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# Littlefish Environmental Policy

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## Version Control

Version	Author	Change	Release Date
0.0	Kate Birchall Chloe Fellows Greg Chambers	New policy	01/11/2021
1.1	Chloe Fellows Laura Howlette	Policy Review	24/05/2023
1.2	Chloe Fellows Mark Kirkwood	Policy Review Minor amendments, addition of Facilities to Organisational Structure. Added net zero commitment and relevant environmental frameworks. Removed reference to Environmental adviser, replaced with ESG Lead.	15/05/2024
1.3	Chloe Fellows Mark Kirkwood	Policy Review Updated CEO details Added Procurement Manager to organisational structure. Added Supplier Code of Conduct, removed mention of Sustainable Procurement Statement. Minor wording changes.	16/05/2025

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## Environmental Policy Statement

Little Fish (UK) Ltd are committed to protecting the environment. We conduct our business in the right way so as to minimise any negative impact on the environment from our operations. We follow an environmental lifecycle perspective when developing and evaluating our management system, to ensure that all aspects are considered. We seek to follow the best practice and use the guidance from the United Nations 'Sustainable development goals' as the blueprint to achieve a better and more sustainable future for all. [THE 17 GOALS | Sustainable Development \(un.org\)](https://www.un.org/sustainabledevelopment/)

Our commitments are as follows:

- We will put processes in place to ensure our activities are carried out in a way that causes minimum disruption to the environment and prevents pollution.
- We will assess our carbon emitting activities and take actions to offset these.
- We will maintain a high level of awareness, motivation and training for all staff, and to encourage staff involvement in new initiatives to help improve Little Fish (UK) Ltd's environmental performance.
- We consider the impact of our office facilities and work equipment on the environment when making purchasing decisions and aim to reduce our carbon footprint as a business.
- Our last option is landfill, and we will endeavour to repair, donate or recycle unwanted equipment, packaging and other business waste.
- We will continuously monitor our environmental performance and set targets to improve.
- At all times, we will fully comply with relevant environmental legislation, and will promote environmental best practice outside the immediate organization wherever possible.

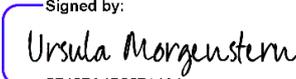
As part of an ongoing process to achieve these aspirations we set objectives and targets that are communicated to workers and reviewed at regular intervals.

Little Fish (UK) Ltd have implemented an integrated management system in accordance with the principles of ISO 14001:2015 and are dedicated to ensuring the implementation and continual improvement of this system.

We recognise that environmental management is the prime responsibility of senior management, who will ensure that there are adequate resources available to implement this policy.

As Chief Executive Officer, I am fully committed to ensuring the implementation of this policy and continual improvement of our environmental management system.

Signed:

Signed by:  
  
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Ursula Morgenstern, CEO

16/05/2025

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## Organisational Structure

This section details the responsibilities for formulating, implementing and complying with Little Fish (UK) Ltd's Environmental Policy.

### 1.1 CEO: Ursula Morgenstern

The CEO is ultimately accountable for all matters relating to environmental management and sustainability throughout Little Fish (UK) Ltd.

As part of the Executive Board, the CEO commits to engaging with monthly ESG updates at the Board meeting and responding to feedback and suggestions appropriately. The CEO shall encourage and motivate workers by inspiring interest in environmental matters and leading by example.

### 1.2 ESG (Environment Social and Governance) Lead

The ESG Lead is responsible for providing advice and guidance on environmental matters, and:

- Shall ensure that an adequate written Environmental Policy is produced, monitored and revised as appropriate and that the Environmental Policy is brought to the attention of all workers.
- Shall ensure that all managers are fully aware of their duties with regards to environmental management, reporting and compliance.
- Shall ensure that all workers receive adequate environmental training and information, relevant to their role.
- Shall encourage and motivate workers by inspiring interest in environmental matters and by setting a personal example; for example, by acting as Chair for the Littlefish "littlefootprint" group.
- Shall monitor environmental standards and review any trends regarding environmental incidents at work and promote actions to prevent recurrence.
- Shall ensure that adequate time and importance is allocated to environmental matters at Management Meetings.
- Shall ensure that best practice is encouraged within the supply chain *via* a Supplier Code of Conduct.
- Shall ensure that prompt and proper communication is maintained with the Environment Agency and other enforcing authorities on any appropriate matter.
- Shall create, review and update environmental risk assessments, emergency plans and COSHH assessments.
- Shall ensure that there is a method for the above records to be effectively communicated to staff, and shall communicate major changes in policy promptly
- Shall ensure that the company is meeting its legislative requirements regarding environmental law and is adhering to best practice wherever possible.
- Shall carry out environmental compliance audits on the workplace.
- Shall provide guidance to other workers on good environmental practices for their work with clients.

### 1.3 Facilities

The facilities team at both office sites shall support the ESG Lead in maintaining good environmental practices, and:

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- Shall ensure proper implementation of environmental initiatives as per ESG Lead guidance.
- Shall liaise with contractors to ensure regulatory compliance.
- Shall upload and maintain site specific maintenance records and annual assessments through the management system.
- Shall support the ESG Lead with audit actions for continual improvement.

