

ENVIRONMENTAL MANAGEMENT SYSTEM



FOR COMPANY OPERATIONS EXCLUDING SLOUGH HEAT & POWER

TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	Welcome	3
1.2	Responsibilities	3
2	ACQUISITION AND INVESTMENT	4
2.1	Contamination assessment and environmental remediation	4
2.2	Authorisation procedure for not accepting consultant's advice	5
2.3	Site environmental assessment	6
3	DESIGN	7
3.1	Site environmental opportunities review	7
3.2	Design brief	9
4	DEVELOPMENT	11
4.1	Contractor selection	11
4.2	Monitoring and reporting environmental performance	13
4.3	Site complaints record	14
5	Asset Management	15
5.1	Tenant engagement and management	15
5.2	Maintenance and monitoring of actively managed properties	16
5.3	Emergency preparedness	17
5.4	Biodiversity	18
6	COMPANY ADMINISTRATION	19
6.1	Purchasing	19
7	SYSTEM	20
7.1	Environmental legislation review	20
7.2	Environmental policy review	21
7.3	Significant environmental aspects and impacts	22
7.4	Maintain and monitor the Company's environmental objectives and targets	23
7.5	Training and internal communications	24
7.6	External communication	25
7.7	Document control	26
7.8	EMS auditing	27
7.9	Corrective and preventative action	28
7.10	Management review	29

1 INTRODUCTION

1.1 Welcome

Welcome to the second version of SEGRO UK's Environmental Procedure Manual. The purpose of this manual is to embed environmental sustainability into SEGRO UK's activities, thereby driving continuous improvements in the company's environmental performance.

Some of SEGRO UK's environmental impacts arise from activities undertaken by external contractors; therefore the procedures identify their responsibilities where appropriate.

This manual includes 23 procedures, each relates to an activity that SEGRO UK controls. In general terms the procedures:

- Identify potential environmental liabilities associated with a site prior to acquisition (section 2).
- Influence the environmental performance of development designs (section 3).
- Ensure that adverse environmental impacts arising from development (demolition and construction) are controlled (section 4).
- Support environmental management of managed assets (section 5).
- Identify new suppliers' environmental management practices and policy (section 6).
- Ensure that environmental management practices continually improve and that the suitability of the management system is reviewed (section 7).

Each procedure introduces:

- The purpose of the procedure.
- Related procedures.
- Those responsible for the procedure.
- The actions to be taken.
- Supporting documentation.

This is the second version of SEGRO UK's Environmental Procedures Manual and your feedback on the contents is welcomed. Please send feedback to the Group Environmental Manager.

1.2 Responsibilities

The Group Board has overall responsibility for SEGRO environmental performance and the Group Environmental Manager is responsible for the UK Environmental Procedure Manual.

EMS Manual Approved by: Group Environmental Manager

Date: February 2007

2 ACQUISITION AND INVESTMENT

2.1 Contamination assessment and environmental remediation

Purpose	To undertake an appropriate contamination assessment of all sites being considered for development and, where appropriate, specify the method of remediation/containment.
Related procedure(s)	2.2 Authorisation procedure for not accepting consultant's advice.
Responsibilities	<p>SEGRO Regional Director / Director of Corporate Acquisitions have overall responsibility for acquisition activities.</p> <p>SEGRO Group Environmental Manager has responsibility for management of environmental consultants employed to investigate sites/properties.</p> <p>The reports will be presented to the Group Environmental Manager who will arrange a review of available reports and advise on further investigations, where necessary. A copy will be sent to the Regional Director and or Development Manager.</p>
Actions	<p>Soil And Building Quality</p> <p>Prior to acquisition:</p> <ol style="list-style-type: none"> 1. An environmental consultant is selected to undertake the appropriate investigations and advise accordingly. 2. When appropriate, a detailed intrusive geo-environmental investigation is undertaken by a consultant and a report is prepared based on the results of this work. 3. On receipt of reports from the consultant(s), the Regional Team and/or Acquisitions Team with the Group Environmental Manager consider the findings and agree appropriate actions. 4. The findings of the above reports will be summarised in a report by the environmental consultant and presented to the Group Environmental Manager and a copy sent to the Regional Director or Director of Corporate Acquisitions. 5. The report will identify environmental risks on the acquisition or investment, the possible legal or financial implications and timeframes for remediation work, if necessary.
Supporting documentation	Previous reports available from vendor.

2.2 Authorisation procedure for not accepting consultant's advice

Purpose	Where environmental consultant's advice on re-testing and remediation is sought, the presumption will be that it will be accepted. Where this is not the case, the procedure set out below will be adopted.
Related procedure(s)	2.1 Contamination Assessment and Environmental Remediation.
Responsibilities	The Development Manager is responsible for ensuring that this procedure is implemented and consulting the Regional Director / Director or Corporate Acquisitions to agree the proposed course of action.
Actions	<p>Following receipt of consultants advice</p> <p>The Regional Director / Acquisitions Team will consider the consultant's advice and recommendations and decide, in consultation with Regional / Acquisition Team(s), whether they should be accepted and implemented.</p> <p>Where it is not deemed appropriate to follow the consultant's advice, The Development Manager will prepare a brief synopsis outlining the following details:</p> <ul style="list-style-type: none"> • Outline of the project. • The consultant's advice received. • The reason(s) for not following it with fully reasoned arguments including appropriate costs. • Details of the proposed alternative course of actions. <p>The Development Manager will submit the project synopsis to the Regional Director and seek approval, in writing, for the alternative action.</p>
Supporting documentation	Reports and formal advice from the consultants.

