

Phoenix Energy Holdings Ltd

Waste Minimisation and Management Policy

June 2026

Policy Authorisation:

Policy raised by:

Denver Wasson – Director of Engineering

Policy authorised by:

Kailash Chada – Chief Executive Officer

Contents

- 1.0 Introduction
- 2.0 Purpose
- 3.0 Scope
- 4.0 References
- 5.0 Definitions
- 6.0 Policy
- 7.0 Audit & Review

1.0 INTRODUCTION

The Company is accredited to the environmental standard BS EN ISO 14001 and has stated its commitment to good environmental practice within our Environmental Policy. The Company is committed to sustainable waste management and will continue to develop waste minimisation strategies at our fixed locations, construction sites, and throughout the licensed area.

This document expands on the Environmental Policy as it relates to waste minimisation, and complements Phoenix Procedure ASHES 012 – Waste Minimisation, Recycling and Management. It has been updated to specifically address the waste streams arising from the Company's natural gas network construction and maintenance activities, including excavation and reinstatement, pipework operations, contaminated materials handling, and the reuse of metering asset components.

The Company recognises the negative impact that its operations can have on the environment with regards to the production, storage, transport and responsible disposal of waste. In recognition of this it is Company policy to ensure the minimisation of waste and the recycling of materials wherever reasonably practicable.

Systems and procedures will be implemented to encourage the recycling and reuse of materials with a view to minimising the overall levels of waste produced.

Phoenix recognises that an effective policy targets the entire asset lifecycle and adheres strictly to the Waste Hierarchy through adherence to the following measures:

- Adhere to the Waste Hierarchy: Prioritise prevention and reuse over recycling and disposal.
- Ensure Regulatory Compliance: Maintain full compliance with local environmental laws and Duty of Care regulations, including the Waste Management (Northern Ireland) Order 2006 and associated Regulations.
- Promote Continuous Improvement: Set and report on annual targets to reduce waste sent to landfill and increase recycling and reuse rates across all operations.
- Engage the Supply Chain: Require contractors and sub-contractors engaged in gas construction and maintenance activities to follow the same waste segregation, reuse, and reporting standards.
- Maximise Asset Reuse: Actively pursue refurbishment and redeployment of metering components, pipework fittings, and other recoverable assets before considering disposal.

2.0 PURPOSE

The purpose of this policy is to minimise the production of waste through effective design, good purchasing sound operational practices, reuse where possible and economic recycling.

The purpose of the policy is to achieve the aim of ensuring there is a maximum re-use of waste or recycling thereby reducing the amount of waste to landfill or incineration to a minimum.

This will be achieved in a number of ways:

1. Ensure all waste produced is managed by compliance with all relevant Northern Ireland legislative requirements regarding the handling of waste and disposal.
2. To ensure that all waste is properly classified, segregated, stored, transported and disposed of.
3. Ensuring all types of waste generated are correctly packaged and left ready for collection and disposal.
4. Ensure all transfers of waste are recorded and documented.
5. To provide a safe, effective and compliant waste service via promotion of waste minimisation and reduce the environment impact of waste through beneficial use and where not practicable by safe disposal.
6. To identify the specific responsibilities of those involved with the waste and recycling processes.

3.0 SCOPE

This policy applies to all employees of Phoenix Energy Holdings Group and its subsidiaries ("The Group").

4.0 REFERENCES

PEHL 02 Environmental and Biodiversity Policy
PEHL 45 Sustainability Policy
ASHES 012 Waste Minimisation, Recycling and Management Procedure

5.0 DEFINITIONS

Companies within Phoenix Energy Holdings:

Phoenix Energy is responsible for the construction and safe operation of the Gas Distribution network within the Greater Belfast & East Down licenced area.

Phoenix Energy Services Ltd provide downstream services into the Northern Ireland energy market and the provision of a 24/7 emergency response, maintenance and metering service to the Group's distribution business within its license area.

Waste is defined as any substance or object, which the producer or the person in possession of it discards or intends to discard, or is required to discard.

