



STRAVICA

**Environmental &  
Sustainability Policy**

# Strategic Policy Framework

## 1.0 Purpose and Context

### 1.1 Purpose

This policy establishes Stravica Ltd's strategic commitment to environmental protection, sustainable development, and continual improvement in environmental performance. It defines the principles, legal obligations, governance structures, and operational expectations that guide all Stravica Ltd activities.

### 1.2 Context of the Organisation

- a) Business Profile: Stravica Ltd delivers integrated Facilities Management, Cleaning, Refurbishment, and Property Compliance services to public- and private-sector clients throughout the UK.
- b) Operating Environment: Work is delivered through office-based functions, mobile field teams, and construction/refurbishment sites, each presenting distinct environmental risks (e.g. energy use, waste, transport emissions and pollution risks).
- c) External Context: The Company operates within the UK's legislative framework for environmental protection and the Government's Net Zero Strategy (2050). Client expectations under Crown Commercial Service frameworks and ISO 14001 principles form the benchmark for compliance.
- d) Strategic Drivers: Climate change mitigation, resource efficiency, biodiversity protection and resilience to environmental risk are core to the organisation's sustainability agenda.

### 1.3 Objectives

- Prevent pollution and reduce adverse environmental impacts arising from operations.
- Comply with all applicable legislation and other requirements.
- Embed a culture of environmental responsibility and continuous improvement.

- Support the UK Government's Net Zero Carbon ambition and clients' sustainability targets.
- Enhance reputation and competitiveness within public-sector procurement frameworks.

## 2.0 Scope and Applicability

### 2.1 Operational Scope

This policy applies to all Stravica Ltd operations, including:

- a) Head Office and administrative functions.
- b) All client sites and projects managed by Stravica Ltd.
- c) All vehicles, plant and equipment owned or operated by the Company.
- d) Procurement and supply chain activities conducted on the Company's behalf.
- e) Digital platforms and data centres supporting service delivery (e.g., stravica.uk).

### 2.2 Personnel Coverage

This policy is binding upon:

- Directors and officers of the Company;
- Permanent and temporary employees;
- Contractors, consultants, and agency workers;
- Suppliers and subcontractors engaged under Stravica contracts.

### 2.3 Geographical Coverage

All activities undertaken within the United Kingdom and, where applicable, overseas projects performed on behalf of UK clients.

### 2.4 Policy Integration

The environmental policy forms part of Stravica's Integrated Management System (IMS), alongside Health & Safety, Quality, and Data Protection policies.

## 3.0 Legislative and Standards Framework

### 3.1 Primary Legislation

Operations shall comply with, but are not limited to, the following acts and regulations:

- Environmental Protection Act 1990
- Environment Act 2021
- Waste (England and Wales) Regulations 2011
- Hazardous Waste (England and Wales) Regulations 2005
- Control of Pollution (Oil Storage) (England) Regulations 2001
- Clean Air Act 1993
- Water Resources Act 1991 and Water Industry Act 1991
- Environmental Permitting (England and Wales) Regulations 2016
- The Energy Savings Opportunity Scheme (ESOS) Regulations 2014 (as amended)
- Climate Change Act 2008 (Net Zero Targets)

### 3.2 Guidance and Best Practice References

- ISO 14001:2015 Environmental Management Systems.
- ISO 50001 Energy Management Systems.
- PAS 2060 – Carbon Neutrality Specification.
- UK Government Procurement Policy Note (PPN 06/21) – Carbon Reduction Plans.
- Crown Commercial Service Supplier Code of Conduct.
- Construction Leadership Council Net Zero Guidance.

### 3.3 Compliance Obligations Register

The Environmental Lead shall maintain a live Legal and Other Requirements Register, detailing statutes, permits, consents, and contractual obligations. The register will be reviewed quarterly and whenever new requirements arise.