2.3 Site environmental assessment

Purpose	<p>To identify potential positive and negative environmental impacts associated with the site to inform the acquisition decision and, if appropriate, support the design brief.</p>
Related procedure(s)	<p>3.1 Site environmental opportunities review. 3.2 Design Brief.</p>
Responsibilities	<p>Environmental Assessment SEGRO Group Environmental Manager ensures that appropriate environmental consultants undertake a desk top environmental assessment.</p> <p>Following the desk study, the Development Manager and Corporate Acquisitions Team shall decide what future site investigations are to be carried out.</p> <p>The findings are reported to senior management teams prior to a decision being made on acquisition.</p> <p>The Development Manager/ Acquisitions Team is responsible for ensuring that:</p> <ul style="list-style-type: none"> • The questions set out in the Site Environmental Assessment Checklist are answered. • Environmental liabilities associated with a potential site are fully considered prior to acquisition (referring decisions to the Regional Director, where appropriate). • Further actions that may be specified as a result of investigations are undertaken by the appointed environmental consultants. • A completed copy of this procedure is retained in the relevant project file. <p>The Group Environmental Manager ensures that there is an annual review of the questions in the Site Environmental Assessment Checklist.</p>
Actions	<p>Desk top survey Impact areas to be assessed during the desk top survey will include:</p> <ol style="list-style-type: none"> 1. Land use (including flood risk, Planning Authority land use policies and 'greenfield land'). 2. Transport & air quality. 3. Biodiversity. <p>Questions to be answered on each impact area during the desk top survey are listed in the Site Environmental Assessment Checklist.</p> <p>Report Survey Findings</p> <ol style="list-style-type: none"> 1. Environmental liabilities associated with a potential site should be considered prior to acquisition and where appropriate the liabilities discussed with the Regional Director or Director of Corporate acquisitions. 2. If the site is acquired and a Design Team appointed, a copy of this report must be provided to the Development Manager and Project Manager. <p>Annual review Once a year the Group Environmental Manager consults the Regions Transactions and Design Teams on the appropriateness of the questions in the Site Environmental Assessment Checklist. When appropriate, questions are amended to reflect good practice and lessons learnt in the past year.</p>
Supporting documentation	<p>Site Environmental Assessment Checklist.</p>

3 DESIGN

3.1 Site environmental opportunities review

Purpose	<p>To ensure the Design Teams’ knowledge of the site’s environmental conditions and opportunities are considered.</p>
Related procedure(s)	<p>2.3 Site environmental assessment. 3.2 Design brief.</p>
Responsibilities	<p>SEGRO Development Manager is responsible for ensuring this procedure is carried out, including commissioning, briefing and managing external consultants.</p> <p>The Project Manager will ensure that the Design and Project Team members:</p> <ol style="list-style-type: none"> 1. Provide answers and references to the questions listed in the Site Environmental Opportunities Review Sheet. 2. Liaise with advisors on those questions that form part of the Environmental Impact Assessment.
Actions	<p>Holistic environmental site review Following the decision to develop the site, a holistic environmental review of the site’s characteristics will be undertaken. This review supports the findings of procedure 2.3 Site Environmental Assessment and introduces the Design Team to further environmental design considerations.</p> <p>Site characteristics Environmental characteristics to be reviewed, which influence the buildings performance, include:</p> <ol style="list-style-type: none"> 1. Energy sources and temperature control 2. Wind conditions and air quality 3. Noise and vibration 4. Water resources 5. Flora and fauna 6. Transport. 7. Site Levels 8. Boundary Conditions 9. Topographic Surveys. <p>Specific questions to be answered for each site are listed in the Site Environmental Opportunities Review Sheet.</p> <p>Upon completion of this sheet, a copy with supportive evidence must be provided to both the Project Manager and the Development Manager.</p> <p>The Development Manager ensures that the completed Site Environmental Opportunities Review Sheet is attached to the Design Brief.</p>

<p>Actions continued</p>	<p>Annual review of site characteristics review template The Group Environmental Manager ensures that an once a year the questions in the Site Characteristics Review sheet are reviewed and amended to reflect good practice and lessons learnt in the past year.</p> <p>Environmental Impact Assessment The Development Manager will ensure that the following are undertaken:</p> <ul style="list-style-type: none"> • A request for a screening opinion is made to the appropriate Planning Authority. • A screening letter is received from the Planning Authority. • Where applicable, a formal Environmental Impact Assessment (EIA) is undertaken.
<p>Supporting documentation</p>	<p>Site Environmental Opportunities Review Sheet. Site Environmental Assessment Checklist. Green Building Toolbox.</p>

3.2 Design brief

Purpose	To ensure that the final design for all new developments and refurbished buildings are environmentally acceptable.
Related procedure(s)	2.3 Site environmental assessment. 3.1 Site environmental opportunities review. 7.1 Environmental legislation review.
Responsibilities	For each scheme, the Project Manager, Development Manager and Group Environmental Manager will ensure that the: <ol style="list-style-type: none"> 1. Design Brief includes environmentally acceptable criteria. 2. Design Team members are introduced to the Design Brief environmental criteria.
Actions	<p>Project Brief Preparation</p> <p>Following the official decision to create a design for the site in question, the Development Manager and Project Manager will create a Design Brief. This shall include environmental aims, objectives and environmental standards, which are drawn from the following documentation:</p> <ol style="list-style-type: none"> 1. Company Environmental Policy, especially the Building Design and Construction statements. 2. BREEAM for Offices and/or Industrial criteria. 3. The Design Team Environmental Checklist. 4. Project Brief Template. 5. Refurbishment brief, when appropriate. 6. Relevant environmental legislation. 7. Future tenants requirements, if known. 8. The completed Site Environmental Assessment Checklist Site Sheet and supporting evidence. 9. The completed Site Environmental Opportunities Review Sheet. 10. Green Building Toolbox. <p>Design Team</p> <p>Upon completion of this process, the Design Team should be tasked with achieving all the environmental aims, objectives and standards identified for the scheme in question.</p> <p>The Design Team members will be briefed by the Development Manager and the Project Manager on:</p> <ol style="list-style-type: none"> 1. The content and relevance of the environmental aims, objectives and standards. 2. The importance of information in the supporting documentation and how they inter-relate. For example how the energy sources and temperature responses in the completed Site Environmental Opportunities Review Sheet help when referring to the Low Energy Design Approaches introduced within the Green Building Toolbox.