Excavation Waste means spoil, soil, tarmac, concrete, and other inert or mixed materials arising from open-cut or directional drilling operations associated with gas main laying or repair.

Contaminated Materials means materials that have been in contact with natural gas, hydrocarbons, or other substances during construction, maintenance, purging or decommissioning activities, requiring controlled disposal.

Meter Asset Components means meters, governors, regulators, valves, and associated fittings removed during replacement or upgrade programmes that may be suitable for refurbishment, testing and redeployment.

WEEE (Waste Electrical and Electronic Equipment) means any item powered by mains or battery electricity, including electronic meters, gas detection equipment, and IT hardware.

6.0 POLICY

Specifically The Group will:

- Apply the waste hierarchy as a priority in order to control the production, storage, collection, transport and disposal of waste to ensure compliance with legislation and to ensure the minimisation of overall waste produced through effective design, good purchasing and operational practice.
- Identify and assess the environmental impact of waste production within its operations including gas network construction and maintenance activities and develop a Waste Management Procedure to promote the reduction in the volume of waste produced and to maximise reuse, refurbishment and recycling opportunities.
- Produce a Waste Management Register to identify all waste streams and the costs, where appropriate, associated to ensure practical solutions in the management of waste across all sites.
- Eliminate the generation of unnecessary waste and design it out of products and processes in the first instance, including through improved construction planning and materials scheduling.
- Operate in a manner to minimise waste production by implementing good design techniques, purchasing practice, monitoring material usage and promoting best practice initiatives across office and field teams.
- Comply with Waste Management Legislation, Codes of Practice and any other requirements applicable to our business.
- Keep abreast of current technologies available for recycling waste, and investing in equipment where economic to do so.
- Cultivate a work ethic with a high level of awareness of waste minimisation and recycling through providing advice and guidance to employees and supply chain.
- Encourage the use of both recycled materials and materials suitable for recycling.
- Promote economy in the use of paper and the selection of print formats and document styles in line with this, along with continued investment in paperless technology platforms.
- Dispose of waste in a responsible manner by segregating waste materials to increase the likelihood of them being reused or recycled and to prevent contamination or pollution.
- Strive for continual improvement in waste minimisation and recycling by regularly setting and reviewing objectives and targets.

- Ensure understanding and compliance with this Policy through a process of education, review and audit.
- Involve and consult employees where appropriate. Ensure employees are aware of their personal responsibility for the way in which their conduct could impact on the environment with particular regard to minimising waste. This personal responsibility extends to ensuring such waste is dealt with in accordance with the principles and guidance set out in this policy.
- Make available appropriate resources and training to enable the implementation and communication of this policy to employees, stakeholders and interested parties.

6.1 Gas Network Construction and Maintenance Activities

The following requirements apply specifically to field activities associated with gas asset, repair, maintenance and decommissioning:

Excavation Spoil and Reinstatement Materials

- Excavation spoil, concrete and other inert materials shall be segregated on site and, wherever practicable, reused for reinstatement, backfill or transferred to an appropriate licensed facility for recycling or disposal.
- Contaminated or mixed spoil shall be assessed prior to disposal; if contamination is suspected, a waste characterisation assessment must be carried out before removal from site. Such works are to be carried out by Principal Contractor, Kier.
- All excavation waste transfers must be accompanied by a completed Waste Transfer Note and recorded in the site waste management records.
- Stockpiling of excavation materials at the highway or public open space shall be minimised and managed to avoid nuisance or secondary contamination.

Pipe Offcuts, Fittings and Steel Scrap

- Pipe offcuts (polyethylene and steel), redundant fittings, valves and metal scrap arising from construction or maintenance activities shall be segregated and returned to stores or transferred to a licensed metal recycler.
- Redundant steel mains and fittings removed during decommissioning or replacement works shall be assessed for residual value and directed to scrap metal recycling where appropriate.
- Polyethylene pipe offcuts shall be collected and transferred to an approved PE recycling contractor; material shall not be mixed with other waste streams.

