



Phoenix Energy Holdings Ltd
Environmental Policy Statement

July 2018

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1.0 INTRODUCTION

The Company recognises that its operations can directly impact on the environment. This includes humans and their interaction with air, water, land, natural resources, flora and fauna.

The Company aims through the Environmental Policy to continually assess and manage the environmental implications of our activities. The Company will actively seek the compliance and co-operation of contractors, sub-contractors and suppliers along with all employees working on its behalf in minimising the adverse effects that its operations can have on the surrounding environment.

The Environmental Management System is designed to comply with the requirements of the BS EN ISO 14001 standard. It is appropriate to the nature, scale and environmental impacts of the Company's activities throughout their life cycle.

2.0 PURPOSE

The purpose of this policy is to outline how the company will endeavour to minimise the impact to the environment of all areas of the Company's activities.

3.0 SCOPE

This policy applies to all employees of Phoenix Energy Holdings Group and its subsidiaries ("The Group").

4.0 DEFINITIONS

Companies within Phoenix Energy Holdings:

Phoenix Natural Gas Ltd is responsible for the construction and safe operation of the Phoenix Natural Gas Distribution Network.

Phoenix Energy Services Ltd provide servicing and maintenance services to the home heating market within Northern Ireland. They also provide emergency response and asset maintenance services to Phoenix Natural Gas.

5.0 POLICY

The Group Directors and Management are fully committed to the protection of the environment, achieving high standards in environmental performance and minimising the environmental impact from all activities, via the implementation, operation and maintenance of its Environmental Management System.

5.1 Policy Statement

Specifically the Group:

- Will comply with or exceed compliance obligations, including legislation requirements, regulations, and any other industry standard to which the Group subscribes. We will ensure that all significant environmental impacts have been identified and assessed and measures taken to mitigate against them throughout their life cycle stages.
- Will operate in a sustainable manner to minimise the environmental risks and the prevention of pollution by controlling its activities and those of the contractors working on its behalf.
- Will liaise with government agencies where appropriate to ensure continued compliance with environmental legislation.
- Will set environmental objectives and targets. The targets and objectives implementation programme will be regularly reviewed, to ensure they cover all aspects of the Group's activities.
- Will apply the waste hierarchy of prevention, preparing for re-use, recycling, other recovery and as a last resort responsible disposal methods, when dealing with all types of waste, including hazardous waste.
- Identify potential emergency incidents and, where appropriate, develop and maintain effective contingency plans in conjunction with relevant authorities and emergency services.
- Promote energy efficiency; Reducing, wherever practicable, the level of harmful emissions.
- Make available appropriate resources and training to enable the implementation of this policy.
- Require all its employees to work with due consideration for the environment and will provide training and supervision for employees to meet these obligations.
- The Group will only do business with responsible suppliers who understand the nature of the products, services and materials they are supplying and who recognise their responsibility to protect the environment and foster good relations with their employees and local communities.
- Foster an understanding of environmental issues relating to its business among staff, suppliers, customers, shareholders, the regulator and local community. Take account of their concerns and consult with them where appropriate.
- Will communicate this policy to all employees and contractors, involving and consulting them where appropriate.
- Co-operate fully with relevant enforcement agencies and work with external bodies to further their understanding and development of environmental management and practice.
- Ensure understanding and compliance with policy through a process of education, review and formalised audit programme.
- Strive for continual improvement in the environmental management system to enhance environmental performance and the prevention of pollution.

This policy will be made available to the public and any other interested parties and will be placed on www.phoenixnaturalgas.com (the Groups) internet site. The policy will be reviewed at any time deemed necessary to ensure its continued relevance but at least annually.

5.2 Roles and Responsibilities

5.2.1 Chief Executive Officer and Non-Executive board.

The Chief Executive Officer is responsible, through his management team, for ensuring that adequate organisation and arrangements exist for the effective implementation of the policy and for compliance with statutory requirements and best practice. The CEO is responsible for giving clear visibility of Environmental Leadership. The Non-Executive Board members shall act as scrutineers, ensuring the processes to support Health and Safety risks are robust.

5.2.2 Executive Team

- Executive team set targets and objectives as appropriate and ensure adequate resources are available to meet Environmental objectives and the implementation of this policy.
- Executive team actively promote Environmental issues and ensure that performance is measured and reviewed at board and senior management meetings.
- Executive team ensure details of any environmental incident or near miss are reported at the earliest opportunity.
- Executive team ensure all incidents are fully investigated and any lessons learned are identified, communicated and recommendations implemented through the senior management team.
- Executive team ensure that employees or their representatives are involved in decisions that affect Environmental Management.