<p>Actions continued</p>	<p>In addition, the Project Manager introduces either:</p> <ol style="list-style-type: none"> 3. a) The requirement for the equivalent of a 'Very Good' BREEAM rating for the scheme design, <p>or</p> <ol style="list-style-type: none"> 4. b) The formal BREEAM rating required for the scheme design and associated arrangements e.g. working with a BREEAM assessor. <p>The Project Manager ensures that:</p> <ul style="list-style-type: none"> • Where appropriate, feasibility studies and technical advice is sought to support environmental performance of the design. • The final design meets with the environmental aims, objectives and environmental standards set in the Design Brief or, where not feasible, the reasons for this are documented. <p>Design Team Checklist Annual Review The Group Environmental Manager ensures that once a year the issues and content of the Site Environmental Assessment Checklist are reviewed and amended to reflect good practice and lessons learnt in the past year.</p>
	<p>Planning Application Stage The Development Manager will ensure that the following documentation accompanies the Planning Application:</p> <ul style="list-style-type: none"> • A Design Statement which includes an environmental section introducing the predicted environmental performance of the design. • A BREEAM assessment, when available. • An Environmental Statement, when a formal EIA is required or undertaken. • An Access Statement. • Highways and Transport Statement.
<p>Supporting documentation</p>	<p>Company Environmental Policy. Project Brief Template. Design Team Environmental Checklist. The completed Site Environmental Opportunities Review Sheet. The completed Site Environmental Assessment Checklist and supporting evidence. Refurbishment Brief. Environmental Legislation Register. Green Building Toolbox. EIA guidance.</p>
<p>Reference materials</p>	<p>Environmental Statement, if appropriate. Green Travel Plan guidance. Design Statement template. Access Statement template.</p>

4 DEVELOPMENT

4.1 Contractor selection

Purpose	To ensure that the principal contractor's environmental management practices are identified and recorded.
Related procedure(s)	4.2 Monitoring and reporting environmental performance.
Responsibilities	<p>The Project Manager ensures that the appropriate environmental management documentation is both given to, and received from, the principal contractor.</p> <p>The Procurement Manager, in consultation with the Group Environmental Manager, is responsible for analysing the principal contractor's response to the 'Environmental Review' questions and ensuring that this complies with SEGRO' desired standards.</p>
Actions	<p>This procedure will be followed for each principal contractor interviewed and/or hired by SEGRO International in the UK.</p> <p>Pre-tender documentation</p> <ol style="list-style-type: none"> 1. All contractors will be provided with the following pre-tender documentation: <ul style="list-style-type: none"> • A copy of the Company Environmental Policy and appropriate environmental objectives. • Site specific requirements and design specification details, for example waste management and recycling obligations. • Part 3: Environmental Review, part of the Supplier Pre-Qualification Questionnaire. The questionnaire should be accompanied by: <ul style="list-style-type: none"> – A request for evidence to support answers provided. – An explanation that the answers are considered in the selection process. – Legal and other requirements for the project. <p>Contractor selection environmental questionnaire</p> <ol style="list-style-type: none"> 1. For the contractor to be considered, Part 3: Environmental Review form must be completed in full. 2. The Procurement Manager, in consultation with the Group Environmental Manager, considers the responses to the Part 3: Environmental Review form and takes these into account when selecting the principal contractor, where financially feasible. <p>Record and evidence retention</p> <p>The central procurement function retains completed Environmental Review questionnaires for each contractor hired by SEGRO International.</p>

<p>Actions continued</p>	<p>Project environmental legislation register The Project Manager and Group Environmental Manager will ensure that the Principal Contractor:</p> <ul style="list-style-type: none"> • Records the legal requirements, and details of any industry Codes of Practice or other controls to which the organisation subscribes. • Summarises the regulatory requirements and how they apply to the construction site in question. • Introduces the requirements to the principal contractor. <p>Start-up Meeting A start-up meeting will be held in advance of any site activities and at the earliest opportunity between the Principal Contractor, SEGRO Project Manager and the Group Environmental Manager.</p> <p>To support management of the Principal Contractor’s environmental performance, the following will be raised during the start-up meeting:</p> <ul style="list-style-type: none"> • Previous site investigation results and historical land use details, including the quality of land and buildings. • How future ‘hot spot’ areas of contaminated land and hazardous materials will be identified and dealt with. • License/permit retention during site operations (e.g. for discharges, abstraction, noise, vibration and crushing plants), if required. • Monitoring requirements during construction activities. • Roles and responsibilities will be discussed and agreed for: <ul style="list-style-type: none"> – The Site Project Meetings. – The monthly SEGRO site inspections. – The implementation of procedures for: <ul style="list-style-type: none"> ▪ Environmental awareness e.g. site inductions and training. ▪ Resource efficiency. ▪ Nuisance prevention and control. ▪ Waste management. ▪ Pollution prevention and control. ▪ Emergency preparedness, control and response.
<p>Supporting documentation</p>	<p>Part 3: Environmental Review, part of the Supplier Pre-Qualification Questionnaire. Legislation Register. Tender documentation. Appointment letter.</p>

