



LEVIN SOURCES

Environmental Policy

Approved: 15th October 2019

Next Review: 14th October 2020

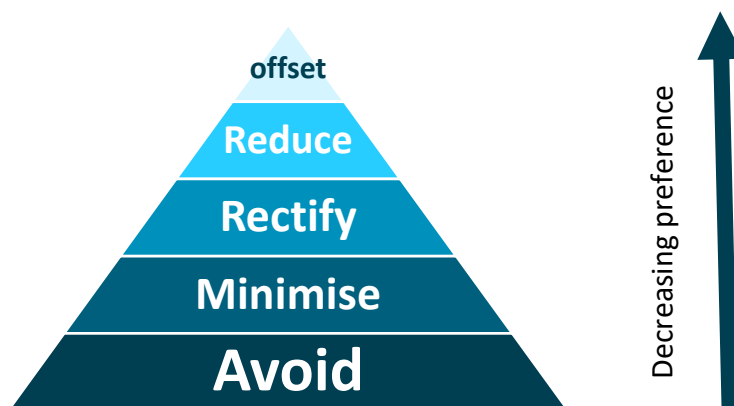
Mission Statement

Levin Sources offers international specialist consultancy along and around the value chain in the raw materials and minerals sector. Delivering sustainable outcomes for society and the environment across space and time underpins all of our work. We are committed to measuring our impact against the recognised indicators of sustainable development, adopting the Sustainable Development Goals as our Framework.

Levin Sources is deeply concerned as to the decline in ecological health and environmental resilience felt across ecosystems and across the planet, as demonstrated in the [IPBES 2019 Global Assessment Report on Biodiversity and Ecosystem Services](#). We are deeply aggrieved by the intra- and intergenerational injustices of climate change, and wish to uphold the principles of the [Paris Agreement](#). Furthermore, as a UK business, it is our longer term ambition to not just support but help *accelerate* the UK's achievement of net zero carbon by 2050, in line with the [UK government's 2019 amendment to the 2008 Climate Change Act](#), by achieving net zero carbon by 2025. We ultimately wish to go above and beyond what society would expect of us as an economic agent, namely not just achieving net zero for ourselves but net positive carbon outcomes in the pursuit of climate repair.

As a social enterprise, Levin Sources is committed to clean growth and to going beyond compliance in relation to our environmental and social performance. It is our core business to promote and facilitate the design, adoption and scaling of more sustainable production systems and value chains that ultimately protect and nurture environmental (and social) values. Beyond this, we are committed to operate showing due regard to our global and local environmental impacts.

This policy captures how we will minimise and mitigate our environmental impacts in our day-to-day business. Levin Sources and its Staff will conduct itself in such a manner to continually improve its environmental performance and reduce its environmental impact. Levin Sources will encourage customers, suppliers and other stakeholders to do the same. We will follow the mitigation hierarchy (see graph below) to guide our decision making when our actions may impact upon the environment.



Responsibility

Levin Sources' Founder and CEO, Estelle Levin-Nally is responsible for ensuring that the environmental policy is implemented (hereby referred as the Environmental Champion) with the support of Levin Sources' Mining, Minerals & Environment Project Manager, Blanca Racionero Gómez. However, all employees have a



responsibility in their area to ensure that the aims and objectives of the policy are met.

Policy aims

The Management and Staff is therefore charged to:

- 1) **Minimise Impact:** Seek to minimise our environmental footprint in all procurement and operational decisions.
- 2) **Go Beyond Compliance:** Ensure that the daily operations of Levin Sources comply with and exceed all relevant regulatory requirements.
- 3) **Prioritise Safety:** Correctly use equipment and facilities provided to ensure the safe and correct handling and disposal of materials and waste products.
- 4) **Pursue Circularity:** Pursue efficiency and economy in the use of all resources to minimise waste and take advantage of recycling schemes.
- 5) **Travel Light:** Ensure that all staff who travel choose the most sustainable option, where possible.
- 6) **Generate an Inclusive Culture:** Promotion of environmental awareness and general encouragement for staff to raise issues of concern and make recommendations and offer ideas to improve Levin Sources' performance.
- 7) **Monitor and Evaluate:** Continually improve and monitor environmental performance to reduce environmental impacts.
- 8) **Influence Widely:** Incorporate environmental factors into business decisions and influence other actors in the sector.