## 4.0 Environmental Governance and Responsibilities

### 4.1 Board of Directors

- Approve this policy and set corporate environmental objectives.
- Ensure sufficient resources (financial and human) to implement the policy.
- Review quarterly performance reports from the Environmental Lead.

### 4.2 Managing Director

- Acts as executive sponsor for sustainability strategy.
- Ensures alignment of environmental goals with corporate business plans.
- Chairs annual Management Review for the Environmental Management System.

### 4.3 Head of Health, Safety, Environment & Quality (HSEQ)

- Designated Environmental Lead.
- Maintains the Environmental Management System (EMS).
- Conducts risk assessments, audits and legal compliance checks.
- Reports performance data and incidents to the Board.

### 4.4 Project & Site Managers

- Prepare Site Environmental Management Plans (SEMPs) aligned to this policy.
- Manage waste, pollution control, and energy consumption on site.
- Conduct daily and weekly environmental inspections.

### 4.5 Employees and Contractors

- Follow site-specific environmental controls and report any non-compliance or incident immediately.
- Participate in training and toolbox talks.

- Propose improvement ideas to line managers or Green Champions.

#### 4.6 Suppliers and Subcontractors

- Must demonstrate environmental competence and compliance through policies, risk assessments and method statements.
- Provide evidence of licensed waste carriers, recycling rates, and carbon reporting where requested.

#### 4.7 Green Champions Network

A voluntary group of employees across departments who promote initiatives, monitor behaviours and support awareness campaigns (e.g., energy savings, waste segregation, low-carbon travel).

### 5.0 Policy Statement and Corporate Commitments

#### 5.1 Statement of Intent

Stravica Ltd recognises its responsibility to protect the natural environment and to operate in a manner that prevents pollution, reduces waste, and makes efficient use of resources. Environmental considerations are integral to strategic planning, project delivery, and day-to-day operations.

#### 5.2 Key Commitments

- a) Operate an EMS aligned to ISO 14001.
- b) Identify and control significant environmental aspects and impacts.
- c) Comply with applicable legislation and client requirements.
- d) Set measurable objectives and targets for carbon reduction, waste minimisation, energy efficiency and pollution prevention.
- e) Reduce Scope 1 and 2 greenhouse-gas emissions by 50 % by 2030 relative to FY 2024.
- f) Promote biodiversity net gain on projects and office grounds where feasible.
- g) Engage and train staff and suppliers to foster environmental awareness.
- h) Integrate sustainability criteria into procurement and design decisions.
- i) Publish annual environmental performance and carbon reduction report.

#### 5.3 Pollution Prevention Principle

All activities shall be planned and executed to avoid emissions to air, land or

water and to minimise noise, dust, vibration and light pollution through design and operational controls.

#### **5.4 Continuous Improvement**

Performance will be monitored through KPIs and audits; lessons learned will inform updated targets and procedures each year.

### **6.0 Integration with Business Strategy and Government Contracting**

#### **6.1 Alignment with Corporate Vision**

Environmental management supports Stravica's core values of excellence, integrity, and innovation and underpins our mission to deliver sustainable solutions to public-sector clients.

#### **6.2 Government Contracting Obligations**

- Compliance with CCS Procurement Policy Notes (PPN 06/21 and PPN 03/23).
- Submission and maintenance of a Carbon Reduction Plan covering Scope 1, 2 and selected Scope 3 emissions.
- Use of environmental criteria in bid evaluation and supplier selection.

#### **6.3 Integration in Project Lifecycle**

- a) Bid Stage: Include environmental risk register and carbon impact assessment in tender submissions.
- b) Mobilisation: Develop Site Environmental Management Plan (SEMP) and toolbox briefings.
- c) Delivery: Monitor energy, waste and incidents via daily site logs.
- d) Close-Out: Report KPIs, carbon data and lessons learned; feed back into EMS review.

#### **6.4 Stakeholder Engagement**

Stravica Ltd engages with clients, regulators, suppliers and communities to share good practice and promote environmental improvements beyond contract requirements.