#### 1.4 Procurement Manager

The Procurement Manager shall support the ESG Lead in ensuring good environmental practices at point of procurement, and throughout the supply chain, and:

- Shall maintain a Supplier Code of Conduct that ensures new suppliers are encouraged to align with best practice on environmental responsibility.
- Shall maintain a supplier management system that monitors compliance with environmental responsibilities throughout the supply chain.
- Shall ensure that purchasing through a new supplier involves a vetting process to encourage sustainable procurement practices.
- Shall regularly review purchasing patterns and identify areas for improvement in relation to this environmental policy.

#### 1.5 Departmental / Line Managers

Departmental / Line Managers are responsible for ensuring that all appropriate environmental measures are being carried out effectively within their area of management, and:

- Shall ensure that Little Fish (UK) Ltd Environmental Policy is effectively implemented in all functions under their control.
- Shall encourage and motivate workers by inspiring interest in environmental matters and by setting a personal example.
- Shall ensure that all work necessary to maintain environmental risk reduction is carried out promptly.
- Shall ensure that the workforce under their control is adequately informed of risk controls and furthermore that the operatives are competent to carry out their work and are fully aware of all environmental hazards.
- Shall report any environmental incidents within their team to the ESG Lead immediately.
- Shall respond promptly to any requests or concerns raised by their staff, relating to environmental management in their role, or a lack of skill to deal with an environmental issue appropriately.

#### 1.6 All workers

All workers (including temporary staff) are expected to take reasonable care of their immediate environment whilst at work, co-operate in the steps which their employer must

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take to comply with environmental legislation, and refrain from interfering or misusing anything provided in the interests of environmental risk reduction.

Little Fish (UK) Ltd requires that all workers:

- Shall be familiar with and conform to the Environmental Policy.
- Shall observe all instructions around environmental risk mitigation and carry out their work in the way they have been instructed and trained to do so.
- Shall comply with Emergency Procedures applicable at the workplace.
- Shall report any environmental hazards or hazardous conditions to their immediate supervisor.
- Shall be mindful of the environment whilst working and keep their workplace in a tidy condition, preventing pollution, resource and energy wastage, and ensuring that waste is disposed of correctly.
- Shall report any defects in equipment to their immediate supervisor, and under no circumstances attempt any makeshift repairs.
- Shall report to their immediate supervisor any observed environmental incidents, including spills and incorrect waste disposal.
- Shall inform their immediate supervisor if the environmental management for a job, which they have been asked to carry out, gives cause for concern, or, if they feel that they do not possess the necessary skills or experience to carry out the work in an environmentally friendly manner.
- Shall engage with environmental initiatives wherever practicable.

## 1.7 Contractors

All contractors / subcontractors and key suppliers will be expected to comply with this Environmental Policy and must ensure that their own Policy is available when requested.

- New suppliers/contractors must abide by and sign the Littlefish Supplier Code of Conduct, which sets clear expectations on sustainability of their operations.
- Contractors must comply with the conditions under which they have been employed, at all times; failure to do so could see them being removed from the workplace.
- All work must be carried out in accordance with the relevant statutory provisions.
- Where deemed necessary and when asked to do so, Contractors must provide their own Environmental Risk Assessments and Method Statements to the Management of this Company, prior to work commencing on Little Fish Ltd premises. No works will be allowed to commence until such Methods of Work have been agreed.
- Contractors should endeavour to engage with the Procurement Manager, the legal team and ESG Lead to provide all relevant Environmental accreditations and sustainability information, and onboard through our supplier management platform.
- All plant or equipment brought onto Little Fish (UK) Ltd premises by the Contractors must be safe and in good working condition, with any necessary certificates available for checking where required (including servicing schedules, statutory inspection, calibration, PAT testing etc.).
- Any environmental incident caused by the Contractor must be reported in the first instance to Little Fish (UK) Ltd's facilities mailbox (facilities@littlefish.co.uk)

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- Any material or substance that is brought onto the premises which is hazardous to the environment must be accompanied by the relevant COSHH Assessment.
- Contractors are particularly asked to note that workplaces must be kept tidy and all debris, waste material, etc., is cleared and disposed of correctly as work proceeds.
- Contractors may be asked to provide waste carrier licences and waste transfer notes for any material disposed of by them or a contractor that they have appointed.

## Environmental Arrangements

To give effect to the Environmental Policy Statement, the following arrangements are in place. They form the basis of how environmental management will be integrated into Little Fish Ltd.'s working practices.

### 2.1 Procedures

Where required, procedures that will detail specific environmental responsibilities, requirements, and actions to comply with legislation will be implemented / provided to support the Little Fish Ltd Environmental Policy.

Our environmental records and documentation are kept on the management system, and upon request a copy will be made freely available.

