

Sustainability Policy

Purpose

EODEX UK Subsea Limited (EODEX) recognises that it has a responsibility to the environment and sustainability beyond legal and regulatory requirements. We are committed to reducing the impact of our business on the local and global environment, and continually improving our environmental performance is an integral part of our business strategy and operating model.

Scope

This policy sets out the process and the employee responsibilities to help comply with our commitment and we will encourage customers, suppliers, and other stakeholders to do the same.

Policy

We are, now more than ever, dependent on a healthy and resilient natural environment both on land and at sea. As a company we have actively campaigned for tighter regulatory controls in the gentle disposal of legacy munitions, and we believe that our industry leading stance on sustainability and protection of our environment through gentle UXO disposal must reflect everything we do in this industry.





We believe that EODEX, along with all other bodies involved in commercial maritime activities has a meaningful role to play in helping protect the environment, today and in the future.

Changes to our climate are accelerating and we have a responsibility to play our part, mitigating our impacts, ensuring we have a climate resilient company and using our influence which has been used to reach the highest levels of Government and the offshore industry to support this important cause.

This is not just because it is expected of us but because it aligns with our core company values of Professionalism, Integrity, Excellence and Respect for our Environment, in leading by example and actively supporting positive action on our part we will aim to leave an enduring legacy for the benefit of all our staff, partners, clients and importantly the areas where we work both nationally and internationally.

Our approach to the environment is just one aspect of EODEX's capacity and responsibility to act as a force for good and a shining example to the commercial maritime community delivering a positive and sustainable impact on our marine environment and in a wider context support of the UN's Sustainable Development Goals:

<https://www.un.org/sustainabledevelopment/sustainable-development-goals/>





We are proud contractors for the UN actively supporting the essential work of their Development Programme initiatives, but beyond this direct support we deliver our wider aim and advocate a positive environmental impact in the work we do.

We will do this by:

- Continuing to promote the minimising of marine disturbance from UXO disposal operations
- Reducing emissions from our operations to 'net zero'
- Being a resource-efficient organisation
- Contributing to a net gain in biodiversity
- Use our influence to inspire an industry for wider positive action
- Use our position as leading maritime EOD practitioners to support better regulatory control of both EOD practice and the qualifications and competencies of people involved

We want to set targets that will stretch us. Our plans for widespread use of gentle UXO disposal processes minimising marine disturbance gives us an opportunity to ensure the legacy of amazing innovations created by Dr Sidney Alford two decades ago are sanctioned as default methodologies for countering maritime UXO contamination. This has already taken two years of hard work through key stakeholder engagement and political messaging bringing this issue to the very top of both the

Government and regulatory agenda. We also recognise that there remains more influence to be done in other nations who face a similar dilemma in their waters to protect global marine biodiversity. Gaining our ISO 14001 accreditation in 2021 has had many benefits including increasing our chances of tendering for larger projects, winning larger projects, and working with companies that we have never worked with before. We were audited by BSI, a globally recognised company and will continue to expand our environmental credentials as we grow.

Minimising Marine Disturbance from UXO Disposal

Achieving a positive environmental impact transition for the industry will involve continuous hard work not only in delivery of operational excellence as we undertake operations nationally but overtly demonstrating to the maritime industry that in raising the standards required to minimise environmental disturbance for all future UXO activities. Nationally and internationally, all of these activities should have the highest demands placed on them to ensure absolute standards are upheld with the ultimate aim of safeguarding the marine space.



What we do now:

- Lead the commercial offshore industry in low order deflagration capability
- Actively promote low order technology for use in the commercial maritime sector
- Develop systems and methods to further minimise marine disturbance
- Improve processes for the safe removal of ordnance and safe transportation to a licenced disposal facility.

- Setting the standards for operator training, currency, and competency

By 2024 we will complete the following:

- Addition of an integrated noise mitigation system to further reduce noise during EOD operations
- Completion of DBEIS OSEA trials in Denmark with NPL and Loughborough University
- Trials with DSTL to showcase deflagration
- Continue to influence UK Government to mandate UK MoD to revert to LOD for disposal of historic ordnance
- Encourage the devolved Governments of the UK to follow the DEFRA lead on LOD

Progressing forward into the future we will:

- Use the UK model to promote marine safeguarding in other countries
- Use our training facility to train and enable more operators in LOD

Net Zero Operational Emissions

This means in all aspects of our operations increasing energy efficiency, decarbonisation of energy, heat and transport and balancing any remaining emissions through carbon compensation.



