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# **Kirby Group Engineering Environmental Manual**

THIS DOCUMENT IS A WORKING DOCUMENT AND AS SUCH, IS SUBJECT TO PERIODIC REVISION TO REFLECT SITE CONDITIONS, TO REFLECT CURRENT PRACTICES AND PROCEDURES AND TO REFLECT LEGISLATIVE CHANGES. THE POLICY STATEMENT IS REVIEWED ANNUALLY.

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Approval			
Name	Department	Signature	Date
Henry McCann Chief Executive Officer	Head Office		17-Jan-2025

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## Environment Policy

Founded in 1964, Kirby Group Engineering (Kirby) is an international multi-disciplinary Building Services Contracting Company who specialises in Design and Management of Electrical, Mechanical, Civil, Structural installations, including Process, Instrumentation, Communications, Calibrations, Fire Protection, Transmission and Distribution Services.

We are committed to providing a quality service that ensures a safe and healthy workplace for our employees in a manner that minimises our potential harmful impacts on the environment. We will strive to use pollution prevention and environmental best practices in all we do. Our current activities do not create emissions to the environment covered by Environmental Protection Legislation; however, we are not complacent and remain committed to a high level of environmental protection and where possible enhancement.

Kirby's Board of Directors supports this statement and have given me the responsibility to implement it. Kirby believes that our Environment, Health & Safety (EHS) Management System will contribute positively to our quality of life and to our environmental footprint. This is an essential requirement of our business, so, we must all give this policy and the Environment Manual the support it needs by conducting our operations in such a manner as to:

- Safeguard the environment in carrying out our normal work, to enhance the wider environment and minimise any harmful impacts as far as possible.
- Strive towards the prevention of pollution through minimizing waste, promoting recycling, reducing energy, reducing raw material consumption, and reducing harmful emissions.
- Establish, document, and maintain Environment procedures to assist in compliance with this policy, the Environment Manual, relevant statutory legislation, ISO 14001 and / or other requirements relevant to our operations.
- Commit to continual improvement of our Environmental performance, policy, and procedures, through the setting of objectives and targets, periodic review and monitoring with regular inspections to ensure that they remain relevant and appropriate to the organisation.
- Work with suppliers and contractors that adopt and promote best environmental practices.
- Communicate to all employees (full and part time), contractors, visitors, and anyone, that may be affected by our operations, their individual Environmental responsibilities, through the provision of instruction, training, supervision, and information.

We shall establish, implement, and maintain processes seeking to improve our EHS performance through the setting of our targets and objectives. Everyone at work is responsible for the environmental aspects of the company and reducing their impacts, and all employees including managers and supervisors, shall accept responsibility for Environmental issues within their own control.

The organisation and responsibilities for carrying out this Environmental Policy are set out in the EHS Management System and our EHS Team will provide advice and assistance in complying with this policy. This will be made available at all locations where we carry out our operations and to any interested parties.

Signed:



Date: 17-Jan-2025

Henry McCann

Chief Executive Officer

## Sustainability Policy

Kirby is committed to promoting sustainable practices and reducing our environmental impact in all areas of our business. Sustainable is defined as *'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'* [Source: Rio Summit]. At Kirby this means that we operate our professional activities and the management of our organisation in a way that enables all our people to realise their potential and improve their way of life, interacting with our communities while protecting and enhancing the earth's natural resources.

We are committed to continually improve the integration of sustainability into our working environment and business processes. Our aim is to play a proactive role in contributing to achieving sustainability where we have influence.

In addressing this statement, the company will:

- Integrate sustainability considerations into our business decisions and how these decisions may impact on our current and future needs.
- Reduce our impact on the environment in all our activities through the implementation of our Environmental Policy, Waste and Energy Management Statements & Procedures.
- Support sustainable sourcing by purchasing materials and products from suppliers who meet our environmental standards.
- Invest in our employees in offering training opportunities, rewards, and fair contractual arrangements.
- Meet our regulatory, customer and other requirements.
- Promote the awareness and education about Sustainability with our staff, supply chain, and customers.

Participate in local and national initiatives which positively impact social diversity and social inclusion within our workplace, supply chain and communities.

## Waste Management Statement

Kirby will seek to minimise the creation of waste by avoiding unnecessary wastage of materials and recycling materials that cannot be directly reused as far as practicable.

All staff are required to comply with this policy by minimising waste creation and co-operating actively with recycling programmes. Kirby will comply with their 'duty of care' towards waste management, where waste is created, it shall be safely placed in appropriate storage receptacles, removed by competent and licenced contractors and disposed at appropriately licenced facilities. In addressing this statement, the company will:

- Develop plans for waste prevention, recovery, and disposal.
- Minimise waste by recycling and reusing materials where possible, using the principles of the 'waste minimisation hierarchy' – prevention, minimisation, reduce, re-use, and recycle, energy recovery and disposal.

## Energy Management Statement

Kirby acknowledges the importance of energy as a necessary resource for successfully meeting the company's operational objectives. Kirby also realises the need to responsibly use this resource in a manner that is sustainable and complementary to Kirby's Environmental Policy. In addressing this statement, the company will:

- Control and manage systems and energy infrastructure including the maintenance of all plant and equipment in such a way as to minimise energy wastage.
- Promote sustainable transportation by upgrading our fleet to EV, using alternative green fuels, and encouraging employees to use public transportation, carpooling, or biking to work.
- Monitor and report on Kirby's energy consumption, under its control, to identify and implement opportunities for improvements in energy performance.
- Review energy efficiency performance and Energy Action Plans annually.
- Promote awareness of the responsibility for energy conservation to staff, supply chain and customers.
- Pursue the use of renewable and alternate energy to supplement conventional energy sources, to meet our obligations as a member of the Global Community including legislative requirements and minimising environmental impact.

Signed:



Henry McCann

Chief Executive Officer

Date: 17-Jan-2025

## 1.0 Scope

### 1.1 Introduction to the Company

Kirby Group Engineering (Kirby) was established in 1964 and provides engineering and construction services to the industrial, life science, mission critical and energy infrastructure market sectors in Ireland, the UK and Europe. We specialise in the design development and installation of mechanical, electrical, instrumentation and turnkey services. This environmental manual complies with the requirements of ISO 14001:2015.

## 2.0 Normative References

No normative references are cited. This clause is included in order to retain the clause numbering identical with ISO 14001:2015.