## 6.5 Communication and Transparency

This policy is available to employees, clients, supply-chain partners and the public through company communications and the website ([www.stravica.uk](http://www.stravica.uk))

## 7.0 Environmental Management System (EMS)

### 7.1 Purpose

The Environmental Management System (EMS) provides the formal mechanism through which Stravica Ltd plans, implements, monitors and continually improves environmental performance across all activities.

### 7.2 Framework

The EMS follows the Plan–Do–Check–Act (PDCA) cycle and aligns fully with ISO 14001:2015 requirements and the Crown Commercial Service (CCS) sustainability principles.

### 7.3 Structure

The EMS comprises the following interlinked elements:

- a) Environmental Policy (this document).
- b) Environmental Aspects & Impacts Register.
- c) Legal & Other Requirements Register.
- d) Environmental Objectives, Targets & Programmes Register.
- e) Site Environmental Management Plans (SEMPs).
- f) Operational Control Procedures (waste, energy, travel, procurement, biodiversity, etc.).
- g) Monitoring & Measurement Framework.
- h) Audit, Review & Continual-Improvement cycle.

### 7.4 Governance

The Head of HSEQ is the EMS owner and reports quarterly to the Managing Director and the Board. Departmental Managers act as Information Asset Owners for their respective environmental aspects.

### 7.5 Certification & Alignment

Although certification is not mandatory, Stravica Ltd aims to maintain its EMS in a state of readiness for ISO 14001 external audit.

## 7.6 Documentation & Control

All EMS documentation is version-controlled within the Integrated Management System. Superseded documents are retained for six years for audit evidence.

## 7.7 Continual Improvement

Outputs from audits, KPIs, and management reviews drive new objectives annually. Non-conformities and lessons learned are tracked through the CAPA (Corrective and Preventive Action) Log.

# 8.0 Identification of Environmental Aspects & Impacts

## 8.1 Purpose

To systematically identify, evaluate and control the environmental aspects and potential impacts associated with Stravica's activities, products and services.

## 8.2 Methodology

- a) Each department completes an Aspects & Impacts Assessment Form (Appendix A).
- b) Aspects are rated for Likelihood (L) and Consequence (C) on a 1–5 scale.
- c) The product  $L \times C$  determines significance (High, Medium, Low).
- d) Controls and residual risk are documented with responsible owner and review date.

## 8.3 Typical Aspects and Controls

Aspect	Potential Impact	Typical Controls
Diesel use in site plant	Air pollution, GHG emissions	EV/Hybrid substitution, fuel-efficiency checks, anti-idling
Cleaning chemicals	Water contamination	COSHH assessment, spill trays, training
Waste generation	Landfill, resource depletion	Segregation, recycling, duty-of-care audits
Noise & dust	Nuisance to neighbours	Barriers, timing, monitoring
Vehicle travel	CO <sub>2</sub> emissions, congestion	Route optimisation, EV transition

## 8.4 Review Frequency

Aspects and impacts are reviewed annually and when new activities, legislation or client requirements arise.

## 8.5 Communication of Significant Aspects

Significant aspects are highlighted in toolbox talks, SEMP briefings and induction training.

# 9.0 Environmental Objectives, Targets & Programmes

## 9.1 Objective Setting

Objectives are defined annually through the Management Review. Each objective must be SMART (Specific, Measurable, Achievable, Relevant, Time-bound) and linked to a legal or strategic driver.

## 9.2 Example Strategic Objectives (2025–2030)

Ref	Objective	Target / KPI	Owner	Review Cycle
O-01	Reduce Scope 1 & 2 GHG emissions	-50 % by 2030 vs FY 2024 baseline	HSEQ Lead	Annual
O-02	Divert waste from landfill	≥ 90 % diversion, ≥ 65 % recycling	Project Managers	Quarterly
O-03	Reduce office electricity use	-15 % kWh / m <sup>2</sup> by 2027	Facilities Manager	Annual
O-04	Reduce potable water consumption	-10 % per site by 2027	Site Managers	Annual
O-05	Enhance biodiversity	1 project / year with positive ecology outcome	Environmental Lead	Annual

## 9.3 Environmental Programmes

Programmes to achieve objectives include carbon-reduction roadmaps, waste-minimisation plans, green-procurement projects and biodiversity enhancements. Each has defined milestones, KPIs and allocated budgets.

