

Environmental management

Our governance structure, group-wide environmental policy and environmental management systems help us manage risks, minimise our impacts and comply with relevant regulations.

Environmental governance

This year, we've simplified the way we manage environmental risk across our business. We set up an environmental management governance group (EMGG) to oversee this globally. Chaired by our Chief Technology and Information Officer, it reports to the *Executive Committee* on a quarterly basis.

Reporting in to the EMGG quarterly, our Environmental Management Compliance steering group, chaired by the Director of Environmental Services, meets monthly to oversee management of our most significant environmental risks in the UK, including climate-related risks. Its members are senior managers with responsibility for managing environmental risks and delivering performance improvements under our ISO 14001-certificated Environmental Management System. Each is an expert in their field and responsible for different 'aspects' of our management system such as energy and GHG emissions, product stewardship, emissions to air, waste and natural environment.

Managing environmental risks and impacts

Environmental considerations inform decisions, such as how we manage risk, develop products and choose what we buy. For example, we manage climate-related risks to our infrastructure and we work with our suppliers to include environmental considerations in our product design. We also ask our people to do their bit by using less energy, reducing their travel, using fewer single-use plastics and recycling waste. See our [Digital impact and sustainability report](#) for more on these topics.

Environmental management systems (EMS) across the business, and our Energy Management System (EnMS), support continual improvements to help us reduce impacts, such as energy use and greenhouse gas emissions, waste and recycling, and water use (see environmental data section at our [download centre](#)). The EMS also cover the natural environment, procurement, product stewardship and transport. Our most material environmental impacts relate to climate change (see box). We also carefully manage operational environmental risks such as the risk of fuel or fluorinated greenhouse gases (F-gases) leaks.

Our EMS in Belgium, Colombia, France, Germany, Ireland, Italy, the Netherlands, Spain and the UK are certificated to the ISO 14001:2015 standard, as well as in Brazil which was certificated for the first time this year. Spain's EMS is also certificated to EMAS (EU Eco-Management and Audit Scheme). All our [corporate assurance](#) certifications can be viewed on our website.

Managing environmental compliance

We work closely with the relevant authorities to manage environmental issues proactively. This year, we had no significant fines or breaches.

Managing product impacts

Our products are subject to environmental legislation. This includes the European Directives on Waste Electrical and Electronic Equipment (WEEE), the Restriction on the Use of Certain Hazardous Substances (RoHS), the Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation (REACH), as well as the Packaging (Essential Requirements) Regulations 2015.

We ask relevant suppliers to complete a product stewardship questionnaire as part of our checks to make sure that electrical or electronic equipment sold to our UK business complies with this legislation.

The only exception to this was that we confirmed through independent testing that, although hazardous substances were not used in the manufacture of our SIM cards, they were not branded in accordance with the RoHS Regulations. We notified the English Regulator who accepted our remedial plan to ensure our SIM cards are fully compliant in future. The regulator took no further action and closed its case at the end of 2018.

Managing fuel storage

We have measures in place to manage leaks and we're taking steps to keep us in line with legislation and ahead of compliance deadlines. We've completed these steps at our sites across England, Northern Ireland and Scotland, and we've almost completed them in Wales.

We've also continued our installation of specialist sump pump units, where there is a risk of fuel spillage. These oil discriminating pumps allow the pumping of water, but issue an alarm and stop pumping when oil is detected to prevent contaminants being pumped out into the drainage system.

When we have a reported spill or leak, we bring in specialist contractors to clean up, using specialist tools and techniques appropriate to the level of contamination. Together, we investigate the extent of the contamination to agree a course of action and prevent similar incidents from occurring in the future. No incidents this year met the severity criteria for notifying the regulator, however we chose to report two minor leaks this year in the spirit of transparency.

Our climate change strategy

We focus on climate change because it's the most material environmental issue for our business. Our ambition is to become a net zero carbon emissions business by 2045.

Our climate change strategy is aimed at reducing our end-to-end emissions and improving the resilience of our assets by:

- Reducing our energy needs and decarbonising the energy we buy and use
- Working with our supply chain to help reduce its emissions
- Developing low carbon products and solutions for our customers
- Inspiring others to take climate action by leading by example and sharing best practice
- Investing in energy efficient and climate resilient networks, and
- Engaging with our people to help them reduce their personal carbon footprints.



See our [Digital impact and sustainability report](#) for more on how we're putting this strategy into practice.