

# **environment matters**

# Duty of Care

Enva England Specialist Waste Limited

Brailwood Road Bilsthorpe Nottinghamshire NG22 8UA 01623 871964

Version 90 – Dec 2024



29 November 2024

Website

www.willistowerswatson.com

Direct Line +44 1473 222825 E-mail phil.curtis@willistowerswatson.com

#### To Whom it May Concern

As Insurance Brokers to Enva Topco Limited and Subsidiary Companies we are writing to confirm that our client holds the following policies:

#### **Employers Liability**

Insurer:	HDI Global SE - UK
Policy Number:	110-76810186-30010
Period:	1 December 2024 to 30 November 2025 both days inclusive Local Standard Time.
Limit of Indemnity:	GBP 10,000,000 any one Occurrence

#### Public & Products Liability

Insurer:	HDI Global SE - UK
Policy Number:	110-76810186-30026
Period:	1 December 2024 to 30 November 2025 both dates inclusive Local Standard Time.
Limit of Indemnity:	GBP 10,000,000 any one Occurrence or all Occurrences of a series consequent upon one source or original cause and in the aggregate for any one period of insurance in respect of Products and Pollution.

This letter is provided as a courtesy to our client as a matter of information only and confers no rights on the holder. Our duties in relation to this insurance are to our client and we accept no duty of care or responsibility to you or any other third party and any liability to you or any third party is excluded. This letter does not amend, extend or alter the coverage afforded by the policies, nor does it purport to set out all of the policies' terms, conditions and exclusions. The policy terms, conditions, limits and exclusions may alter after the date of this document or the insurance may terminate or be cancelled, and the limits shown may be reduced by

Willis Limited 51 Lime Street London EC3M 7DQ

T +44 (0) 20 3124 6000 W willistowerswatson.com

#### WillisTowersWatson III"III

paid claims. We have no obligation to advise you of any changes which may be made to the policies or to advise you of their cancellation or termination.

Signed on behalf of WILLIS LIMITED

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Authorised Signatory

Chubb European Group SE 100 Leadenhall Street London EC3A 3BP T 020 7173 7000 F 020 7173 7800 <u>chubb.com/uk</u>

СНИВВ

#### Certificate of Employers' Liability Insurance

(Where required by regulation 5 of the Employers' Liability (Compulsory Insurance) Regulations 1998 and subsequently amended by regulation 2 of the Employers' Liability (Compulsory Insurance) Regulations 2008 (the Regulations), one or more copies of this certificate must be displayed at each place of business at which the policyholder employs persons covered by the policy. This requirement will be satisfied if the certificate is made available in electronic form and each relevant employee to whom it relates has reasonable access to it in that form).

Pol	icy Number:	UKCAND54714	
1.	Name of Policyholder:	ENVA Topco Limited and Subsidiaries	
2.	Date of commencement of insurance policy:	01 December 2024 L.S.T.	
3.	Date of expiry of insurance policy:	30 November 2025 L.S.T.	
		Both days inclusive	
		L.S.T. (Local Standard Time) means the time applicable on the relevant date at the Address of the Insured as shown on the Schedule to the Policy	

We hereby certify that:

- 1. The policy to which this certificate relates satisfies the requirements of the relevant law applicable in Great Britain, Northern Ireland, the Isle of Man, the Island of Jersey, the Island of Guernsey and the Island of Alderney; and
- 2. The minimum amount of cover provided by this policy is no less than GBP5,000,000.

#### Signed on behalf of Chubb European Group SE

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Mark Roberts Division President UK&I

Chubb European Group SE (CEG) is a Societas Europaea, a public company registered in accordance with the corporate law of the European Union. Members' liability is limited. CEG is headquartered in France and governed by the provisions of the French insurance code. Risks falling within the European Economic Area are underwritten by CEG, which is authorised and regulated by the French Prudential Supervision and Resolution Authority. Registered company number: 450 327 374 RCS Nanterre. Registered office: La Tour Carpe Diem, 31 Place des Corolles, Esplanade Nord, 92400 Courbevoie, France. Fully paid share capital of €896,176,662.

CEG's UK branch is registered in England & Wales under UK Establishment number: BR023093. UK Establishment address: 100 Leadenhall Street, London EC3A 3BP. Authorised by the Prudential Regulation Authority. Subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority. Details about the extent of our regulation by the Prudential Regulation Authority are available from us on request. Details about our authorisation can be found on the Financial Conduct Authority's website (FS Register number 820088).

#### **Company Details**

NameEnva England Specialist Waste LtdRegistered OfficeBrailwood Road<br/>Bilsthorpe<br/>Nottinghamshire.<br/>NG22 8UATelephone01623 871 964<br/>01623 871 780Websitewww.enva.com

Date of Incorporation5th March 1997Company Registration Number03328035VAT Number836 4301 39



#### FILE COPY

#### CERTIFICATE OF INCORPORATION ON CHANGE OF NAME

Company Number **3328035** 

The Registrar of Companies for England and Wales hereby certifies that under the Companies Act 2006:

#### **OAKWOOD FUELS LIMITED**

a company incorporated as private limited by shares; having its registered office situated in England and Wales; has changed its name to:

#### ENVA ENGLAND SPECIALIST WASTE LIMITED

Given at Companies House on 6th November 2018







#### Safety, Health, Environmental & Quality Statement of Intent Enva England Specialist Waste

Enva's Management Systems scope, accredited to ISO9001, ISO14001 and ISO45001, relates to the provision of waste management services and laboratory services. Collection, treatment and transfer of waste oils, other permitted waste streams and the manufacture and sale of fuel products.

Enva recognises that Health, Safety, Quality, and Environmental issues relevant to our office, processing areas and logistics operations, are a fundamental part of our business. Our objective is to meet and where possible, exceed the requirements of all applicable legislation and Group policy. This will be achieved whilst addressing the needs of the business and maintaining our accredited Management Systems. Wherever possible, Enva shall commit to the implementation of identified best practice through its Management Systems.

