



Environmental Management Policy Standard

Issue Date:

1st July 2010

Authority:

Directors AES Group

Applicability:

AES Group

covering all business divisions, operating companies and business units throughout the world

Executive Summary

This Policy Standard describes the way in which environmental management is to be performed throughout AES and associated companies. It sets out the aims and objectives and the documentary framework for the management of the environment as defined in the Health, Safety and Environment Policy Statement for AES Group. AES objectives with regards to the environment so to ensure that we understand and effectively manage the actual and potential environmental impact of our activities. Our operations will be conducted with due consideration being given to sustainability and the limited use of natural resources. We will comply with all legal requirements in areas where we carry out our business to prevent damage to the environment.

We will achieve and demonstrate sound environmental performance through the identification and control of the impacts of our activities and services on the environment consistent with our overall environmental policy and objectives.

1 - Introduction

This Environmental Management Policy Standard is concerned with achieving and demonstrating sound environmental performance through the identification and control of the impacts of our activities and services on the environment consistent with our overall environmental policy and objectives.

Through the implementation of this policy standard divisions and their business units will be provided with the assurance that their performance meets and will continue to meet their legal and policy requirements.

1.1 Definitions

For the purpose of this policy standard, the terms and definitions listed in ISO 14001:2004 Environmental management systems – Requirements with guidance for use apply.

2 - Commitment and Objectives

AES' objective with regard to the environment is to ensure that we understand and effectively manage the actual and potential environmental impact of our activities. Our operations will be conducted with due consideration being given to sustainability and the limited use of natural resources. We will comply with all legal requirements in areas where we carry out our business to prevent damage to the environment.

Our commitment extends to all our activities, wherever they take place, which have the potential to adversely affect the environment. We aim to prevent environmental damage, minimise energy and resource usage and ensure that the principles of sustainable development are operated throughout all AES's operations. We will therefore:

- identify the significant environmental aspects and impacts from current and relevant past activities and services and, where we have direct control or can be expected to have an influence, implement an appropriate environmental management system;
- minimise and where reasonably practicable eliminate any adverse impact on the environment arising from the activities of our business;
- minimise the use of energy, resources consumed and waste produced while undertaking our business activities in a safe and professional manner;



- support the reduction, reuse and recycling of materials and ensure the legal disposal of all waste arising from the activities of the business;
- comply with legal requirements and where appropriate go beyond compliance with the minimum environmental requirements of legislative bodies and our customers;
- make appropriate resources available to manage the environment and ensure human resource roles, responsibilities and authorities are defined.
- ensure that all staff whose work may create a significant impact upon the environment are provided with adequate and appropriate information and training and are competent in environmental matters;
- inform and train our staff in understanding and fulfilling their environmental responsibilities and those of the company;
- establish and measure environmental performance against objectives and/or targets;
- regularly review our environmental management system at senior management level with a view to continually improving our environmental performance.

3 - Principles

AES senior managers are committed to improved environmental performance through the issue of policies and objectives, which highlight management of the environment and the need to ensure compliance with environmental requirements.

AES facilitates a culture of environmental stewardship and sustainable development through the recognition of the impacts of its activities and service provisions on environmental conditions and the adoption of practices that eliminate or reduce negative environmental impacts and where practicable generate positive environmental impacts.

We will ensure that wherever we are operating and whatever our activities, we do everything possible to prevent pollution of the environment, minimise the use of energy, conserve natural resources and reduce waste and encourage our customers, contractors and suppliers to do likewise.

The primary focus for environmental management rests with business unit ensuring that all significant environmental aspects and impacts are identified and satisfactorily dealt with and that employee input is sought.

Personnel are assigned the necessary authority, accountability, and responsibilities to address environmental performance.

Where activities are subject to legal controls and statutory legislation it is the responsibility of those managing the operation to make themselves fully conversant with such controls and legislation and to take such steps as may be necessary to ensure compliance.

4 - Requirements

4.1 Environmental Management System

All business divisions and business units within AES Group worldwide will operate an effective Environmental Management System appropriate to their business based on the latest requirements of ISO 14001. Where we are not in full control of the operating environment or where it is a requirement by our customer, environmental management may be met through operating within the customer's environmental management system.

