.3 Communication and Competence

Communications will be conducted through the ESG team, with documents and policies being stored and communicated to staff through the [Group ESG Hub](#)

Training will be delivered to stakeholders and interested parties as required, through the Group training platform and applicable courses.

5.4.4 Design and Procurement

The design of any new systems or frameworks will consider energy management. This will be part of the measurements in the future and be included in any future EnPI.

5.5 Check

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Checks will be conducted in the following way across the group, as part of the EnMS. All findings will be categorised in the following way:

Major Non-Conformity (Major) – The requirements of the EnMS have not been met and need to be addressed within 90 days.

Minor Non-Conformity (MNC) – The requirements of the EnMS have partially not been met and need to be addressed at the next possible opportunity.

Opportunity for Improvement (OFI) – There is an opportunity to improve compliance to the EnMS.

Internal audits – These will be conducted by the Sustainability Manager across all locations within scope to check performance indicators are accurate and energy performance variables are being established and monitored.

External Audits – Checks of the management system and the establishment of the EnMS across the group, in line with ISO 50001. All findings will be documented in the CAPA log and reported on to drive continual improvement.

External Measurements – External sources will be used to measure certain elements of energy performance and logged within the EnMS.

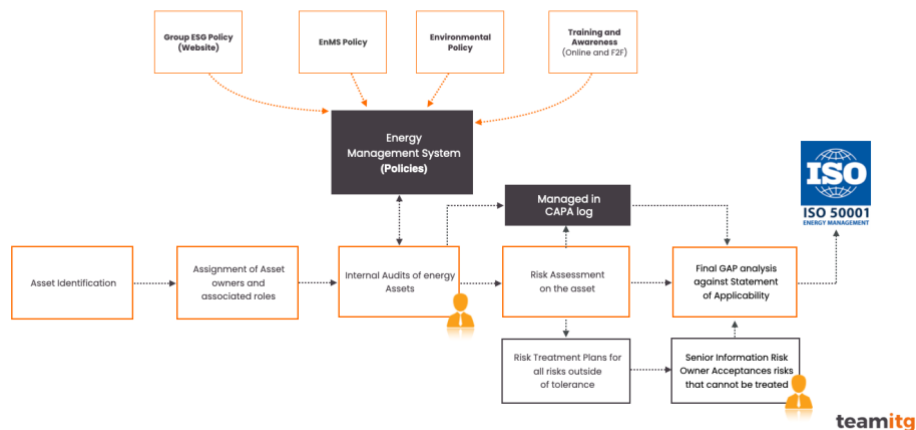
5.6 Act

This will be the continual improvement of the EnMS through the findings of internal audits and logged in the CAPA log which can be found [here](#).

Findings, risks, progress, and measurable variables will be reported annually to the group CFO and Procurement Director as part of the ESG reporting cycle and improvement plan. The following process will be followed in order ensure compliance annually:

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ISO 50001:2018 Certification Group Certification Process



6 Waste Management

6.1 Overview

Due to the varied activities Inspired Thinking Group (ITG) undertakes, a variety of waste types are produced. These range from general waste, recyclable waste and WEEE waste, through to small quantities of clinical and hazardous waste.

This policy sets down the framework for all waste management at ITG.

6.2 Purpose

ITG will apply a 'waste hierarchical approach', to reduce, reuse, recycle and recover waste products as a preference over the disposal of waste to landfill.

There is a legal requirement for all who produce, keep, or dispose of waste of any type to comply with the various regulations and the duty of care under Environmental Protection legislation. To ensure compliance the company will:

- Ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes to mitigate their effects.
- Minimise waste generation at source and facilitate repair, reuse, and recycling over the disposal of wastes, where it is deemed reasonably practicable.
- Provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management chain.
- Promote environmental awareness in order to increase and encourage waste minimisation, reuse, and recycling.
- Secure, where possible, revenue for recyclable material to reinvest into the expansion of recycling opportunities available to ITG.

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- Ensure the safe handling and storage of waste at all ITG sites.
- Provide appropriate training for employees on waste management issues.
- Promote industry waste management best practice.
- Appoint competent person(s) to provide waste management advice.