## 3.0 Terms and Definitions

For the purpose of this document please reference the 'Terms and Definitions' as set out in ISO 14001:2015.

<b>EHS</b>	Environment Health and Safety	<b>K:/EHS Dept</b>	Kirby Shared Network Drive
<b>EHSA</b>	Environment Health and Safety Advisor	<b>K-Net</b>	Kirby Intranet
<b>EHSM</b>	Environment Health and Safety Manager	<b>KPI</b>	Key Performance Indicators
<b>EHSMS</b>	Environment Health and Safety Management System	<b>QEHS</b>	Quality Environment Health and Safety
<b>EMS</b>	Environmental Management System	<b>RAMS</b>	Risk Assessment Method Statement
<b>ETS</b>	Emission Trading Scheme	<b>SDS</b>	Safety Data Sheet
<b>FS</b>	Function Scorecard	<b>SEOR</b>	Safety Environment Observation Report
<b>GHG</b>	Greenhouse Gas	<b>SWMP</b>	Site Waste Management Plan

## 4.0 Context of the Organisation

### 4.1 Understanding the organisation and its context

Kirby recognises that a successful operation requires it to be managed in a systematic and visible manner. As a result, Kirby, has established, documented, and implemented a robust Environmental Management System (EMS). External and internal issues that are relevant to Kirby's purpose and the achievements of its intended outcomes of EHS management system include:

- External – Construction related activities in new environments either greenfield or brownfield. Specific requirements specified by Statutory and Client / Project requirements. The outcome is compliance with statutory requirements at a minimum.
- Internal – Prevention of pollution and safeguarding the environment. The outcome is meeting and exceeding targets.

Kirby has identified its processes, so they are clearly understood and can be more easily applied, managed, and improved upon. The criterion and methods required for the effective operation and control of these processes have been determined.

Kirby makes the necessary resources and information available to support the operation and effective control of these processes. The processes are monitored, measured, and analysed to determine any actions needed to achieve the planned results and continuous improvements.

Kirby Environmental Management System is managed in accordance with the requirements of the ISO 14001:2015. Any outsourced processes are identified and controlled through our purchasing processes as per MP7.

### 4.2 Needs & Expectations of interested parties

Kirby determines the interested parties that are relevant to the EMS and the requirements of these parties by contracts, tender and project specification and drawings, and regulatory and statutory requirement. We monitor and review that information. Kirby manages these requirements by its EMS Layout. Interested parties are identified on our Interested Parties Register which includes their needs and expectations and those which become legal and other requirements.



### 4.3 Scope

Kirby is certified to ISO 14001 for its Environment management system by the National Standards Authority of Ireland. The Kirby EHS Management System provides a mechanism for environmental management throughout all fixed locations, temporary locations, and departments, which includes: The design and management of electrical, mechanical, civil, structural installations, including process, instrumentation, communications, calibrations, fire protection, transmission, and distribution services.

The environmental management system is designed to cover environmental aspects which Kirby can control and directly manage, and those it does not control or directly manage but can be expected to have an influence.

The purpose is to implement the Company Environmental Policy, achieve the objectives and targets and ensure compliance with ISO 14001: 2015.

The Environmental Manual defines the scope of Kirby EHS Management System and provides a linkage of system documents, to the various elements of the ISO 14001:2015, ISO 9001:2015 and ISO 45001:2018 standards.

### 4.4 Environmental Management System and its Processes

This Environmental Manual is a statement by Kirby that its Environmental Management System is compliant with ISO 14001:2015 Standard. The scope of Kirby Environmental Management System (EMS) includes all of the supplies, services, design, and processes involved in meeting our commitment to customer satisfaction and it is effective at all levels within the organisation. For the activities within the scope of the EMS, Kirby addresses the risk and opportunities.

The documents of the EMS contain the details about the process's inputs and outputs, criteria and methods, resources needed and responsibilities.

The Environmental Manual is maintained and controlled to ensure its adequacy and currency. The EHS Department maintains the master copy of this manual. When amendments are made to the manual, the new revised copy is sent to all authorised copyholders. Copies issued to unauthorised persons like visiting auditors and major customer are stamped "Uncontrolled Copy".

The format of this manual is designed so that each section correlates to an area of activity as defined by the ISO 14001 standard for ease of reference. Refer to the table of contents for an index of this manual.

Aspects of the environmental management system interact with the health and safety management system and in several areas, procedures have been combined for ease of implementation. A table showing where the two systems interact or are combined is provided in Appendix 1. The combined EHSMS are administered by the Environmental, Health and Safety - EHS Department.

We consider the knowledge gained in 4.1 and 4.2 when establishing and maintaining this EHSMS.

The format of this manual also correlates to the EHS MS maintained on the Kirby shared network drive: K:\EHS Dept\ EHS Management System.

### 4.5 Issue and Update

The control of this Manual is in accordance with the Kirby operating procedure MP1 Document, Record Control & IT. All copies of this Manual not marked "Controlled Document" are uncontrolled and should be used for reference purposes only. This document is distributed to all management and supervisory personnel, is available on the Kirby intranet (K-Net) and may be made available to other employees and to third parties concerned (e.g., sub-contractors, suppliers, clients), subject to the approval of the EHS Manager or EHS Director.

Amendments will be issued by the Kirby EHS Associate Director or designee following approval by the EHS & Sustainability Director.

## 5.0 Context of the Organisation

### 5.1 Leadership and Commitment

The organisation structure including top management is set out in the Safety Statement Appendix 2 **Kirby EHS Organisation Chart**. Top management leadership and commitment are set out in the safety statement and policy. The requirements are integrated through the following elements: Org Charts, Competitive Strategy Map, Function Maps, Management Reviews, Monthly KPIs, QEHS Policies, QEHS Tours, Communications, Meeting minutes, Business Updates etc.

Kirby Management demonstrates its leadership and commitment to the development and implementation of the environmental system by:

- Taking accountability for the effectiveness of the environmental management system
- Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of Kirby.
- Ensuring the integration of the environmental management system requirements into the Kirby business processes
- Ensuring that the resources needed for the environmental management system are available

- Communicating the importance of effective environmental management and of conforming to the environmental management system requirements
- Ensuring that the environmental management system achieves its intended outcomes.
- Directing and supporting persons to contribute to the effectiveness of the environmental management system.
- Promoting continual improvement
- Supporting other relevant management roles to demonstrate their leadership as it applies to the area of responsibility.