Specific Activities

Emission Reduction Targets

1. Agree on annual emission reduction targets and revise these annually.
2. Blanca Racionero Gómez is responsible for presenting suggested reduction targets to the Senior Management Team with potential offsetting schemes to achieve those targets and repair the damage caused historically by Levin Sources.
3. The Senior Management Team is responsible for assessing the suggested reduction targets and offset schemes, and does its best to select the targets and offsets/reparation schemes that are commercially viable for the company.
4. The SMT will consult the board on decisions that present commercial challenge to the business.
5. Blanca Racionero Gómez is responsible for measuring and documenting the company's emissions and environmental impacts yearly.

Air and other travel

1. Avoid booking business class flights; instead budget an additional day or two for each journey over 5 hours total journey time, so that the person has enough time to recover from traveling. Where a client has offered a business class flight and we decline it, propose they use the balance to a.) cover the extra day or two and associated and expenses and b.) offset other environmental impacts associated with the project with the remainder.
2. Prioritize booking direct flights with as few legs as possible.
3. Reduce the need to travel, restricting to necessity trips only.
4. For client work:
 - Travel by train instead of plane where possible.
 - Allow train travel to be counted as work time.
 - For airport transfers, travel by public transport instead of going by car or taking a taxi where possible and reasonable and where safe to do so in line with Levin Sources' risk policy.
 - When writing a proposal seek to minimize the carbon and environmental impacts of the project by considering these in its design. Where design is altered as a result of this, include explanation / justification in the proposal where possible.
 - When selecting external consultants, consider prioritizing local consultants that live in the area.
 - Engage with the client to find ways to minimise travel for the Levin Sources team and other stakeholders. When travelling for a meeting that is less than one day, discuss with the clients the possibility of holding the meeting(s) remotely, always stating that we need to assess this



option as part of our environmental policy, and highlighting the savings in costs for the clients.

- Include carbon offsets for the flights in the budget as a standard measure, where the client allows. Check on a case-by-case basis and if this is not possible add a line in the proposal saying that Levin Sources offsets its flights as standard but do not include any cost in the budget.
5. For internal travel (sales meetings, events, conferences, etc.):
- Travel by train instead of plane where possible
 - Train travel in Europe should be booked instead of plane travel when:
 - Door-to-door train costs and time:
 - Do not exceed 10% or cost £100 more than of the price of alternative travel (plane + taxi), whichever is smaller, AND
 - Do not exceed 10% or do not last more than 8 h of the time of alternative travel.
 - When train costs or times exceed those limits, staff should contact their line manager to take a decision.
 - Allow train travel to be counted as work time.
 - When travelling to the airport and where it is safe to do so (including but not limited to in Europe, the UK, North America, Australia, New Zealand, China, Japan, etc.) prioritize travelling by public transport instead of going by car or taking a taxi. Public transport should be prioritized when public transport is available and when it is safe to travel by public transport:
 - Door-to-door public transport costs and time:
 - Do not exceed 10% or cost £50 more than of the price of alternative travel (plane + taxi), whichever is smaller, AND
 - Do not exceed 10% or do not last more than 5 h of the time of alternative travel.
- When train costs or times exceed those limits, staff should contact their line manager to take a decision.
- When writing the business case to attend a conference, the carbon impacts should be included in the equation (take a look at <https://climatecare.org/calculator/> to calculate flight emissions). Will the conference bring enough value to justify the economic, environmental and social costs?
 - A meeting at the beginning of each year and on a quarterly basis should aim to select the key conferences to attend and personnel, so travel can be booked in advance reducing costs and making train travel more competitive.
2. Before conducting any travel (especially long-distance travel), the decision tree should be applied:
- Is travel really necessary? What will being there in person achieve that remote working would not, and is this valuable enough to the business to justify the cost of offsetting the travel?
 - If it is, what is the most efficient and sustainable way to get there?
 - Will the client accept that?
3. In the event of health issues or any other exceptional circumstances for staff not being able to commit to the above, staff are encouraged to talk to their line manager and to the Environmental Champion in order to find an appropriate solution.
4. Exceptional circumstances should be monitored and if a particular circumstance is recurrent, the policy should be adjusted the following year.

