

Audit report

✓ Sullivan and Cromwell
LLP

SOCOTEC Certification UK

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UNITED KINGDOM

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CLIENT DETAILS			
Client Ref / Tracking No(s).	UK-22979-1-EM	Client Name:	Sullivan and Cromwell LLP
Address:	1 New Fetter Lane London EC4A 1AN United Kingdom		
Client Representative (Name)	Mark Benson	Client Representative (Role)	Quality Manager
		Employee Numbers	150

AUDIT DETAILS		
Audit Criteria: Standard(s) 1. 14001:2015 2. 3. Client's documented Management System	In case of multi standards, indicate whether the audit is: Combined (multi standard, not Integrated) <input type="checkbox"/> Joint (dual accreditation) <input type="checkbox"/> Integrated <input type="checkbox"/>	Type of audit: <input type="checkbox"/> Stage 1 <input checked="" type="checkbox"/> Recertification <input type="checkbox"/> 2 nd Surv <input type="checkbox"/> Special audit Please Specify <input type="checkbox"/> Stage 2, <input type="checkbox"/> 1 st Surv

Audit Duration: **2 days total 0.5 day off site** **Audit Dates:** **7-8 November 2022**

Scope of Certification:	The provision of business activities in relation to legal services.
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Is the documented scope of certification (above) appropriate for the activities, products and services being managed by the client's documented system, witnessed at audit? Yes No
 If "No" the auditor is required to provide details below:

LEAD AUDITOR RECOMMENDATION	
Recommendation for Certification/Continued Certification (No CARs raised or CARs Closed out on site)	X
Recommendation for Certification/Continued Certification following off site verification of responses	<input type="checkbox"/>
Recommendation for Certification/Continued Certification following on site verification of CAR responses	<input type="checkbox"/>
Non-Recommendation for Certification/Continued Certification (evidence of major system failure)	<input type="checkbox"/>
Total number of nonconformities and observations raised*: (<i>* attached RP2 Form refers</i>)	

Client signature (for acceptance of the above details only)

 M Benson

Lead Auditor signature

 P Granger

MULTI SITE SAMPLING

Company Location(s) visited this audit:	Type of Site	Site Scope (If different from Main Scope)

ADDITIONAL CLARIFICATION

Have there been any changes since the previous audit?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Company Name: <input type="checkbox"/>	Site Address(es): <input type="checkbox"/>	Top Management: <input type="checkbox"/>	Employee Nos.: <input type="checkbox"/>
Processes: <input type="checkbox"/>	Products / Services: <input type="checkbox"/>	Legislation: <input type="checkbox"/>	Other: <input type="checkbox"/>
If yes, please give details:			
Were there any deviations from the Audit Plan?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, please give details:			
Were there any significant issues impacting on audit programme (audit duration, auditor competency, sufficient coverage)?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, please give details:			
Are certification documents and marks being used in accordance with requirements?			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Please give details of where marks are used: Not used.			
Were there any unresolved issues by the end of closing meeting that would lead to appeal, complaint or other?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, please give details:			
Dates of Next Audit: (please agree provisional dates with Client)	To be confirmed closer to the next audit		

By signing the first page of this report, the Lead Auditor confirms that:

- **the objectives of the audit (detailed on the F058 – Audit Plan)** have been met and that the recommendation shown on first page of this report reflects the relevance and the ability of the management system to achieve the expected results;
- the certification scope is appropriate;

Audit Team:	
Lead Auditor:	Paul Granger
Support Auditor(s):	
Technical Expert(s):	
Observer:	
Others: (please specify)	

This audit was completed using a sampling of objective evidence of implementation and effectiveness, taken from a combination of records and data, observed practices and activities and client personnel's knowledge and understanding of the requirements of the Management System.

Examples of objective evidence sighted are provided within each of the relevant sections of the report that follows.

REVIEW OF PREVIOUS NON-CONFORMITIES	
Were Non-Conformities raised at the previous audit?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, please summarise the effectiveness of the Corrective Actions taken, including details of the objective evidence viewed that supports your decision:	

INTRODUCTION TO CLIENT / GENERAL COMMENTS
Please provide an overview of the client's organisation giving useful information to help understanding of the context of the audit: economic, geographic situation for EMS audits, hazards for OHSMS, etc.
<p>Sullivan and Cromwell LLB are a Law firm dealing in civil litigation and are US owned with the UK Branch based in Chancery Lane in the City of London. The company has been at its current premises for a number of years which it occupies 5 of the 7 floors with two other law firms on the 2nd and 3rd Floors. The premises is rented and the Landlord uses CBRE as a facilities ,management company for all communal areas and for management of the building. Sullivan and Cromwell have a close relationship with the Landlord and CBRE and have agreed joint initiatives to improve Environmental impact of the business.</p> <p>The company are fully committed to the EMS at all levels and also have an Environmental Task Force involving the UK and US offices.</p> <p>The company continues to operate within its current scope of: <i>Sullivan & Cromwell LLP business activities in relation to legal services and their associated environmental services.</i></p>

AUDIT SUMMARY

Please provide a summary of the overall position of the Management System with regards to its conformity with the Standard(s), its ability to manage the identified risks and opportunities and sponsor continual improvement.

The Recertification audit against the requirements of ISO14001:2015 by selective sampling of the company's management system. The audit took place at the company's premises which is in the City of London.

All information requested was supplied by the company. In addition as this was a recertification audit a review of the audits conducted during the certification period was carried out and showed that no non conformances had been raised and only one observation had been raised during the certification period which has been addressed.

There was one opportunity for improvement raised during this audit and therefore Recertification to the ISO14001:2015 is recommended.

The auditor would like to thank the company for their assistance with the audit.

Therefore continued certification to ISO 14001:2015 is recommended.

Reference to major and minor NC and observations

Findings:	Surv 1	Surv2	Recert			
Number of major non conformities	0	0	0			
Number of minor non conformities	0	0	0			
Number of observations	1	0	0			

POSITIVE FINDINGS

- The Management system has migrated to completely electronic and has folders for all activities within the management system e.g. Waste, Energy Management, Internal Audit, Management Review etc
- There is clear senior management commitment to the EMS which also extends to sharing ideas with the US Office.
- The EMS is well maintained and the company are actively looking to reduce its carbon footprint and reduce water usage with Environmental Objectives demonstrating this.