## 9.4 Monitoring and Reporting

Progress is reported quarterly to the Board and summarised in the Annual Environmental Report and Carbon Reduction Plan.

## 10.0 Carbon & Energy Management

### 10.1 Purpose

To measure, monitor and reduce greenhouse-gas emissions from all activities within Stravica's operational boundary in line with the UK Net Zero Strategy.

### 10.2 Boundary Definition

- Scope 1: Direct fuel combustion (vehicles, generators, boilers).
- Scope 2: Purchased electricity for offices and sites.
- Scope 3 (Material Categories): Purchased goods and services, upstream energy, business travel, commuting, waste, transport, capital goods, and leased assets.

### 10.3 Carbon-Accounting Methodology

Follows GHG Protocol Corporate Standard using DEFRA / BEIS emission factors. Data sources include meter readings, fuel invoices, mileage logs and waste tonnages.

### 10.4 Reduction Strategy

- a) Fleet & Transport: electrification programme, telematics, eco-driver training, EV charging rollout.
- b) Energy Efficiency: LED conversion, smart controls, BMS optimisation, appliance audits.
- c) Renewable Energy: purchase of 100 % REGO-certified electricity; feasibility of on-site PV.
- d) Construction & Refurbishment: specify low-carbon materials (EPD-verified).
- e) Behavioural Change: staff campaigns ("Switch Off", "Idle Free").

### 10.5 Verification & Disclosure

Annual carbon footprint externally verified to limited assurance. Published in Carbon Reduction Plan as required by PPN 06/21.

## 10.6 Energy Monitoring

Sub-metering in offices and major sites; energy-intensity KPI (kWh / m<sup>2</sup> and tCO<sub>2</sub>e / £ revenue).

## 10.7 Renewable and Offsetting Approach

Priority is on genuine reductions. Offsetting only for residual emissions and must be accredited to Gold Standard / Verified Carbon Standard (VCS).

# 11.0 Resource Efficiency, Waste & Circular Economy

## 11.1 Purpose

To minimise resource consumption and waste generation, maximising reuse and recycling in line with the Waste Hierarchy and UK Circular Economy Strategy.

## 11.2 Waste Hierarchy (Descending Order of Preference)

1. Prevention – avoid waste creation.
2. Preparation for reuse.
3. Recycling.
4. Other recovery (e.g. energy).
5. Disposal (landfill only as last resort).

## 11.3 Operational Controls

- a) Site-specific Waste Management Plans detailing segregation streams.
- b) Clearly labelled skips for mixed recyclables, timber, inert waste, metals and hazardous waste.
- c) Licensed waste carriers only; Waste Transfer Notes and Consignment Notes retained ≥ 3 years.
- d) Monthly waste-performance reports (kg / m<sup>2</sup> or kg / project hour).
- e) Re-use of fit-out materials where feasible.

## 11.4 Hazardous Waste Management

- Maintain inventory of hazardous substances with COSHH assessments.
- Bunded storage (110 % capacity), spill kits available, dedicated disposal area.

- Disposal via authorised hazardous waste contractors.

## 11.5 Office Resource Efficiency

- Paperless workflow, duplex printing, recycled paper > 80 % content.
- Centralised printing with PIN release.
- Recycled or refillable cleaning products.
- Water-saving devices on taps and cisterns.

## 11.6 Measurement & Reporting

KPIs: % waste diverted from landfill; recycling rate; material reuse value (£); resource use intensity (kWh / £ revenue).

