

BARRETT STEEL LIMITED

ENVIRONMENTAL & ENERGY POLICY STATEMENT

Barrett Steel Limited considers that care for the environment is essential both in terms of our duty to society & to ensure the on-going success of our business. We are committed to minimising the impact of our operations on the environment & by adopting sustainable practises, we aim to continuously improve our environmental performance & control.

Our objectives are to:-

Communication & Communities

- 1. respond to the concerns of the local community & other interested parties on environmental issues;
- 2. supporting local communities & local interests;
- 3. sponsorship & involvement in community projects;
- 4. website & social media exposure:

Environmental Compliance

- 1. meet all legal & other requirements, to which the business subscribes in relation to the business environmental aspects ISO 14001:2015;
- 2. control emissions, minimise waste production & adopt practicable noise control techniques to prevent pollution. A demonstrable commitment to a reduction in or CO2 emissions;
- 3. regularly evaluate the environmental impacts & opportunities associated with our products, processes & services to ensure that we apply BAT principles:
- 4. consents to discharge where appropriate, including testing regimes;
- 5. "living" Aspect & Impacts matrices for all sites, plus a fully maintained & up to date legal register created in conjunction with our business partner Pennine Pack;
- 6. anti-bribery & corruption ethics & principles;

Energy & Resource Use

- 1. improve the environmental performance of our operation & the life cycle effects of our activities through the review of material sourcing to the effective use of raw material, energy & water to reduce our drain on natural resources. Working in partnership with the "Green Team" to seek & explore energy saving opportunities via the ESOS programme & achievement of BES 6001:
- 2. undertaking Authorised Supply Capacity (ASC) reviews to define need & reduce demand where possible.
- 3. support the purchase of energy efficient products & services, & design for energy performance. Solar renewable energy is in place at Bradford, Burton, Cradley Heath, Oldham, Reading, Scunthorpe (Omega) & York, with opportunities to install elsewhere subject to ownership & suitability of premises. Exploration of opportunities to store energy generated in battery systems;
- 4. smart & intelligent lighting systems installed;
- 5. monitor & audit our environmental performance & energy efficiency to ensure that our efforts are achieving our defined strategic targets & objectives & that continuous improvement is being attained. Where renewable energy systems are not possible, energy efficient power quality analysis is undertaken;
- 6. on off policies, shutdown systems & energy use analysis graphs;
- 7. installation of one fiscal meter per site, with "remote read" capabilities
- 8. limited & reduced use of water;
 - a. low flush welfare systems, push taps & leak testing,
 - b. spray mist coolant as opposed to "flood" coolant systems,
 - c. vehicle wash systems,

Learning & Development

- 1. implement an effective environmental & energy management system & to ensure the environmental training and awareness of our workforce;
- 2. government funded schemes such as the "apprentice levy";
- 3. equal opportunity schemes such Science, Technology, Engineering & Maths (STEM), projects;
- 4. upskilling the workforce via "warehouse to wheels" (see also Transport section);

Legal Compliance Registers

1. Electrical, Environmental, Finance & Taxation, Gender Pay Gap Reporting, Health & Safety, Human Resources, Payroll, Standards & Specifications, Transport & Waste Management compliance register reviewed at least annually (January);

Material Utilisation

- 1. improve the environmental performance of our operation & the life cycle effects of our activities through the review of material sourcing to the effective use of raw material;
 - a. material optimiser systems,
 - b. off-cut parameter controls,
- 2. waste material "transacted" as a commodity & recycled in to the metal production industries;
- 3. "lifecycle" assessment of steel & related activities;

Purchase & Procurement

- 1. encourage suppliers and contractors to maintain sound environmental practices;
- 2. supplier vendor application forms, with defined requirements for authorisation to supply;
- 3. due diligence assessments of suppliers;

Transport

- 1. Improvements in the utilisation of the commercial fleet
 - a. 50% of the commercial fleet to be Euro V or VI engines by 2020,
 - b. replacement of FLT & SL with electric "green" models,
 - c. monitoring, measurement & reporting of vehicle idling & avoidance techniques,
 - d. avoidance of steel tourism & efficient load planning systems (VLP)
 - e. fuel economy & optimum driving skills training,
 - harsh braking & excessive accelerating monitoring,
- 2. selection & availability of company vehicles (cars)

Waste Management

- 1. segregation & waste management;
- 2. reporting & performance monitoring via waste management service providers;
- 3. maximisation of "scrap" value & recyclable content;

Work

- 1. Fundamental Rights at Work as per the International Labour Organisation (www.ilo.org)
 - a. freedom of association & the effective recognition of the right to collective bargaining;
 - b. the elimination of forced or compulsory (Modern Day Slavery Policy);
 - c. the abolition of child labour (Modern Day Slavery Policy);
 - d. the elimination of discrimination in respect of employment & occupation (Equal Opportunities Policy);

Headline Environmental KPI's (September 2018)
CO2 Emissions - Reduce where possible but otherwise sustain
CRC submissions – reduce (or its replacement)
Energy used per tonne sold – reduce 2018-19 v 2017-18
Feed In Tariff – improve generation & returns 2018-19 v 2017-18
Pollution - Zero environmental pollution incidents across all sites
Waste to landfill - less than 5%

James Barrett

James Barrett
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August 2018

Jam Danett