6.3 Waste Hierarchy

The hierarchy lists the different ways of dealing with waste in order of preference.

1. Reduce – Also known as waste minimisation, to reduce the amount of waste materials being produced.
2. Re-use – To continually re-use an item in order to eliminate the wasting of resources in making new items.
3. Recovery – Recycling. The collection and reprocessing of waste either into the same product or a different one. Composting – biological decomposition of organic material to create a soil conditioner. Energy – waste is incinerated, and the heat is recovered to generate energy.
4. Disposal – Waste is sent, untreated, to landfill.

7 Terms

General waste – Also called residual waste, is material that cannot be recycled. It includes materials such as non-recyclable plastics, polythene, some packaging, and kitchen scraps.

Recyclable Waste – These materials are recyclable and generally include paper, plastic, cans, and glass.

WEEE– Stands for Waste Electrical & Environmental Equipment. In broad terms, WEEE can be defined as most products that are battery- or plug-operated.

Clinical waste – Any waste which consists wholly or partly of:

- human or animal tissue
- blood or other body fluids
- excretions
- drugs or other pharmaceutical products other than controlled or cytotoxic drugs
- swabs or dressings
- syringes, needles, or other sharp instruments which, unless rendered safe, may prove hazardous to any person coming into contact with them

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Hazardous Waste - Is considered 'hazardous' under environmental legislation when it contains substances or has properties that might make it harmful to human health or the environment. This does not necessarily mean it is an immediate risk to human health, although some waste can be.

The Environment Agency's interpretation of the definition and classification of hazardous waste can be found in the following link - <https://www.gov.uk/dispose-hazardous-waste>

Recycling - The diversion of waste away from landfill or incineration, and the reprocessing of that waste either into the same product or a different one.

Waste - The legal definition of waste comes from Section 75(2) of the Environmental Protection Act 1990 (EPA 1990). Which details article 3(1) of the waste frame directive as detailing waste as 'any substance or object which the holder discards, or intends to, or is required to, discard'.

Environmental protection act 1990 - This is one of the most important pieces of environmental legislation and it controls many aspects of how the environment is protected and regulated. The EPA 1990 (amended 1995) provides the main statutory framework in relation to waste.

EnPI - Energy performance indicators.

EnB - Energy baseline.

SEU - Significant energy user.

ISO 14001 - Environmental management international standard.

ISO 50001 - Energy management international standard.

Renewable energy - Energy derived from natural sources such as solar, wind, geothermal and hydro.

CDP - Carbon disclosure project.

8 Supporting Documentation

All documents can be found in the [group ESG Hub](#):

Group Legal and Regulatory Policy

Group Business Governance and Risk Management Framework

9 Document Control

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9.1 Version control

Version	Date	Release and Change	Author
Version 1	May 2020	Initial Draft – Amalgamation of various polices.	Carl Brooks

9.2 Distribution history

Version	Names
Version 1	Group ISM SharePoint

9.3 Applicability

All policy documents should be used as a guide on best practice for information security in line with current risk assessments; where more detail is needed, enquiries and questions should be directed to the Group ISO.

Non-compliance with policies may be subject to disciplinary action.

9.4 Document control statement

The following outlines the access, handling, communication, and disposal guidelines that are followed by ITG for this document, based on the assigned classification. For this document, which has a classification of CONFIDENTIAL, the following is recommended:

9.5 Access guidelines

This document is currently restricted for distribution and the IAO must be consulted before the information is shared externally. The IAO for this document is the Group ISO. Please refer to Information Classification Policy for further details.

9.6 Handling guidelines

Documents will be stored on the ITG SharePoint system. Where hard copies of documents are created, they will be stored under lock and key.

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9.7 Communications guidelines

Documents created using the Microsoft Office suite of products must have 'Information Rights Management' enabled, where possible, to control distribution within ITG.

Documents that are externally communicated must be done so in line with company policy.

9.8 Disposal guidelines

All copies of this document will be disposed of in line with policy.