## 11.7 Continuous Improvement

Quarterly review of waste streams and identification of new recycling opportunities (e.g. textiles, plastics, coffee grounds).

# 12.0 Pollution Prevention and Nuisance Control

## 12.1 Policy Intent

Stravica Ltd is committed to operating in a manner that prevents pollution to air, water and land, and minimises nuisance such as noise, dust, vibration, and odour. Pollution prevention is treated as a legal, ethical and commercial imperative across all Stravica-managed sites and facilities.

## 12.2 Legal and Regulatory Context

All activities must comply with:

- Environmental Protection Act 1990
- Environmental Permitting (England and Wales) Regulations 2016
- Control of Pollution (Oil Storage) Regulations 2001
- Clean Air Act 1993
- Water Resources Act 1991
- Control of Noise at Work Regulations 2005

## 12.3 Pollution Prevention Measures

### a) Air Quality Management:

- Minimise emissions from vehicles, generators, and heating systems through maintenance and anti-idling policies.
- Use electric or hybrid vehicles and battery-powered plant wherever practicable.
- Avoid open burning of materials under all circumstances.

### b) Water Protection:

- Bunded storage for fuels and chemicals.
- Use of spill trays beneath static plant and refuelling points.
- Spill response kits located at every site and office; spill training for staff.
- No discharge of pollutants to surface water drains without consent.

### c) Noise and Vibration Control:

- Use of silencers, acoustic barriers, and restricted operating hours (typically 08:00–18:00).
- Regular maintenance of equipment to manufacturer standards.
- Noise and vibration risk assessments for high-impact work.

### d) Dust and Odour Control:

- Use of water suppression, sheeting, or enclosed chutes for cutting and demolition.
- Monitoring of air quality on sensitive sites.
- Immediate response to complaints logged via Environmental Incident Register.

## 12.4 Incident Response

All environmental incidents (e.g., spills, uncontrolled emissions, complaints) must be reported immediately to the Site Manager and logged within the Environmental Incident Report Form (Appendix B). Serious incidents must be

escalated to the HSEQ Lead within 1 hour for assessment and reporting to relevant authorities if required.

## 12.5 Continuous Monitoring

Routine site inspections, client audits, and environmental performance reviews ensure preventive actions are working effectively.

# 13.0 Water, Air and Noise Management

## 13.1 Water Management

- a) Install water meters and track consumption (m<sup>3</sup> per £ turnover).
- b) Fit low-flow fixtures, push taps, and waterless urinals in facilities.
- c) Reuse grey water or rainwater where feasible (for cleaning or irrigation).
- d) Train staff on avoiding contamination during refuelling and cleaning.

## 13.2 Air Quality Management

- Annual review of fleet emissions profile.
- Use of DEFRA-approved dust suppression where works generate airborne particulates.
- Maintain indoor air quality in offices via HVAC maintenance and CO<sub>2</sub> monitoring.

## 13.3 Noise and Vibration

- Noise risk assessments for all high-impact operations.
- Log and review all noise complaints; apply corrective actions.
- Coordinate with local communities and councils where works are near sensitive receptors (schools, hospitals, residential areas).

# 14.0 Biodiversity, Ecology and Land Management

## 14.1 Objective

To protect and enhance biodiversity across Stravica Ltd operations and projects,

ensuring no net loss of habitat and supporting the UK's Biodiversity Duty and Local Nature Recovery Strategies.

## 14.2 Legal Context

Compliance with:

- Wildlife and Countryside Act 1981
- Natural Environment and Rural Communities (NERC) Act 2006
- Environment Act 2021 – Biodiversity Net Gain requirement

## 14.3 Key Commitments

- a) Conduct pre-project ecological assessments where works affect land or vegetation.
- b) Avoid disturbance to nesting birds and protected species through timing and exclusion zones.
- c) Reuse and restore topsoil to support local vegetation.
- d) Plant native species and install pollinator-friendly landscapes around offices and work sites.
- e) Collaborate with local authorities and environmental groups to improve urban green spaces.