OPPORTUNITIES FOR IMPROVEMENT

- The company have not included compostable waste in the life cycle approach:

AUDIT TRAIL

BASIS OF THE MANAGEMENT SYSTEM

The auditor is required to provide details of the Context of the Management System as determined by the organisation. Include details of the Internal & External influences and Interested Parties' Needs & Expectations that the organisation has identified and the Risks & Opportunities it has documented, that result from these.

Process Function Clause	Evidence collected (interviews, documents...)
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4 Context

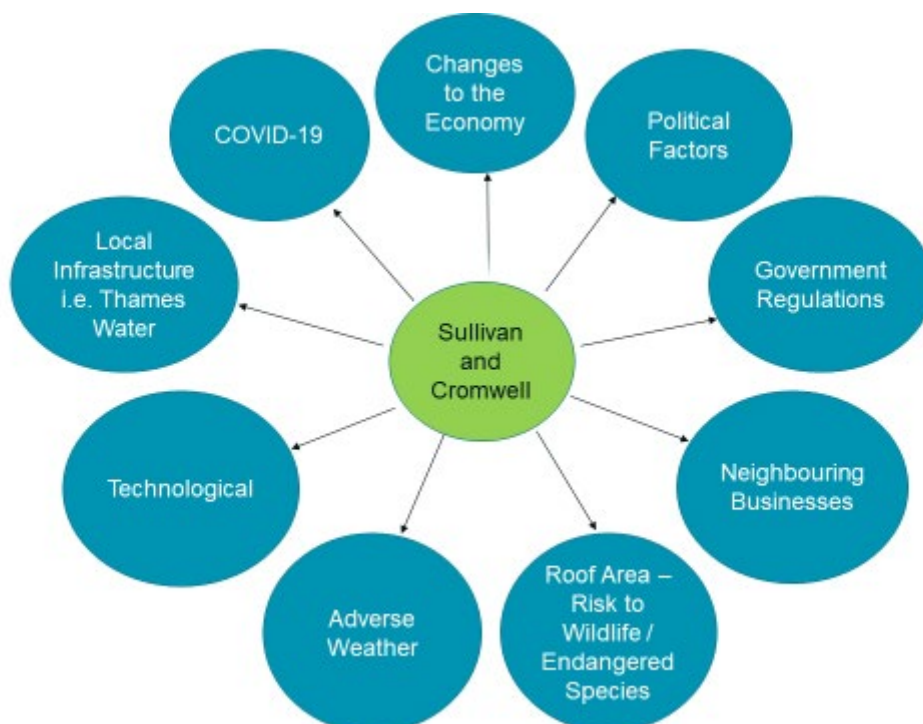
Covered in Section 4 of the Environmental Management Manual Rev I.
Interview Mark Benson and Janet Errington.

The company is American owned with the EMS being specific to the London Office. The office is based in a 7 floor building with two floors occupied by other companies. The offices are rented and managed communal areas are the responsibility of CBRE, including Boilers, Chillers, Air Con, Water storage and maintenance. Staff have returned to the offices since covid. There has been a lot of air travel in the past and the company is looking at ways to reduce this.

The company have updated their EMS and have added Emergency Response Plans.

Internal and External issues are represented Diagrammatically as:

External Issues



Internal Issues



It is clear the company is aware of the context within which it operates.

Needs and Expectations of Interested Parties

Covered at 4.2 of the Environmental Manual.

These are defined as; CBRE, Clients, shareholders, board members, competitors and regulators, other Tenants in the building, neighbouring businesses- their needs and expectations are considered appropriately.

In relation to CBRE their responsibilities which are excluded from Sullivan and Cromwells are also defined:

- External repairs to the building
- The maintenance, repairs and cleanliness to all common areas and plant rooms
- The safe supply of electricity, gas and hygienic water
- The safe collection and responsible disposal of waste
- The provision of security to the building with both security systems and manned guarding
- Pest control within the common areas and plant rooms
- The regular maintenance and safe operation of all lifts
- Fire precautions and health & safety within the common areas and plant rooms
- Maintaining a Covid-19 Safe Building in all areas relating to the common parts

The company has clearly understood the context within which it operates and the Needs and Expectations of Interested Parties.

Management System

The Management system is now stored on the company's Net Docs Document Management system which automatically updates documents as they are amended:

The EMS is available 'Read Only' to all staff via Net Docs Consists of:

- Environmental Management Manual Rev I 05/08/22
- Appendix B- Environmental Policy Statement 05/08/22- Signed by Janet Errington.
- Appendix c- Organisation chart
- Appendix D – Index of Standard Operating procedures
- Carbon Management Plan

E.g. SOP-01- Management and Planning- Rev-01, SOP-03-n Training and Competence- Rev-Aug 22, SOP-07 Non Conformity Handling- August 22.

- Work instructions - WI – E01 Training and staff awareness, WI – E02- Energy Management, WI-E03- Procurement, WI – E04- Waste Management, WI – E05- Mini Cabs, Taxis and Hire Cars, WI – E06- Water Treatment, WI – E07 Water supply and Drainage, WI-E08 Maintenance. All reviewed July 2022.

The Environmental Manual is comprehensive and covers all areas of the EMS and appendices covering Aspects and Impacts, Risk and Opportunities, Compliance obligations etc..

The Management system has migrated to completely electronic and has folders for all activities within the management system e.g. Waste, Energy Management, Internal Audit, Management Review etc... and a positive comment is recorded here.

LEADERSHIP

Process Function Clause	Evidence collected (interviews, documents...)
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5 Leadership

Section 5 of EMS Manual Covers this area.

Overall responsibility for the EMS is down to the Administration Director Janet Errington and the Facilities Manager has day to day responsibility for the maintenance of the EMS.

Interview with Janet and Mark, the EMS is taken very seriously by the company and senior managers. Mark and Janet meet bi weekly to discuss the EMS and Janet will meet with the Administration Partner and they promote amongst senior managers. Information is shared via the Environmental Task Force which is a joint meeting with the New York office to share practice and ideas,

In terms of promoting to staff, catering dept promote waste streams regularly, and the EMS is on the Intranet. The company also use posters and Tikka Taping on the Intranet screens to promote the EMS.

There is clear Top Management support for the EMS which is reflected in the system.

