

## Environmental Policy

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### 1. Purpose and Scope

The purpose of this Environmental Policy is to set out Promont Limited's commitment to minimising the environmental impact of its business operations, promoting sustainability, and ensuring compliance with all applicable UK environmental legislation and regulations.

This policy applies to:

- All employees, directors, officers, and workers of Promont Limited
- Contractors, subcontractors, and agency workers engaged by Promont Limited
- All premises, vehicles, equipment, and operations under Promont Limited's control
- All suppliers and third parties acting on behalf of Promont Limited

Promont Limited recognises that the security industry, while primarily a service-based sector, has environmental responsibilities relating to fleet management, energy consumption, waste generation, procurement, and the use of electronic systems. This policy establishes the framework for managing these responsibilities effectively.

### 2. Legal and Regulatory Framework

Promont Limited is committed to compliance with all applicable UK environmental legislation and regulations, including but not limited to:

- **Environmental Protection Act 1990:** Duty of care regarding waste management and the prevention of pollution
- **Environment Act 2021:** Binding environmental targets, environmental principles, and extended producer responsibility
- **Climate Change Act 2008 (as amended):** UK commitment to achieving net zero greenhouse gas emissions by 2050
- **Waste (England and Wales) Regulations 2011:** Waste hierarchy obligations — prevention, preparation for reuse, recycling, recovery, and disposal
- **The Waste Electrical and Electronic Equipment Regulations 2013 (WEEE):** Requirements for the disposal and recycling of electrical and electronic equipment
- **Hazardous Waste Regulations 2005:** Requirements for the safe handling, storage, and disposal of hazardous waste including batteries and electronic components
- **Control of Pollution Act 1974:** Prevention and control of pollution of water, land, and air
- **Clean Air Act 1993:** Regulation of emissions to air, including from vehicles
- **Energy Savings Opportunity Scheme (ESOS) Regulations 2014:** Where applicable to qualifying organisations
- **The Water Industry Act 1991:** Prevention of pollutants entering public drainage and water systems
- **Road Vehicles (Construction and Use) Regulations 1986:** Vehicle emissions standards applicable to company fleet
- **ISO 14001:** International standard for environmental management systems, used as a best-practice framework

### 3. Environmental Principles and Commitments

Promont Limited is committed to the following environmental principles:

- **Pollution Prevention:** Preventing pollution at source wherever practicable, rather than relying on end-of-pipe

controls

- **Continual Improvement:** Setting environmental objectives and targets and reviewing performance regularly to achieve continual improvement
- **Waste Hierarchy Compliance:** Following the waste hierarchy — prevention, reuse, recycling, recovery, and disposal as a last resort
- **Resource Efficiency:** Using energy, water, and materials efficiently and reducing consumption wherever possible
- **Legal Compliance:** Meeting or exceeding all applicable environmental legal requirements
- **Employee Engagement:** Promoting environmental awareness among all employees and encouraging responsible environmental behaviour
- **Supply Chain Responsibility:** Working with suppliers and contractors who share Promont Limited's commitment to environmental protection
- **Carbon Reduction:** Taking measurable steps to reduce Promont Limited's carbon footprint in line with the UK's net zero ambitions

## 4. Waste Reduction and Management

### 4.1 Waste Prevention and Reduction

Promont Limited shall minimise waste generation across all business activities by:

- Reducing the production of waste materials, including unnecessary packaging when forwarding information, equipment, uniforms, or supplies
- Implementing a digital-first approach to documentation, reducing reliance on printed materials wherever operationally feasible
- Encouraging the reuse of materials, equipment, and packaging before disposal
- Avoiding single-use plastics in offices, control rooms, and operational facilities where alternatives are available
- Ordering supplies and materials in appropriate quantities to avoid excess and waste