Chief Operating Officer

Whilst all Directors within the group have clear Environmental responsibilities, PNG Chief Operating Officer is the director responsible for Environmental Management.

In addition to the above responsibilities of all directors, the Chief Operating Officer will also be responsible for;

- Ensuring Environmental issues appear on every board meeting agenda and report to the board on all Environmental Matters.
- Ensuring the Environmental management system and its performance are reviewed on a regular basis.
- Ensuring the Environmental policy is developed, implemented and monitored.
- Ensuring adequate resources are made available to allow effective Environmental Management

5.2.3 Network Performance Manager

The Network Performance Manager reports directly to the Chief Operating Officer and has the following responsibilities;

- Ensuring the implementation and management of an effective health, safety and environmental management system.
- Responsible for the safe operation and maintenance of the Natural Gas Distribution Network.
- Ensuring that the Group complies with all relevant Health, Safety and Environmental legislation.
- To ensure that the alliance partner's health, safety, environment systems are satisfactory and monitor their performance against these.

5.2.4 Responsibilities of Managers and Supervisors

Management of Health and Safety is a prime responsibility of all levels of management and shall be an integral part of all business processes. As managers and supervisors you must;

- Understand and comply with the requirements of the Group's Environmental policies and the Group ASHES management system.
- Implement the policy within your area of responsibility.
- Ensure you are familiar with the issues and the legal requirements relevant to your area of work and understand the risks of the operations and activities for which you are responsible.
- Minimise risks, by risk assessing the work activities you control and take measures commensurate with the level that the risk demands.
- Ensure that all work is properly planned and resourced, that appropriate controls are implemented and that the personnel involved are adequately instructed, trained and competent.
- Ensure that in-house inspections, audits or reviews, where relevant, are carried out and that any corrective actions are taken.
- Ensure all incidents, including "near misses", are reported promptly, investigated, lessons learnt identified, communicated and recommendations implemented.

5.2.5 Responsibilities of all Employees

Whatever job you do, you have a duty to co-operate in ensuring that your workplace is safe for everyone who might be affected by your actions, and to take reasonable care not to do anything which might endanger either yourself or others.

- Be familiar with the workplace Environmental arrangements and work according to the groups safe systems of work and operational controls at all times.
- Report any incidents and “near misses” you may have when working as soon as possible to your manager or supervisor, including any situations which are potentially unsafe.
- You must not knowingly act in a way in which may cause either you or the Company to be in breach of the law. You must take into account the potential hazards and risks in everything you do.

5.2.6 Health, Safety and Environmental Manager

HSE Manager’s responsibilities are as follows;

- Advise the Network Performance Manager, Group Management Team, the Executive Team and the CEO on policy formation and strategy programme for Environmental management.
- Advise the Network Performance Manager, Group Management Team and the executive Team of proposed changes to statutory legislation and the implications of same.
- Maintain an up-to-date portfolio of specialist advice and information on techniques to assist the business processes and achieve compliance with legislation and the Group Environmental policy.
- Ensure a suitable HSE Management system is implemented, maintained and reviewed.
- Advise and support Group managers in fulfilling their Environmental Responsibilities.
- Maintain contacts with Regulators, Legislators, other companies and organisations to influence developments in safety legislation and monitor comparative performance.
- Communicate effectively environmental issues and information throughout Group and to external bodies as appropriate.
- Investigate all incidents and near misses in conjunction with relevant senior managers.
- Lead by example in relation to HSE matters.

- Report to the management team on HSE performance.

5.3 Organisation

The Group Chief Executive Officer has overall responsibility for health, safety and environmental management.

The responsibility for Environmental Management is clearly allocated to senior management, line management and supervisors who are fully committed to achieving continuous improvement and to leading by example.