## 5.2 Environmental Policy

The Kirby Environmental Policy is endorsed by the Chief Executive Officer on behalf of the Board of Directors. The policy covers all activities undertaken by Kirby. The Policy includes a commitment to continual improvement and prevention of pollution, as well as a commitment to meet or exceed relevant environmental legislation, regulations, and other requirements. The Policy will be reviewed annually by senior management, communicated to all employees, subcontractors, interested parties, posted in a prominent location at all company sites and made available to the public as required. The policy includes Waste Management, Energy and Sustainability Statements. The policies are available on the company website and K-Net.

## 5.3 Organisational roles, responsibilities, and authorities

The EHS management system roles, responsibilities and authorities are defined at relevant functions and levels within the organization. The Board of Directors jointly provides the resources essential to the implementation and control of the EHS management system, including training, human resources, specialty services, financial resources, technical and informational services. The related documents include Environmental Manual, OP-021 Organisation & Administration, Environmental Health, and Safety Operating Procedures; & the Site EHS Plan.

### Responsibilities / Duties of the Chief Executive Officer

- Review, endorse and support the Environmental Policy, FS and resourcing of competent personnel.
- Promote continual improvement in sustainability within the organisation and those impacted by our operations.

### Responsibilities / Duties of the Board of Directors

- Approve the Objectives and Targets for the year.
- Supports initiatives to improve sustainability within the business.

### Responsibilities / Duties of Financial Director

- Reviews and monitors situations resulting from loss or damage to property, the environment or injury to a member of the public.
- Arranges for insurable risks to be assessed in relation to injury or ill-health employees, loss or damage to property, the public and the environment.

### Responsibilities / Duties of Chief Operations Officer

- Ensures that sufficient resources of time, personnel and finance are available for the effective operation of the company EHSMS.
- Ensures that provisions are made at planning, estimating and tender stage for EHS requirements and considerations.
- Participates in Company Management Team Meetings.

### Responsibilities / Duties of Director EHS & Sustainability

- Develop, implement, and monitor ESG strategy.
- Monitor sustainability trends, regulations, and best practices.
- Engage and collaborate with key stakeholders to ensure sustainability initiatives and targets are supported.
- Develop and implement sustainability policies, plans and procedures.
- Develop and implement sustainability communication plans & training programs.
- Ensure compliance with statutory reporting requirements.
- Monitor and report on sustainability performance.

### Responsibilities / Duties of Associate Director EHS

- Coordinates the EMS to ensure it is properly established, implemented, and maintained to ISO 14001:2015 requirements in all areas of the organisation.
- Ensuring that adequate resources & specialised skills essential to the implementation, maintenance and control of the EMS are available.
- Reporting to Senior Management on the performance of the EMS for review, including recommendations for improvement.



- Reviews incidents, recommends corrective actions and maintains incident register.
- Promotion of Environmental programs and achievement of targets.
- Promotion of energy conservation.
- Overall direction and guidance in relation to arrangements for the operation of the EMS.
- Participation in the EMS Management Review and partial reviews.
- Approves EMS Documents including the Manual, Targets & Objectives and Management Review.
- Maintains a library of environmental literature, guidance, documentation and advises on impending changes.

**Responsibilities / Duties of Business Unit Leaders / Operation Managers**

- Ensures that sufficient resources of time, personnel and finance are available for the effective operation of the company EHSMS at project level.
- Ensures that provisions are made at planning, estimating and tender stage for Environmental requirements and considerations.
- Promote continual improvement and review opportunities for improvement identified through audits, inspections and / or suggestions from staff.

**Responsibilities / Duties of EHS Manager**

- Establishing, operating, and maintaining the EMS in accordance with ISO 14001:2015.
- Ensuring that adequate records are maintained and updated for demonstration of the conformance to the EMS requirements.
- Updating relevant personnel on new and impending environmental legislation and their requirements.
- Ensuring that all environmental incidents/non-conformances are investigated and reported in accordance with the reporting procedure.
- Receiving, documenting, and responding to documented environmental communications from external interested parties.
- Liaising with external regulatory bodies in matters relating to the environment.
- Carrying out internal or organizes external environmental audits to ensure the adherence to documented procedures.
- Reviewing Environmental Incident Reports and following up on actions.

**Responsibilities / Duties EHS Advisor**

- Develops in conjunction with the Contract / Project Managers a Site EHS Plan and Waste Plan.
- Provide advice and guidance and have the authority to instruct all site personnel to comply with the specific provisions of the plan(s).
- Advise site personnel on environmental issues, including carrying out inductions and toolbox talks.
- Carries out regular environmental inspections and audits.
- Coordinates environmental monitoring and review results.
- Ensures that NCRs within the EMS are identified, recorded, and resolved.
- Reports environmental incidents immediately to the EHS Manager and Site Manager and carries out investigation and recommends improvements.
- Review RAMS to ensure environmental impacts have been identified and controlled.

**Responsibilities / Duties of Project / Construction Manager:**

- Managing the work to comply with the Environment Management Plan.
- Minimising negative impact to the environment so far as is reasonably practicable.
- Ensuring site operators are aware of their responsibilities, have the necessary training to be competent and comply with relevant Regulations.
- Ensuring that waste is managed responsibly, preventing waste production and prioritising reuse and recycling versus landfill.
- Participating in environmental inspection & audits.
- Ensuring that all relevant environmental incidents are reported within the 30-minute protocol and investigated.

**Responsibilities / Duties of Site Manager / Supervisor:**

- Be instructed on the operational procedures and shall be responsible for ensuring that personnel under their control are complying with the plan.
- Be responsible for ensuring RAMS are up to date and relevant so that environmental aspects and associated controls are implemented.
- Use plant and equipment appropriately as per manual/instructions.

- Ensure arrangements are in place to monitor waste storage, pollution prevention controls and energy saving opportunities.
- Ensuring that all necessary documentation is in place including waste movements.
- Reporting monthly on-site statistics, key information and KPI's internally and externally as required.
- Attend training and participate in toolbox talks.
- Complete SEOR's.
- Report any environmental incidents/spillages/concerns to Site Management, Project Manager and EHS Advisor.