In particular we shall:

- Continue to develop a positive Safety, Health, Environmental & Quality culture across the organisation involving employees in the development and implementation process.
- Ensure all employees and contractors take responsibility for working in a manner that promotes quality, minimises the risk of harm to the environment and promotes the Health & Safety of employees, contractors, visitors and members of the public.
- Assess the level of risk from all significant health, security, safety and environmental hazards and so far as reasonably practicable, ensure that they are eliminated or adequately controlled.
- Provide appropriate leadership, information, systems of communication, instruction, development training, retraining and supervision in health and safety to maintain and continuously improve the competence levels of all employees.
- Monitor and minimise the health, safety and environmental impact of our operations where reasonably practicable.
- Communicate, consult and encourage participation of employees and interested parties.
- Ensure full compliance with applicable legal requirements, Approved Codes of Practice and industry specific guidance and Protocols related to our Safety, Health, Environmental & Quality processes and corporate business strategies; these will be regarded as minimum standards of achievement.
- Allocate sufficient financial and physical resources to achieve our objectives.
- Accurately assess customer requirements, ensure that the quality of service delivered consistently meets or exceeds expectations and respond effectively to any concerns about the level of service provided.
- Regularly monitor, audit and review our own, contractors' and suppliers' performance to ensure continual improvement.
- Regularly review Company assets and security measures to minimise losses
- Maintain and communicate a COVID19 response plan and policy
- Provide an independent OH advisory service targeting health screening and health surveillance for each employee where appropriate

The Director and Management Team are responsible for Safety, Health, Environmental & Quality at Enva. They are supported in this role by the Safety, Health, Environment, and Quality Manager who, as a management representative, is responsible for developing the Company's policies and procedures in line with current Health, Safety and Environmental legislation and for monitoring/auditing compliance with the systems.

This Policy Statement is reviewed at least annually, and is communicated to employees, contractors and suppliers; prominently displayed for visitors and will be made available to the public, stakeholders and any other interested party on request.

Michael Sneath Director

Trevor Lawlor Sales Director

Gareth Lowry Company Secretary



### **Certificate of Motor Insurance**

Certificate Number: MV23Z0042814

#### 1. Description of vehicle

Any motor vehicle the property of or on hire or loan or leased to the policyholder

2. Name of the policyholder

ENVA Topco Limited and Subsidiary Companies

3. Effective date of the commencement of insurance for the purpose of the relevant law:

1st December 2024

4. Date of expiry of insurance

30th November 2025

5. Persons or classes of person entitled to drive: Provided that the person driving holds a licence to drive the vehicle or has held and is not disqualified for holding or obtaining such a licence

Any person who is driving on the order or with the permission of the policyholder.

6. Limitations as to use:

Use for social domestic and pleasure purposes. Use in connection with the policyholder's business.

The policy does not cover:-

- 1. Use while the vehicle is let on hire.
- Use for the carriage of passengers for reward.
   Use for racing pacemaking reliability trials competitions rallies or trials.
   Use whilst drawing a greater number of trailers in all than is permitted by Law.
   Use in connection with the motor trade

For Zurich Insurance Company Limited Authorised insurers

in B

Tim Bailey Chief Executive Officer of Zurich Insurance Company Limited, UK Branch



We hereby certify that the policy to which this Certificate relates satisfies the requirements of the relevant law applicable in Great Britain,

Northern Ireland, the Isle of Man, the island of Guernsey, the island of Jersey and the island of Alderney. Note: For full details of the

insurance cover reference should be made to the policy.

Advice to Third Parties: Nothing contained in this Certificate affects your right as a third party to make a claim.

This Policy applies in respect of events occurring in Great Britain, Northern Ireland, the Isle of Man and the Channel Islands, all member countries of the European Union, Iceland, Norway, Switzerland, Serbia, Andorra and Bosnia & Herzegovina.

Diese Versicherung gilt für Schadenereignisse, die in Großbritannien, Nordirland, der Isle of Man und den Kanalinseln, allen Mitgliedstaaten der Europäischen Union, Island, Norwegen, der Schweiz, Serbien, Andorra und Bosnien-Herzegowina eintreten. La présente politique s'applique aux événements survenant en Grande-Bretagne, en Irlande du Nord, sur l'île de Man et les îles Anglo-Normandes, dans tous les pays membres de l'Union européenne, en Islande, en Norvège, en Suisse, en Serbie, en Andorre et en Bosnie-Herzégovine.

La presente Politica si applica a eventi che si verificano in Gran Bretagna, Irlanda del Nord, Isola di Man e Isole del Canale, tutti i paesi membri dell'Unione europea, Islanda, Norvegia, Svizzera, Serbia, Andorra e Bosnia-Erzegovina.

La presente Política es aplicable al respecto de los hechos que tienen lugar en Gran Bretaña, Irlanda del Norte, la Isla de Man y las Islas del Canal, todos los países miembros de la Unión Europea, Islandia, Noruega, Suiza, Serbia, Andorra y Bosnia y Herzegovina.

#### Instructions in the event of an accident

#### You SHOULD

1. take names and addresses of all witnesses;

2. report the accident to the office issuing this Certificate (see overleaf) or if this is not practicable, to the nearest office (see Telephone Directory) quoting the Certificate Number; 3. if your policy is comprehensive put us in touch with your garage; if your vehicle is in use tell us when and where you intend taking it for repair;

 send all communications you receive relating to claims or proceedings against you, unanswered, to the office with which you normally deal quoting, if known, the claims reference.

#### **IMPORTANT**

#### The Law requires:

1. unless names and addresses, including those of the vehicle owner, together with the registration mark of the vehicle are exchanged at the time of the accident the driver must report it to the Police as soon as possible and in any case within 24 hours;

2. if anyone was injured and the Certificate of Insurance was not produced to the Police at the time of the accident, the driver must report the matter to the Police as soon as possible and in any case within 24 hours and produce the Certificate (or arrange to produce it within five days of the accident). You SHOULD NOT

1. admit any liability;

2. negotiate or make any agreement with anyone regarding your responsibility for the accident;

3. make or offer any payment whatsoever to any Third Party, if in doubt – consult us;

 repudiate a claim without our agreement; this may result in Court Action against you by the other party

Pen Underwriting Limited is authorised and regulated by the Financial Conduct Authority (FCA number 314493). Registered Office: The Walbrook Building, 25 Walbrook, London EC4N 8AW. Registered in England and Wales. Company Number: 5172311. www.penunderwriting.co.uk

### **GOODS VEHICLE OPERATOR'S LICENCE**

#### THIS LICENCE MUST NOT BE ALTERED OR DEFACED IN ANY WAY

Issued to:

Alex Rice ENVA ENGLAND SPECALIST WASTE LTD BRAILWOOD ROAD BILSTHORPE NEWARK NG22 8UA Issued by:

Office of the Traffic Commissioner North East of England Hillcrest House 386 Harehills Lane Leeds LS9 6NF 0300 123 9000

Goods Vehicle Standard National

Licence number: OB0231171 NOT TRANSFERABLE

This licence is in force from:

20/10/2001

This licence will continue for as long as you continue to meet its terms. However, it will come to an end if you do not pay the necessary continuation fee by the date required. The licence may also face regulatory action including revocation if you operate outside its terms. You have paid for an initial period of five years, which starts with the date the licence was issued. The continuation fee must be paid before the end of the month before that five year period comes to an end and every five years after that. Please see note 1 for further details.

