

## WASTE MANAGEMENT POLICY

### 1. POLICY

This Waste Management Policy forms part of our sustainability policy and underpins the said policy. The policy aims to reduce the negative environmental impacts of our waste, to reduce landfill waste and to ensure disposal of waste materials is in an environmentally responsible manner.

We recognise we need to reduce the unnecessary use of raw materials and will enable waste recycling and energy recovery, where possible, to assist in reducing landfill waste.

ALB Brickwork Ltd is committed to the implementation of an effective waste management programme that meets or exceeds all legislative and regulatory requirements placed upon it.

### 2. POLICY AIMS

ALB Brickwork Ltd's waste management policy is based on the principle that priority order of action is to:

- **Reduce waste produced:** Through purchasing responsibly, operational activity and by raising awareness, reduce the waste that will be created for disposal.
- **Re-use:** Before discarding items, take action to re-use in the first instance within the business and if this is not applicable, with external nominated organisations and contractors. Every avenue of re-use of items must be explored before being discarded as wastes.
- **Recycle:** ALB Brickwork Ltd has the facility to recycle significant quantities of general waste and is increasing this provision and its targets as new markets are developed for recycled materials. Where practical and viable, our procurement activities will support these markets for recycled materials;
- **Minimum waste to landfill:** Redundant items that cannot be dealt with other than being disposed of, will be sent to landfill as a last resort.
- **Risk Minimisation:** Including considering the end of life disposal (costs and environmental impact) when making purchasing decisions and developing activities. Complying with regulations, legislation and applying best practice in order to minimise risks of immediate and future pollution or harm to health by disposing of waste appropriately.

### 3. WASTE MANAGEMENT

- Certification of appropriate disposal (in the form of a waste transfer note, consignment note or certificate of disposal) must be obtained when using an external approved service supplier to dispose of wastes.
- Waste should be prevented or minimised wherever possible and must be stored, carried processed or disposed of in accordance with the principles of duty of care.
- Waste must be stored in compliant and suitable containers and locations pending their disposal.
- Waste containers must be securely sealed to prevent accidental spillage or leakage.
- Segregation of waste should take place to prevent mixing of incompatible materials and to allow for recycling.
- Waste is not to be stored anywhere where it is prohibited to do so.
- Waste and recycling removed from the sites must only be transported by employees or service providers that are authorised to do so.

#### 4. DEFINITIONS

##### Waste

Waste includes any substance or object which the holder discards or intends or is required to discard and any substance which constitutes a scrap material, an effluent or other unwanted surplus arising from the application of any process or any substance or article which requires to be disposed of which has been broken, worn out, contaminated, or otherwise spoiled as per the Environmental Protection Act 1990 and amendments.

##### General Waste

A form of Controlled Waste, comprising all waste from ALB Brickwork Ltd office and field-based operations with the exception of Hazardous Waste.

##### Recycling

The diversion of waste away from landfill or incineration and the reprocessing of those wastes either into the same product or a different one. This mainly includes non-hazardous wastes (or non-hazardous components of other wastes) such as paper, glass, plastic and scrap metal.

##### Duty of Care

A requirement of all producers, importers, carriers and those involved in the disposal of waste to take all reasonable steps to ensure that waste is segregated, described, stored, transported and treated or disposed of safely.

##### Service Provider

Third parties providing works, goods or services to ALB Brickwork Ltd whether contracted or not.

##### Hazardous Waste

This term encompasses the term Special Waste as defined by Hazardous Waste Regulations 2005 and amendments. It includes waste that could, in certain circumstances, be harmful to human health or the environment in the short or long term due to its physical, chemical or biological properties of explosive, oxidising, flammable or highly flammable, irritant, corrosive, toxic or very toxic, harmful, carcinogenic, mutagenic, infectious and ecotoxic.

Batteries, fluorescent tubes, paint, waste oils, solvents, alkaline solutions and electrical equipment are all hazardous wastes.

Some hazardous wastes such as Asbestos and Electrical Waste are subject to their own regulations and their disposal is covered by other guidance.

#### 5. REVIEW, CONTINUAL IMPROVEMENT AND REPORTING PERFORMANCE

Audits of waste will be carried out throughout the year by the Directors and external auditors as part of local procedures.

Reports on findings from audits will inform the procedures of dealing with waste to ensure legal and regulatory compliance and continually improve our environmental impact and performance.

Performance against targets will be reported in the annual Management Review Meeting for review and action where appropriate.

## 6. RESPONSIBILITIES

### Members of Staff

All members of staff have a personal responsibility for the way their conduct impacts on this policy and should ensure that the waste they create is dealt with in accordance with this policy.

### Directors

Have a duty to comply with legislation relating to the segregation, storage, transport, treatment and recording of waste types. The Directors are responsible to ensure this policy is disseminated within their area of responsibility. For the performance monitoring of this policy, review and future development.

## 7. REVIEW

This policy will be reviewed periodically (annually) in respect of changing regulations, legislation and new opportunities which present themselves to ALB Brickwork Ltd.



**Managing Director**

Date: 02/01/2026

Next Review: 01/01/2027