Roles and Responsibilities

Section 5.1 outlines responsibilities as:

1. Accountability for the effectiveness of the Environmental Management System.
2. Communicating the importance of effective environmental management and of conforming to the environmental management system requirements.
3. Directing and supporting persons to contribute to the effectiveness of the environmental management system.
4. Promoting continual improvement.
5. Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

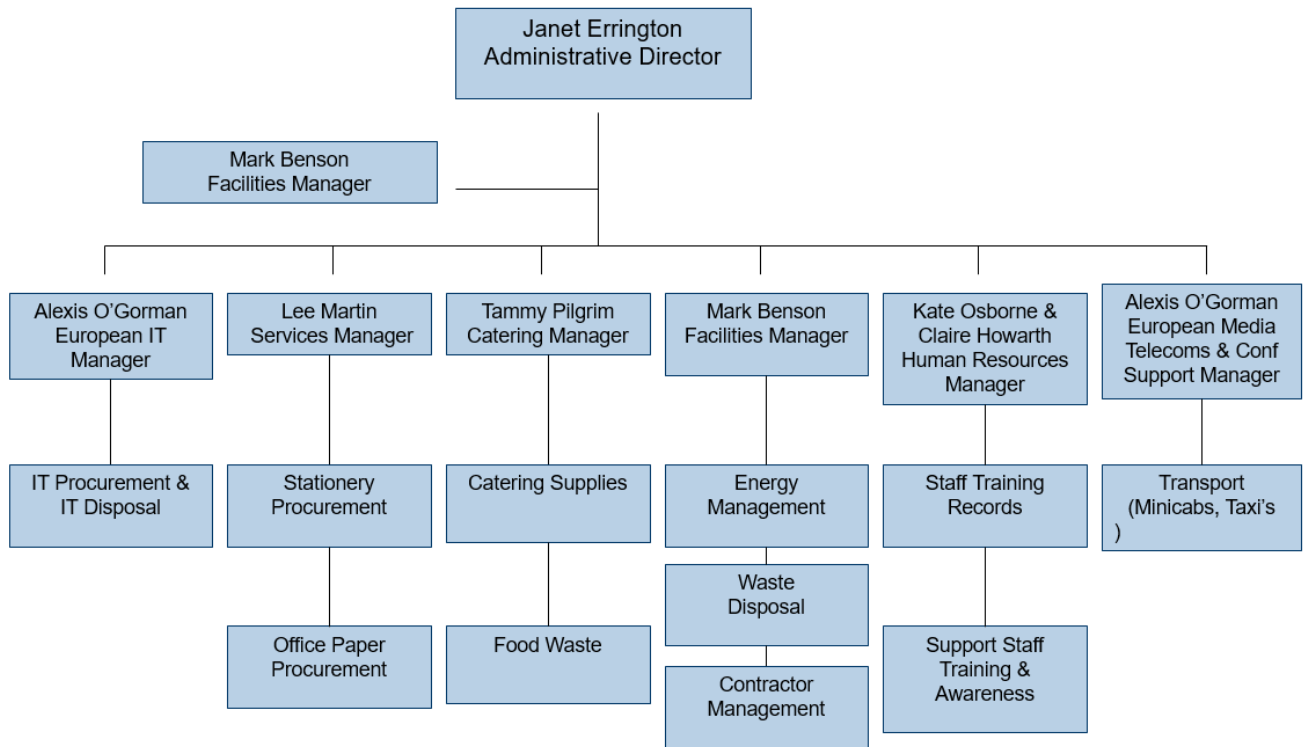
And through the following four responsibilities:

1. Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organisation.
2. Ensuring the integration of the environmental management system requirements in the organisation's business process.
3. Ensuring that the resources needed for the environmental management system are available.
4. Ensuring that the environmental management system achieves its intended outcomes.

Changes to the EMS are controlled by the Facilities Manager and authorized by the Administration Director and discussed at the MRM.

The Administrative Director is responsible for the communication of the EMS.

The company also have an organisation chart at Appendix C of the Manual.



Policy	Environmental Policy Statement 05/08/22- Signed by Janet Errington. And available to all staff and will be shared externally as required. The Policy complies with the requirements of 14001:2015.
Scope	The company's scope is confirmed as: Sullivan & Cromwell LLP business activities in relation to legal services and their associated environmental services. And is confirmed as appropriate.

PLANNING

Process Function Clause	Evidence collected (interviews, documents...)
6	<p>Environmental Objectives</p> <p>The company performance against objectives during the Certification cycle has been sampled:</p> <p>All are reviewed at Management Review Meetings and by the Facilities Manager</p> <p>2020</p> <ol style="list-style-type: none"> To fully assess COVID-19 and to integrate within the environmental management system, to identify any potential significant changes to our operating processes, the effects on human health and the environment with the target to protect both. - Achieved Identify any changes to our compliance obligations as part of and after Brexit. As a result of Brexit, there may be possible changes to UK environmental legislation. The impact of not keeping an awareness and being up to date could result in not remaining legally compliant. - Achieved To introduce compostable packaging for an additional recycled waste stream. This will help to support the reduction of cross contamination when recycling at the treatment facilities and will support Sullivan & Cromwell in continually improving – Achieved <p>2021</p> <p>Main objective To work with the Landlords Representative to fully understand , Past present and Future improvements to the building which will have a positive Impact on the Environment</p> <p>This will be achieved by:</p> <ol style="list-style-type: none"> Identify plant replacements – Meet with the Building Manager – Responsibility Facilities Management- complete 11/10/21 Understand how the energy initiatives will contribute to Environmental improvements- Identify how these are related to Sullivan and Cromwell- Achieved 11/10/21 Reduce energy consumption and carbon emission – Achieved 11/10/22

2022

No.:	Title	Aspect	Impact	Target
1	Complete BMS upgrade. The Building Management System fully controls the heating and cooling in all areas from the main plant, chillers, Air Handling Units, Fan Coil Units and boilers. The upgrade will provide a further 10-15 years service, and in addition all Fan Coil Unit controllers will be upgraded ensuring our heating and cooling is operating and communicating as efficiently as possible with the BMS.	Main building plant replacements	Reduced energy consumption with improved energy efficiency	To reduce carbon emissions Still ongoing started completion date Dec 2022
2	Install a new Energy Management System. This is not currently in place, but will enable floor by floor metering, so that we can more effectively monitor our energy usage, which will create further opportunities for continual improvement in managing our overall contribution to building emissions. This will also enable the monitoring of the main plant to identify plant failures before they get worse.	Main building plant replacements	Reduced energy consumption with improved energy efficiency	To reduce carbon emissions Completion Date Dec 2022
3	Refurbishment of the main air handling units with multiple high efficiency direct drive fans. These fans will offer considerable energy reduction, and reduce ongoing maintenance costs.	Main building plant replacements	Reduced energy consumption with improved energy efficiency	To reduce carbon emissions Target date 2023
4	The gas fired boilers to be replaced between 2022/23 with more efficient models, and the low temperature hot water pumps will also be replaced as part of the boiler works. These new pumps will cut energy consumption by up to 80%.	Main building plant replacements	Reduced energy consumption with improved energy efficiency	To reduce carbon emissions Target Date 2023
5	Water Management Plan	Water Conservation	Protecting a finite Resource	Reduce Unnecessary use of water Through: Water Meters Appointment of a Team Taps and Toilets leak fixes and Infrared taps Efficient Equipment Roofs consider harvesting Rain Water