This document is an operator's licence issued under the Goods Vehicles (Licensing of Operators) Act 1995 (the Act). The undertakings recorded on this licence have been given by the licence holder and are considered to be material to the grant of the licence. In the case of a licence first issued before 1 January 1996, the recorded undertakings include statements of intent made by the operator.

The maximum number of motor vehicles and trailers authorised in accordance with section 6 of the Act is:

Motor vehicles 55

Trailers (inc semi-trailers) 15



**Traffic Commissioner** 

#### **Operating centre(s)**

Operating Centre:	Address: BRAILWOOD ROAD BILSTHORPE NEWARK NG22 8UA	Vehicles Trailers	55 15
Conditions o Undertakings	r		

Operating Centre:		Address:	Vehicles	8
		ENVA GATESHEAD NEST ROAD FELLING GATESHEAD NE10 0ES	Trailers	2
Conditions Undertakings	or			

#### Transport Manager(s)

ALEXANDER RICE PAUL EDWARD JAMES

#### Specific conditions attached to licence

Specific undertakings attached to licence

### **GOODS VEHICLE OPERATOR'S LICENCE**

#### THIS LICENCE MUST NOT BE ALTERED OR DEFACED IN ANY WAY

Issued to:

Paul James ENVA ENGLAND SPECALIST WASTE LTD BRAILWOOD ROAD BILSTHORPE NG22 8UA Issued by:

Office of the Traffic Commissioner London and the South East of England Ivy House 3 Ivy Terrace Eastbourne BN21 4QT 0300 123 9000

Goods Vehicle Standard National

Licence number: OK2057421 NOT TRANSFERABLE

This licence is in force from:

15/07/2022

This licence will continue for as long as you continue to meet its terms. However, it will come to an end if you do not pay the necessary continuation fee by the date required. The licence may also face regulatory action including revocation if you operate outside its terms. You have paid for an initial period of five years, which starts with the date the licence was issued. The continuation fee must be paid before the end of the month before that five year period comes to an end and every five years after that. Please see note 1 for further details.

This document is an operator's licence issued under the Goods Vehicles (Licensing of Operators) Act 1995 (the Act). The undertakings recorded on this licence have been given by the licence holder and are considered to be material to the grant of the licence. In the case of a licence first issued before 1 January 1996, the recorded undertakings include statements of intent made by the operator.

The maximum number of motor vehicles and trailers authorised in accordance with section 6 of the Act is:

Motor vehicles 26

Trailers (inc semi-trailers) 8



ual 2000

**Traffic Commissioner** 

Operating Centre:	Address: YARD OFF JETTY ROAD KINGSNORTH INDUSTRIAL ESTATE KINGSNORTH HOO ROCHESTER ME3 9ND	Vehicles Trailers	26 8
Conditions or Undertakings			

#### Transport Manager(s)

PAUL EDWARD JAMES ALEXANDER RICE

#### Specific conditions attached to licence

#### Specific undertakings attached to licence

#### **Certificate of Registration under the Waste** (England and Wales) Regulations 2011

### Regulation authority

Name



Address	National Customer Contact Centre 99 Parkway Avenue Sheffield S9 4WF
Telephone number	03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

#### **Carriers details**

Name of registered carrier	ENVA ENGLAND SPECIALIST WASTE LIMITED
Registered as	An upper tier waste carrier, broker and dealer
Registration number	CBDU167145
	E N V A ENGLAND SPECIALIST WASTE
	1
Address of place of	BRAILWOOD ROAD
business	BILSTHORPE
	NEWARK
	NG22 8UA
Telephone number	01623 871964
Date of registration	19 January 2023
Expiry date of	
registration (unless	12 April 2026
revoked)	

#### Making changes to your registration

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.

#### Authorised transaction confirmation

#### Please retain for your records

#### Thank you

Your transaction has been securely processed by WorldPay, on behalf of the Environment Agency.

#### **Transaction Details:**

Description: Waste Carrier Registration renewal: CBDU85735 for Associated Reclaimed Oils Ltd

Authorisation ID: 27264231601

Amount: GBP 125.00

Order Code: 1643006307

#### **Enquiries:**

Do not reply to this email, it has been generated automatically.

If you have any questions about your transaction, please email our customer services team at: <u>nccc-carrierbroker@environment-agency.gov.uk</u> or call **03708 506 506**, with the transaction details listed above.

#### Charges are outside the scope of VAT

Environment Agency VAT No: 662 4901 34

Your payment is securely processed by WorldPay.



# Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Enva England Specialist Waste Limited

Bilsthorpe Oil Treatment Plant Brailwood Road Bilsthorpe Newark Nottinghamshire NG22 8UA

Variation application number

EPR/DP3331MG/V007

Permit number

EPR/DP3331MG

#### Bilsthorpe Oil Treatment Plant Permit number EPR/DP3331MG

#### Introductory note

#### This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made.

This variation is to include the shredding of waste oil filters and oily rags for recovery as an additional Schedule 1 Section 5.3 Part A(1)(a)(ii) activity, extend the permit boundary, and add additional waste types to table S2.2 (waste oils treatment). The annual limits listed in tables S2.2 and S2.3 remain the same. A new table S2.4 has been included for the waste types to be treated under the new Schedule 1 Section 5.3 Part A(1)(a)(ii) activity, with a throughput limited to 13,000 tonnes per year.

As a result of this variation there will be the addition of a new building within the extended permit boundary area to house the shredding activity, including a new emission point to air from the activated carbon filter serving the new shredder.

The rest of the facility is described as follows:

The facility is currently permitted to manufacture Processed Fuel Oil (PFO). PFO is used as a virgin fuel substitute in a variety of large industrial burning applications and undertake waste operations on a variety of hazardous and non-hazardous waste.