Meals

- Provide vegan or vegetarian, local, and organic meals with no plastic packaging when there is a training, board meeting, team meetings, etc.
- Engage all staff to see who is willing to be registered as vegetarian or vegan with Key Travel to get vegetarian meals as standard on plane journeys

Paper and Printing

- Minimise the use of paper in the office
- Reduce packaging as much as possible
- Seek to buy recycled and recyclable paper products



Environmental Policy Levin Sources

- Reuse and recycle all paper where possible
- When printing in the office:
 - Think twice - is a paper copy really needed?
 - Print double sided as standard
 - Use recycled paper
- Set up all computers to default to print double-sided, draft quality

Energy, fuel use and waste

Heating

- Heating and air conditioning systems will be adjusted to be between 18 and 21 degrees, having energy consumption in mind.
- Avoid artificially heating or cooling the office unless the temperature exceeds 29 °C in summer or dips below 18°C in winter. Temperature ceilings will be adjusted after a month trial period before summer and another month before winter. Blanca Racionero Gómez will be responsible to gather feedback from Staff on the agreed temperature ceilings and to understand how the heating system works.
- To maintain a cool temperature during the summer, curtains should be closed before leaving the office.
- Avoid opening the windows when heating or air conditioning systems are on. Consider turning them off instead.

Electricity and Water

- Seek to reduce the amount of energy used as much as possible.
- Always switch off lights, PC, photocopy machine, dishwasher, close curtains, etc., when leaving the office.
- Always switch off plugs at each personal workstation and unplug electronic devices when not in use, including but not limited to at the end of each workday.
- Reduce dishwasher usage – hand wash dishes as far as possible.
- Reduce kettle usage – boil the kettle with as much water as needed and only as necessary.
- Rinse the coffee cups before putting them into the dishwasher so that ECO mode can be used. Only use the dishwasher when full.
- Choose energy efficient appliances when they need to be changed (kettle, dishwasher, fridge, computers, monitors, printer, microwave, TV) - look for the EU energy efficiency label and GreenPlug scores criteria for guidance.

Waste

- Include an organic compost bin to dispose of all organic waste
- Follow property recycling requirements

Office Supplies

- Evaluate the environmental impact of any new products intended to be purchased
- Favour more environmentally friendly and efficient products wherever possible, packaged as sustainably as possible. This includes electronics, as well as consumables like hand-soaps, washing up liquid, toilet rolls, tea, milk, etc.
- Reuse and recycle all possible office supplies.
- Evaluate if the need can be met in another way like renting or sharing office equipment.

In the field

- Observe the environmental policies and instructions issued by competent, recognised authorities when visiting customer sites and premises.
- If such policies would appear to contradict Levin Sources' policy statements, common good sense or create a potential environmental or safety hazard, staff are instructed to refer to the Director or Supervisor for advice before proceeding.



Monitoring and Disclosure

- Continually monitor environmental performance. This includes but is not limited to annual audits of carbon and forest footprints.
- Environmental performance and plans to minimise our impacts should be reported to the board on an annual basis.
- Increase client, employee, associate, and supplier awareness of this policy by publishing it on the Levin Sources website, and including it as part of the package of policies these stakeholders receive.

Commitment to Continuous Improvement

- Continually seek to improve and reduce environmental impacts where commercially possible.
- Make commitments to international principles and norms (such as the NYDF) that allow us to stretch ourselves and improve our environmental impacts.
- Incorporate environmental considerations into all business decisions.
- Increase employee awareness of this policy through training.
- Review this policy and any related business issues annually at a minimum, and as needed where issues arise. This should be done in consultation with Staff and other stakeholders where necessary, and in light of the annual carbon and forest audits.

Operationalisation of this Policy and Generating an Eco-Commercial Culture and Operating environment for Levin Sources

- Each year, Blanca Racionero Gómez will draft a plan with medium term actions to support the fulfilment of this policy. The Senior Management Team will review and approve the plan, before training all staff to ensure its operationalisation.
- Involve Staff in the implementation of this policy, for greater commitment and improved performance.
- Increase employee awareness of the environmental impacts of their work, including their commute, through training.
- Procurement:
 - Use local labour and materials, where available, to reduce the environmental footprint and help the community.
 - Work with suppliers, contractors and sub-contractors to improve their environmental performance.

Approved by Estelle Levin-Nally this day, 15th October 2019