#### **Responsibilities / Duties of Function Managers**

- It is the responsibility of each Functional Management such as Pre-Construction, Procurement, HR, IT, Commercial and Engineering etc. of Kirby to:
- To apply resources and carry out roles and responsibilities as per Operating Procedures.
- To identify risks, opportunities, corrective actions and to promote continual improvement.
- Engage with EHSMS audits on their function requirements and take action on recommended findings.
- Participate in EHS initiatives which relate to their function and / or other when required.
- Consider improvements to the Environment performance when reviewing planned changes in policies, processes and activities.

#### **Responsibilities / Duties of Employees**

- Everyone at work is responsible for the environmental aspects of the company and reducing their harmful impacts, and all employees including managers and supervisors, must accept responsibility for Environmental issues within their own control.
- An Environmental Organisation Chart portrays the levels of responsibilities – see Appendix 2. Resources, roles, and responsibilities forms part of the Kirby Safety Statement and are detailed within the operating procedures.

#### **Responsibilities / Duties of Sub-Contractors, Self Employed and Suppliers**

- To manage and conduct all work activities to ensure the environmental aspects of the company are controlled to reduce harmful impacts.

## **6.0 Planning**

### **6.1 Actions to address risks and opportunities**

#### **6.1.1 General**

Corrective actions are identified to eliminate causes for potential non-conformities. Potential problem impacts are considered in determining the appropriate actions.

A documented procedure as per *MP10* is established and includes identifying potential non-conformities, evaluating need for action to prevent occurrence of non-conformity, implementing needed corrective action, recording the results of these actions, and reviewing the effectiveness of these actions.

Actions taken to address risk and opportunities are proportionate to the potential impact on the conformity of products and services, as described on CP-08 Risk Management:

#### **Kirby Risk Categories:**

- |                            |                                     |
|----------------------------|-------------------------------------|
| • Strategic Risks          | • Design & Project Management Risks |
| • Financial Risks          | • Construction Risks                |
| • Customer Service Risks   | • Organisational Risks              |
| • Environmental Risks      | • Performance Risks                 |
| • Health & Safety Risks    | • Information & Technology Risks    |
| • Legal / Compliance Risks |                                     |

#### **6.1.2 Environmental Aspects**

Kirby has established a procedure for the purpose of identifying the environmental aspects which the company controls and over which it may be expected to have an influence and determines which of those aspects are considered significant. The OP-040 Environmental Aspects and Impacts Assessments define how this process is established, implemented, maintained, and controlled. The process also takes into account change and abnormal conditions and reasonably foreseeable emergency situations.

We communicate the significant environmental aspects among the various levels and functions of the organization, as appropriate.

Significant environmental aspects can result in risks and opportunities associated with either adverse environmental impacts (threats) or beneficial environmental impacts (opportunities).

Aspects are reviewed at least annually by the EHS Ass. Director or when there is a new or changed process or activity at the company. The EHS Ass. Director maintains minutes and other records. A full list of Environmental Aspects and Impacts is maintained on the company server – 4.3.1 Aspects & Impacts – and is available to all Kirby employees through the K-Net.

### **6.1.3 Compliance Obligations**

Kirby has established procedure which outlines the periodic review of regulatory & 'other requirement' compliance (see OP-021-02 Organisation & Administration of the EHSMS) and those results are reported to management on a yearly basis. Other procedures support this covering a variety of methods which can be used to assess compliance, including audits, document and/or record reviews, inspections, interviews, project or task reviews, routine sample analysis or test results, site tours and 'Safety Environment Observation Reports' (SEORs).

Generally, compliance within the site is evaluated through the regular inspections and monitoring and at regular site management meetings, where the effectiveness of the control measures is reviewed. Compliance is also evaluated by the EHSMS through the internal audit process with the findings reported back to the site management.

Records of these evaluations will be maintained. See also the current aspects register & legislation register.

### **6.1.4 Planning Actions**

Kirby plans for the activities and resources needed to satisfy the Environmental Policy. Our planning processes consider customer needs, product requirements, processes performance and improvement opportunities. Kirby also has documented processes for maintaining integrity of the Environmental Management System and consider potential consequences when changes to the environmental system are planned and implemented for planning action. This is demonstrated in Aspects & Impacts Register page 2.

## **6.2 Environmental Objectives**

### **6.2.1 Objectives & targets**

The Kirby OP-021 Organisation & Administration of the EHSMS establishes a process for the development, implementation and maintenance of objectives and targets for each significant environmental aspect. These objectives and targets define:

- The performance objectives (Investigate / Study, Control / Maintain, or Improve) for each significant environmental aspect.
- The specific, quantified targets which define those performance objectives; and
- The planned deadlines for the achievement of those targets.

Objectives and targets are developed considering significant environmental aspects, legislative requirements, technological options & financial, operational, and business plans, and the views of interested parties.

### **6.2.2 Planning Action**

The EHS Dept. establishes programs as a means for achieving objectives and targets. These programs define the principal actions to be taken, those responsible for undertaking those actions and the scheduled times for their implementation. The programs are developed by EHS Mgt. and approved by Kirby Board of Management (refer to Section 5.0 Environmental Aspects) and are related to strategic planning (Company Strategic Direction Document – 'Corporate Strategy Map') & the function maps.

The Objectives, targets and programs are maintained on the Data drive at 4.3.3 - Objectives and Programmes.

## **7.0 Support**

### **7.1 Resources**

The EHS management system roles, responsibilities and authorities are defined at relevant functions and levels within the organization. The Board of Directors jointly provides the resources essential to the implementation and control of the EHS management system, including training, human resources, specialty services, financial resources, technical and informational services.

### **7.2 Competence**

Kirby identifies, plans, monitors, records, and evaluates training needs for personnel whose work may create a significant impact upon the environment. Kirby has a procedure to train employees at each relevant function and level, so they are aware of the environmental policy, significant environmental aspects & potential impacts, benefits of improved personal performance, potential consequences of departure from specified procedures, their roles and responsibilities in achieving conformance with the policy, procedures and with the requirements of the EHS management system.

### **7.3 Awareness**

The training coordinator is responsible for maintaining employee training records. Appropriate records are monitored and reviewed on a scheduled basis. Competency is determined by the employee's supervisor as specified in MP4 Training and OP-026 EHS Training. A training plan is drawn up annually and reviewed by the EHS Ass. Director.

