



Environmental Policy



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2. Introduction

Overview

The purpose of this document is to set out Wave’s commitment to reducing our impact on the environment, the environmental standards for all areas of our business, which we expect all our employees and contractors to meet and our ambition to help customers reduce consumption and act in a more sustainable way.

Scope

Wave provides utilities retail services and related additional services to business and public-sector customers across the United Kingdom.

This policy covers all of Wave’s business activities in all locations and applies to all employees.

The scope also includes work carried out by contractors on our behalf.

3. Our Commitments

Wave are committed to the creation of a more sustainable world and the protection of our natural environment in delivering our services and to achieving continuous improvement in environmental management and performance.

We will:

- Achieve net-zero carbon by 2030;
- Achieve zero waste to landfill by 2030;
- Achieve the Waterwise Checkmark for Water Consumption in all Wave offices in FY23/24;
- Influence our customers to reduce water consumption by 9,400,000m³ by FT25/26
- Engage with our employees to capture and monitor positive environmental practises at home through the Alaya platform. This will be embedded across the business.
- Comply with all relevant environmental legislation, other applicable requirements and current best practice, fulfilling and, where possible, exceeding our compliance obligations;
- Ensure that appropriate resources are available to maintain, monitor and, where necessary, improve environmental performance;
- Integrate the consideration of environmental aspects and impacts into our decision making and activities;
- Train, educate and inform our employees about environmental issues that may affect their work, promote environmental awareness among our employees, and encourage them to work in an environmentally responsible manner;
- Use natural resources sustainably, and purchase products and services that do the least damage to the environment;
- Lead by example on water efficiency, minimising water use within our own buildings, and advising our customers on water efficiency through our range of services;
- Minimise energy use within our buildings and processes and choose sustainable energy sources where possible and in our control;
- As far as is possible, use natural resources sustainably, and purchase products and services that do the least damage to the environment;
- Set stretching targets to crystalise our ambition for reducing our own and our customers impact on the environment. We will be accountable and report progress against these targets on an annual basis in the form of a sustainability report.

4. Context

Environmental Aspects and Impacts

The elements of our activities and services that can interact with the environment and which may cause (either adverse or beneficial) impacts on the environment include:

- Travel – greenhouse gases and other emissions from vehicles can contribute to local air quality issues and global climate change;
- Use of energy (gas and electricity) to power our working environments (e.g. heating, air conditioning, lighting) and equipment (e.g. computers) - can cause greenhouse gas and other emissions, contributing to air quality issues and climate change;
- Use of water in our working environments - can contribute to depletion of water resources;
- Our services to our customers - can influence their usage of water, which may result in either depletion or conservation of water resources;
- Use of natural resources in the form of equipment and consumables (e.g. paper);
- Production of waste, which needs to be disposed of.

A full list of our environmental aspects and impacts (including scoring criteria and significant aspects) is recorded in our Environmental Risk Register and reviewed annually.

Environmental Conditions

External and internal issues and environmental conditions that are relevant to our business and may affect our environmental management system include the following:

- The size of our business, the number of employees, the location of our workplaces, our customers' requirements and the state of the markets that we operate in – can affect our travel requirements, energy, water and resource usage;
- Our customers' demands for our services may be influenced by UK climate and weather conditions, particularly rainfall levels, flooding and drought conditions in areas we operate;
- Our water, energy and resource usage may be affected by the availability and performance of supplier services.

Our processes will also be shaped by our compliance obligations and regulatory requirements. A full list of our compliance obligations is kept in our Legal Register and reviewed at least annually.

Stakeholders

The needs and expectations of interested parties that are relevant to our environmental management system include:

- Employees – expect us to be an environmentally responsible employer, and also require the use of water, energy, resources and suitable facilities to do their work and support their welfare needs;
- Customers – expect us to be an environmentally responsible supplier, and require us to supply them with quality services;
- Contractors and Suppliers – require us to purchase their goods and services;

- Owners – require us to operate a successful business and maintain a good company reputation;
- Regulators – expect and require us to comply with relevant obligations;
- Neighbours – expect our business to operate in a manner that does not cause undue disturbances (e.g. noise, pollution).