What we do now:

- We buy responsibly and ethically to enable our operations
- Maximise use of Teams meetings to reduce travel and encourage home working where practicable
- Consider all environmental aspects and impacts to ensure that when we conduct business travel and attend Expos that all environmental risks and opportunities for improvement are implemented (journeys are planned, travels methods are explored, essential personnel).
- We have embarked on a programme of energy efficiency measure in our offices
- Have an active recycling programme in all our office and external operations

By 2024 we will add the following:

- Continue to build decarbonisation plans into our projects and operations
- We will measure and factor our operational emissions across all our activities
- Introduce systems to meter, monitor and control energy consumption to a more granular level across all our activities

Progressing forward into the future we will:

- Introduce zero carbon principles to new projects
- Maximise energy efficiency of existing buildings, equipment, and appliances
- Review and replace any generators with powered alternatives
- Reduce dependence on fossil fuels
- Electrify our vehicle fleet
- Investing in offsets and forest protection schemes
- Communicate our aims and progress internally and externally



Resource Efficiency

This means we reduce the number of resources we use, increasing proportion of recycled content as well as the amount of materials reused. The ultimate goal is to design out waste, keeping products in use so that nothing goes to waste.



What we do now:

- Recyclable materials are separated from general waste

- All operational instructions to our people are a continual reminder to them of their responsibilities to be resource efficient
- Day to day office operations minimise printing and maximise use of electronic working

By 2024 we will add the following:

- Reduce single-use plastic waste across all our operations
- Increase the amount of consumables which can be recycled
- Build in sustainable design requirements in any company expansion projects

Progressing forward into the future we will:

- Continue to incorporate sustainable design principles for company development
- Promote the use of reusable or recyclable products using renewable, recyclable materials
- Work with suppliers to eliminate single-use plastic packaging
- Communicate our aims clearly and progress internal and external goals in this arena

Biodiversity Gain

In being mindful of the marine environment and the species who live there we will undertake positive action which results in the increase, abundance and diversity of plant and animal species – in all our work we will aim to do no harm.



What we do now:

- Rigorously enforce maritime safeguarding on operations and undertake all operations with full consideration to protecting marine biodiversity
- Transit at slow speed when on operations and as conditions allow
- Regularly brief our people on their environmental safeguarding responsibilities
- Adhere to the highest levels of noise reduction when undertaking disposal operations
- Ensure all mitigations are in place to prevent any accidental spills

By 2024 we will add the following:

- Investigate where ecology efficiencies/initiatives can be introduced at our land-based areas of operations
- Look for further enhancement to marine biodiversity initiatives in our maritime operations
- Use social media to promote wider awareness
- At the next website update expand on our biodiversity credentials

Progressing forward into the future we will:

- Establish partnerships to promote biodiversity, particularly conservation charities
- Look to support marine charities from a percentage of company profits
- Communicate our aims and progress internally and externally

Inspiring Wider Action

Using our influence to reach beyond our boundaries through partnership, leadership, and collaboration with other major bodies in the maritime offshore industry and beyond. While we aim to exemplify best practice through our day-to-day actions and decisions, we believe it is equally important to work together with partners and stakeholders on using our platform to amplify the benefits of a sustainable approach and encourage and support wider action beyond our reach.



What we do now:

- As a company we have an integrated Business Management System which is ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 accredited. The business sustainability programme is based on Figure 1 the 'three pillars of sustainability': social sustainability, economic sustainability, and environmental sustainability (Brundtland report in 1987, and outlined by the United Nations

Millennium Declaration), together they provide a framework for applying a solution-oriented approach to complicated sustainability issues like marine mammal protection and damage to the marine environment.

- We ensure all our employees and contractors understand our commitment as a company to the environment.



Figure 1 Three Pillars of Sustainability

By 2024 we will add the following:

- Continue to showcase our commitments during our operations and through all our communication mediums.
- Collaborate with our partners and stakeholders on a variety of initiatives
- Participating in and supporting environmental initiatives

Progressing forward into the future we will:

- Introduce the importance of the environment, climate change and sustainability into our learning programmes delivered through our education programme
- Assist our people in understanding their own carbon footprint in relation to their activities with EODEX through our digital platforms
- Explore opportunities with our media partners for ongoing learning and education
- Explore opportunities with our commercial partners for further brand awareness and education

- Work alongside the rest of the offshore industry to promote positive action through organisations like the Global Underwater Hub and the Business Network for Offshore Wind
- Exemplify these principles in our day-to-day behaviours
- Explore the options to establish a future EODEX Foundation as a force for good to protect our marine biodiversity

Summary

The case for action to protect and preserve the environment in which we operate has never been stronger. We know this will challenge us in ways we may not expect and that as industry leaders in promoting gentle UXO disposal we have much work to do, but we are firmly committed to playing our part and look forward to embracing the opportunities for leaving an enduring and positive legacy for our precious marine environment both nationally and internationally.



Policy Review

It is the responsibility of everyone in the business to comply with this policy and its associated arrangements as an integral part of their day-to-day business.

The policy will be reviewed annually, as a minimum, by the Directors in consultation with the Head of HSEQ and amended as required by law should new legislation come into force or to ensure it remains relevant and appropriate to the organisation. This has been endorsed by the Board at EODEX who take direct responsibility for its execution.

A handwritten signature in black ink, appearing to read 'S. Welling'.

Simon Welling
Group Managing Director
EODEX UK Subsea Limited

19th June 2023