4.2 Monitoring and reporting environmental performance

Purpose	<p>Project meetings ensure that all those working on site are informed of environmental management practices and performance on site. Monthly environmental inspections enable the effectiveness of environmental management on site to be monitored and, where possible, improved.</p>
Related procedure(s)	<p>4.1 Contractor selection. 4.3 Site complaints record.</p>
Responsibilities	<p>Principal contractor ensures that:</p> <ol style="list-style-type: none"> 1. The site project meetings raise environmental issues. 2. Monthly inspection findings are translated into actions within agreed timeframes. <p>SEGRO Project Manager ensures that:</p> <ol style="list-style-type: none"> 1. Weekly Environmental Reports are completed by the Site Management. 2. Monthly inspections are scheduled by the Group Environmental Manager. 3. Inspection findings are communicated to the principal contractor. 4. 'Actions agreed' are carried out by the principal contractor. <p>Group Environmental Manager ensures that trends in site environmental performance are reported to the Head of Construction.</p>
Actions	<p>Agreement of Programme At the Contract Start Up Meeting, SEGRO and the principal contractor agree:</p> <ol style="list-style-type: none"> 1. Responsibility for site environmental matters. 2. The data to be reported weekly. 3. The monthly inspection programme. <p>Site Project Meeting Preparation Prior to the site construction project meeting, the principal contractor and SEGRO Project Managers are required to:</p> <ol style="list-style-type: none"> 1. Agree the Environmental Management Plan for the site. 2. Discuss environmental concerns, for the site in question. 3. Agree the environmental matters for the next Project Meeting agenda. <p>Weekly Environmental Reports will include the following :</p> <ol style="list-style-type: none"> I. Number of people who have attended the site induction II. Number of environmental incidents that have been recorded. III. Number of complaints received from the public/third parties. IV. Summary of all waste leaving site. V. Copy of all licences applicable to this period. <p>Monthly Environmental Inspection</p> <ol style="list-style-type: none"> 1. SEGRO on site inspection are conducted on a monthly basis using the Environmental Site Inspection Form. 2. The completed inspection forms are issued to the Site/ Project Manager within 7 days of the inspection. 3. SEGRO Group Environmental Manager retains the Environmental Site Inspection Form and supporting documentation for 2 years. 4. The Project Manager ensures any corrective actions are carried out. <p>Reporting Inspection Findings SEGRO Group Environmental Manager reports trends in environmental performance, identified in the weekly reports and monthly inspections, to the Head of Construction.</p>
Supporting documentation	<p>Environmental Site Inspection Form. Company Environmental Policy.</p>

4.3 Site complaints record

Purpose	To monitor complaints and ensure that appropriate actions are taken.
Related procedure(s)	4.2 Monitoring and reporting environmental performance 7.6 External Communications
Responsibilities	The principal contractor, SEGRO Project Manager and Group Environmental Manager ensure that responses to complaints are agreed before the response is sent. The Group Environmental Manager holds the register of complaints.
Actions	<p>Recording and monitoring complaints</p> <ol style="list-style-type: none"> 1 Upon receipt of a complaint, by either the contractor or SEGRO International (UK), the Development Manager should be informed and the following details will be logged in a centrally held register: <ul style="list-style-type: none"> • Name and contact details of person who complained. • The date and time the complaint was received. • The reason for complaint and appropriate evidence. • The name of the person who is allocated to respond to the communication. 2 The response to the communication must be discussed by the Project Manager and Group Environmental Manager: <ul style="list-style-type: none"> • Explain the proposed course of action. • Include a contact name and number on which the complainant can call if there are further concerns. • Be agreed by the principal contractor and at least one SEGRO representative, either the Project Manager or the Group Environmental Manager. 3. The agreed response will be sent within 5 working days of receipt to the complainant and a copy is sent to the Group Environmental Manager. 4. The Group Environmental Manager retains the copy in the Register of complaints for 2 years.
Supporting documentation	Register of complaints. Emergency contact sign displayed on site.

5 Asset Management

5.1 Tenant engagement and management

Purpose	<p>To introduce prospective and new tenants to environmental management requirements and provide relevant environmental information.</p> <p>To ensure that, where appropriate, environmental high risk clauses are included in tenant leases.</p>
Related procedure(s)	<p>5.2 Maintenance and monitoring of actively managed properties</p>
Responsibilities	<p>The Estate Manager ensures that the environmental management information has been provided to prospective and new tenants.</p> <p>The Asset Manager asks tenants to complete the Environmental Assessment of new occupier form.</p> <p>Group Environmental Manager identifies level of risk.</p>
Actions	<p>Tenant responsibilities include:</p> <ul style="list-style-type: none"> • Preventing and preparing for an accidental/emergency incident and agreeing lines of communication with SEGRO should this occur. • Cooperating prior to, during and following tenant site environmental inspections. <p>Responsibilities may include:</p> <ul style="list-style-type: none"> • Complying with, and implementing aspects of, the site Biodiversity Management Plan during landscaping maintenance activities. <p>Tenant engagement includes</p> <ul style="list-style-type: none"> • The Asset Manager asks the tenant to complete the Environmental Assessment of new occupier form. • Providing information periodically on environmental management • Visit site either once or twice a year. <p>Slough Trading Estate Tenants</p> <p>New Slough Trading Estate tenants receive a tenant handbook which includes information sheets titled 'why not to pollute', 'areas of risk' and 'how we can help'. Addition sheets for storage, waste & wash down activities are provided, where appropriate.</p>
Supporting documentation	<p>Company Environmental Policy. Environmental Assessment of new occupier form. New Slough Trading Estate Tenant's handbook.</p>

