



## Environmental Policy

allpay Limited is the UK's leading payments specialist. Established in 1994, its core business concentrates on providing bill payment services - primarily to the public sector – and handles £6 billion a year across 60 million transactions.

allpay Ltd is committed to protecting the local and global environment of the Earth.

To minimise environmental impacts concerning our activities, products and services, we shall: -

- Comply with applicable legal requirements and other requirements to which allpay Ltd subscribes to, which relate to its environmental aspects.
- To include the consideration of environmental issues in all business strategies and initiatives.
- allpay Ltd senior management are committed to ensure that protection of the environment is firmly embedded in both the company's and all employees culture and will endeavor to influence its suppliers and customers in a similar strategic improvement manner.
- Prevent pollution, reduce waste and minimise the consumption of resources.
- Consider the wider global impact of all our activities including those of our suppliers, customers and other stakeholders.
- Educate, train and motivate employees to carry out tasks in an environmentally manner and ensure that a continuous professional development strategy remains core to our business goals.
- Encourage environmental protection among suppliers and subcontractors
- To investigate the feasibility of influencing its suppliers, customers and third parties with consideration to life cycle impacts of their aspects and activities.
- Encourage and enhance biodiversity and ecology.
- Commit to a strategy to work towards 'Carbon Net-Zero'
- As part of our ESG & corporate social responsibility we strive for continual improvement of our carbon emission reduction strategies across the business under periodic review.

allpay Ltd is committed to continual improvement of environmental performance. This policy is communicated to all staff, contractors and suppliers and is available to the public through the company's website and selected social media.

A handwritten signature in black ink, reading "Anthony Martin Killeen", written over a horizontal line.

**Tony Killeen**  
CEO

April  
2026

# Environmental Roles and Responsibilities

All members of staff have a responsibility for their actions and the following impact on the companies identified environmental risks.

All staff have responsibilities to consider the environmental impact of the company, cooperate in the improvement programmes and maximise recycling and minimise the use of energy and other resources.

Specific responsibilities have been assigned to certain key individuals within the organisation for ensuring that the Management System operates effectively.

The main system responsibilities have been assigned as follows:

## CEO – Tony Killeen

The CEO, duly supported on a day-to-day basis by the Managing Director, is responsible for the overall arrangements and for ensuring that the company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the reduction of the environmental impact of the business.

The CEO will:

- Ensure there is an effective environmental policy and that all employees, contractors, and temporary workers are made aware of their individual responsibility.
- To appoint a director(s) responsible for monitoring the business's environmental responsibilities.
- To ensure that all directors and managers understand and fulfil their responsibilities regarding monitoring of the business' Environmental responsibility.
- Arrange funds and facilities to meet the requirements of company policy and legislation.
- Make provisions for adequate and appropriate training to be given to all employees.
- To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.

## Directors

Have the responsibility to:

- Provide Environmental direction and focus as applicable to the company's business.
- Ensure that adequate resources of personnel and equipment are provided in a safe and secure working environment, to achieve business and environmental objectives whilst minimising the impact on the environment.
- Ensure periodical internal audits of environmental management in their areas of responsibility are carried out.
- Conduct management reviews of Environmental Responsibility in line with requirements set out in the BMS system and identify any required remedial actions or actions to improve the performance of the system.
- Review staff roles and responsibilities and personal development needs in respect of Environmental Responsibility.

## Heads of Department

Each Head of Department is responsible for the environmental impact of their actions and that of all personnel under their authority, including others who may be affected by the company's activities.

In particular they will:

- Understand and implement the company environmental policy.

- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows their responsibility and are equipped to play their part.
- Ensure that all new employees in the company are provided with a copy of the policy statement, receive such induction training as may be laid down in procedures and understand their impact on the environment.
- Set a personal example for environmental responsibility.
- Ensure existing and new processes/procedures are developed in line with ISO14001/27001/45001/50001 & company requirements via the management review meetings.
- Ensure environmental considerations are taken into account when selecting new suppliers.
- Ensure staff are developed to adhere to the processes/procedures appropriate to their own responsibilities.
- Consult with staff where problems with operation of any process/procedure are identified along with appropriate action required.
- Ensure external assessor/awarding body audits are arranged and clarify requirements and respond to internal or external audit requirements (Quality & Audit Manager).
- Set a personal example for environmental responsibility.

## Health, Safety and Environmental (HSE) Advisor

The primary role of the HSE Advisor is to advise the Directors and Managers on all safety, health, welfare and environment matters to ensure the Company complies with its statutory obligations.