Executive Team Structure

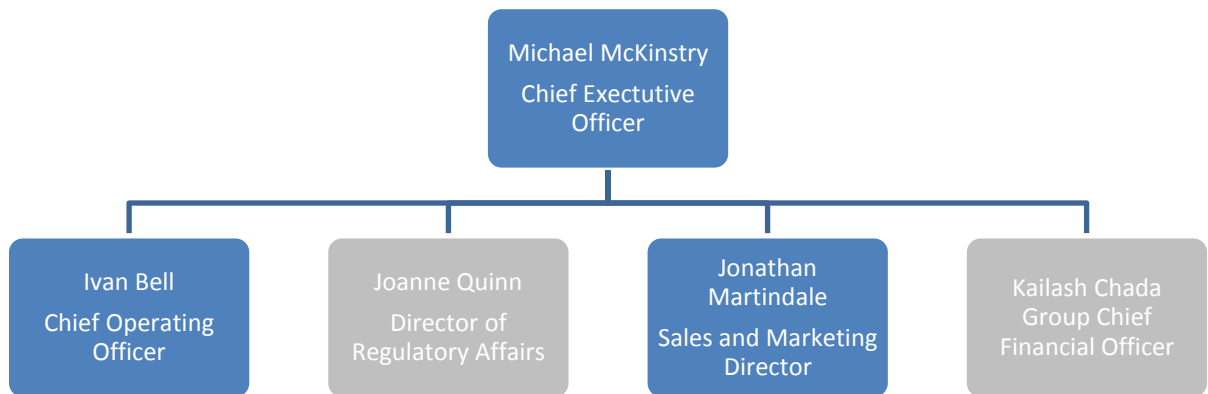


Fig. 1 PNGL Executive Team and line of responsibility.

Commercial Operating Officer's Structure

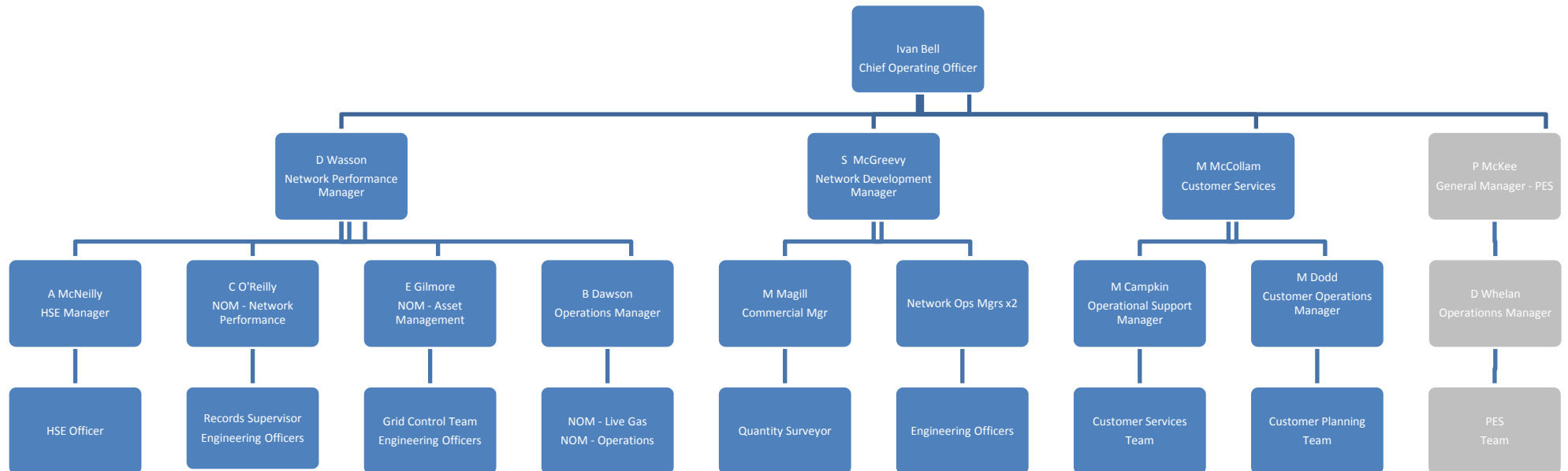


Fig. 2 Commercial Operating Officer's Structure and line of responsibility

PNG have defined, documented and communicated roles and responsibilities in order to facilitate an effective HSE management system. The need for sufficient and adequate resources is reviewed at management meetings and addressed where necessary. The HSE manager is the management representative for Health, Safety and the Environment and reports directly to the Network Performance Manager. The Network Performance Manager reports to the Chief Operating Officer.

5.4 Arrangements

The Group will develop, maintain and improve a positive culture through senior management by: -

Ensuring the effective operation of the Health, Safety and Environment Management System. The Awareness of Health, Safety and Environmental Systems (ASHES) Manual shall contain all Health, Safety and Environmental operating procedures. These procedures shall be communicated to relevant managers and employees, audited at scheduled intervals and revised where appropriate.

- Ensuring, where necessary, risk assessments have been completed assessing the risks arising from activities, adequate control measures implemented and risk assessments reviewed on a regular basis.
- Ensuring that employees are competent and adequately trained to carry out the duties assigned to them.
- Implementing measures, reviewing and auditing systems to monitor the achievement of performance standards against compliance with legislation, company policy, best practice and Key Performance Indicators.
- Ensuring systems are in place for the reporting and investigation of accidents, incidents and “near misses”.
- Having arrangements in place to assess the performance of contractors carrying out work on the Group’s behalf.

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