



Environmental Policy

Company Policy

APOL-043

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1 Document Control

This section defines who prepared, checked and approved this document version.

Date	V.	Prepared	Checked	Approved	Comments
29/09/2024	1	Enea Di Mauro	James Boucher	Jun Zhang	Expansion and extraction from the combined HSSE policy 2025-2026

Table 1. Document control

2 Distribution

This company policy applies to the UK Headquarters.

3 Validity

This policy is applicable from the date of issue and takes the place of any previous policy on this subject. It will be valid until a new version is published. Please also note that any specific UK laws will take precedence over this guideline if the two differ.

4 Reference

This section lists any other documents or regulations that are connected with this policy:

APOL-001	Corporate Social Responsibility Policy
IPP.33	Non-conformances Procedure
IPP.39	Hardware Procurement and Shipping Procedure
IPP.47	Hardware Manufacturing Procedure
IPP.59	General Risk Assessment Procedure
IPP.61	Subcontractor Management Procedure

5 Definitions

This section lists any specific terminology used within this policy:

B2B	Business to Business
OEM	Original Equipment Manufacturer
PIEs	Public Interest Entities

6 Compliance

The following legislation and regulations inspired the production of this document:

BNG	Biodiversity Net Gain
BR	Building Regulations
CCA	Climate Change Act 2008
EA	Environment Act 2021
EIA	Environmental Impact Assessments
EPC	Energy Performance Certificates (EPCs) & MEES
EPR	Extended Producer Responsibility (2022)
GGC	Greening Government Commitments
LBC	Listed Building Consent
NPPF	National Planning Policy Framework
PERR	Packaging Essential Requirements Regulations Government Guidance Notes
PCPA	Planning and Compulsory Purchase Act 2004
PA	Planning (Listed Buildings and Conservation Areas) Act 1990
SECR	Streamlined Energy and Carbon Reporting (this applies to large UK companies)
SRS	Sustainability Reporting Standards (inc. CSRD in the EU)
WEEE	Waste Electrical and Electronic Equipment Directive
WMR	Waste Management Regulations

7 Purpose

The goals for this environmental policy are listed below.

7.1 Legal Compliance

Ensure the company meets all relevant environmental laws and regulations.
Avoid fines, penalties, and reputational damage.

7.2 Environmental Protection

Minimize pollution, waste, and resource consumption.
Promote sustainable practices across operations.

7.3 Corporate Responsibility

Demonstrate commitment to social and environmental responsibility.
Align with stakeholder expectations and ESG (Environmental, Social, Governance) goals.

7.4 Operational Efficiency

Improve energy and resource efficiency.
Reduce costs through better waste management and sustainable procurement.

7.5 Risk Management

Identify and mitigate environmental risks (e.g., spills, emissions, climate-related disruptions).
Enhance resilience and business continuity.

7.6 Employee Engagement

Encourage staff to participate in sustainability initiatives.
Foster a culture of environmental awareness and accountability.

7.7 Customer and Investor Confidence

Build trust with clients, partners, and investors.
Meet sustainability criteria for contracts, funding, or certifications.

7.8 Continuous Improvement

Set measurable environmental objectives and targets.
Monitor performance and drive ongoing improvements.

8 Scope

The scope of this policy is restricted to the UK Headquarters of Atmos International Ltd. Please note that the UK Headquarters for Atmos are housed in a Listed Grade II building, so there are additional regulations that apply and also some limitations (for instance, we cannot use double glazing).

9 Introduction

The Atmos International is an SME company in the UK that occupies a niche (pipeline technology) within a niche (water, oil and gas, primarily). Albeit our customers are large corporations with large multisite around the world, Atmos has historically never reached 150 staff in UK. We operate as a

software house and hardware design and prototyping company. Therefore, we do not directly manufacture our hardware products, which are instead physically built by our OEM (Original Equipment Manufacturer) partners. The other hardware products are purchased from large reputable world-class manufacturers. It is important to note that our purchasing power, the volume and frequency of goods purchased are very low with respect to the size of these suppliers. Finally, we have no control over which subsidiary of these large suppliers provides us with their products or services.

10 The policy

10.1 Applicable environmental regulation or legislation

The compliance section 6 lists all the possible UK regulations. The table below shows the applicability (or otherwise) for each of them with a justification in each case.

Law or regulation	Long description	Applicability	Justification
BNG	Biodiversity Net Gain	No	Applicable to developers and authorities
BR	Building Regulations	Yes	Applicable to the building/land
CCA	Climate Change Act 2008	No	Large, high-emission companies only.
EA	Environment Act 2021	Yes	UK Manufacturer
EIA	Environmental Impact Assessments	No	Large, high-emission companies only.
EPC	Energy Performance Certificates	No	Listed building exemption
EPR	Extended Producer Responsibility	No	UK Manufacturer of packaging only
GGC	Greening Government Commitments	No	Public bodies only
LBC	Listed Building Consent	Yes	Listed building and curtilage
NPPF	National Planning Policy Framework	Yes	Heritage conservation area
PA	Planning (Listed Buildings and Conservation Areas) Act 1990	Yes	Heritage conservation area
PCPA	Planning and Compulsory Purchase Act 2004	Yes	Planning
PROR	Producer Responsibility Obligations (Packaging Waste) Regulations 2007	Yes	Applicable to all producers
SECR	Streamlined Energy and Carbon Reporting	No	This applies to large (>250) UK companies
SRS	Sustainability Reporting Standards (inc. CSRD in the EU)	No	Only Public Interest Companies, large UK companies, multinationals
WEEE	Waste Electrical and Electronic Equipment Directive	Yes	UK manufacturer under own brand
WMR	Waste Management Regulations	Yes	UK office

Table 2. Applicable environmental regulation or legislation

The regulations and laws applicable to our business are then addressed in the following sections.