5.2 Maintenance and monitoring of actively managed properties

Purpose	To ensure that the environmental performance of managed properties is actively managed and monitored.
Related procedure(s)	5.1 Tenant engagement and management
Responsibilities	<p>The Group Environmental Manager liaises with Estate Managers to ensure that appropriate maintenance and monitoring activities are undertaken.</p> <p>The Asset Managers arrange and oversee maintenance activities on their site and gather data for the Group Environmental Manager.</p>
Actions	<p>Waste Management <i>Multi-let properties</i> For each site, waste is collected. Centralised system includes recycle and mixed waste bins. Management system will be arranged to optimise the recycle rate and reduce potential harm to the environment.</p> <p><i>Tenant-occupied properties</i> When a tenant decides to put in place their own waste management system, the Estate Manager will undertake regular waste management audits of the tenant-occupiers storage facilities and practices in order to ensure that the systems put in place accords with the group policy.</p> <p>Energy and water consumption (private and common) The Asset Manager(s) will focus on multi-tenant buildings with common areas. Each Asset Manager reports the meter readings to the Environmental Administrator. The Group Environmental Manager will monitor trends and collate data for the annual report.</p> <p>Mechanical installations Contractors maintain mechanical installations.</p>
Supporting documentation	<p>CSR report and targets.</p> <p>Biodiversity Policy.</p>

5.3 Emergency preparedness

Purpose	To ensure that lines of communication and responsibility required in an emergency are clarified in order to eliminate or minimise the risk of environmental damage.
Related procedure(s)	5.1 Tenant engagement and management. 5.2 Maintenance and monitoring of actively managed properties.
Responsibilities	The Asset Manager ensures that the response to an incident protects the environment. The Group Environmental Manager ensures that details of the event and related environmental details are reported to the CEO.
Actions	<ol style="list-style-type: none"> 1. The Asset Manager and Estate Surveyor shall be notified at the earliest opportunity of an incident which poses a risk to the environment. 2. Upon notification of an incident the Asset Manager and Group Environmental Manager shall ascertain the details of location, nature of incident, names of third parties involved with contact telephone numbers, etc. 3. The scale and potential impact of the incident shall be assessed and discussed with the parties involved. 4. Where responsibility for the incident lies with a 3rd party, maintain close contact, provide help and assistance where necessary and ensure prompt and appropriate action is taken. 5. Where responsibility for the incident lies with SEGRO, arrange for all necessary and appropriate action to be taken promptly, involving consultants, service providers and legal advisors as appropriate. In all instances, liaise with statutory authorities to ensure any selected course of action is supported and approved before implementation. 6. Upon resolution of the incident, SEGRO' Asset Manager and the Group Environmental Manager analyse the outcome to identify and implement any improvements to procedures and/or preventative measures before communicating the analysis to other managers and tenants. 7. The Group Environmental Manager will write a report for attention of the CEO of SEGRO indicting why the event happened, results of the analysis and any proposed amendments to practices. <p>The CEO submits the report to the Chairman and the Board as soon as possible. Where amendments to practices are proposed, the Board should consider the reduction of environmental risk along side financial and resource implications.</p>
Supporting documentation	Company Environmental Policy.

5.4 Biodiversity

Purpose	To consider ecological issues associated with landscaping during the design, installation and maintenance stages.
Related procedure(s)	5.2 Maintenance and monitoring of actively managed properties.
Responsibilities	Development Manager and Investment Manager.
Actions	<p>Installation & Maintenance</p> <p>The following should always be considered:</p> <ul style="list-style-type: none"> • Peat-free compost as the plant stock growing medium for container grown shrub stock • Recycled fertiliser and compost wherever possible. • Clippings and arisings from regular landscape maintenance operations are composted. Preference should be given to on site composting.
Supporting documentation	Biodiversity Policy. Group Environmental Policy.

6 COMPANY ADMINISTRATION

6.1 Purchasing

Purpose	To establish engagement on the environmental impacts associated with new services, goods and materials procured by SEGRO.
Responsibilities	<p>The Procurement Manager is responsible for ensuring that new suppliers are asked about their environmental performance.</p> <p>All members of staff are responsible for implementing environmental good practice with respect to office management and administration.</p>
Actions	<p>Engagement with new suppliers</p> <p>Purchasing staff will ensure that the Supplier Approval Process is followed and that Part 3: Environmental Review, part of the Supplier Pre-Qualification Questionnaire is employed.</p>
Supporting documentation	<p>Company Environmental Policy.</p> <p>Supplier Pre-Qualification Questionnaire: Part 3 Environmental Review.</p>