The facility is divided into 4 areas – two processing areas and two office facilities. The centre of the site is at National Grid Reference SK65256060.

The site is enclosed within a two metre high chain link fence topped with 3 strand barbed wire except for the eastern boundary which has a two metre high palisade fence along the access road approach to the site. Access to site is by one of two lockable gates with the northern access limited further by a remotely controlled barrier.

There are vehicle dismantlers and landfill operations to the east of the site and secure vehicle storage facilities to the north.

There is a dense area of shrubs and young trees to the western boundary which screens the plant from domestic properties some 180 metres away to the west.

Birklands and Bilhaugh SAC are 7 km from site. The River Greet is approximately 1 km away and Rainworth Water is 1.1 km from the site.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/DP3331MG/A001	Duly made 22/10/2007	-
Additional information received	14/09/2007	-
Additional information received	26/09/2007	-

Status log of the permit		
Description	Date	Comments
Permit determined EPR/DP3331MG	28/09/2007	-
Variation application EPR/DP3331MG/V002	Duly made 14/07/2011	Application to vary permit EPR/DP3331MG and consolidate with permits EPR/LP3593CR, EPR/RP3290CZ and EPR/LP3594LX.
Variation determined EPR/DP3331MG/V002	28/11/2011	Varied and consolidated permit issued.
Variation application EPR/DP3331MG/V003	Duly made 04/04/2013	Application to add a second boiler and further treatment to the effluent from the oily waste treatment process.
Variation determined EPR/DP3331MG/V003	21/05/2013	Variation issued to add second boiler and further treatment to effluent and Agency variation to make amendments as a result of the Industrial Emissions Directive.
Variation application EPR/DP3331MG/V004	Duly made 20/06/2013	Variation to consolidate previous variation into the permit.
Variation determined EPR/DP3331MG/V004	02/07/2013	Consolidated permit issued.
Notified of change of Company Name	03/04/2019	Name changed to Enva England Specialist Waste Limited.
Variation issued EPR/DP3331MG/V005	08/04/2019	Varied permit issued to Enva England Specialist Waste Limited.
Application EPR/DP3331MG/V006 (variation and consolidation)	Duly made 26/10/2020	Variation for the installation of additional oil storage capacity on site, utilising new larger tanks, reconstructing the secondary containment and installation of abatement and control of air emissions.
Response to Schedule 5 notice (dated 13/11/2020)	04/12/2020	<ul> <li>Key documents</li> <li>Major incident plan</li> <li>Bund details</li> <li>Carbon filter details</li> <li>Initial commissioning and testing documents</li> <li>Preventative Maintenance system details</li> <li>Monitoring system details.</li> </ul>
Additional Information received 13/01/2021	13/01/2021	Installation and Emission Layout Schematic.
Additional Information received 18/02/2021	18/02/2021	Updated site plan.
Variation determined and consolidation issued EPR/DP3331MG	25/02/2021	Varied and consolidated permit issued in modern format.
Application EPR/DP3331MG/V007 (variation)	Duly made 27/01/2022	Variation to add the shredding of waste oil filters and oily rags as an additional Schedule 1 Section 5.3 Part $A(1)(a)(ii)$ activity, extend the permit boundary, and add additional waste types to table S2.2 (waste oils treatment).
Additional information received 07/03/2022	07/03/2022	Clarifications on the Noise Impact Assessment.

Status log of the permit			
Description	Date	Comments	
Additional information received 17/03/2022	17/03/2022	Further clarification on Noise Impact Assessment, Specifications for the centrifuge and eddy current separators, and pump data sheets.	
Additional information received 25/03/2022	25/03/2022	Further clarifications on Noise Impact Assessment.	
Additional information received 30/03/2022	30/03/2022	Responses in relation to BAT including enclosed process and emissions, revised BAT assessment, revised Fire Risk Assessment, and details of procedures for packaged wates.	
Additional information received 10/06/2022	10/06/2022	Clarification on the purpose and recovery of oily rags, storage of the outputs, revised BAT assessment and revised Monitoring Plan.	
Additional information received 25/07/2022	25/07/2022	Information relating to the recovery options for fluff and oily rags fraction. Confirmation of intent and timescale for enclosing shredder building. Confirmation of heat and smoke detection systems and provision of fire auto-suppression for fluff and oily rags fraction storage.	
Additional information received 10/09/2022	10/09/2022	Revised final Noise Management Plan and BAT Assessment Report.	
Variation issued EPR/DP3331MG/V007 Waste – EAWML 43209	20/09/2022	Varied permit issued to Enva England Specialist Waste Limited.	

End of introductory note

#### Notice of variation and consolidation

#### The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

#### **Permit number**

EPR/DP3331MG

#### Issued to

Enva England Specialist Waste Limited ("the operator")

whose registered office is

Brailwood Road Bilsthorpe Industrial Estate Bilsthorpe Newark Nottinghamshire NG22 8UA

company registration number 03328035

to operate regulated facilities at

Bilsthorpe Oil Treatment Plant Brailwood Road Bilsthorpe Newark Nottinghamshire NG22 8UA

to the extent set out in the schedules.

The notice shall take effect from xx/xx/2022

Name	Date
Philip Lamb	20/09/2022

Authorised on behalf of the Environment Agency

#### Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

#### Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

#### Permit

#### The Environmental Permitting (England and Wales) Regulations 2016

#### Permit number

#### EPR/DP3331MG

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/DP3331MG/V007 authorising,

Enva England Specialist Waste Limited ("the operator"),

whose registered office is

Brailwood Road Bilsthorpe Industrial Estate Bilsthorpe Newark Nottinghamshire NG22 8UA

company registration number 03328035

to operate an installation and waste operations at

Bilsthorpe Oil Treatment Plant Brailwood Road Bilsthorpe Newark Nottinghamshire NG22 8UA

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Philip Lamb	20/09/2022

Authorised on behalf of the Environment Agency



This is to certify that the Management System of:

**Enva England Specialist Waste Ltd** 

Brailwood Road, Bilsthorpe, Newark, NG22 8UA

And as detailed on the annex of this certificate

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 14001: 2015



Certificate Number:	6875-E
Initial Registration Date:	06/08/2
Previous Expiry Date:	23/10/2
Recertification Audit Date:	14/09/2
Re-issue Date:	23/09/2
Current Expiry Date:	23/10/2