Risks and Opportunities Aspects and Impacts

Covered at 6.1.2 of the Manual. Last reviewed 10/08/22 and remain as:

1. Energy
 - a. Electricity

- b.** Gas (Landlord)
 - c.** Fuel
 - d.** Energy consumption

- 2.** Emissions to Atmosphere
 - a.** Exhaust emissions generated from business travel – Flights
 - b.** Exhaust emissions generated from business travel – Rail
 - c.** Exhaust emissions generated from business travel – Road
 - d.** Emission of flue gas from boilers and generators (Landlord)
 - e.** Potential release of refrigerants from air conditioning systems
 - f.** Warm air emission from air handling units and plant rooms (Landlord)
 - g.** Noise from plant rooms (Landlord)

- 3.** Water
 - a.** Water consumption
 - b.** Drainage
 - c.** Discharge to foul sewer from normal domestic activities
 - d.** Discharge to surface water (Landlord)
 - e.** Water testing for biological activity to protect staff

- 4.** Wastes
 - a.** Mixed recycling
 - b.** Food
 - c.** General
 - d.** Confidential
 - e.** Hazardous Waste
 - f.** Disposal routes
 - g.** Documentation

- 5.** Environmentally Hazardous Materials / Storage
 - a.** General housekeeping for all stored chemicals and equipment used on site
 - b.** Use and storage of general maintenance chemicals
 - c.** Spillage of maintenance chemicals
 - d.** Use of normal domestic cleaning products
 - e.** Spillage of domestic cleaning products

- 6.** Suppliers
 - a.** Paper
 - b.** Cooking oil
 - c.** Selection of contractors
 - d.** Procurement of goods and services

- 7.** Emergencies
 - a.** Fire
 - b.** Power failure

c. Flood

8. External Issues

- a. Changes to the economy
- b. Political factors
- c. Government regulations
- d. Neighboring businesses
- e. Roof area – Risk to wildlife and endangered species (Landlord)
- f. Adverse weather
- g. Technology
- h. Local infrastructure

9. Internal Issues

- a. Use of the landlord’s premises
- b. Influence over tenants
- c. Employee engagement

Each Aspect and Impact is linked to a Risk and Opportunity and are coded RAG status and scored out of 4 for Frequency, Legislation, Env. Effect, Concern, Controls and 1-9 is Low level of concern, 10-15 Medium level, 16-20 is High Level. High Level to be addressed in 3 months, medium 6 months and Low 1 year +.

The following are the highest scoring with scores of 10 all the others are low risk:

Procurement of Goods and Services		Score	Level of Significance
Frequency		2	10
Legislation		2	
Environmental Impact		2	
Concern		2	
Control		2	
Risks	Lack of control during contractors working out of hours with potentially hazardous chemicals.		
Opportunities	All risk assessments and method statements received prior to any work being undertaken, site rules to be followed, contractor inductions and monitoring by the Building Management Team during works.		
Actions	Continue with current practices.		

Government Regulations		Score	Level of Significance
Frequency		2	10
Legislation		2	
Environmental Impact		2	
Concern		2	
Control		2	
Risks	Failing to keep up with government regulations Sullivan & Cromwell can lose the early competitive advantage in staying ahead of their competitors. Failure to comply with regulations can lead to fines and a breakdown to the Firm’s environmental management system.		

Opportunities	To remain legally compliant and make tangible environmental improvements.
Actions	Regularly review our compliance obligations.

There are 33 scoring nine including:

Employee Engagement		Score	Level of Significance
Frequency		2	9
Legislation		1	
Environmental Impact		2	
Concern		2	
Control		2	
Risks	There could be a partial or whole breakdown in Sullivan & Cromwell's Environmental Management System.		
Opportunities	The use of technologies; computer based document management systems, double sided printing, effective use of posters displaying environmental information, and to keep employees up to date with changing environmental data relevant to the external and internal issues.		
Actions	Continually ongoing.		

Technology		Score	Level of Significance
Frequency		2	9
Legislation		1	
Environmental Impact		2	
Concern		2	
Control		2	
Risks	By not keeping up with and using new technology, Sullivan & Cromwell run the risk of maintaining environmentally inefficient machinery and plant systems, for example high energy lights compared to LED and air filtration systems.		
Opportunities	To reduce carbon emissions, energy and material supply costs.		
Actions	Account management meeting with engineering and cleaning to keep as up to date as possible with the latest technological opportunities.		

Changes to the Economy		Score	Level of Significance
Frequency		2	9
Legislation		2	
Environmental Impact		2	
Concern		2	
Control		1	
Risks	Can affect the spending patterns of businesses. Increases in interest rates and or a high level of unemployment will depress the consumption of non-essential goods and services.		

Opportunities	Businesses will be more encouraged to expand and take positive steps more freely when economic conditions are right e.g. low interest rates and rising demand
Actions	To monitor the economic changes and as a business adapts and respond consistently with continual environmental improvement.

The Aspects and Impacts and Risks and Opportunities associated with them are comprehensive and well understood and maintained.

Life Cycle Approach

Life Cycle Approach is comprehensively covered at 6.1.2 of the Environmental Manual: These cover the following areas:

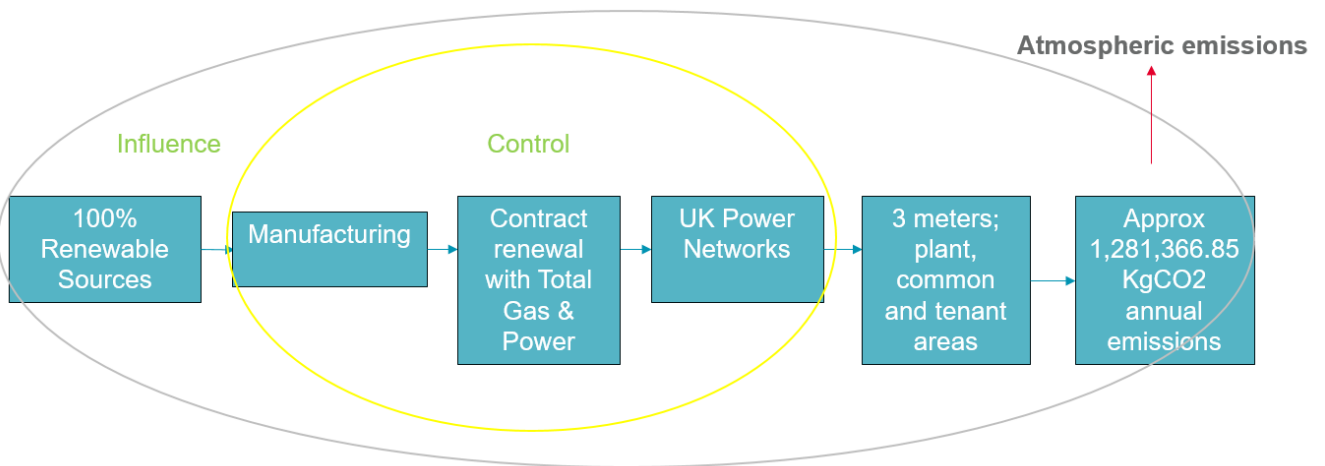
1. Electricity
2. Fuel (Diesel)
3. Refrigerant
4. Water
5. Mixed Recycling
6. Food waste
7. General waste
8. Confidential waste
9. Hazardous waste
10. Paper
11. Cooking oil
12. Gas

The company may wish to consider including compostable waste streams as part of the lifecycle approach so an OFI is raised here:

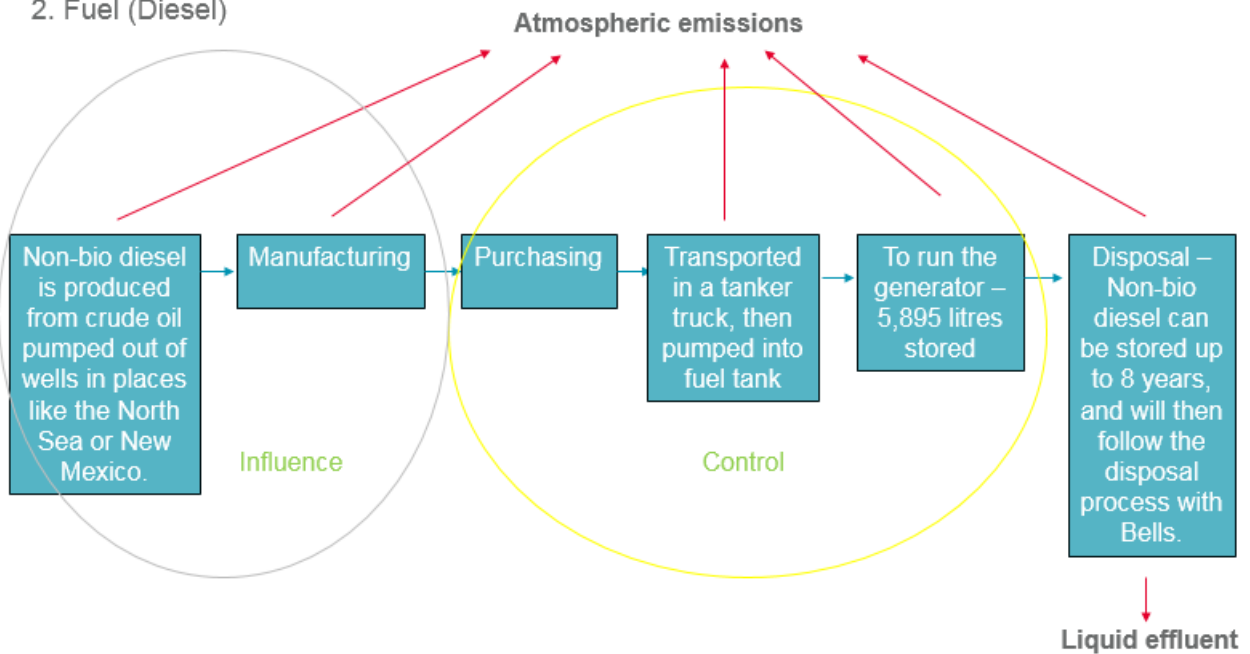
OFI 1 - The company have not included compostable waste in the life cycle approach:

The company demonstrate how they approach the life cycle approach via diagrams eg.g.