7 SYSTEM

7.1 Environmental legislation review

Purpose	To review relevant environmental legislation that applies to SEGRO operations at all stages of the property process and per development project.
Related procedure(s)	All procedures.
Responsibilities	The Group Environmental Manager ensures that SEGRO UK's central and project environmental legislation registers are: <ol style="list-style-type: none"> 1. Created. 2. Reviewed at appropriate intervals. 3. Updated and amended as legislation changes.
Actions	<p>Central environmental legislation register The central legislation register must include:</p> <ol style="list-style-type: none"> 1. A list of the legal requirements relevant to SEGRO UK's activities, and details of any industry Codes of Practice or other controls to which the organisation subscribes. 2. Forthcoming acts of parliament and European Regulations which are relevant to business activities and operations. 3. A summary of the regulatory requirements and how they apply to SEGRO. 4. Policy requirements specifying the internal controls or standards of operation that SEGRO imposes on itself. These policies will be congruent with, if not in excess of, regulatory requirements. <p>The Group Environmental Manager will:</p> <ol style="list-style-type: none"> 1. Keep the register up to date, e.g. through review of forthcoming legislation. 2. On an annual basis, or as required, review the legal requirements. 3. Inform staff responsible for managing legal compliance of changes introduced. <p>Retention of records</p> <ul style="list-style-type: none"> • The central legislation register will be retained by the Group Environmental Manager with the Environmental Management Systems manual. • A copy will be available on the Company Intranet for staff access.
Supporting documentation	Croners' environmental regulations updates. SEGRO UK significant environmental aspects and impacts register.

7.2 Environmental policy review

Purpose	To review, document, communicate and implement SEGRO's environmental policy.
Related procedure(s)	7.1 Environmental legislation review. 7.3 Significant environmental aspects and impacts.
Responsibilities	<p>The Group Board is responsible for agreeing and implementing the Company Environmental Policy.</p> <p>All members of staff are responsible for implementing the Company Environmental Policy.</p> <p>The Group Environment Manager is responsible for ensuring that:</p> <ul style="list-style-type: none"> • The policy content is reviewed annually to reflect the Groups activities and significant aspects. • The revised policy is issued to Company Environment Representatives. • The revised policy is available for all members of staff in the UK. <p>Project Managers are responsible for ensuring that all contractors receive a copy of the environment policy and understand their environmental responsibilities.</p>
Actions	<p>The Group Environment Manager ensures that the Company Environmental Policy is reviewed:</p> <ol style="list-style-type: none"> 1. Annually or when company activities change. 2. By Environmental Management Representatives in UK, Europe and America. 3. Against SEGRO peer's Environmental Policy content. 4. To reflect: <ul style="list-style-type: none"> • Changes to the Groups' activities and environmental aspect in the UK, Europe and America (refer to procedure 7.3 Significant environmental aspects and impacts). • Developments in policy and legislation (refer to procedure 7.1 Environmental legislation review). <p>When appropriate, The Group Environment Manager will ensure that the revised policy is:</p> <ol style="list-style-type: none"> 1. Approved by the Group Board and signed by the Company Chairman. 2. Sent to Environmental Representatives in Europe and America with a request that they inform their staff and update their EMS documentation. 3. Communicated to all staff members in the UK. 4. Uploaded on the UK Intranet and Company Internet. 5. Displayed in prominent positions in the UK offices. 6. Saved with the electronic EMS manual documentation. 7. The obsolete version is retained electronically for 2 years. <p>Project Managers ensure that:</p> <ol style="list-style-type: none"> 1. All potential and employed contractors are provided with a copy of the adopted Company Environmental Policy. 8. Employed contractors are aware of their environmental responsibilities.
Supporting documentation	Company Environmental Policy on http://www.segro.com/ UK Significant environmental aspects and impacts register.

7.3 Significant environmental aspects and impacts

Purpose	To maintain a register that identifies SEGRO' UK activities, significant environmental aspects and impacts. The register enables the significance of these environmental impacts to be assessed and identified.
Related procedure(s)	7.2 Environmental policy review. 7.9 Management review.
Responsibilities	The Group Environment Manager ensures that a periodic review takes place and that the register is up to date and available to all UK members of staff.
Introduction	The register (UK's Significant Environmental aspects and impacts register) is a 'live document', within an Excel file that contains 4 sheets: <ol style="list-style-type: none"> 1. Introduction 2. Significance matrix 3. Aspects and Impact register 4. Glossary of terms. <p>The methodology for assessing significance is specified on sheet 1 and 2 of the register.</p>
Actions	The Group Environment Manager ensures that: <ol style="list-style-type: none"> 1. The UK register is reviewed and updated on a periodic basis, either when activities change or once every 6 months and in advance of the Management Review. 2. Changes to activities and aspect are included in the register. 3. The revised register is saved with the electronic EMS manual. 4. SEGRO UK staff are aware of the location of the revised register. 5. The obsolete version is retained electronically for 2 years.
Supporting documentation	SEGRO UK's Significant environmental aspects and impacts register.

7.4 Maintain and monitor the Company's environmental objectives and targets

Purpose	To review, document, communicate and implement SEGRO's objectives and targets, to drive continuous improvements in environmental performance.
Related procedure(s)	7.2 Environmental policy review. 7.3 Significant environmental aspects and impacts. 7.9 Management review.
Responsibilities	The Group Board is responsible for agreeing and implementing the Group's environmental objectives and targets. The Group Environment Manager is responsible for defining and reviewing the UK environmental objectives and targets.
Actions	The Group Environment Manager ensures that: <ol style="list-style-type: none"> 1. The Group environmental objectives and targets are reviewed annually and in advance of the Management Review. This shall include liaison with the Company Environmental Representatives and the CSR Manager. 2. New UK targets are set in consultation with appropriate managers and agreed by the Regional Managers and The Board. The new targets shall take into account any changes in the Company's activities and significant environmental aspects identified in the aspects register that are not managed by a procedure or method of control. 3. For each target an individual will be responsible for developing a program of action and meeting the target. 4. The Group targets shall be communicated to all relevant members of staff.
Supporting documentation	The current environmental objectives and targets are published in the CR report. SEGRO UK significant environmental aspects and impacts register. Company Environmental Policy.