## 7.4 Communication

Kirby communicates information regarding environmental aspects, environmental incidents & emergencies and the EHS Management System. Internal communications are carried out among the various levels and functions of the organisation through informal discussions, meetings, toolbox talks, inductions, training, notice boards, internal newsletters, SEOR scheme, website, and e-mail etc. The EHS Ass. Director will communicate environmental information throughout the company via the company's K-Net, email and via the EHS Advisors and Site Management on each site, who will distribute this information to relevant site personnel.

External communications are carried out among interested parties through informal discussions, meetings, toolbox talks, inductions, websites, e-mail, press releases, advertisements, and tender documentation etc. The Environmental Policy, EMS Manual, EHS Operating Procedures and EHS Templates & Forms may be communicated to:

- Clients, or prospective clients as part of tender submissions.
- Subcontractors.
- Suppliers; and
- External auditors for audit or ISO 14001 accreditation purposes.

A register to record public & interested parties' queries regarding the organisation's EMS will be maintained by the EHS Ass. Director.

Communication of the EMS documents is generally as follows:

Document	Internal <sup>1</sup>	External	Availability <sup>2</sup>
Policy	All	All <sup>5</sup>	K-Net, EHS Dept., Website
Register of Environmental Aspects	Senior Management <sup>3</sup> Project Managers EHS	NO <sup>4</sup>	K-Net, K-Drive (EHS Dept.)
Register of Legal & Other Requirements	Senior Management Project Managers EHS	NO	K-Drive (EHS Dept.) 4.3.2, Project EHS Plan.
EMS Manual	All	Only with prior approval of the EHS Manager or EHS Ass. Director.	K-Net, K-Drive (EHS Dept.)
Environmental Targets & Objectives	Senior Management Project Managers EHS	Only with prior approval of the EHS Ass. Director.	K-Drive (EHS Dept.) 6.2
Operating Procedures	All	Only with prior approval of the EHS Manager or EHS Ass. Director.	K-Net, K-Drive (EHS Dept.) 7.5.2
Waste Management Register	EHS	Only with prior approval of the EHS Ass. Director.	K-Drive (EHS Dept.)
Energy Management Register	EHS	Only with prior approval of the EHS Ass. Director.	K-Drive (EHS Dept.)
Templates & Forms	All	Only with prior approval of the EHS Manager or EHS Ass. Director.	K-Net, K-Drive (EHS Dept.)
Environmental Incidents	All	Relevant Interested Parties <sup>5</sup> Only with prior approval of the EHS Ass. Director.	EHS Mgt.
Management Review	Senior Management EHS Mgt.	NO	EHS Mgt., K-Drive (EHS Dept.)

Table 1 Communication of EMS Documents

1. Documents not communicated to all personnel may be made available to others internally upon request or at the discretion of senior managers.
2. Refers to the location of controlled copies. Once issued documents are uncontrolled. See section 7.5.3 Control of Documents for further details.
3. Senior Management: Directors, Associate Directors, Business Unit Leaders, Operation Managers.
4. Kirby will not be communicating externally it's significant environmental aspects (as per ISO 14001 7.4 Communication)
5. Relevant Interested Parties: Relevant Site PSCS/PC, Client, Main Contractor, Sub-Contractors, or equivalents.

Information on the performance of the Company shall be communicated through the Quarterly EHS Management Review.

## 7.5 Documented Information

### 7.5.1 General

This Manual identifies all documents relevant to Environmental management. A copy of EHS documents, other than visual aids and records, can be obtained from the Kirby EHS Ass. Director or designee. An overview of the EMS is

provided in this manual. Processes of the EMS are aligned and combined with existing Kirby ISO 9001 and ISO 45001 management systems.

### **7.5.2 Creating & Updating**

Documents are managed electronically to facilitate updating, control of access and ensuring that all users are using the valid versions of documents. All EHS procedures and forms have been reviewed and are deemed satisfactory for the coming year.

The entire EHSMS is located at K-Drive (EHS Dept.). Kirby EHS management system documentation includes:

- Policy and objectives
- Description of the scope of the EHS management system
- Description of the main elements and their interaction including referencing to related documents
- Documents, including records, required by the ISO 14001 standard, client, and main contractor requirements.
- Documents including those necessary to ensure the effective planning, operation and control of processes that relate to the management of environmental risks. (See Appendix 1 ISO 14001:2015-v-EHS&Q Mgt. Systems-v-Environment Manual).

### **7.5.3 Control of Documents**

A procedure 'MP1 Document, Record Control and IT' is implemented and maintained by Kirby to define how documents, including records, required by the EHS Management system, ISO 45001 standard, client and main contractor are controlled. This procedure describes where documents can be located and how and when they are reviewed. The procedure ensures that current versions are available and that obsolete documents are promptly removed from use or are suitably identified.

All documentations supporting procedures and work instructions are all subject to formal control with regard to issue and approval. Applicable procedures, work instructions and forms etc. are available to all Kirby employees on the K-Net (Kirby Intranet). A master file for all system documentation is maintained on the K-Drive (EHS Dept.). Controlled documents are obtainable from the EHS Ass. Director or designee. A matrix of controlled documents is maintained on the Kirby shared network drive: K:\EHS Dept\ EHS Management System, uncontrolled versions of relevant policy, procedures and forms are available at all locations where operations essential to the effective functioning of the system are performed.

All technical standards, specifications, and codes of practice applicable to the company's operations are subjected to a formal review on an on-going basis.

Appropriate levels of issue control are applied to all construction project documents within the company at both field and general office level.

Electronic data systems operated by the company are subjected to formal controls to prevent unauthorized changes and misuse or loss of any data held on them.

## **8.0 Operation**

### **8.1 Operational Control**

The EHS Ass. Director and EHS Mgt. are responsible for identifying operations and activities associated with significant environmental aspects that require operational controls in procedures, risk assessments, work practices or environmental management programs.

The Kirby EHS Management System procedures define the mechanisms for the establishment, implementation, and maintenance of the EHS management system in accordance with the environmental policy, objectives and targets. Applicable procedures and requirements are communicated to suppliers and contractors.

System Procedures cover the management and control of both the EHS Management System and the principal environmental aspects, which the system manages. These procedures are companywide in their application.