The Environmental Management System will ensure that the significant environmental aspects and impacts of the business unit's activities and services are identified, taking into account planned or new developments, and that the applicable legal requirements and how these requirements apply to the environmental aspects are also identified.

Objectives and targets for the improvement of environmental performance are to be established along with a programme for their achievement.



4.2 Environmental Management Operation

Resources essential to the operation and improvement of the management system will be provided and all staff will have clearly defined roles, responsibilities and authorities.

Staff will be adequately trained, motivated and competent to carry out the tasks they are required to do. Staff and others working on behalf of the Company will be aware of the significant environmental aspects and related actual or potential impacts associated with their work.

Business units will plan those operations that are associated with identified significant environmental aspects and ensure they are carried out under controlled conditions.

Management will ensure that when obtaining services from external sources such as contractors, those contractors have a sound understanding of environment issues, recognising their potential for causing environmental impact. Product and materials purchased should be from sustainable sources with an emphasis on using recycled materials whenever possible.

Business unit managers will identify potential emergency situations and potential accidents that can have an impact on the environment and how it will respond to them. All incidents will be attended to immediately they occur with the aim of containing any environmental damage thereby reducing the effects to a minimum. Emergency procedures will be clearly defined, established and regularly practised wherever there is a high risk of causing significant environmental impact. All serious incidents will be reported, recorded and thoroughly investigated.

4.3 Environmental Assurance

Where we operate within our own Environmental Management System all businesses will undertake/produce:

- *Environmental Surveys* will be carried out upon initial acquisition of the site/contract to identify potential problems that could lead to environmental damage.
- *Environmental Monitoring* will consist of a regular programme of audits of the Environmental Management System. Using auditors from another division within AES is to be encouraged as the cross fertilisation of ideas and experiences will prove invaluable. Environmental auditing is a useful and effective form of monitoring and those techniques should be applied where relevant. Audit report results along with incident reports and analysis will be required for compilation of divisional quarterly reports to be submitted to the Assurance Group.
- *Environmental Records* will be a requirement of the Environmental Management System and they will form a basis for providing assurance to the business and the Assurance Group of the effectiveness of the system.
- *Risk Assessment* will form an integral part of the Environmental Management System and with due consideration being given to the environmental aspects and impacts, the corrective/control measures being applied proactively will reduce the likelihood of adverse environmental impact.
- *Management Review* will be carried out at planned intervals by top management to ensure the continuing suitability, adequacy and effectiveness of the environmental management system. The outputs from management reviews will include any decisions and actions consistent with the commitment to continual improvement.



5 - Responsibility and Authority

This policy standard is issued under the authority of the Directors, AES Group. Responsibility for implementation of this policy standard is set out below.

- Responsibility for the achievement of this policy standard rests with the Executive Team.
- Directors are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their division and report to their divisional board. They are also responsible for ensuring that resources essential to the effective implementation of this Policy Standard are made available.
- Managers are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their operations and report to their contract board.
- All staff are responsible for the ownership and undertaking of their environmental management functions in accordance with this Policy Standard and for its implementation within the framework of Serco's procedures and directives.
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6 - Evidence of Compliance

To demonstrate compliance with this Policy Standard, the following documentation is to be available for audit:

- AES Group
 - a) Environmental Management Policy Standard (This document)
 - b) Related policy statements and procedures
 - c) Internal Audit reports
- AES Divisions
 - a) Environmental Management System
 - b) Procedures/Processes
 - c) Audit/review records
- Operating Contracts/Projects
 - a) Environmental Management System
 - b) Procedures/Processes/Work Instructions
 - c) Audit/review records

7 - Guidance

Supporting policy and guidance documentation is available on the HSE Assurance Group site available through the contact SHE / Office Manager.

The following international standards provide useful guidance on the implementation of environmental management Systems:

- ISO 14001:2004 Environmental Management Systems – Requirements with guidance for use.
- ISO 14004:2004 Environmental Management Systems - General guidelines on principles, systems and support techniques.