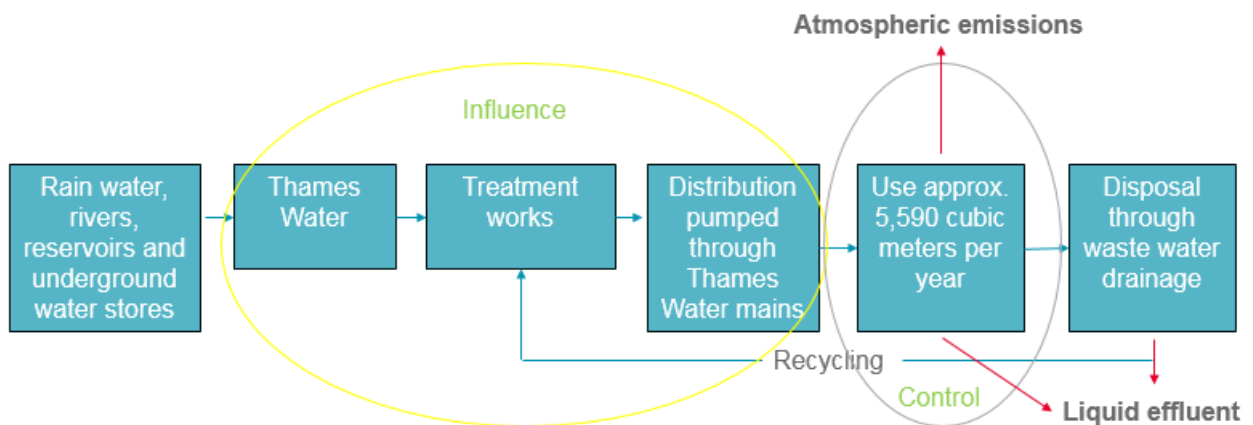
1. Electricity



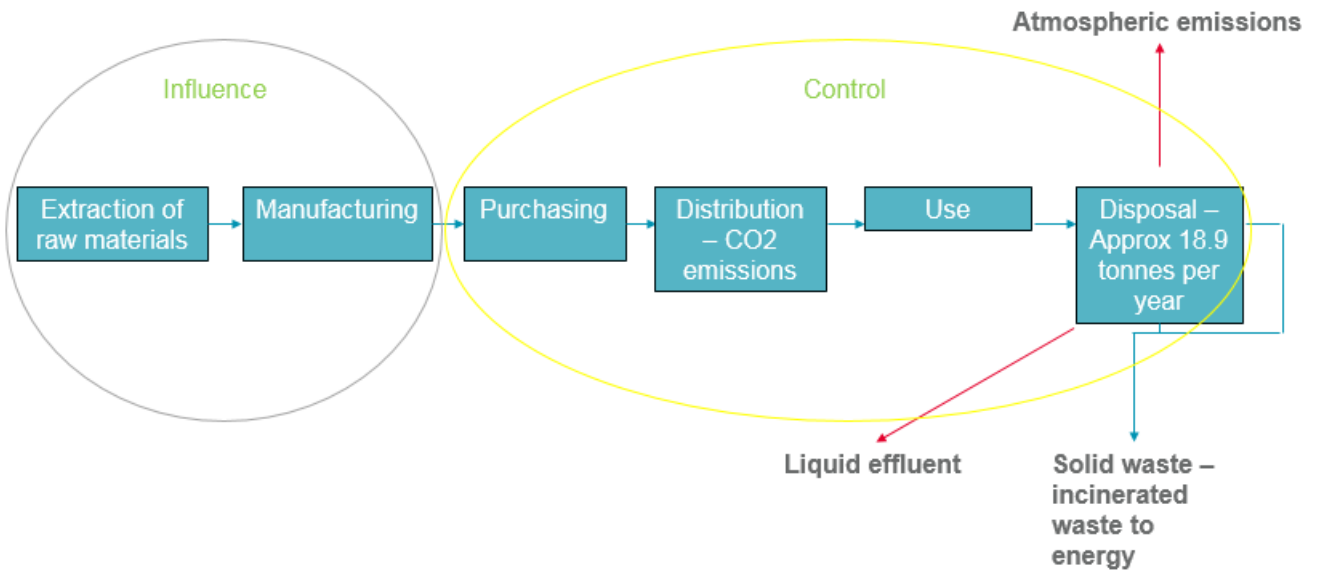
2. Fuel (Diesel)



4. Water



7. General Waste



Compliance Obligations

The company details compliance obligations at 6.1.3 of the Environmental Manual it was noted within the Manual that these were reviewed on 10th and 22nd November 2022. The obligations are under the following Headings: Energy, Diesel Fuel, Water, Waste, Emergencies, Environmentally Hazardous materials Emergencies and other requirements. Each obligation provides details of the requirement, Relevance and to address Clause 9.1.2 details of how the organisation is complying, the compliance obligations include:

Copies of all regulations are stored in folders within the Management System.

The following have been removed as they have been revoked:

Ozone Depleting Substances (Qualifications) Regulations 2009

Groundwater (England and Wales) Regulations 2009.

SUPPORT

Process
Function
Clause

Evidence collected (interviews, documents...)

7 Competence and Awareness

Covered by 2.1.2 of the Manual as part of the Facilities Manager responsibilities. And SOP-03 Training and Competence Rev. 01.

The Facilities Manager is responsible for inducting the staff in the Environmental Management System, staff are briefed as are contractors regarding energy usage water, usage, and waste streams and their responsibilities..

The following training records for staff were sampled:

- ✓ Mark Benson- In House Training forv 14001:2015v BATALAS cert no 596364
- ✓ Mark Benson 14001 14001 Internal Auditor
- ✓ Mark Benson Fire Safety Training
- ✓ Oneal Roach Engineer- Legionella Awareness
- ✓ Rob Wells Engineer Legionella Awareness

First Aid Training:

First Aid at work-

Emanuele Agni Exp 30/07/24

Nicola Carpenter – Exp 14/02/23

Fiona Drewitt – Exp 27/08/24

Appointed Person

Karen Robinson Exp 12/02/23

Kirsten Davis – 12/02/23

AED Life Support

Chris Bassett Exp 15/11/24

Janet Errington 15/11/24

	<p>Sub Contractors</p> <p>In terms of contractors who the company use they have a Contractor and Supplier Questionnaire, Environment and Sustainability Document. This covers staff training and registrations in relation to Environmental issues.</p> <p>The company also have a sub contractors induction which covers the EMS, Waste, energy and water usage. Mark also briefs them on the EMS and waste streams Induction checklist for Mark Lund was sampled dated 10/11/21.</p>
	<p>Communication</p> <p>Internal</p> <p>The company rely on their Intranet as a means of Communicating the EMS. All staff have 'Read Only' access to the EMS and Mark carries out induction with all new members of staff and part of the induction relates to the EMS. Internal communication is Face to Face telephone and e-mail. The company also use Zoom and encourage its use where possible to avoid travel producing carbon emissions. Notice boards contain information regarding the EMS and Environmental information e.g. the company's stationary provider Environmental brochure showing that use sustainable methods for producing paper.</p> <p>External</p> <p>The company communicate by the usual channels of Telephone, face to face and e-mail. The company have a website which it has its 14001:2015 certificate and its Quality Policy. In line with the company's desire to reduce its carbon footprint zoom is encouraged where possible rather than face to face.</p> <p>The communication of the Environmental policy and EMS appears to be effective internally and externally.</p>
	<p>Documented Information</p> <p>Documented Information is well controlled by version number and / or date. The move to a fully electronic system on net docs means that documented information is auto controlled and accessible. The documented information required for the audit was easily accessible and well maintained.</p>

OPERATION

<p>Process Function Clause</p>	<p>Evidence collected (interviews, processes observed, documents...)</p>
<p>8</p>	<p>Site Tour</p> <p>A site tour was carried out on 07/11/22 and 08/11/22 with Mark Benson.</p> <p>The company is based in a shared office block and this is facilities managed on behalf of the Landlord by CBRE. The company occupy floors Lower Ground, Ground, 1, 4,5,6 and 7. Floor seven is split in 2 with an area on each side of the business, one side is an IT Training room.. Hand sanitizer is on all floors at various intervals, There are different waste bins for the following waste:</p> <ul style="list-style-type: none"> - General - Mixed Recycling - Food Waste

- Compostable waste
- Coffee Grinds
- Paper
- Confidential waste
- PPE Bins

Most of the lighting is LED with PIR's,. The toilets all have Air Sanitizing UV Lamps to kill bacteria on surfaces. Toner cartridges are returned to Xerox under contract. There are overflow / leak alarms in cleaners cupboards to detect leaks.

Bins checked all had correct waste in.