7.5 Training and internal communications

Purpose	To provide information to all staff on the EMS and their associated responsibilities.
Related procedure(s)	7.2 Environmental policy review.
Responsibilities	The Group Environmental Manager ensures that: <ul style="list-style-type: none"> • New members of staff attend an environmental management induction. • Staff environmental training needs are reviewed annually. • The monthly newsletter includes an environmental piece.
Actions	<p>Training The Group Environmental Manager liaises with HR to arrange and conduct Environmental Induction(s) with new staff. The induction introduces the Company Environmental Policy, the EMS and their environmental responsibilities.</p> <p>The Group Environmental Manager liaises with Regional Directors to review staff environmental training needs on an annual basis.</p> <p>Internal communications The Group Environmental Manager will:</p> <ol style="list-style-type: none"> 1. Introduce an environmental section into the monthly newsletter to support awareness of the EMS and the SEGRO UK environmental performance. 2. Consider staff feedback on the EMS, and either respond directly or discuss the response with an appropriate member of staff before responding.
Supporting documentation	Company Environmental Policy. HR and training records.

7.6 External communication

Purpose	To ensure that appropriate responses are provided to external stakeholders regarding SEGRO' environmental management and performance.
Related procedure(s)	All EMS System Procedures.
Responsibilities	<p>The member of staff who receives the external communications regarding SEGRO environmental management and performance will ensure that an appropriate response is agreed internally and sent to the recipient.</p> <p>The Group Environment Manager will support recipients and the Corporate Communications Team.</p>
Actions	<p>External communications strategy SEGRO UK and Group stakeholders may make contact and ask questions on environmental issues and the company's environmental performance. Stakeholders include investors, tenants, potential tenants, property neighbours, potential employees, regulators, environmental groups, journalists, peers, supply chain companies, contractors, potential contractors and service providers. External communications regarding environmental issues may relate to SEGRO:</p> <ul style="list-style-type: none"> • Company Environmental Policy content. • Environmental Performance, including compliance with legislation, the design, construction and management of property. • Approach to concern such as climate change. • Response to proposed or current legislation. <p>Responding to external communications</p> <ol style="list-style-type: none"> 1. Upon receipt of an environmental communications, the details should be sent to the Environmental Administrator. 2. The Environmental Administrator records the communication in the Environmental communications file and forwards a copy to the Group Environment Manager. 3. The Group Environment Manager shall review and advise the recipient on the appropriate response. Further advice should be sought from the Corporate Communications Team if the communication is of a sensitive nature. 4. A copy of the response must be filed with the original communication. 5. The record of external enquiries and the responses should be retained for at least 2 years.
Supporting documentation	Environmental communication file. Company Environmental Policy. CR Report(s).

7.7 Document control

Purpose	Specifies the basic requirements which must be followed to ensure that documentation is adequately identified and therefore controlled.
Related procedure(s)	7.9 Management review.
Responsibilities	The Group Environmental Manager will ensure that the document control procedure is complied with.
Actions	<p>Document control The following steps must be taken to ensure that all EMS documentation can be accurately identified.</p> <p>Template Forms All forms must include:</p> <ul style="list-style-type: none"> • Reference name/title. • Reference to the EMS procedure. • Issue/version number. • Date of issue. <p>Revision to templates To ensure that superseded documentation is not in use, the obsolete forms should be:</p> <ul style="list-style-type: none"> • Removed from the master (paper/electronic) file(s) and identified as obsolete. • Replaced with the new documentation. • Retained by the Group Environmental Manager for reference for 2 years. <p>Completing records/forms Each time a form is used, the following details should be recorded:</p> <ul style="list-style-type: none"> • Date completed. • Name of responsible person or the author. <p>EMS procedures Each procedure should specify:</p> <ul style="list-style-type: none"> • Reference number and name/title. • Issue/version number. • Date of issue. • Page numbers. <p>Document approval Amendments which involve very limited or no technical or resource implications, the changes will be approved by the Group Environmental Manager. Amendments requiring the re-issue of the procedure and/or manual will be made by the Group Environmental Manager. The Group Environmental Manager ensures that the changes are:</p> <ul style="list-style-type: none"> • Saved with current EMS documentation. • Uploaded on the Intranet. • Introduced to all members of UK staff. <p>Where appropriate, are issued to contractors.</p>
Supporting documentation	All EMS procedures and templates.

7.8 EMS auditing

<p>Purpose</p>	<p>To monitor the effectiveness of the Environmental Management System, a planned program of auditing is planned and conducted.</p> <p>This procedure aims to check conformity against the management system elements and identify areas for improvement.</p>
<p>Related procedure(s)</p>	<p>7.9 Corrective and preventative action.</p>
<p>Responsibilities</p>	<p>The Group Environmental Manager ensures that the audit program is created, approved and implemented each year and retains copies of the auditing results. Regional Managers ensure that members of staff concerned comply with the requirements in this procedure and provide adequate resources to support the audit program.</p> <p>Auditor(s) undertake the audit then ensure that the findings are communicated and responded to accordingly.</p>
<p>Actions</p>	<p>EMS audits establish whether:</p> <ol style="list-style-type: none"> 1. Activities undertaken conform to the content of the EMS procedures, supporting documentation and legal requirements. 2. The EMS has been properly implemented and maintained. <p>Audit Program</p> <p>The Group Environmental Manager, in consultation with Environmental Representatives in countries with adopted EMS manuals, plans and co-ordinates the EMS annual audit program.</p> <p>The EMS annual audit program will specify the audit scope, auditor names and time of year when the audit is due.</p> <p>The Group Environmental Manager ensures that:</p> <ol style="list-style-type: none"> 1. Appropriate resources are in place to support the audit program for the UK. 2. The audit program gains the appropriate approval before being implemented. 3. Auditors are informed of the approved audit program. 4. Audit programs and reports are safely filed and retained for 2 years. <p>EMS Audit</p> <p>Trained auditor(s) with relevant experience and knowledge conduct the audits. The following steps are to be undertaken:</p> <ol style="list-style-type: none"> 1. Arrange a date for the audit with the Regional Manager. 2. Create an audit plan and provide a copy to the relevant Regional Manager. 3. Conduct the audit in accordance with the Auditing Program and with reference to procedure 7.9 Corrective and preventative action procedure. 4. Complete and send the Audit Report to the appropriate Regional Manager and a copy to the Group Environment Manager within 10 working days of the EMS audit. <p>The appropriate Regional Manager will ensure that:</p> <ol style="list-style-type: none"> 1. Appropriate members of their staff are available during the audit to accompany the auditor, answer questions and provide evidence. 2. Following receipt of the audit report, the agreed Corrective and Preventative actions are carried out within 2 weeks, or the agreed timeframe.
<p>Supporting documentation</p>	<p>EMS annual audit program. EMS Audit reports.</p>