### 4.2 Recycling and Disposal

- Recycling facilities shall be provided at all Promont Limited premises for paper, cardboard, plastics, glass, and metals
- All waste shall be segregated at source to maximise recycling and minimise landfill disposal
- Waste disposal shall be carried out by licensed waste carriers in accordance with the Environmental Protection Act 1990 and the Duty of Care Regulations
- Waste transfer notes shall be retained for a minimum of two years (three years for hazardous waste consignment notes) as required by law
- Electronic waste (computers, monitors, CCTV equipment, radios, mobile devices) shall be disposed of in accordance with the WEEE Regulations through an approved WEEE-compliant recycling provider
- Batteries shall be collected separately and recycled in accordance with the Waste Batteries and Accumulators Regulations 2009
- All waste disposal shall be conducted in a safe, responsible, and legally compliant manner

## 5. Energy and Carbon Management

### 5.1 Energy Efficiency

Promont Limited shall reduce energy consumption across its operations by:

- Ensuring that energy is used only where necessary and is used efficiently throughout all premises and operations
- Switching off lighting, heating, cooling, and electrical equipment when not in use or outside of working hours
- Specifying energy-efficient equipment, LED lighting, and high-efficiency heating and cooling systems when purchasing or replacing equipment
- Monitoring energy consumption regularly and setting annual reduction targets
- Considering renewable energy sources (solar panels, green energy tariffs) for company premises where practicable
- Ensuring that control rooms, offices, and operational bases are adequately insulated and energy-efficient

### 5.2 Carbon Footprint Reduction

In support of the UK's net zero target under the Climate Change Act 2008, Promont Limited shall:

- Measure and record its Scope 1 (direct) and Scope 2 (indirect energy) greenhouse gas emissions annually
- Set incremental carbon reduction targets aligned with national and industry benchmarks
- Transition company fleet vehicles to low-emission or electric vehicles where operationally feasible
- Offset unavoidable emissions through verified carbon offset schemes where appropriate
- Report on environmental performance annually to senior management

## **6. Water Management**

- Promont Limited shall use water wisely and efficiently across all its operations
- Water leaks shall be reported and repaired promptly to prevent waste
- Water-efficient fixtures and fittings shall be installed or retrofitted where practicable
- Pollutants, chemicals, oils, and hazardous substances must never be discharged into drains, watercourses, or the public drainage system, in accordance with the Water Industry Act 1991 and the Control of Pollution Act 1974
- Spill kits shall be available at premises and in vehicles where hazardous substances are stored or transported
- Vehicle washing shall be conducted using approved facilities that properly manage waste water

## **7. Fleet and Transport**

Given Promont Limited's use of vehicles for mobile patrols, response services, and operational activities, the following measures shall be implemented:

- Fleet fuel consumption and mileage shall be monitored and reported regularly
- Unnecessary journeys shall be avoided through route optimisation, efficient scheduling, and the use of technology (remote meetings, phone calls, digital reporting)
- Shared transport and car-pooling shall be encouraged for travel to meetings, training events, and operational sites where practicable
- All employees and managers shall be made aware of public transport options available as an alternative to car travel
- Eco-driving techniques shall be promoted, including smooth acceleration, appropriate speed, tyre pressure checks, and avoidance of unnecessary idling
- New fleet vehicles shall be selected with consideration of fuel efficiency, emissions standards, and the feasibility of electric or hybrid alternatives
- Vehicle maintenance schedules shall be adhered to, ensuring vehicles operate efficiently and within legal emissions limits

## **8. Sustainable Procurement**

Promont Limited shall consider environmental impact as a factor in all procurement decisions:

- Maximising the use of recycled paper, sustainably sourced materials, and products with recognised environmental certifications (e.g. FSC, EU Ecolabel)
- Utilising and relying on electronic communications and digital systems in preference to printed materials where the opportunity exists
- Purchasing products with the principle of using materials in a sustainable way, considering whole-life costs including disposal
- Prioritising locally produced and sourced goods to reduce transportation emissions and support local economies
- Purchasing equipment with an emphasis on durability, repairability, and long-term usage rather than disposable alternatives
- Engaging with suppliers regarding their environmental policies and performance, and favouring suppliers with demonstrated environmental commitments
- Avoiding products containing hazardous substances where safer alternatives are available