EHS & Q Management Procedures, Method Statements & Risk Assessments cover the environmental control of specific operational activities and are often activity specific in their application. These include but are not limited to

- Construction or modification of properties and facilities
- Transportation
- Utility processes e.g., energy and water supply, recycling, waste and wastewater management
- Contracting
- Customer service
- Handling and storage
- Marketing and advertising
- Production and maintenance processes
- Purchasing



- Design and development engineering

An EHS Plan and waste management plan is produced for significant sites of operation, including the head and regional offices, to facilitate operation control. Templates and procedures are available to assist site management in developing these plans.

### **8.1.1 Waste Management**

The Kirby OP-032 Waste Management establishes a process for the management of waste at all Kirby locations and controlling, measuring, and monitoring waste performance on a regular basis. Waste Management has been identified as an area of significant environmental impact, and as such is specifically targeted within the group EMS with a reduction in waste to landfill the measurable function. In order to improve site waste management a number of practical initiatives have been commissioned. These include:

- Prevention of waste through supplier take back initiatives with regard to materials including empty cable drums, unused cable, empty hazardous waste containers, gas cylinders and over ordered stock.
- Source segregation of wastes, by provision of material specific skips onsite to aid recovery and recycling consistent with the waste management hierarchy. Single, multi-waste receptacles are discouraged in all scenarios except where physical or infrastructural conditions dictate that there is no alternative.
- Secure storage and handling of waste materials to prevent damage and the associated production of waste.
- The use of prefabricated materials where practical to prevent waste production onsite.
- Training at all levels within the organisation, from specific environmental management training of Operational Managers to induction training and toolbox talks for all staff, which includes instruction on the segregation rationale, process, and benefits.
- Internal communication on waste management through the production of a newsletter for staff working for and on behalf of the group to support training and instruction and encourage staff commitment to our waste prevention philosophy.
- Measurement of waste quantities and categories, through analysis of transfer documentation and recycling supplier returns for off-site materials and internal measurement of reused materials, to identify opportunities for improvement and to set realistic benchmarks for the company.

This approach to waste management is applied throughout our contracts, whether a formal SWMP is required and present or not in order to ensure a consistently high level of waste prevention and minimisation and to instil in staff the need for effective site waste management.

### **8.1.2 Energy Management**

The Kirby OP-032a Energy Management establishes a process for the management of energy at all Kirby locations and controlling, measuring, and monitoring waste performance on a regular basis. Kirby measures their energy consumption in kilowatt hours (kWh), Greenhouse Gas Emissions (CO<sub>2</sub>) and cost.

For the purposes of the Kirby Environmental Management System Kirby are currently monitoring and reporting on energy consumption through the GHG Protocol. Kirby's GHG inventory evaluates scope 1, 2, and relevant Scope 3 emissions. Kirby calculates emissions associated with the following:

- Scope 1 Emissions (direct emissions from sources owned or controlled by the company):
  - Stationary Combustion – natural gas, diesel fuel, hydrotreated vegetable oil fuel, kerosene burning oil
  - Mobile Combustion – company owned/leased vehicles
- Scope 2 Emissions (indirect emissions from generation of purchased energy):
  - Electricity – grid-delivered electricity
- Scope 3 Emissions (other indirect emissions resulting from company activities):
  - Category 1 – Purchased goods and services – physical and spend data on products purchased or acquired
  - Category 2 – Capital goods – spend on capital goods purchased or acquired
  - Category 3 – Fuel and energy related activities (FERA) – upstream impacts of energy use not included in Scope 1 or 2
  - Category 4 – Upstream transportation and distribution – inbound logistics services including air, rail, road, and marine transport
  - Category 5 – Waste generated in operations – disposal of waste from offices, storage units or other facilities
  - Category 6 – Business travel – air travel, rail travel, rental car travel, mileage, and hotel stays
  - Category 7 – Employee commuting – employee travel to and from the office or site of work



- Category 8 – Upstream leased assets – overhead electricity consumption at offices, storage units or other facilities not included in Scope 1 or 2
- Category 9 – Downstream transportation & distribution - outbound logistics services including air, rail, road, and marine transport
- Category 11 – Use of sold products – direct and indirect use of energy from sold products or equipment installed in projects
- Category 12 – End-of-life treatment of sold products – disposal of sold products or systems installed at end-of-life

Kirby determined the relevance and materiality of each Scope 3 category listed above, and importantly, the categories not listed above through a 'Scope 3 Screening' exercise carried out in 2024.

Ireland's Climate Action Plan outlines a commitment to achieving a 51% reduction in overall greenhouse gas emissions by 2030 compared to 2018 levels. Kirby aims to play their part in this agreement by reducing the organisations energy related carbon emissions on a yearly basis.

The company strategy is focused on gradually reducing its intensity of energy consumption continuing to increase the use of energy from renewable sources, through training and education of all our staff, and introducing more efficient and less carbon intensive resources at existing facilities.

To increase our efficiency of energy and reduce associated greenhouse gas emissions, Kirby will:

- Commence a materiality assessment in 2024 of all our Green House Gas (GHG) emissions, identify near term Science Based Targets to reduce our GHG emissions to achieve Net 50% reduction by 2030. Adopt best energy management practices.
- Adopt opportunities for improvements identified in internal and external audits.
- Regularly monitor energy use across offices and transport.
- Report quarterly and annually on energy use to staff and at Management at board meetings.
- Identify and implement ways to increase staff and contractor/vendor awareness regarding energy efficiency.
- Establish Energy Improvement Objectives and Targets and develop Energy Actions Plans to reach the improvement targets.
- Ensure that new equipment and building projects are energy efficient.
- Review energy efficiency performance and Energy Actions Plans annually.

## **8.2 Emergency Preparedness and Response**

Kirby has a procedure to identify the potential for and respond to incidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. Emergency methods are reviewed by the EHS Mgt. on an annual basis and after the occurrence of incidents or emergency situations.

Environmental incidents and emergency response are managed via the Site EHS Plan. Each site must identify potential for, and develop procedures to respond to, accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. Such procedures are included in the Site EHS Plan as Emergency Response Procedures. To assist in their development environmental operating procedures are available to provide guidance on:

- Responding to environmental incidents (OP-023 Incident Reporting & Investigation); and
- Containing and cleaning up spills (OP-028 Emergency)

Each site shall review and revise, where necessary, its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations. Each site shall also periodically test such procedures where practicable.

Environmental incidents shall be reported to the EHS Department using the Damage Report Form. Environmental incident reports shall be reviewed by the EHSM and the EHS Ass. Director as appropriate.