5. Roles and Responsibilities

Everyone in Wave has a role in maintaining our environmental management system and enhancing environmental performance. The following roles have particular responsibilities:

Role	Responsibilities
Chief Executive Officer (CEO)	<ul style="list-style-type: none"> • Taking accountability for the effectiveness of the environmental management system; • Ensuring that the environmental policy and environmental objectives/KPI's are established and are compatible with the strategic direction and the context of the business; • Ensuring that the resources needed for the environmental management system are available;
Directors and senior managers	<ul style="list-style-type: none"> • Ensuring the integration of the environmental management system requirements into business processes; • Ensuring that the environmental management system achieves its intended outcomes; • Directing and supporting persons to contribute to the effectiveness of the environmental management system; • Promoting continual improvement; • Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility; • Communicating the importance of effective environmental management and of conforming to the environmental management system requirements;
Support Services Manager	<ul style="list-style-type: none"> • Ensuring that the environmental management system conforms to the requirements of ISO 14001:2015; • Reporting on the performance of the environmental management system to the Leadership Team; • Providing expert advice to the business on environmental matters; • Overseeing a programme of internal and external environmental audits.
Purchasing Managers	<ul style="list-style-type: none"> • Ensure environmental aspects and impacts are considered in relation to procurement of goods and services.
Contractor Managers	<ul style="list-style-type: none"> • Ensure environmental aspects and impacts are considered in relation to work done on our behalf by contractors and hold contractors to account for their environmental performance.
People Managers	<ul style="list-style-type: none"> • Ensure that employees doing work in their area of responsibility that has the potential to affect environmental performance, are competent on the basis of appropriate education, training or experience.
All employees	<ul style="list-style-type: none"> • Conform to the requirements of our environmental management system insofar as they apply to their particular roles; • Work in an environmentally responsible way as far as possible. • Utilise and engage with the Alaya platform to capture positive environmental impacts at home

6. Planning

Wave will use the British and International Standard for environmental management systems, BS EN ISO 14001:2015, as the framework for its environmental management system. Compliance will be audited periodically.

Risks and Opportunities

Considering the scope of our environmental management system, relevant environmental issues, environmental aspects and impacts, requirements of interested parties, and compliance obligations, there are various risks and opportunities that need to be addressed.

These will include:

- Risk of breach of legislation;
- Risk of lack of employee awareness or commitment to environmental issues;
- Opportunities to provide services to help customers use water responsibly;
- Opportunities to increase efficiency, save resources and money and reduce environmental impacts (Carbon Footprint).

Environmental Action Plan

An Environmental Action Plan will be created and reviewed bi-monthly with the Environmental Working Group. The action plan will then be reviewed quarterly at the CSR Steering Group and six-monthly with the Senior Leadership Team. Actions will be planned to address identified risks and opportunities, environmental aspects and impacts, compliance obligations and environmental objectives.

7. Operation

Competence, Training and Awareness

We will ensure that all our employees and those doing work on our behalf that may affect environmental performance, are competent on the basis of suitable training, education, experience and awareness.

Communications

We will issue relevant internal and external communications on environmental matters as required, in order to inform, instruct or engage stakeholders as appropriate. Employees will be made aware of our environmental policy, their responsibilities, our significant environmental aspects and our environmental objectives.

We will listen and respond to communications from our stakeholders regarding our environmental management system in order to improve environmental performance.

Documentation

Company documentation such as policies, procedures and guidance information will be controlled in line with our Document Control Procedure.

Operational Control

We will put in place appropriate operational controls to manage our environmental aspects and impacts and enhance environmental performance. Controls may include processes, systems, procedures, training and documentation.

We will ensure that environmental requirements are taken into consideration when planning new products and services, purchasing goods and services, or making changes to business processes, systems, or activities.

Procedures will include emergency preparedness and response to emergency situations where relevant.

8. Performance Evaluation and Improvement

Monitoring, Measurement and Evaluation

We will monitor and measure our performance against our environmental objectives, and performance information will be reported against monthly KPI's.

We will monitor and evaluate performance against our environmental compliance obligations as listed in our legal register. Compliance will be evaluated through internal audits. Environmental performance of contractors will be monitored by the team(s) responsible for managing them.

Nonconformities, Corrective Actions and Continual Improvement

When nonconformities occur, we will take appropriate action(s) to deal with the problem and its consequences, mitigate any adverse impacts where possible, determine the root cause(s) and eliminate the cause(s) to prevent recurrence.

Records of nonconformities and corrective actions will be kept.

Internal Auditing

We will schedule and operate an internal environmental audit programme in order to evaluate whether our environmental management system has been properly implemented, maintained and effective in meeting policy and objectives, and to monitor compliance with the requirements of our environmental management system. Auditing will include critical areas of our supply chain.

Internal Auditing

The Wave Leadership Team will review the environmental management system at planned intervals to ensure its continuing suitability, adequacy and effectiveness.

9. Change History

This is a CONTROLLED document. Any printed copy must be checked against the current electronic version prior to use.

Version	Date	Author	Information Owner	Comments	Date for Review
1	11/01/2018	Sarah Wilkinson	Sarah Wilkinson	First Version	11/01/2019
1.1	03/01/2019	Matt Hobbs	Matt Hobbs	Updated to remove SHEQ Manager and replace with Support Services Manager	03/01/2020
2	13/01/2022	Matt Hobbs	Matt Hobbs	Updated to include new commitments following agreement at WLT and Board, inclusion of the Alaya platform and updated to employee roles and responsibilities	13/01/2023