6875-EMS-001 06/08/2008 23/10/2023 14/09/2023 23/09/2023 23/10/2026

#### **Scope of Registration:**

The provision of Waste Management Services and Laboratory Services. The collection, treatment and transfer of waste oils, other permitted waste streams and the manufacture and sale of fuel products.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



This is to certify that the Management System of:

**Enva England Specialist Waste Ltd** 

Brailwood Road, Bilsthorpe, Newark, NG22 8UA

And as detailed on the annex of this certificate

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 45001: 2018 SSIP



Certificate Number:	6875-OHS-001
Initial Registration Date:	29/09/2020
Previous Expiry Date:	23/10/2023
Recertification Audit Date:	14/09/2023
Re-issue Date:	23/09/2023
Current Expiry Date:	23/10/2026

#### **Scope of Registration:**

The provision of Waste Management Services and Laboratory Services. The collection, treatment and transfer of waste oils, other permitted waste streams and the manufacture and sale of fuel products.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



This is to certify that the Management System of:

**Enva England Specialist Waste Ltd** 

Brailwood Road, Bilsthorpe, Newark, NG22 8UA

And as detailed on the annex of this certificate

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 9001: 2015



Certificate Number:	6875-C
Initial Registration Date:	02/12/
Previous Expiry Date:	23/10/
Recertification Audit Date:	14/09/
Re-issue Date:	23/09/
Current Expiry Date:	23/10/

6875-QMS-001 02/12/2011 23/10/2023 14/09/2023 23/09/2023 23/10/2026

#### **Scope of Registration:**

The provision of Waste Management Services and Laboratory Services. The collection, treatment and transfer of waste oils, other permitted waste streams and the manufacture and sale of fuel products.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



This is to certify that the Management System of:

#### **Enva England Specialist Waste Ltd**

Enva, Rod End Industrial Estate, Lower Road, Northfleet, Gravesend, DA11 9SW

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 14001: 2015



Certificate Number:	6875-EMS-002
Initial Registration Date:	13/12/2021
Previous Expiry Date:	23/10/2023
Recertification Audit Date:	14/09/2023
Re-issue Date:	23/09/2023
Current Expiry Date:	23/10/2026

The validity of this certificate depends on the validity of the main certificate and is one of several issued to registration number 6875-EMS-001

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



This is to certify that the Management System of:

**Enva England Specialist Waste Ltd** 

#### Nest Road, Felling, Gateshead, NE10 0ES

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 14001: 2015



Certificate Number:	6875-EMS-003
Initial Registration Date:	16/11/2022
Previous Expiry Date:	23/10/2023
Recertification Audit Date:	14/09/2023
Re-issue Date:	23/09/2023
Current Expiry Date:	23/10/2026

The validity of this certificate depends on the validity of the main certificate and is one of several issued to registration number 6875-EMS-001

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



This is to certify that the Management System of:

#### **Enva England Specialist Waste Ltd**

#### Enva, Rod End Industrial Estate, Lower Road, Northfleet, Gravesend, DA11 9SW

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 45001: 2018 SSIP



Certificate Number: Initial 18001 OHSAS Registration Date: Initial ISO 45001 Registration Date: Previous Expiry Date: Recertification Audit Date: Re-issue Date: Current Expiry Date: SSIP CDM Duties: 6875-OHS-002 27/06/2012 29/09/2020 23/10/2023 14/09/2023 23/09/2023 23/10/2026 Contractor

The validity of this certificate depends on the validity of the main certificate and is one of several issued to registration number 6875-OHS-001

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR.



This is to certify that the Management System of:

**Enva England Specialist Waste Ltd** 

#### Nest Road, Felling, Gateshead, NE10 0ES

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 45001: 2018 SSIP



Certificate Number: Initial 18001 OHSAS Registration Date: Initial ISO 45001 Registration Date: Previous Expiry Date: Recertification Audit Date: Re-issue Date: Current Expiry Date: SSIP CDM Duties: 6875-OHS-003 27/06/2012 29/09/2020 23/10/2023 14/09/2023 23/09/2023 23/10/2026 Contractor

The validity of this certificate depends on the validity of the main certificate and is one of several issued to registration number 6875-OHS-001

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



This is to certify that the Management System of:

**Enva England Specialist Waste Ltd** 

Enva, Rod End Industrial Estate, Lower Road, Northfleet, Gravesend, DA11 9SW

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 9001: 2015



Certificate Number:	6875-QMS-002
Initial Registration Date:	13/12/2021
Previous Expiry Date:	23/10/2023
Recertification Audit Date:	14/09/2023
Re-issue Date:	23/09/2023
Current Expiry Date:	23/10/2026

The validity of this certificate depends on the validity of the main certificate and is one of several issued to registration number 6875-QMS-001

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



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**Enva England Specialist Waste Ltd** 

#### Nest Road, Felling, Gateshead, NE10 0ES

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 9001: 2015



Certificate Number:	6875-QMS-003
Initial Registration Date:	16/11/2022
Previous Expiry Date:	23/10/2023
Recertification Audit Date:	14/09/2023
Re-issue Date:	23/09/2023
Current Expiry Date:	23/10/2026

The validity of this certificate depends on the validity of the main certificate and is one of several issued to registration number 6875-QMS-001

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

Alyn Failiti

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



### **Certificate Annex**

Enva England Specialist Waste Ltd Annex 1 of 1 to Certificate number 6875-QMS/EMS/OHS-001 Containing 3 locations including Head Office

#### 23/09/2023

ISO 9001: 2015, ISO 14001: 2015, ISO 45001:2018 SSIP

#### **Scope of Registration:**

The provision of Waste Management Services and Laboratory Services. The collection, treatment and transfer of waste oils, other permitted waste streams and the manufacture and sale of fuel products. The collection, bulking and transfer of waste oils and other permitted waste streams.

#### **HEAD OFFICE**

001 Brailwood Road, Bilsthorpe, Newark, NG22 8UA

#### **Scope of Registration:**

The collection, bulking and transfer of waste oils and other permitted waste streams.