The EHS Ass. Director shall maintain a file of environmental incident reports.

## **9.0 Performance Evaluation**

### **9.1 Monitoring & Measurement**

#### **9.1.1 Monitoring and Measurement**

Kirby has established procedures to monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment. Monitoring and measurements are maintained for achieving objectives, targets & continual improvement:

- Monitoring the local environmental conditions where required (identified in site EHS Plans).
- Monitoring management of waste to meet targets at Kirby regional offices.

- Monitoring energy consumption.
- Inspections required on all construction sites include those undertaken by the EHS Officer, Foreman (weekly) and Contract/Project Manager (Monthly).

Kirby has established procedures that includes calibration and maintenance requirements and ensures that records will be retained.

### 9.1.2 Evaluation of Compliance

Kirby has established procedure which outlines the periodic review of regulatory & 'other requirement' compliance (see OP-021 Organisation & Administration of the EHSMS) and those results are reported to management on a yearly basis. Other procedures support this covering a variety of methods which can be used to assess compliance, including audits, document and/or record reviews, inspections, interviews, project or task reviews, routine sample analysis or test results, site tours and 'Safety Environment Observation Reports' (SEORs).

Generally, compliance within the site is evaluated through the regular inspections and monitoring and at regular site management meetings, where the effectiveness of the control measures is reviewed. Compliance is also evaluated by the EHSMS through the internal audit process with the findings reported back to the site management.

Records of these evaluations will be maintained.

## 9.2 Internal Audit

### 9.2.1 General

Periodic system audits are conducted to ensure that the environmental management system has been properly implemented and maintained. The results of these audits are provided to management.

### 9.2.2 Programme

Kirby has a procedure OP-021 Organisation & Administration of the EHSMS which sets out the establishment, implementation, and maintenance of the Kirby EHSMS auditing program. Audits are performed according to a schedule, which is based on the environmental importance of an activity, the results of previous audits and the audit schedule. All auditors are trained, and audit records are kept with the EHS Manager.

## 9.3 Management Review

A full annual EHSMS review covering the entire Kirby operation subject to the EHSMS. A report of the review findings is issued to the Board of Directors and discussed at management review (see OP-021 Organisation & Administration of the EHSMS).

Input to the management reviews shall include:

- The results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which the company subscribes.
- Communication from external interested parties, including complaints.
- The extent to which objectives and targets have been met.
- Environmental incident reports.
- Waste Management Performance Report
- Energy Management Performance Report
- Status of corrective and preventive actions.
- Follow-up actions from previous management reviews.
- Changing circumstances, including
  - Changes in activities and services.
  - Results of the evaluation of environmental aspects from planned or new developments.
  - Changes in applicable legal requirements and other requirements.
  - The views of interested parties.
  - Advances in science and technology, and
  - Lessons learned from emergency situations, incidents, and near-misses.

The outputs from the management review shall include observations, conclusions, and recommendations for improvement. These will be documented, and actioned where necessary, by the EHS Ass. Director.

## 10.0 Improvement

### 10.1 General

Kirby determines and selects opportunities for improvement and implement any necessary actions to meet customer requirements and enhance customer satisfaction.

## **10.2 Nonconformity & Corrective Action**

Kirby has a procedure MP10 Non-conformance Control & Corrective Action for defining responsibility and authority for handling and investigating non-conformance, for taking action to mitigate impacts, for initiating and completing corrective and preventive action, evaluating the need for actions to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence, recording the results of corrective actions taken and reviewing the effectiveness of corrective actions taken.

Any changes in procedures resulting from corrective actions are implemented and recorded. The EHS Ass. Director maintains these records.

## **10.3 Continual Improvement**

Kirby continually seeks to improve the effectiveness of Environmental Management System through the use of the Environmental Policy, environmental objectives, audit results, data analysis, corrective and preventive actions and management reviews and customer feedback. The overall objective of continual improvement is an improvement in the service provided and improved customer satisfaction. The EHS Ass. Director is responsible for analysing data and the outcome of this will be reviewed at Management Review and recorded in the minutes.

In 2025 Kirby will focus on improving our Environmental Management System (EMS) through building on previous achievements in implementing opportunities for improvement; strengthening our focus on organisational & operational factors affecting energy consumption and waste management across the business.