There are meeting rooms all with screens and microphones and cameras which will allow remote meetings to take place. There is an ongoing BMS upgrade to make heating and cooling system more efficient which is being carried out in conjunction with the Landlord.

The Heating and Cooling / Air con system is the responsibility of the landlord.

Documents to support site Tour

Fire Extinguishers serviced by Pyrotec 12/04/22

Fire Alarm – CBRE

Air Conditioning – CBRE / Landlord

Surface water CBRE/ Landlord.

Waste

The company have a Waste Management Plan at page 93 of the EMS Manual. It outlines where waste is going e.g. Coffee Grinds will turn into fuel, Composted, WEEE waste recycled, General waste is waste to energy, confidential waste saves 400 trees each year.

The company have the following waste streams with separate bins available throughout the premises.

Date	Mixed Recycling Weight Kg	Food Waste Weight Kg	Confidential Waste Weight Kg	General Waste Weight Kg	Compostable Waste Weight Kg	Coffee Waste Weight KG	Hazardous Waste Weight Kg
Jan	3,900.00	1,170	3,700.00	1,950.00	15	0	0
Feb	3,625.00	1,615	3,700.00	1,500.00	15	0	0
Mar	1,420.00	240	3,700.00	1,264.00	45	0	0
Apr	1,376.00	142	3,336.00	1,456.00	0	0	0
May	1,477.00	360	3,608.00	1,616.00	15	0	0
Jun	1,314.00	360	3,596.00	1,706.00	15	0	0
Jul	1,679.00	1080	3,700.00	1,698.00	15	0	0

Aug		1,13 4.00		480		3,800. 00		1,628. 00		15		75		0
Sep		1,46 2.00		360		3,700. 00		1,655. 00		0		0		572. 17
Oct														
Nov														
Dec														
Tot al	0	1738 7	0	580 7	-	32840	0	14473		135		75		572. 17
Percentage		24.5		8.2		46.2		20.4		0.2		0.1		0.8
														100 .0

Waste Carrier – Paper Round- CBDU114789 exp. 06/08/2025 – used for General, Food, Mixed recycling, Compostable, coffee and Paper. The following waste carriers are used:

Shredit – CBDU 51993- Confidential waste.

Olleco – Cooking Oil- CBDU-67998 exp. 24/11/24

MS Maintenance Solutions- Any engineering waste- CBDU99959 exp. 04/04/25

Simply washrooms- Air Fresheners, Sani Bins- CBDU606730- Exp. 14/10/24

Stone Computers- Computer Waste- CBDU 82742- Exp. 12/02/25

Trane- Air Con Contractors CBDU139963 Exp. 23/10/25

The following WTN's were sampled:

Stone Technology- 27/09/22- EWC 20 01 35 – Mixed IT Equipment 572 Kg

Olleco 19/08/22- 40 ltrs used cooking oil SIC 56290.

Paper Round annual duty of care WTN- exp 11/01/23- Food waste EWC 200108- 19500Kg (est.), Municipal waste EWC 20 03 01- 6240 Kg (est), Dry Mixed Recycling 200301- 9360 Kg (ext).

Emergency Preparedness

The company have a portal on the Intranet Emergency Planning which has links to Emergency Information, Disaster Recovery Contingency Plan June 2022, which identify individual roles within a Disaster recovery Team. The Plan is comprehensive with contact details internally and for relevant emergency services and other organisations. The company have back up servers in a different location. There is a further link to Emergency Information with further contact details. And links to CBRE Major Incident plan February 2022 V 5. The company have emergency phones on a different phone network. Sample e-mail regarding Emergency plans for possible 3 hour power outages 26/10/22 from Mark.

On floors 4-6 there are Evac Chairs.

The company have Fire Evacuation Procedure January 2021, and all fire wardens and first aid trained staff are listed and have carried out fire evacuation drills as follows:

16/03/22 – No issues recorded

26/08/22- No issues recorded

Energy Management

The company have a Carbon Management plan within the EMS Manual and monitor electricity and Gas usage as well as Air Travel as areas that can be addressed. The company uses a calculator from the Carbon Trust. The company has used 100% renewable energy since 2015. Meter readings are taken and carbon emissions calculated. The company objectives are clearly linked to monitoring of Energy and Water management. The data is collected building as a whole and then calculated for just Sullivan and Cromwell. These are presented to provide year on year comparisons. The current results are:

Electricity

2018	2019	2020	2021	2022
KgCO2e	KgCO2e	KgCO2e	KgCO2e	KgCO2e
55,865.51	50,499.58	59,880.51	55,404.72	50,195.17
50,150.42	46,154.29	56,477.87	42,103.72	46,568.40
57,946.20	54,796.96	57,902.86	54,818.16	53,517.95
55,747.51	74,307.34	57,386.56	42,556.64	51,650.77
47,137.20	77,116.53	61,057.23	46,903.05	56,832.33
61,464.40	74,566.36	52,005.83	53,194.55	58,618.14
40,485.81	84,474.15	53,693.50	59,442.58	62,147.58
62,950.80	73,271.26	66,569.00	59,063.70	58,434.89
56,676.40	67,564.32	59,205.01	59,513.16	53,188.28
54,158.17	65,775.19	56,211.95	56,158.02	
50,258.58	58,848.32	48,827.14	51,879.64	
47,045.46	58,736.94	49,814.92	50,767.22	
639,886.46	786,111.24	679,032.38	631,805.16	491,153.51

Gas

KgCO2e	KgCO2e	KgCO2e	KgCO2e	KgCO2e
2018	2019	2020	2021	2022
21,416.53	27,185.02	21,846.02	26,919.25	21,788.37
24,077.79	19,701.11	20,736.58	21,297.17	17,158.06
25,532.66	20,425.17	22,235.23	20,807.76	16,760.83
19,453.67	18,918.87	16,551.72	17,739.06	13,294.90
10,939.03	16,743.53	15,123.32	14,037.92	13,312.29
11,325.80	13,150.36	12,800.06	11,813.93	11,473.74
10,699.50	11,467.57	13,095.68	12,430.71	7,658.27
11,922.14	15,362.16	15,003.26	12,985.49	8,461.94
13,093.59	15,143.87	10,703.79	12,649.11	9,941.45
15,173.25	17,451.46	16,280.71	13,699.03	
18,170.30	22,060.59	15,672.06	18,457.52	
18,359.76	22,799.87	23,067.04	20,677.64	