## **9. Premises and Site Management**

- All Promont Limited premises shall be maintained in a manner that minimises environmental impact
- Environmental considerations shall be incorporated into the fit-out, refurbishment, or relocation of any premises
- CCTV systems, alarm systems, and monitoring equipment shall be selected for energy efficiency where

performance requirements are met

- Grounds and external areas shall be maintained responsibly, with consideration for local biodiversity where applicable
- Staff operating on client sites shall comply with the environmental policies and procedures of the site owner in addition to this policy

## 10. Environmental Incident Management

Environmental incidents include, but are not limited to: spills of fuel, oil, or chemicals; unauthorised emissions to air; discharge of pollutants to water or drainage; illegal waste disposal; and damage to protected habitats or species.

- All environmental incidents must be reported immediately to the relevant line manager and the designated environmental lead
- Immediate containment action shall be taken where safe to do so (e.g. deploying spill kits, isolating drains)
- The relevant environmental regulator (Environment Agency in England, Natural Resources Wales) must be notified without delay for reportable incidents
- All environmental incidents shall be investigated, with root causes identified and corrective actions implemented to prevent recurrence
- Records of all environmental incidents shall be retained for a minimum of three years

## 11. Training and Awareness

- All employees shall receive environmental awareness training as part of their induction, covering the key principles of this policy and their individual responsibilities
- Refresher training shall be provided at least annually, or more frequently where roles involve specific environmental risks (e.g. vehicle fleet, waste handling, chemical use)
- Promont Limited shall promote environmental awareness through internal communications, team briefings, and visible signage at company premises
- Employees are encouraged to suggest improvements to Promont Limited's environmental practices and to report any observed environmental concerns
- Environmental champions or representatives may be appointed within operational teams to promote good practice

## 12. Roles and Responsibilities

Role	Environmental Responsibility
<b>Senior Management / Directors</b>	Overall accountability for environmental performance; approval of policy and targets; allocation of resources for environmental initiatives
<b>Operations Managers</b>	Ensuring environmental requirements are incorporated into operational planning; fleet and site management; incident response
<b>Finance / Procurement</b>	Integrating environmental criteria into purchasing decisions; monitoring energy and fuel expenditure; waste disposal contracts
<b>Line Managers / Supervisors</b>	Promoting environmental awareness within their teams; ensuring compliance with waste, energy, and transport requirements
<b>All Employees and Contractors</b>	Following this policy in daily activities; reducing waste and energy use; reporting environmental incidents; completing training

## 13. Monitoring, Reporting, and Targets

- Promont Limited shall monitor and measure its environmental performance against defined objectives and targets
- Key environmental metrics shall include: energy consumption (kWh), fleet fuel consumption (litres), waste generation and recycling rates, water consumption, and carbon emissions (tCO<sub>2</sub>e)
- Environmental performance data shall be reviewed by senior management at least annually
- Annual environmental objectives shall be set, documented, and communicated to all employees
- Progress against targets shall be reported to employees through internal communications

## 14. Non-Compliance

Non-compliance with this Environmental Policy may result in:

- Requirement for additional environmental awareness training
- Disciplinary action in accordance with Promont Limited's Disciplinary Policy, up to and including dismissal for serious or repeated breaches
- Personal liability under environmental legislation where an individual is found to have knowingly caused or permitted pollution or illegal waste disposal
- Termination of contract for third-party or contractor non-compliance
- Reporting to the relevant environmental regulator where a legal obligation to do so exists

## 15. Policy Review

This Environmental Policy shall be reviewed at least annually, or sooner in the event of:

- Changes in UK environmental legislation or regulatory guidance
- A significant environmental incident
- Changes in Promont Limited's business operations, premises, or fleet
- Findings from audits, inspections, or performance reviews
- Achievement or non-achievement of environmental targets

All revisions must be approved by senior management. Updated versions of this policy shall be communicated to all employees and made available via Promont Limited's document management system.



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Managing Director

Promont Limited

Dated: 01 May 2026