ATLANDTIS & CO LTD

Waste Management Policy

1. Introduction

Atlandtis & Co Ltd is committed to reducing its environmental impacts through effective waste management and aims to divert a significant proportion of its' waste from landfills. In order to meet our legal obligations and recycling aspirations, the company requires all staff, contractors and visitors to comply with this Policy and associated procedures on waste management.

2. Aims and Objectives

The purpose of this policy is to enable the company to honour its commitment to manage waste responsibly. To achieve this, the company will:

- · Remain compliant with all relevant waste legislation;
- Aim to reduce the amount of waste generated and the associated environmental impacts by applying the principles of the waste management hierarchy;
- Provide facilities to ensure the safe handling, effective segregation and secure storage of waste on all sites, with these aimed at maximising reuse and recycling opportunities;
- Set specific objectives and targets in relation to minimising waste, improving recycling rates and reducing disposal to landfill;
- Complete regular waste audits in order to drive continual improvement;
- Provide appropriate training and induction for staff, students and visitors around waste practices and site specific requirements.

3. Scope

This policy applies to activities across all sites and applies to all staff, contractors and visitors.

4. Definitions

Waste: Waste includes any substance or object which the holder discards or intends or is required to discard and any substance which constitutes a scrap material, an effluent or other unwanted surplus arising from the application of any process or any substance or article which requires to be disposed of which has been broken, worn out, contaminated or otherwise spoiled as per the Environmental Protection Act 1990 and amendments.

General waste: A form of controlled waste, comprising of all waste from the company the exception of fibre, co-mingled recyclables, food waste and hazardous waste. Fibre waste: Card and paper.

Co-mingled waste: Cans, Glass and Plastic. Note the absence of food as this will contaminate recyclables.

Hazardous Waste: It includes waste that could, in certain circumstances, be harmful to human health or the environment in the short or long term due to its physical, chemical or biological properties. Batteries, fluorescent tubes, photographic chemicals, paint, waste oils, solvents, acids, alkaline solutions, pesticides and electrical equipment are all hazardous wastes.

5. The Policy Principles

All staff, contractors and visitors have a personal responsibility to ensure the waste they create is dealt with in accordance with this policy.

Chief consideration must be given to applying the waste management hierarchy to all activities across the company.

- Reduce: Only order/purchase/use the amount of materials required
- Reuse: Retain materials which can be reused onsite or by others
- Recycle: Segregate to maximise value of material for recycling
- Recover: Energy from waste will be recovered where facilities allow
- Dispose: Last resort

The Facilities Management Team will ensure appropriate procedures and waste management processes are in place as applicable for the principal waste streams (e.g. General waste, fibre waste, co-mingled waste and hazardous waste from estate activities).

Certification of appropriate disposal (in the form of a waste transfer note, consignment note or certificate of disposal) will be obtained when waste is removed by a contractor.

All contractors removing waste must be registered with the Environment Agency (EA) to carry/broker waste, and proposed waste management site will need to be licenced or have letter of exemption issued by the EA.

Waste should be prevented or minimised wherever possible and must be stored, carried, processed or disposed of in accordance with the principles of duty of care.

Waste must be stored in compliant and suitable containers and locations pending their disposal.

Waste containers must be securely sealed to prevent accidental spillage or leakage.

Segregation of waste must occur on site to prevent contamination and mixing of materials to maximise the opportunity for recycling.

Waste is not to be stored in plant rooms, service risers or any other location not intended for waste collection.

Waste and recycling removed from the company must only be transported by persons or service providers that are authorised to do so.

Audits of waste will be carried out throughout the year by a range of company staff and / or external auditors as part of local procedures and work towards accreditation.

Reports on findings from audits will inform the procedures of dealing with waste to ensure legal and regulatory compliance and continually improve our environmental impact and performance.

Staff: With changing waste legislation affecting the Company, those staff with responsibilities for the disposal of waste, must ensure that they are doing so legally and appropriately.

- 6. Equality, Diversity and Inclusion (with particular reference to disability reasonable adjustments) and Equality Assessment Statements In many Company policies these statements are compulsory elements and where appropriate consideration should be given to whether the following will impact on the policy in question:
 - The Equality Act 2010 covers the "protected characteristics" of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief (including lack of belief), sex and sexual orientation. The Company has developed a Single Equality Scheme and Equality Objectives to implement the Equality Act within the Company practices and procedures.
 - Within the Equality Act it remains permissible to treat a disabled person more favourably than a non-disabled person. It remains lawful to make reasonable adjustments in relation to employment, education and services to ensure that there is true equality of opportunity for disabled people.
 - This policy and its implementation will be monitored, as appropriate, in line with relevant legislation for its impact on different equality groups. This process will provide a check on whether there are any differences and allow the Company to assess whether these differences have an adverse impact on any particular group such that appropriate action is taken.

These are important issues and further information should be sought from the Company as required.

7. Records Management Statement

The following statement, completed as appropriate should be included in all policies:

- The records associated with this policy are controlled by Atlandtis & Co Ltd and will be created, stored and disposed of in line with the Company's Records Management guidelines and procedures.
- The Company is committed to complying with the requirements of Data Protection legislation and regulations and any personal data created as part of

this policy will be processed in accordance with the Company's Data Protection Act procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.

• The Company also aims to ensure that users of this policy are aware of Data Protection, Freedom of Information and Records Management issues associated with this policy.

8. Risk Management Statement

Failure to comply with this policy could lead to environmental pollution and expose the company to risk of legal noncompliance.

9. Roles and Responsibilities

It is the responsibility of:

- The Company Board to endorse and approve the policy
- Chief Operating Officer to own the policy
- Environment & Sustainability Manager to manage and maintain the policy
- Staff, contractors and visitors to adhere to the policy