#### **OTHER LOCATIONS**

002 Enva, Rod End Industrial Estate, Lower Road, Northfleet, Gravesend, DA11 9SW003 Nest Road, Felling, Gateshead, NE10 0ES

Signed: Alyn Franklin, Chief Executive Officer (on behalf of Alcumus ISOQAR)

alyn Faili

This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR



### **Continuing Competence Certificate**

#### This certificate confirms that

#### John Haddow

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 06/07/2023

HW	Healthcare Waste
ТМН	Treatment - Hazardous Waste
TSH	Transfer - Hazardous Waste

### Expiry Date: 06/07/2025

Verification date: 28/06/2023 Authorised:

**Professional Services Director** 

Learner ID: 24688 Certificate No.: 5229205 Date of Issue: 06/07/2023

**CIWM Chief Executive Officer** 



The Chartered Institution of Wastes Management



Scan code on reverse to authenticate that this is a genuine paper

### **United Kingdom Accreditation Service**

#### ACCREDITATION CERTIFICATE



#### TESTING LABORATORY No. 4671

#### ENVA ENGLAND SPECIALIST WASTE LIMITED

is accredited in accordance with the recognised International Standard ISO/IEC 17025:2005 - General Requirements for the competence of testing and calibration laboratories.

This accreditation demonstrates technical competence for a defined scope as detailed in and at the locations specified in the schedule to this certificate, and the operation of a laboratory quality management system (refer joint ISO-ILAC-IAF Communiqué dated April 2017).

The schedule to this certificate is an essential accreditation document and from time to time may be revised and reissued by the United Kingdom Accreditation Service. The most recent issue of the schedule of accreditation, which bears the same accreditation number as this certificate, is available from the UKAS website www.ukas.com.

This accreditation is subject to continuing conformity with United Kingdom Accreditation Service requirements. The absence of a schedule on the UKAS website indicates that the accreditation is no longer in force.

Section Head, United Kingdom Accreditation Service

Initial Accreditation date 2 March 2011 This certificate issued on 21 November 2018

UKAS is appointed as the sole national accreditation body for the UK by The Accreditation Regulations 2009 (SI No 3155/2009) and operates under a Memorandum of Understanding (MoU) with the Department for Business, Energy & Industrial Strategy (BEIS)





### ROAD HAULAGE ASSOCIATION

### This is to Certify

#### **Oakwood Fuels Ltd**

Brailwood Road, Bilsthorpe Industrial Estate, Bilsthorpe, Newark, Nottinghamshire, NG22 8UA

was this day elected a MEMBER of the ROAD HAULAGE ASSOCIATION

dated this \_\_\_\_\_ day of \_\_\_\_\_

September 2014

Chairman

Jellian Ol &

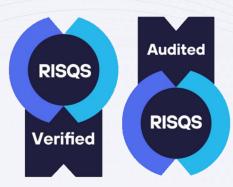
Member of the Board

**Chief Executive** 

**Registered No:** 

0021371-000

This certificate is the property of the Road Haulage Association Limited and must be surrendered to the Association on cessation of Membership.



## Certificate of Audit

This is to certify that

#### Supplier Name ENVA ENGLAND SPECIALIST WASTE LIMITED

Supplier Number 1760

Is now qualified by Audit on RISQS





Certificate Expiry

05-DEC-2025



### **Modules Covered**

Core Non Operational Railway Services

## Supplier ID1760Supplier NameENVA ENGLAND SPECIALIST WASTE LIMITED

Product Code	Product Name	Result
H.G.3.2N	Waste Disposal - Hazardous/Toxic Service	~
H.G.3.3N	Waste Disposal - Non Hazardous & Non Toxic Service	<b>~</b>

**Certificate Expiry** 

#### 05-DEC-2025





## **Certificate of Verification**

This is to certify that

## Supplier Name ENVA ENGLAND SPECIALIST WASTE LIMITED Supplier ID

1760

1

is now a verified supplier on RISQS

Subscription Expiry Date: 03/11/2024





### **RICCL Code Summary**

Supplier Name:ENVA ENGLAND SPECIALIST WASTE LIMITEDSupplier Number:1760

RICCL Code	Name	<u>Status</u>
H.G.3.2N	Waste Disposal - Hazardous/Toxic Service	Qualified via Audit
H.G.3.3N	Waste Disposal - Non Hazardous & Non Toxic Service	Qualified via Audit





# Certificate of Audit

This is to certify that

### ENVA ENGLAND SPECIALIST WASTE LIMITED

has achieved the following standards through audit for Safety, Health, Environmental and Quality practices and procedures as a registered supplier on UVDB Verify Category B2 Audit - Category B2.

UVDB Verify Category B2 Audit	Score	
MSE - HEALTH & SAFETY AUDIT SCORE	99	
MSE - ENVIRONMENTAL MANAGEMENT AUDIT SCORE	100	
MSE - QUALITY AUDIT SCORE	98	
MSE - SUSTAINABILITY AUDIT SCORE	100	
SITE - HEALTH & SAFETY AUDIT SCORE	100	
SITE - ENVIRONMENTAL AUDIT SCORE	100	
SITE - QUALITY AUDIT SCORE	100	
SITE - SUSTAINABILITY AUDIT SCORE	100	



AchillesID: 00022466 Expiration Date: 18 October 2025

Achilles Information Limited conducted this audit on behalf of all UVDB Verify Category B2 Audit subscribing companies.

## Product and Service Code Summary

Supplier Name: ENVA ENGLAND SPECIALIST WASTE LIMITED

AchillesID: 00022466

#### 1.11.18.0 Fuel Oil

2.5.3.0 Refuse/General Waste Disposal Services 2.5.7.0 Non-hazardous Disposal Services 2.5.12.0 Waste Management Services 2.5.99.0 Other Disposal Services 4.1.51.0 Sewage/Sludge Disposal Services





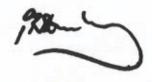
# Certificate of Registration

This is to certify that

### ENVA ENGLAND SPECIALIST WASTE LIMITED

has successfully achieved the Achilles UVDB registration, having completed an online pre-qualification questionnaire.

AchillesID: 00022466 Start date of membership: 17 October 2024 Expiration Date: 16 October 2025



Dr. Paul Stanley Chief Executive Officer Achilles



## Product and Service Code Summary

Supplier Name: ENVA ENGLAND SPECIALIST WASTE LIMITED

AchillesID: 00022466

#### 1.11.18.0 Fuel Oil

2.5.3.0 Refuse/General Waste Disposal Services 2.5.7.0 Non-hazardous Disposal Services 2.5.12.0 Waste Management Services 2.5.99.0 Other Disposal Services 4.1.51.0 Sewage/Sludge Disposal Services





## Anti-Corruption and Bribery Policy

### Introduction

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption. We remain bound by UK laws, including the Bribery Act 2010 and the Republic of Ireland Anti-Corruption and Bribery Act of 2018, in respect of our conduct both at home and abroad.