The HSE Advisor is designated responsibility by the board, and is to control and update relevant environmental documentation and to assist all departments to operate to the procedures and instructions contained there:-

In particular the HSE Advisor will:

- Have overall responsibility for ensuring that the records and record management system used within allpay are included in the environmental management system and that the procedures are followed at all times.
- Have overall responsibility for ensuring that the Environmental Management System is regularly audited and that any non-conformances are reviewed by senior management and that corrective actions are taken.
- Keep up to date with changes in current legislation and to bring to the attention of the board and HSE Committee responsible for environment any relevant new legislation.
- Ensure any environmental incident and safety concern reporting procedures are understood and implemented. Assist with investigations where appropriate.
- Attend such courses/seminars run by external sources to enable accurate interpretation of legislation to enable implementation within the organisation.
- Immediately contact the Facilities Management or Director(s) responsible for environment if situations are found, that in the opinion of the HSE Advisor, require immediate rectification or the stopping of any operation.
- To notify the Facilities Management or Director(s) responsible for the environment if the corrective action agreed after any workplace inspection is not implemented by the arranged date.
- To highlight areas where training/certification is required to meet the standards imposed by legislation, approved codes of practice, or Environmental Agency guidance.
- Is responsible for identifying training needs and for ensuring that training is sourced or provided internally to satisfy the training needs.
- Developing and Maintaining the Legal Register and Environmental Aspects Register and advising management on any changes that affect the information contained therein.

## Managers

Managers are responsible for:

- Ensuring that all staff under their control are fully aware of their requirements and responsibilities under allpay's Environmental Policy.

- Ensuring that all employees under their control are trained and competent to carry out their work in an environmentally friendly manner; are fully aware of known hazards and risks to the environment, and that the necessary precautions are in place.
- Ensuring that all waste control and recycling guidelines are followed and that the use of energy and resources are kept to a minimum.
- Ensuring that individuals clean as they go and good housekeeping is maintained at all times.
- Ensuring that any defects concerning environment are rectified without delay.
- Appraise, assess, discuss and action environmental matters with relevant personnel.
- Ensuring effective liaison with all departments on the operation and development of environmental management and control within allpay.

## **Assistant Managers / Co-ordinators / Team Leaders**

Whilst the Director and Managers are available to advise on matters regarding Environmental responsibility, this does not in any way detract from the Supervisor's primary Environmental responsibility within their section or department and ongoing environmental management.

Therefore, the Supervisor is responsible for:-

- Ensuring that all staff under their control are fully aware of their requirements and responsibilities under the Company's Environmental Policy.
- Undertaking environmental Inspections, therefore ensuring that all necessary preventive and/or corrective measures are being implemented.
- Ensuring that all employees under their control are trained and competent to carry out their work in a safe manner; are fully aware of known hazards and risks to health & safety and the environment, and that the necessary precautions are in place.
- Ensuring that all waste control and recycling guidelines are followed and that the use of energy and resources are kept to a minimum.
- Ensuring that any instructions given to employees take full account of the employee(s) individual capabilities and their environmental responsibilities.
- Ensuring that adequate supervision is available at all times, particularly where young or inexperienced workers are concerned.
- Ensuring that individuals clean as they go and good housekeeping is maintained at all times.
- Appraise, assess, discuss and action environmental matters with relevant personnel.

## **Employees' Responsibilities**

In accordance with allpay's Environmental Policy, all employees have an individual responsibility and duty for the following:-

- Making themselves familiar with, and conforming with, allpay's environmental policies at all times.
- Follow all guidelines and instructions on recycling, waste management and effective energy use and resource usage.
- Wearing appropriate safety or protective equipment, personal footwear or clothing and using appropriate safety devices, as specified, at all times..
- Make suggestions to improve environmental risks within the Company to the Manager.
- Ensure that a good level of housekeeping at and around their workstation is maintained at all times.

## **HSE Forum Responsibilities**

- Review the status of the Company's environmental, health and safety policies and performance, including processes to ensure compliance with applicable laws and regulations.

- Review and provide input to the Company on the management of current and emerging environmental, health and safety issues.
- Reporting periodically to the Board of Directors on environmental, health and safety matters affecting the Company.
- Review the Company's progress on sustainable development.
- Monitor the adequacy of health, safety and environmental communication, publicity and training and development in support of company health, safety and environmental policy.
- Monitor the effectiveness of health, safety and environmental management and compliance with Company health, safety and environmental policy through consideration of reports and statistics relating to health, safety and environmental concerns.