Contaminated Materials

- Any material that has been in contact with natural gas, hydrocarbon liquids or other controlled substances must be handled, stored and disposed of in accordance with the relevant special waste or hazardous waste regulations.

- Purge gas operations shall be planned to minimise gas release to atmosphere in line with best available technique and relevant environmental permitting requirements.
- Contaminated PPE, rags, absorbents or equipment used in contact with hydrocarbons shall be disposed of as hazardous waste via a licensed contractor, with consignment notes retained.
- No contaminated material shall be deposited in general waste containers, skips or mixed with inert excavation arisings.

6.2 Reuse of Meter Asset Components

The Group recognises that metering equipment represents a significant asset value and that reuse and refurbishment should be prioritised before disposal is considered.

- All meters, governors, regulators, valves and associated components removed during replacement or upgrade programmes shall be inspected and assessed for refurbishment potential before disposal is authorised.
- A Meter Asset Reuse Register shall be maintained by the Metering Manager to track removed components, their condition assessment outcome (reuse / refurbish / dispose), and their subsequent deployment or disposal route.
- Components assessed as suitable for reuse shall be returned to a designated storage facility, inspected, tested and recertified as appropriate before redeployment.
- Components containing residual gas or hazardous substances shall be purged and made safe prior to storage, transport or disposal in accordance with relevant safety procedures.
- Disposal of metering equipment that cannot be refurbished shall follow the relevant waste stream guidance (WEEE where applicable, scrap metal for non-electronic components).
- Contractors engaged in meter exchange programmes shall be required to return all removed assets to Phoenix for assessment; unauthorised disposal of removed assets is not permitted.

Disposal of Electronic Equipment:

Waste Electrical and Electronic Equipment (WEEE) is any item that is powered by mains or battery electricity.

WEEE must be segregated from other waste in accordance with the Waste Electrical and Electronic Regulations 2006.

Any electronic/electrical equipment owned by Phoenix that has memory capability i.e. hard drives, laptops, mobile phones/tablets etc, is to have its memory cleared by an appropriate service provider before being responsibly disposed of. The IT Manager will ensure all such electronic goods are disposed of as specified above.

Supply Chain and Contractor Requirements

- All contractors and sub-contractors engaged to carry out construction, maintenance, or metering work on behalf of The Group shall be required to comply with this policy and the associated Waste Management Procedure.
- Site Waste Management Plans (SWMPs) shall be prepared for significant construction projects and shall identify anticipated waste streams, minimisation measures, and intended disposal routes.
- Contractors shall be required to provide waste transfer documentation and disposal records as part of project close-out.
- Non-compliance with waste segregation and disposal requirements shall be recorded and addressed as part of the contractor performance management process.

GENERAL GUIDANCE FOR WASTE

- Waste should be segregated according to its content, and disposed of in the appropriate manner and in the appropriate container.
- All confidential waste paper should be disposed of in Shredbank Bins located across the businesses premises.
- Segregation of waste should be carried out at source; by ensuring it is placed into the appropriate bin/waste container.
- Office waste bins are provided at communal areas across the main Phoenix HQ building to facilitate the correct and safe segregation of waste at source.
- All waste bags should be removed for disposal when necessary.
- Bins should only be used for the correct waste that they are allocated for.
- Cardboard for recycling should be flat packed and left for collection in a tidy and safe manner.

WASTE MINIMISATION

The cost of waste disposal is increasing. Generation and disposal of waste not only increases costs, but also requires additional resources in materials, space and preventive techniques. The true cost of waste for Phoenix can be much greater than is apparent.

7.0 AUDIT & REVIEW

This policy will be subject reviewed at least as part of a 3-yearly review cycle, or sooner should the need arise.

Copyright Notice

© Phoenix Energy Holdings Ltd 2026 - all rights reserved.

Material published in this document is the copyright of Phoenix Energy Holdings Ltd 2026 and may not be reproduced without permission.