#### Purpose

The purpose of this policy is to:

- set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery, we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, "third party" means any individual or organisation you encounter during your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### Policy

#### Who Must Comply With this Policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external





consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

#### Who Is Responsible for the Policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The compliance department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

Employees of Enva must read, understand and comply with this policy. Employees follow procedures (including HR, procurement, and financial procedures) to minimise the risk of actual or perceived bribery or corruption by employees or third parties.

#### What Are Bribery and Corruption?

"Bribery" is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An "advantage" includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts "improperly" where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

"Corruption" is the abuse of entrusted power or position for private gain.

#### What You Must Not Do

It is not acceptable for you (or someone on your behalf) to:







- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
- offer or accept a gift to or from government officials or representatives, or politicians or political parties;
- threaten or retaliate against another individual who has refused to commit a bribery offence or /who has raised concerns under this policy; or
- engage in any other activity that might lead to a breach of this policy.

#### **Facilitation Payments and Kickbacks**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

"Facilitation payments", also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK, but are common in some other jurisdictions in which may we operate.

"Kickbacks" are typically payments made in return for a business favour or advantage.

You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the compliance department.

#### Gifts, Hospitality and Expenses

This policy does not prohibit normal and appropriate gifts, entertainment and hospitality, both received and given, from and to third parties. Routine and inexpensive activities such as business breakfasts/lunches and small items of promotional material such as Enva branded marketing items remain appropriate to what we do. However, any other type of gifts, hospitality or entertainment is subject to the following rules:

- they are appropriate to the circumstances and there is no risk that they could be perceived as improperly influencing the recipient;
- they are for the purpose of establishing or maintaining good and ethical business relationships;
- they improve the image or reputation of Enva and is arranged in good faith





• any gifts hospitality or entertainment is not offered promised or accepted to secure an advantage for the company or any of it's employees, or to influence the impartiality of the recipient;

Enva has procedures for accepting or providing gifts, hospitality or entertainment. In general, this should be with the full and open knowledge of your manager and, where possible, in advance. As a rule, the acceptable level of acceptance of Christmas gifts and the like should equate to a maximum of  $\pm 50/\pm 50$ , if it is any higher than this it should be politely refused. For employee gifting the expenses system should be used to record any such spending or arrangements.

If you answer yes to any of the following questions about any exchanges, you must discuss the issue with your manager:

- 1. Is it intended to influence a third party, gain or retain advantage;
- 2. Is the gift/hospitality in your individual name rather than Enva's name;
- 3. Is any part of it cash or cash equivalent;
- 4. Is any part of the transaction secretive;
- 5. Is it in breach of any local law;

Report to your manager or any other manager any suspected or actual bribery, or any concerns that other employees or associated persons may be linked with bribery. Enva will investigate any allegations or suspected bribery, this includes use of the disciplinary processes and referral of information/investigations to relevant enforcing authorities.

#### Donations, sponsorship and political contributions

Sponsorship and charitable donations by any business must be expressly approved in advance by the Divisonal Managing Director, COO or CEO of the business. Detailed records must be kept of any sponsorship or charitable donations made.

Any political contribution by a Group business must be expressly approved in advance by the relevant Divisional Managing Director, COO or CEO. Detailed records must be kept of any political contribution made.

Requests for sponsorship made by Group employees, to customers, suppliers or other third parties may be viewed as inappropriate in some circumstances and so need to be made with caution and with the approval of the Divisional Managing Director, COO or CEO.





#### **Conflicts of Interest**

This is a situation in which personal interest of an employee or representative conflicts with the interests of the business. It can be financial, professional, family or other interests. The Conflict of Interest Policy and associated documentation is available on the employee portal, it is within the Policies & Guidelines section under Group HR.

Please report any such conflicts, or perceived possible conflicts, to your manager so they can support you in managing the situation and process.

#### Doing business in high-risk countries

Some countries suffer from widespread bribery and corruption, both within the public and private sectors. We need to be particularly careful where we do business in high-risk countries or deal with parties, such as suppliers or customers, who are based in one of these countries.

Among the steps that we may need to take before doing business with a party in a high-risk jurisdiction are:

- Carry out a background check to see if they have previously been involved in bribery, corruption or other illegal or improper practices.
- Check what policies and procedures they have in place to prevent bribery and corruption within their own organisation.
- Include suitable clauses in any contract that is put in place.
- Look out for danger signs such as payments that have no clear purpose, connections with government or inappropriate hospitality.
- Companies within the Group that regularly do business with parties in high-risk countries must maintain more detailed policies and procedures on those transactions.

#### Intermediaries, Suppliers, Agents and Service Providers

Employees of Enva exercise due diligence to prevent bribes being offered or given by intermediaries, suppliers, agents or service providers. Third parties are expected to abide to similar zero tolerance approach to bribery and corruption. Agreements entered into should provide for their termination in the event of actual or perceived corruption or bribery by the third party with any concerns immediately being raised with your manager or any other manager.

#### **Record-keeping**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.





You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.

You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

#### Your Responsibilities

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business.

#### How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager.

#### Protection

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.





We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### Training and Communication

Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

#### **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### Potential Risk Scenarios: "Red Flags"

The following is a list of possible red flags that may arise during you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager or using the procedure set out in the whistleblowing policy:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;





- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- you are offered an unusually generous gift or offered lavish hospitality by a third party.

Signed, for and on behalf of Enva:

Jung-T

James Priestley Chief Executive Officer





## Equal Opportunities & Diversity

### Introduction

Enva is committed to the principle of equal opportunities and to avoiding unlawful discrimination in our employment practices and with our customers. We will continue to work hard to have a work environment that is free from harassment and bullying, one where everyone is treated with dignity and respect. With this approach Enva will ensure equal opportunities in employment. We recognise that it is unlawful to discriminate directly or indirectly in recruitment.

### Purpose

We recognise that it is unlawful to discriminate directly or indirectly in recruitment or employment on the basis of age, disability, gender, pregnancy, maternity, race, sexual orientation, religion or belief or marital status (known as protected characteristics). Enva will make reasonable adjustments, including the removal, adaption, or alteration of physical features, if features make it impossible or unreasonably difficult for disabled persons to make use of services or given equal opportunity in their employment.