### 2.2 Risk Management

Little Fish Ltd will follow our risk assessment procedure to identify environmental aspects and their impacts and determine the most effective way to eliminate or reduce their likelihood and severity. We follow a lifecycle perspective when analysing environmental risk, looking at the hazards that form part of our processes but are outside of our immediate control. All risk assessments are stored in the management system and communicated to staff.

If a new work process is to be introduced that carries different environmental risks to our existing processes, this will not commence until an environmental risk assessment has been carried out and the necessary controls are in place to reduce the hazards to as low a risk as is reasonably practicable. This includes, but is not limited to, working in new locations or sites outside an office environment, business travel means, producing a new waste stream, extension of or opening a new Little Fish Ltd office, or changes in the type or usage of energy.

### 2.3 Environmental Incident Reporting

Environmental incidents at work must be reported; this includes any incident which has, or may have, a significant environmental impact, including incorrect disposal of waste, pollution events, destruction of habitats, and archaeological or ecological damage. A record is kept of all incidents, and the circumstances are always investigated to see if any special actions are required on the part of management.

Near miss incidents must also be reported, as these assist in identifying potential problems / trends which may prevent an accident occurring in the future.

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Initial investigation will be by the line manager then, dependant on severity, by a more senior manager. The ESG Lead will be informed of all serious incidents and assist the company in investigating these. The Environment Agency (EA) will be informed where required.

All environmental incidents or near misses are reported in the first instance to Facilities ([facilities@littlefish.co.uk](mailto:facilities@littlefish.co.uk))

## 2.4 Legal Obligations

Little Fish Ltd recognises the legal obligation placed on it by relevant environmental legislation and statutory instruments. We maintain a legal register within the management system and get regular updates on changes to regulations to ensure this is kept current and that we remain compliant.

## 2.5 Waste Management

Our policy for waste management is apply the waste hierarchy in accordance with the Waste (England and Wales) Regulations 2011, in order to minimise waste production, encourage reuse, recycling and recovery, and divert waste from landfill or less environmentally beneficial disposal routes.

Little Fish Ltd have carried out an audit to identify all waste streams found within the business. These are documented within the management system, alongside the management tools for each waste stream. When a new project is started where waste may be generated that Little Fish Ltd is responsible for managing, we will evaluate the storage and disposal of this waste and record it within the management system.

We carry out due diligence checks on all waste contractors used, including reviewing and storing waste carrier licences and waste transfer notes on file, and auditing these for compliance.

If Hazardous waste is generated, such as WEEE or batteries, additional checks will be undertaken. If we have working IT equipment that we can no longer use within the business, this will be donated to charity or good causes for reuse; otherwise, WEEE shall be collected through accredited WEEE refurbishment and recycling schemes.

## 2.6 Energy and Resource Monitoring

Little Fish Ltd are committed to reducing our carbon footprint. We comply with Streamlined Energy and Carbon Reporting (SECR) and Energy Saving Opportunity Scheme (ESOS) Phase 3. We aim to record and monitor our energy and fuel usage across the business, set targets to reduce these wherever possible, and offset our Scope 1 and 2 carbon emissions once annually. We have a commitment to achieve Net Zero emissions by 2040.

Where we are a tenant, we will endeavour to influence building management to adhere to best practice in environmental matters e.g. green tariff purchasing.

## 2.7 Business Travel

Staff are encouraged to consider how they travel to work. Little Fish Ltd have based our offices in central city locations well served by public transport and offer secure bike storage at each site, in addition to discount public transport schemes where practicable.

Wherever possible, Little Fish Ltd utilise technology to reduce the need for business travel. Sometimes this is unavoidable, and staff will have to travel for work purposes, either between

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Little Fish Ltd offices, to client sites, or for business meetings and networking events. Where public transport is not practical and workers must drive their own vehicle, this is covered by our Driving for Work Policy.

Business travel is monitored by type to understand trends and drive improvement.

## **2.8 Procurement**

We are conscious that our purchasing decisions can have an impact on the environment. We consider the environmental credentials of our suppliers and any products or materials that are purchased, and the shipping method and distance, and are committed to choosing ethical local suppliers wherever possible.

We carry out pre-qualification checks on any major supplier or subcontractor to Little Fish Ltd and ask for environmental certification and policies to ensure that their views align with our own – this includes onboarding through a supplier management platform, and signing of a Supplier Code of Conduct

## **2.9 Hazardous Substances**

Any hazardous substance that is used by Little Fish Ltd or stored at a Little Fish Ltd site will have a COSHH Assessment carried out for it. This will include any environmental considerations regarding storage, use and disposal.

The *ad hoc* purchasing of hazardous substances for specific purposes will be monitored, and guidelines provided to discourage unnecessary purchasing e.g. bulk buys

## **2.10 Monitoring and Audit**

Regular audits and inspections will be carried out to ensure the requirements of this policy are being met, to include process compliance audits, legislative compliance audits and office inspections.

## **2.11 Distribution and Review**

Little Fish Ltd Environmental Policy will be brought to the attention of all workers and shall be monitored to ensure efficiency and effectiveness. It will be reviewed annually, and amendments will be made where necessary.