
Environmental Policy

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1.0 Purpose

The objective of South East Modular Ltd (SEM) is to manage its environmental responsibilities in a controlled, practical and proportionate way, minimising negative environmental impacts while supporting the company's strategic direction.

To achieve this objective, SEM shall maintain an effective and proportionate Environmental Management System (EMS) aligned to the requirements of ISO 14001:2015 and integrated into the wider SEM Management System.

The EMS shall be implemented through the company's documented system, including the BMS Manual, SOP Manual, supporting registers, forms, records and project controls. It shall be applied across SEM's activities in design, procurement, manufacture, delivery, installation and associated business processes, as relevant to the company's scope.

SEM is committed to the following:

- Protecting the environment and preventing pollution arising from its activities
- Reducing embodied carbon in its products
- Complying with applicable environmental legislation, regulations and other requirements
- Maintaining environmental objectives aligned with the Business Management System
- Ensuring objectives are appropriate, measurable and support improved environmental performance
- Identifying and controlling environmental aspects and impacts associated with SEM activities
- Reducing waste and promoting reuse, recycling and responsible disposal
- Using materials, energy and resources efficiently
- Considering environmental impacts during design, procurement and delivery
- Operating defined processes and controls so that activities are planned and carried out responsibly
- Monitoring performance through management review, internal audit, KPI reporting and corrective action
- Identifying environmental nonconformities and taking corrective action to prevent recurrence
- Ensuring personnel are aware of environmental responsibilities and follow defined procedures
- Promoting a responsible, practical and accountable approach to environmental management
- Encouraging the identification of environmental risks, issues and improvements
- Ensuring this policy is communicated, understood and applied throughout the business

The EMS is intended to provide clarity, consistency and control across SEM's operations while supporting continual improvement.

2.0 Environmental Management System

SEM shall maintain its EMS as part of the overall SEM Management System.

The EMS shall include, as applicable:

- The Environment Policy and associated objectives
- The Legal Register and Aspects and Impacts Register
- The BMS Manual and SOP Manual
- Defined process controls and responsibilities
- Operational controls for environmental risks and impacts
- Document and record control requirements
- Internal audit and management review processes
- Nonconformance and corrective action processes
- Project and operational controls, including those applied through Mission Control

The level of control applied shall be proportionate to the nature, scale and risk of the activity being undertaken.

3.0 Environmental Control

SEM shall identify and manage environmental aspects and impacts associated with its activities.

Environmental controls shall be applied, where relevant, to:

- Waste generation, segregation and disposal
- Selection and management of waste contractors
- Storage and handling of materials, fuels and substances
- Use of hazardous materials and COSHH-controlled substances
- Spill prevention and response
- Use of energy, water and consumables
- Noise, dust and emissions where applicable
- Procurement of materials, products and services
- Design decisions affecting environmental performance
- Factory, site and office housekeeping standards

Environmental risks and requirements shall be considered during planning and delivery, including through SEM's Mission Control process where applicable.

4.0 Roles and Responsibilities

Role	Responsibilities
CEO	Overall accountability for the Environmental Management System; approval of the Environment Policy; ensuring the EMS is established, implemented and maintained; ensuring alignment with business strategy; ensuring environmental compliance; ensuring adequate resources are in place.
Managers / Process Owners	Implementation of the EMS within their areas; ensuring compliance with procedures and controls; identifying environmental risks and impacts; monitoring performance; supporting corrective actions and improvements; maintaining appropriate records.
All Employees and Relevant Subcontractors	Following applicable procedures and controls; using materials and resources responsibly; preventing pollution where possible; reporting environmental incidents, risks and nonconformities; contributing to environmental performance and improvement.

5.0 Monitoring and Continual Improvement

SEM shall review the effectiveness of its EMS through:

- Management review meetings
- Internal audits
- KPI and performance monitoring
- Review of environmental incidents and nonconformities
- Corrective action tracking
- Review of environmental objectives and performance
- Feedback from projects, operations and stakeholders

Where improvements are identified, SEM shall take proportionate action to update its processes, controls, documentation or training. Continual improvement is a core principle of the SEM Management System and forms part of normal business operations.