## 14.4 Biodiversity Enhancement Measures

- Installation of bird boxes, bee hotels, and bat roosts.
- Establish “no-mow” zones and wildflower areas.
- Tree-planting initiatives offsetting residual carbon emissions.

## 14.5 Monitoring and Reporting

Annual Biodiversity Statement summarising all enhancement actions and ecological KPIs (e.g., m<sup>2</sup> habitat restored, trees planted, pollinator species identified).

# 15.0 Sustainable Travel and Fleet Operations

## 15.1 Policy Intent

Stravica Ltd recognises that business travel and vehicle operations contribute significantly to Scope 1 emissions. The company is therefore committed to

reducing these impacts through cleaner technologies, efficient routing, and behavioural change.

### 15.2 Fleet Management Principles

- a) Transition fleet to low- or zero-emission vehicles by 2030.
- b) Fit all vehicles with telematics to monitor driving behaviour and idling.
- c) Maintain tyre pressure, service intervals, and MOT compliance to reduce emissions.
- d) Establish centralised route planning to minimise mileage.

### 15.3 Employee Travel

- Encourage public transport, car sharing, cycling and walking.
- Provide mileage reimbursement for low-emission vehicles and electric-car salary sacrifice schemes.
- Offer interest-free loans for public transport passes.
- Introduce Cycle-to-Work scheme and secure bike parking at offices.

### 15.4 Remote Working & Virtual Meetings

- Promote online meetings to reduce unnecessary travel.
- Provide digital tools (Teams, SharePoint) to support hybrid working and collaboration.

### 15.5 EV Infrastructure

- Install EV charging points at all office sites and encourage clients to do the same.
- Prioritise green-tariff electricity for charging.

### 15.6 KPI Monitoring

KPIs include:

- Fleet CO<sub>2</sub> intensity (g/km).
- % low- or zero-emission vehicles in fleet.
- Business travel mileage reduction year-on-year (%).

## 16.0 Sustainable Procurement and Materials Management

### 16.1 Objective

To procure goods, materials, and services that minimise environmental impact and encourage a circular economy while maintaining quality, cost efficiency, and compliance with CCS sustainability standards.

### 16.2 Legal and Guidance Framework

- Public Contracts Regulations 2015.
- CCS Procurement Policy Note (PPN 06/21).
- ISO 20400:2017 Sustainable Procurement.

### 16.3 Sustainable Procurement Principles

- a) Preference for suppliers with ISO 14001 or equivalent certification.
- b) Require supply-chain partners to provide environmental and carbon policies.
- c) Incorporate sustainability criteria (energy efficiency, recyclability, embodied carbon) into tender evaluations.
- d) Require disclosure of material origin for timber, stone, and metals (FSC, BES 6001).
- e) Encourage suppliers to reduce packaging and offer take-back schemes.

### 16.4 Material Efficiency

- Maximise use of recycled aggregates, FSC timber, and low-VOC paints.
- Avoid single-use plastics in site operations and office supplies.
- Implement “Design for Deconstruction” principles in refurbishment projects.

### 16.5 Supplier Engagement

- Maintain a Sustainable Supplier Register (Appendix C).
- Conduct supplier sustainability audits annually for high-spend or high-impact vendors.

- Collaborate with key suppliers to set joint carbon-reduction goals.

## 16.6 Life-Cycle Approach

Purchasing decisions consider full life-cycle impacts — extraction, manufacture, transport, use, maintenance, and disposal — and prioritise options that deliver lowest overall environmental footprint.

## 16.7 Procurement KPIs

KPI	Target	Review Frequency
% spend with environmentally accredited suppliers	≥ 75 % by 2026	Annual
% materials with verified sustainable certification	≥ 90 % by 2027	Annual
% reduction in packaging waste from suppliers	-30 % by 2028	Annual

## 17.0 Training, Awareness and Communication

### 17.1 Purpose

To ensure that all employees, contractors, and partners possess the knowledge, competence, and motivation necessary to comply with Stravica Ltd's Environmental Policy and deliver continuous environmental improvement.