7.9 Corrective and preventative action

Purpose	To ensure that appropriate response(s) and actions to Non-conformance(s) or Comment for action(s) raised are adopted.
Related procedure(s)	7.6 Document control. 7.7 EMS auditing.
Responsibilities	Any member of staff, contractor or auditor, at any time, can identify a Non-conformance or Comment for action. Regional Manager and/or Environmental Representative respond to a Non-conformance or Comment for action. The Group Environmental Manager monitors the corrective action requests on a periodic basis to ensure problems are not recurring.
Actions	<p>Definitions <i>Non-Conformance</i> is:</p> <ul style="list-style-type: none"> • A failure to adhere to the requirement of the procedures or the system; or • A significant aspect that can result in, or cause, a major breakdown in the EMS. <p><i>Comment for action</i> is either:</p> <ol style="list-style-type: none"> 1. A minor omission or shortcoming, that if left unmanaged or inadequately addressed could result in a non-conformance; or 2. A suggestion for an improvement to the system. <p>Once identified</p> <ol style="list-style-type: none"> 1. When a Non-conformance or Comment for action is identified the details will be recorded by the Group Environment Manager. 2. The appropriate Regional Environmental Representative or Manager: <ul style="list-style-type: none"> • Reviews the root causes and recommends appropriate preventative and/or corrective action. • Where necessary, informs an external authority. • Refers to procedure 7.7 Document control to change procedure content. • The auditor or person who raised the Non-conformance or Comment for action, checks that the preventative and/or corrective action has been carried out within the agreed timeframe. In the case of an external auditor raising a Non-conformance or Comment for Action, the Group Environment Manager ensures corrective and preventative actions are carried out within the agreed timescale. 3. The Group Environmental Manager uses the auditing results to improve the EMS documentation and drive continual improvements in UK's environmental performance. For example by reviewing the Non-conformances and Comments for action on a periodic basis, to ensure problems are not recurring repeatedly and reports the results internally.
Supporting documentation	EMS annual audit program.

7.10 Management review

Purpose	<p>For Senior Management to review the UK EMS on a regular basis, to ensure its suitability and adequacy.</p>
Related procedure(s)	<p>All EMS System Procedures.</p>
Responsibilities	<p>SEGRO Group Environmental Manager will chair the Management review meeting and ensure that the review is carried out periodically.</p> <p>Members of the Management Team will be in attendance.</p> <p>The Group Environmental Manager will chair the Environmental Representatives meeting and prepare appropriate information in advance for the Management Review.</p> <p>UK Environmental Representatives will carry out an environmental review of their department/region's environmental performance in advance of the Environmental Representatives meeting and Management Review meetings.</p>
Actions	<p>UK Environmental Representatives meeting UK Environmental Representatives meet the Group Environmental Manager once every 3 months and in advance of each Management Review meeting.</p> <ol style="list-style-type: none"> 1. UK Environmental Representatives will attend to provide information which will support the Management Review meeting. For example, report their department/regions environmental management performance, to date, against objectives and targets. The group can then discuss and propose future actions/approaches which may require Management approval. 2. The Group Environmental Manager will chair the UK Environmental Representatives meeting. <p>UK Management Review Preparation The Group Environmental Manager ensures that:</p> <ol style="list-style-type: none"> 1. The Environmental Representatives meeting outcomes are used to prepare for the UK Management Review. 2. Environmental data related to the agenda items, listed below, are requested and collated in advance of the UK Management Review meeting. <p>UK Management Review The Management Review should be undertaken every 6 months for the first year and then annually thereafter. A member of the Management Team will chair this meeting and ensure that the agenda items, listed below, are covered. The Group Environmental Manager will:</p> <ul style="list-style-type: none"> • Prepare and present appropriate data for/during the meeting. • Ensure that the minutes and actions are disseminated to Board Members, the UK and Group Environmental Representatives.

Actions cont...	UK Management Review Agenda Items The following items must be included in the Management Review agenda: <ul style="list-style-type: none"> • Changes to activities within the business. • Changes in Environmental Legislation. • Review of significant environmental aspects. • Review of the Company Environmental Policy. • Progress against environmental targets. • Number of environmental audits conducted and the results, including the number of Non-Conformance and Comment for action.
Supporting documentation	SEGRO UK Significant environmental aspects and impacts register. Environmental regulations register. Environmental objectives and targets. EMS Audit reports. Company Environmental Policy.