## 11.0 Appendices

### 11.1 Appendix 1 - ISO 14001-v-EHSMS-v-Environmental Manual

ISO 14001	EHS MANAGEMENT SYSTEM	ENVIRONMENT MANUAL
4. Context of the organization		4. Context of the organization
4.1 Understanding the organization and its context	Competitive Strategy Map, Function Maps Management Reviews, Quality Manual	4.1 Understanding the organization and its context
4.2 Understanding the needs and expectation of interested parties	Tender/Handover Checklist, Communications Register, Project Plans,	4.2 Understanding the needs and expectation of interested parties
4.3 Determining the scope of the environmental management system	All Kirby Operations - see scope.	4.3 Determining the scope of the environmental management system
4.4 Environment management system	Environmental Health and Safety Operating Procedures, Environment Manual.	4.4 Environment management system
5. Leadership		5. Leadership
5.1 Leadership and commitment	Management Review • Competitive Strategy Map Environmental Policy • Communications	5.1 Leadership and commitment
5.2 Environmental policy	Environmental Policy	5.2 Environmental policy
5.3 Organizational roles, responsibilities, and authorities	Environmental Manual • OP-021 Organisation & Administration • Environmental Health and Safety Operating Procedures • Site EHS Plan • Organisation Chart(s)	5.3 Organizational roles, responsibilities, and authorities
6. Planning		6. Planning
6.1 Actions to address risks and opportunities	CP-08 Risk Management • OP-022 Hazard ID & Risk Assessment • OP-040 Environmental Aspects & Impacts Assessment • Environmental Aspects & Impacts Register	6.1 Actions to address risks and opportunities
6.1.1 General	CP-08 Risk Management • OP-022 Hazard ID & Risk Assessment • OP-040 Environmental Aspects & Impacts Assessment • Environmental Aspects & Impacts Register	6.1.1 General
6.1.2 Environmental aspects	OP-021 Organisation & Administration • OP-031 Site Set Up • OP-040 Environmental Aspects & Impacts Assessment • Environmental Aspects & Impacts Register • Tender/Handover Checklist • Communications Register, and Project Plans.	6.1.2 Environmental aspects
6.1.3 Compliance obligations	OP-021 Organisation & Administration • Environmental Legislation Register • Tender/Handover Checklist, Communications Register, Project Plans, Planning Conditions, Environmental Impact Statements / Assessments • Management Review	6.1.3 Compliance obligations
6.1.4 Planning action	Management Review • Objectives & Targets • Function Maps • KPIs	6.1.4 Planning action
6.2 Environmental objectives and planning to achieve them	Objectives & Targets • Management Review • KPIs	6.2 Environmental objectives and planning to achieve them
6.2.1 Environmental objectives	Objectives & Targets • Function Maps • KPIs	6.2.1 Environmental objectives
6.2.2 Planning actions to achieve environmental objectives	Objectives & Targets • Function Maps • KPIs	6.2.2 Planning actions to achieve environmental objectives
7. Support		7. Support
7.1 Resources	Management Review – Competent Persons, Training, Equipment, Technology, Finance.	7.1 Resources
7.2 Competence	MP4 Training • OP-026 EHS Training • Site EHS Plan	7.2 Competence
7.3 Awareness	MP4 Training • OP-026 EHS Training • Project EHS Plan • K-Net Communications / Alerts / Initiatives	7.3 Awareness
7.4 Communication	OP-041 Communication • 4.4.3 Communication Register • Kirby Group Environmental Manual Site EHS Plan • K-Net Communications / Alerts / Initiatives • Training, Inductions, Toolbox Talks, Email shots.	7.4 Communication
7.5 Documented information	MP1 Document, Record Control & IT Quality and EHS Management Systems.	7.5 Documented information
7.5.1 General	MP1 Document, Record Control & IT Quality and EHS Management Systems	7.5.1 General
7.5.2 Creating and updating	MP1 Document • Record Control & IT	7.5.2 Creating and updating
7.5.3 Control of documented information	MP1 Document • Record Control & IT • EHS Document Control	7.5.3 Control of Documented Information
8. Operation		8. Operation
8.1 Operational planning and control	Project EHS Plans, Planning Conditions • Environmental Impact Statements / Assessments. Environmental Plans, Risk Assessment Method Statements, SPA. • Design Risk Assessments • OP-032 Waste Management • OP-032a Energy Management	8.1 Operational planning and control
8.2 Emergency preparedness and response	OP-023 Accident & Incident Investigation • OP-028 Emergency	8.2 Emergency preparedness and response

ISO 14001	EHS MANAGEMENT SYSTEM	ENVIRONMENT MANUAL
	Project EHS Plan	
9. Performance evaluation		9. Performance evaluation
9.1 Monitoring, measurement, analysis, and evaluation	Project EHS Plan • Management Review • OP-021 Organisation & Administration OP-023 Accident & Incident Investigation OP-032 Waste Management • OP-032a Energy Management	9.1 Monitoring, measurement, analysis, and evaluation
9.1.1 General	MP10 Non-Conformance Control and Corrective Action <ul style="list-style-type: none"> <li>• SSP06 Calibration of Test Equipment</li> <li>• OP-021 Organisation &amp; Administration</li> <li>• OP-022 Hazard ID &amp; Risk Assessment</li> <li>• OP-023 Accident &amp; Incident Investigation</li> <li>• OP-024 Inspections</li> <li>• OP-025 Preventative Maintenance</li> <li>• OP-026 EHS Training</li> <li>• OP-027 Disciplinary &amp; Commendation</li> <li>• OP-028 Emergency</li> <li>• OP-029 PPE</li> <li>• OP-030 Occupational Health</li> <li>• OP-031 Site Set Up</li> <li>• OP-032 Waste Management</li> <li>• OP-032a Energy Management</li> <li>• OP-040 Environmental Aspects &amp; Impacts Assessment</li> </ul> Environmental Aspects & Impacts Register Site EHS Plan EHS Meeting Minutes	9.1.1 General
9.1.2 Evaluation of compliance	MP10 Non-Conformance Control and Corrective Action • MP9 Internal Audit • OP-021 Organisation & Administration • OP-024 Inspections • OP-040 Environmental Aspects & Impacts Assessment • Environmental Aspects & Impacts Register Site EHS Plan • EHS Combined Committee Minutes MP10 Non-Conformance Control and Corrective Action • MP9 Internal Audit • OP-021 Organisation & Administration • OP-024 Inspections • OP-040 Environmental Aspects & Impacts Assessment • Environmental Aspects & Impacts Register • Site EHS Plan • EHS Meeting Minutes	9.1.2 Evaluation of compliance
9.2 Internal audit	OP-021 Organisation & Administration • MP10 Non-Conformance Control and Corrective Action • EHS Audit Schedule • KPIs, EHS016 Inspections	9.2 Internal audit
9.2.1 General	MP10 Non-Conformance Control and Corrective Action • MP9 Internal Audit • OP-021 Organisation & Administration • OP-024 Inspections • Function Maps Environmental Objectives and Targets	9.2.1 General
9.2.2 Internal audit programme	MP10 Non-Conformance Control and Corrective Action • MP9 Internal Audit • OP-021 Organisation & Administration • OP-024 Inspections • Function Maps Environmental Objectives and Targets	9.2.2 Internal audit programme
9.3 Management review	All EHS & Q Management System • MP10 Non-Conformance Control and Corrective Action • MP9 Internal Audit • OP-021 Organisation & Administration of the EHS MS • OP-023 Accident & Incident Investigation • OP-025 Preventative Maintenance Function Maps • Environmental Objectives and Targets • 4.4.3 Communications	9.3 Management review
10.1 General		10.1 General
10.2 Nonconformity and corrective action	MP10 Non-Conformance Control and Corrective Action • MP1 Document, Record Control & IT OP-023 Accident & Incident Investigation • OP-025 Preventative Maintenance • EHS Meeting Minutes	10.2 Nonconformity and corrective action
10.3 Continual improvement	All EHS & Q Management System • MP10 Non-Conformance Control and Corrective Action • MP9 Internal Audit • OP-021 Organisation & Administration of the EHS MS • OP-023 Accident & Incident Investigation • OP-025 Preventative Maintenance Function Maps • Environmental Objectives and Targets • 4.4.3 Communications	10.3 Continual improvement

## 11.2 Appendix 2 - Kirby EHS Organisation Chart