### 17.2 Training Framework

#### a) Induction Training:

Every new employee receives environmental induction covering:

- Environmental policy and company commitments.
- Site environmental controls and responsibilities.
- Pollution prevention, waste segregation, and emergency procedures.
- Reporting of environmental incidents.

#### b) Role-Specific Training:

Tailored modules delivered to:

- Site Managers (SEMP preparation, waste & emissions control).
- Procurement staff (sustainable purchasing criteria).

- Drivers (eco-driving and fuel-efficiency awareness).
- Office staff (resource conservation, waste segregation).

c) Toolbox Talks and Refresher Sessions:

Held quarterly or when new risks, controls, or legislation arise.

### 17.3 Awareness and Culture Initiatives

- Green Champions Network: Coordinates campaigns (e.g. “Energy Smart Week”, “No Plastic Month”).
- Environmental Noticeboards: Display KPIs, energy data, and local success stories.
- Digital Engagement: SharePoint sustainability hub hosting policies, guides, and videos.

### 17.4 External Communication

The Environmental Lead ensures open communication with:

- Clients (through tenders, audits, and reports).
- Regulators (Environment Agency, Local Authorities).
- Community stakeholders (complaints, local engagement).
- The general public (policy publication at [www.stravica.uk](http://www.stravica.uk))

### 17.5 Consultation and Participation

Employees are encouraged to propose environmental improvements through suggestion schemes or directly to their line manager. Outstanding ideas are recognised annually through the “Green Leadership Award”.

## 18.0 Documentation and Data Management

### 18.1 Documentation Control

All environmental documents (policies, procedures, risk assessments, audits) are controlled under the Integrated Management System (IMS). Each record must display:

- Version number, issue date, author and approver.
- Retention period and next review date.
- Distribution list.

## 18.2 Environmental Records

Examples include:

- Waste Transfer Notes and Consignment Notes.
- Energy and water bills, meter readings.
- Fuel logs, carbon calculations.
- Audit reports, inspections, and incident logs.
- Training attendance records.

Records are retained for a minimum of six years unless specified otherwise by law or client contract.

## 18.3 Data Integrity and Confidentiality

All environmental data is stored on secure Stravica servers with restricted access in accordance with the Data Protection and GDPR Policy.

## 18.4 Software and Monitoring Tools

Stravica uses digital dashboards and Excel-based registers to track environmental KPIs and generate quarterly performance reports.

# 19.0 Performance Monitoring, Key Performance Indicators (KPIs) and Audit

## 19.1 Purpose

To measure Stravica Ltd's environmental performance objectively, identify trends, and ensure compliance with legal and corporate obligations.

## 19.2 Key Performance Indicators

Area	KPI	Measurement Unit	Target	Review Frequency
Carbon Emissions	tCO <sub>2</sub> e (Scope 1 & 2) per £ revenue	-50 % by 2030 (vs FY24)	Quarterly	
Energy	kWh/m <sup>2</sup> office space	-15 % by 2027	Annual	
Waste	% diverted from landfill	≥ 90 %	Quarterly	
Water	m <sup>3</sup> / £ revenue	-10 % by 2027	Annual	
Biodiversity	Number of enhancement projects	≥ 1 per year	Annual	
Fleet	% electric/low-emission vehicles	≥ 60 % by 2028	Annual	
Procurement	% spend with sustainable suppliers	≥ 75 %	Annual	

## 19.3 Monitoring and Reporting

- Monthly: Site waste, fuel and energy data logged by Site Managers.
- Quarterly: Departmental performance reviewed by HSEQ.
- Annually: Consolidated Environmental Report submitted to the Board and clients.