10.2 Complying with Building Regulations (BR, LBC, NPPF, PA, PCPA)

These are strictly applicable to the building and curtilage of the Headquarters location: St. Paul's church in Manchester, which is a Grade II listed building. The official responsibility to comply with them rests with the company which owns the land and building. The Infrastructure Manager is then tasked with day-to-day management of managing any repair work, upkeep and modifications that comply with the regulations.

10.3 Complying with the Environment Act (EA)

The EA applies to all UK businesses. However, albeit we are officially a manufacturer, our operations are strictly office-based and therefore our environmental footprint is very small. We design hardware equipment which is manufactured by our suppliers in very small batches and used by pipeline owners or operators to detect (and therefore reduce) leakage. This is a major contribution to protecting the environment against contaminants. Atmos designs, certifies and prototypes pipeline equipment and then our OEM manufacturing partners are the ones deputized to build and test them. Such equipment is then used as part of our complete solution/service to the customer and physically installed on site (worldwide) by locally accredited reputable companies who meet all local regulation and legislation requirements.

10.4 Complying with Waste Electrical and Electronic Equipment Directive

Atmos ensures proper handling of **e-waste** and production waste. When electronic devices used by staff reach their end-of-life they are properly recycled by authorized providers of waste management services. Records are kept.

10.5 Complying with Waste Management Regulations

- Prepare for digital waste tracking systems mandated by the Act.
- Use licensed waste carriers and maintain documentation.
- Improve waste management.
- Separate food waste, dry recyclables, and general waste.

10.6 Objectives

The objectives of this policy are the following:

- Minimize energy consumption and carbon footprint.
- Promote sustainable procurement and waste reduction.
- Encourage remote work and digital collaboration to reduce travel.
- Support environmental awareness and training.

10.7 Key Environmental Aspects

- **Energy use:** Office lighting, heating, cooling, and IT equipment.
- **Digital footprint:** Data center efficiency, cloud usage, and software optimization.
- **Waste management:** E-waste, paper, and office supplies.
- **Travel:** Business travel policies, promoting virtual meetings.
- **Procurement:** Preference for eco-friendly suppliers and products.

10.8 Responsibilities

The ultimate responsibility for this environmental policy, resourcing and implementation of action to improve Atmos environmental impact is with the CEO. She delegates the day-to-day management of these matters to the HSE (Health, Safety and Environment) Manager.

In addition to the HSE Manager, there is an HSE committee formed by members of the company in different department who meet once a month to discuss, analyze and address any environmental issue that affects our performance, reputation and our legal compliance.

In addition to the above, all staff need to take responsibility, such as:

- **Management:** ensure policy implementation and review.
- **Employees:** follow sustainable practices and report issues.
- **Facilities/IT teams:** monitor energy use, manage equipment lifecycle.

10.9 Implementation Measures

- Use energy-efficient hardware and cloud services.
- Implement recycling programs and reduce single-use items.
- Replacing all old lighting with LED lights.
- Encourage remote work and green commuting (EV chargers, electric car incentives, bike schemes).
- Choose suppliers with environmental certifications (whenever possible).

10.10 Monitoring and Review

- Track energy usage and waste reduction metrics.

- Conduct annual reviews and update the policy as needed.
- Report progress in sustainability reports or internal communications.

10.11 1. Supply Chain Responsibility

We require that our **manufacturing partners** comply with UK environmental laws and standards. Therefore, we encourage or require partners to:

- Minimize emissions and waste,
- Use sustainable materials,
- Implement energy-efficient production processes.

Include **environmental clauses** in supplier contracts or terms and conditions to enforce compliance.

10.12 Product Design for Sustainability

Design hardware with **eco-friendly principles**, such as:

- Energy efficiency
- Recyclability
- Reduced use of hazardous substances

Align with WEEE regulations for end-of-life disposal (see section 10.4).

10.13 Environmental Monitoring and Reporting

- Monitor environmental performance across operations and supply chain.
- Report progress in line with **Environmental Improvement Plans (EIPs)** and targets set by the **Office for Environmental Protection (OEP)**.

10.14 Policy Alignment

Align internal environmental policies with the **environmental principles duty**, including:

- Polluter pays,
- Prevention,
- Precautionary principle,
- Integration of environmental protection into decision-making.

10.15 Our Environmental Impact

- Conduct an environmental audit to identify areas like waste generation, emissions, water usage, and biodiversity impact.
- Monitor Air and Water Quality.
- Track emissions and pollutants from operations.
- Implement measures to reduce air pollution and improve water discharge quality.

10.16 Packaging impact

Atmos aims to reduce packaging and also use as much as possible recyclable material for packaging. Our boxes are reusable and recyclable carb board. For wrapping we use Green Biodegradable Bubble Wrap Roll, which is reusable, recyclable and biodegradable. For loose filling we use Biodegradable Peanuts Fillers. Finally, a green replacement is sought for injection moulded inserts for specific products.

We also follow the governmental guidelines:

- [Packaging Essential Requirements Regulations Government Guidance Notes](#) and
- [Packaging Waste Regulations quick guide \(2025 update\)](#)

10.17 Report and Review

Submit required reports (e.g., under SECR or other frameworks).
Review and revise environmental strategies annually.

10.18 Communication and Training

- Share the policy with all staff.
- Provide training on environmental practices.
- Encourage feedback and suggestions for improvement.



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