

CONFIDENTIAL

Environmental Policy

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Endorsed by:

Chief Commercial Officer



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1 Introduction & Scope

This document defines Waterstons commitment and controls for operating in an environmentally ethical manner.

Waterstons are committed to working towards a net zero position with carbon emissions in line with the statutory target set by the Climate Change Act 2008 for at least a 100% reduction in UK greenhouse gas emissions by 2050 (compared to 1990 levels).

The policy is supported by action plans for gas, water, electric and waste and the plans and policy will be reviewed and updated regularly. We are committed to developing further action plans to tackle the other key impacts identified.

The policy covers all office locations.

Communicating our Policy

- The policy will be communicated to our colleagues and published on our intranet site for easy reference and access
- The policy will be published on our website for external stakeholders and made available to interested parties including members of the public.

2 Responsibilities

The development and implementation of this policy is a commitment of Waterstons' directors and a shared responsibility of all Waterstons people.

Role	Responsibilities
Board	Chief Commercial Officer (CCO) as the person with board responsibility and who endorses this policy and Waterstons commitments.
CSER Lead	Responsible for: <ul style="list-style-type: none">• the day to day implementation of this policy and CSER activities.• Keeping the CCO updated.• Coordinating activities of the Sustainability Solutions Group.

Systems &
Facilities Team

Responsible for:

- WEEE Disposal.
- Supporting CSER activities related to Systems & Offices.

All Employees

Responsible for:

- Compliance with this Policy.
 - Considering the environment in their everyday role.
 - Disposing of waste appropriately.
 - Considering appropriate low carbon travel.
 - Turning lights off when not in use.
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Our Commitment

Waterstons are committed to an environmental policy that seeks to minimise wherever practical and possible the impact the business has on the environment we live in.

This includes reducing unnecessary wastage of raw materials, energy and natural substances that are in danger of becoming exhausted and minimising the use of machinery or materials that produce noxious or harmful by-products or have a detrimental effect on the environment.

Waterstons acknowledge that our business operations have an effect on the environment and have identified the following key environmental impacts:

- Consumption of gas, electric and water
- Waste generation – general waste, food, recyclable and WEEE waste
- Transport emissions through staff commuting and business travel to clients
- Procuring goods and services for our business and other clients
- Our digital carbon impact

Waterstons will develop monitoring of the above environmental impacts to support reduction targets.

Waterstons will conduct a carbon footprint assessment annually.

Waterstons are committed to providing a safe and healthy working environment for our colleagues and to reducing and minimising wherever practical and possible the environmental impact that the business has.

3 Policy

This policy commits everyone working for or with Waterstons to:

- 3.1 Comply with all environmental laws and regulations, and to the extent that it is practical, implement programmes in line with government requirements.
- 3.2 Comply with all WEEE waste regulations.
- 3.3 Monitoring and reducing our energy and resource consumption.
- 3.4 Maximise the use of information technology to minimise the quantity of new material and paper required to service the commercial needs of the business.
- 3.5 Recycle used material whenever possible; the company will provide the means to recycle.
- 3.6 All waste is disposed of in the appropriate waste containers provided.
- 3.7 Where possible we will use suppliers that offer recycling services for our disposal requirements.
- 3.8 Give preference to using equipment and machinery that uses energy efficiently and wherever possible giving attention to minimising avoidable energy consumption and loss.
- 3.9 Contribute to the creation of a healthy and supportive office and onsite environment.
- 3.10 Encourage good environmental practice from our partners, affiliates and suppliers and where possible use this to support decision making criteria for supplier and partner selection.
- 3.11 Reducing our impact due to transport and travel.
- 3.12 Ensuring we offer virtual meetings and events over in person where appropriate.


3.13 Ensuring in person events are near public transport links.

3.14 Using low carbon public transport and electric pool cars wherever practical.

3.15 Being aware and taking actions to energy waste, such as turning off lights, closing windows, using radiator thermostatic valves at mid temperatures etc.

3.16 Considering carbon offsetting options.

Document Approval

Version	Date	Details	Author/Reviewer	Approval
1.0	May 2018	Initial Policy		Michael Stirrup – Finance Director
2.0	August 2021	Reviewed and updated	Beverley Robinson – Security & Compliance Manager	Michael Stirrup - CEO
2.1	Oct 2024	Reviewed – No Change	Beverley Robinson – Security & Compliance Manager	N/A
2.2	May 2025	Reviewed No Change	Beverley Robinson – Security & Compliance Manager	N/A
3.0	Nov 2025	Review and rewrite <ul style="list-style-type: none"> • Expansion of scope • Updates to commitments • Change of endorsing board member • Inclusion of CSER lead 	Alison Dent (CSER Lead)/ Beverley Robinson (Compliance & Security Manager)	James Alderson – CCO 

- Addition of environmental impacts
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Definitions

Term	Definition
WEEE	Waste Electrical and Electronic Equipment Directive is the European Community Directive 2012/19/EU on waste electrical and electronic equipment which, together with the RoHS Directive 2011/65/EU, became European Law in February 2003.