### Policy

#### Types of Discrimination

Enva employees will be made aware of the types of discrimination:

- Direct where someone is treated less favourable than another because of a protected characteristic.
- Indirect the application of a provision, criteria or practice in relation to people with a relevant protected characteristic in a way that is to the detriment of people with that protected characteristic in comparison with those who do not have it, and where such a provision cannot be shown to be proportionate in achieving a legitimate aim.
- Harassment Enva has clear procedures for eliminating and tackling any harassment. Harassment is the unwanted conduct that has the purpose or effect of violating a persons dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Enva employees are aware, through this policy, that it does not matter if this effect was intended or not.
- Associative discrimination where an individual is directly discriminated against or harassed because of their association with another individual with a protected characteristic (excluding harassment because of marital status).
- Perceived discrimination an individual is directly discriminated against or harassed on the basis that they are perceived as having a protected characteristic (except marital status and pregnancy/maternity).





*3rd Party harassment* - where an employee is harassed and that harassment is related to a protected characteristic (except marital status and pregnancy/maternity) by 3rd parties. Enva is liable if the harassment occurred on at least 2 occasions, must have been aware that the harassment had taken place and failed to take reasonable steps to prevent it from reoccurring.

*Victimisation* occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare their treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation

#### Equal Opportunities in Employment

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job.

Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.

Disability and personal or home commitments will not form the basis of employment decisions, except where necessary.

The Company will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the Company considers it has good reasons, unrelated to any protected characteristic, for doing so.

The Company will comply with its obligations in relation to statutory requests for contract variations.

The Company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.





The Company will monitor the ethnic, gender and age composition (where this information is provided freely) of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

#### Customers, Suppliers and Other People Not Employed by the Company

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company. Employees should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

#### Training

The Company will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise. The Company will provide training to all existing and new employees and others engaged to work at the Company to help them understand their rights and responsibilities under the dignity at work policy and what they can do to help create a working environment free of bullying and harassment. The Company will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

#### Employee Responsibilities

Every employee is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence. Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

#### Grievances

If you consider that you may have been unlawfully discriminated against, you may use the Company's grievance procedure to make a complaint. In the first instance this should be raised via local HR, if you feel unable to do so it should be raised to the Chief People Officer, Caroline Hudson – caroline.hudson@enva.com

Regardless of who this is raised to the recipient will aim to hold a meeting with you within 2 weeks to fully understand your concerns. You will be able to be accompanied by a fellow employee or trade union representative during this meeting if you so wish. Post this meeting an investigation will be conducted and your complaint will be responded to within 30 working days. If for any reason this deadline has to be extended to ensure the investigation can be completed then the complainant will be informed.



### compliance matters

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The Company will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

#### Monitoring and Review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. If changes are required, the Company will implement them. Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

Signed, for and on behalf of Enva:

J-fing

James Priestley Chief Executive Officer





## Modern Slavery

### Introduction

This statement is issued by Enva in compliance with section 54 of the UK Modern Slavery Act 2015. Enva is established under the laws of England and Wales. Enva is a full-service and leading provider of recycling and resource recovery solutions. With sustainability at the forefront of its proposition, Enva recovers a broad range of hazardous and non-hazardous waste materials for re-use in manufacturing and for energy conversion, as well as providing a complete portfolio of water and waste-water services.

Enva is opposed to slavery and human trafficking in any part of our business or our supply chain. We are therefore committed to ensuring that we have adequate procedures in place to identify and prevent these practices.

As of February 29th, 2024, Enva had a headcount of 2000 employees across UK and Ireland. The range of employees cover from initial waste collection to professional roles. The risk of modern slavery would predominantly arise in our initial waste collection roles most specifically roles we utilise on a temporary or agency basis i.e. not on our payroll.

### Purpose

This statement covers the following businesses within the Enva Group:

- Enva Topco Ltd
- Enva England Specialist Waste Ltd
- Enva Battery Recycling Ltd
- Enva Organics Ltd
- Enva Wood Recycling Ltd
- Enva England Ltd
- Enva Northern Ireland Ltd
- Enva Ireland Ltd
- Enva Plastics Ltd
- Enva Scotland Ltd

Seasonal work is not a feature of the industry in which we operate. More detailed information on our business is available at enva.com.





#### Policy

#### Our Supply Chains

Enva did not support nor knowingly deal with any business involved in modern slavery or human trafficking and did not work with any party suspected to be connected to any such activity.

In the past year we have not been made aware of any incidents of modern slavery or human trafficking in our supply chain. In the event that this would occur, Enva would immediately seek to influence the supplier to address any adverse impact.

#### Procedures on Slavery and Human Trafficking

As part of our compliance referred to above, we have taken the following steps:

- Assessed potential risk areas in our supply chains via a supplier approval process.
- Mitigated the risk of slavery and human trafficking occurring in our supply chains, including conducting reviews, where necessary, of the controls our suppliers have in place and carrying out other suitable checks.
- Monitored potential risk areas in our supply chains when required.
- In additional we have internal whistleblowing procedures to ensure there are clear and independent reporting lines available to report any concerns.

#### Employees

Our recruitment processes are thorough and transparent, we have robust procedures in place to vet new employees, including background checks. Identity is checked for every employee; more extensive background checks are conducted as required by HireRight – a specialised screening organisation. These processes are capable of capturing the existence of any forced labour or human trafficking.

We also have a Pay Policy to ensure compliance with human rights and local employment laws, all staff are remunerated fairly, as such we are satisfied that employees are not exploited.

#### Training

To ensure a suitable level of understanding of the risks of modern slavery, and human trafficking, in our business, and our supply chains, relevant directors and employees participated in appropriate training workshops. In 2024 we plan to introduce an online Learning Management System where training will be conducted annually for all with IT access, the modules will also be delivered via classroom for those that do not.





#### Assurance and Key Performance Indicators

We will review this statement on an annual basis, reviewing annual key performance indicators, ie training & no. of issues reported, to measure compliance.

Responsibility for ensuring that our procedures are adequate and are adhered to in all of our activity's rests with the Managing Directors of each business within Enva.

#### Approval

This modern slavery statement has been approved by the Enva board of directors and signed by the Chief Executive Office on behalf of the board in June 2024.

Signed, for and on behalf of Enva:

J-fint

James Priestley Chief Executive Officer