## 19.4 Audit Programme

- Internal audits conducted twice per year by the Environmental Lead or qualified auditors.
- Audits assess compliance with ISO 14001 principles, legal duties, and internal procedures.
- Findings categorised as Conformity, Observation, Minor Non-Conformance, or Major Non-Conformance.
- Corrective actions tracked to closure within 30 days (minor) or 10 days (major).

## 19.5 Client and Regulatory Audits

Stravica will cooperate fully with client or regulatory environmental audits, providing transparent access to data and documentation.

## 20.0 Management Review, Non-Conformance and Continuous Improvement

### 20.1 Management Review

The Board conducts a formal Management Review annually to assess:

- Suitability, adequacy, and effectiveness of the EMS.
- Achievement of objectives and KPIs.
- Audit results, incidents, and complaints.
- Compliance obligations and legal updates.
- Opportunities for improvement and resource needs.

### 20.2 Non-Conformance and Corrective Action

All environmental non-conformances are logged in the Environmental Improvement Register (EIR), categorised by severity, and assigned to a responsible person for corrective action.

Corrective actions must include:

- Root-cause analysis.
- Remedial actions to prevent recurrence.
- Verification of effectiveness by HSEQ Lead.

### 20.3 Continuous Improvement Process

The company is committed to ongoing enhancement of its environmental performance through:

- Integration of new technologies (AI-based energy monitoring, fleet telematics).
- Benchmarking against industry leaders.
- Employee engagement programmes.
- Collaboration with supply-chain partners to reduce embodied carbon.
- Regular review of the Carbon Reduction Plan and Net Zero Roadmap.

### 20.4 Recognition and Incentives

Achievements such as reduction milestones, environmental innovations, or

exemplary community engagement will be acknowledged through internal awards and external submissions (e.g., Green Apple Awards, CCS Supplier Recognition).

## 21.0 Appendices

### Appendix A – Environmental Aspects and Impacts Register Template

Activity	Environmental Aspect	Potential Impact	Control Measure	Residual Risk	Responsible Person	Review Date
Vehicle operation	Fuel consumption, emissions	Air pollution, GHG	Route planning, EV fleet	Low	Fleet Manager	Annual

### Appendix B – Environmental Incident Report Form

Includes:

- Date/time/location of incident
- Description and root cause
- Corrective action taken
- Escalation (if regulator or client notified)
- Preventive measures

### Appendix C – Sustainable Supplier Questionnaire

Key sections:

- ISO 14001 or EMS certification
- Carbon and waste-reduction targets
- Evidence of ethical sourcing (FSC, BES 6001)
- Packaging and logistics reduction commitments

## **Appendix D – Waste Transfer Record**

Record template for type, volume, EWC code, carrier licence number, disposal route and recovery/recycling percentage.

## **Appendix E – Training and Awareness Record**

Tracking matrix of induction, toolbox talks, refresher and specialist training (COSHH, spill control, biodiversity, etc.).

## **Appendix F – Environmental KPIs Dashboard Example**

Dashboard fields: KPI code, metric, baseline, target, trend arrow, variance, corrective action notes.

## **Appendix G – Biodiversity Enhancement Checklist**

Checklist includes habitat assessment, native species planting, nesting provision, pollinator areas, maintenance plan.

## **Appendix H – Carbon Reduction Plan Summary**

- Reporting Year
- Scope 1 & 2 baseline and progress
- Scope 3 inclusion
- Reduction initiatives implemented
- Net Zero target date (2045 aspiration for Stravica Ltd)

## 22.0 Approval and Version Control

Field	Detail
Document Title	Environmental & Sustainability Policy
Version	1.0
Date Issued	23 October 2025
Next Review	23 October 2027
Approved By	Managing Director, Stravica Ltd
Responsible Department	Health, Safety, Environment & Quality (HSEQ)
Distribution	All employees, subcontractors, suppliers, clients
Public Availability	Posted at <a href="http://www.stravica.uk">www.stravica.uk</a>