200,164.02	220,409.58	203,115.47	203,514.59	119,849.85
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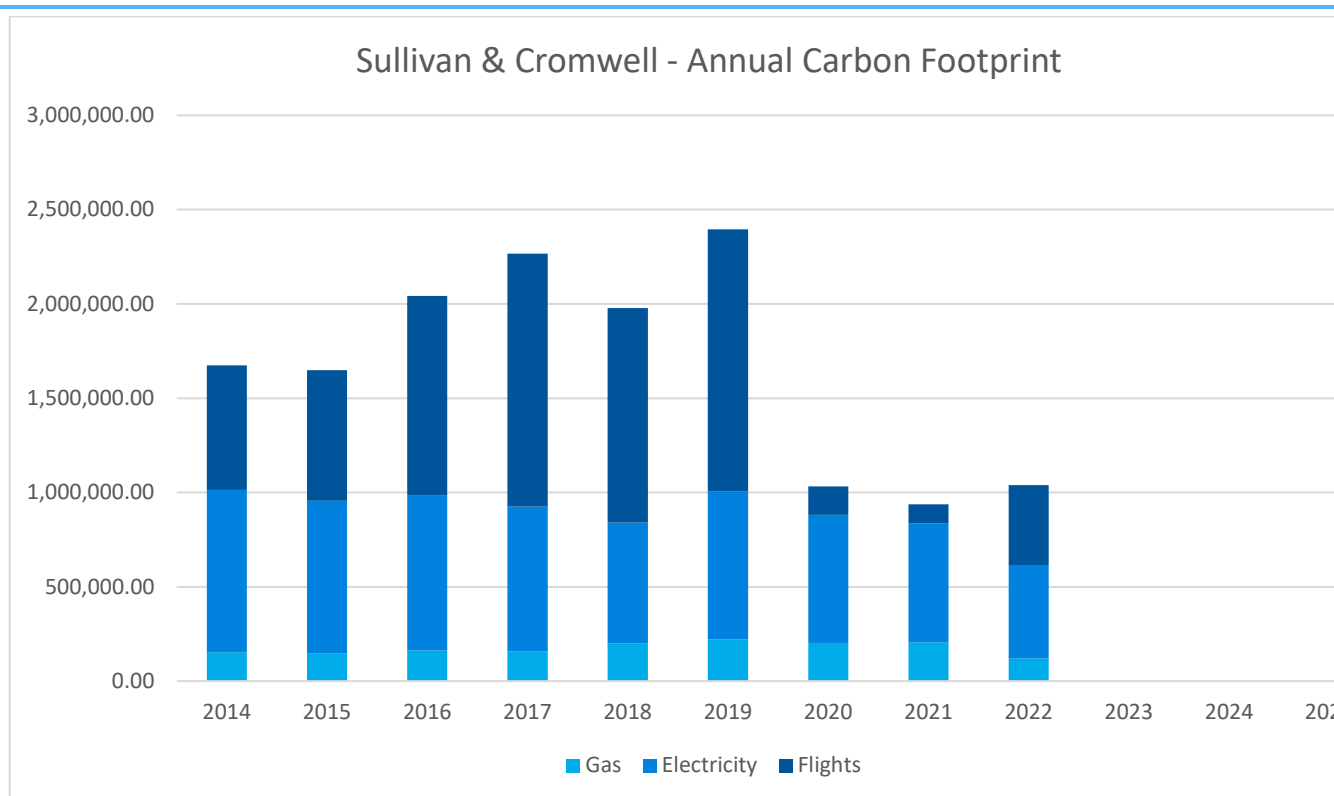
Combined Gas and Electricity

2018	2019	2020	2021	2022
		KgCO2e	KgCO2e	KgCO2e
77,282.04	77,684.60	81,726.53	47,336.51	71,983.54
74,228.21	65,855.40	77,214.45	72,064.39	63,726.46
83,478.86	75,222.13	80,138.09	75,625.92	70,278.78
75,201.18	93,226.21	73,938.28	60,295.70	64,945.67
58,076.23	93,860.06	76,180.55	60,940.97	70,144.62
72,790.20	87,716.72	64,805.89	65,008.48	70,091.88
51,185.31	95,941.72	66,789.18	71,873.29	69,805.85
74,872.94	88,633.42	81,572.26	72,049.19	66,896.83
69,769.99	82,708.19	69,908.80	72,162.27	63,129.73
69,331.42	83,226.65	72,492.66	69,857.05	-
68,428.88	80,908.91	64,499.20	70,337.16	-
65,405.22	81,536.81	72,881.96	71,444.86	-
840,050.48	1,006,520.82	882,147.85	808,995.79	611,003.36

Air Travel

2018	2019	2020	2021	2022
KgCO2e	KgCO2e	KgCO2e	KgCO2e	KgCO2e
47,926.48	100,739.35	31,830.35	0	2,371.54
191,452.79	243,292.65	53,570.59	0	21,910.71
91,583.88	125,142.86	60,632.57	0	8,480.44
63,141.20	112,797.67	3,062.19	0	35,537.67
139,044.64	176,144.78	0	1,443.83	155,387.79
134,482.11	77,412.88	291.76	9,620.20	27,451.47
39,061.45	29,347.98	1150.24	9,937.50	32,845.24
75,811.04	44,320.33	157.86	10,304.82	15,105.04
98,637.56	69,672.63	0	20,135.09	88,056.60
92,523.73	128,586.14	0	17,548.19	41,550.70
85,104.70	218,491.64	240.15	19,890.05	
79,197.90	63,824.88	0	12,625.54	
1,137,967.48	1,389,773.79	150,935.71	101,505.22	428,697.20

The annual carbon footprint in total is also calculated



	KgCO2e	KgCO2e	KgCO2e
	Gas	Electricity	Flights
2014	153,473.10	860,757.41	659,493.00
2015	148,368.53	808,414.34	692,107.00
2016	161,206.19	821,610.19	1,059,677.00
2017	156,366.79	768,760.84	1,342,208.29
2018	200,164.02	639,886.46	1,137,967.48
2019	220,409.58	786,111.24	1,389,773.79
2020	203,115.47	679,032.38	150,935.71
2021	203,514.59	631,805.16	101,505.22
2022	119,849.85	491,153.51	428,697.20
2023			
2024			
2025			
Total	1,566,468.12	6,487,531.53	6,962,364.69

This monitoring has led to the company objectives in order to continue to reduce their usage and carbon footprint.

Water Management

Water usage is also monitored and as a result a Water Management plan and objectives around rain water collection and installing automatic taps have been produced to check their viability. The company monitor water useage as follows:

2018	2019	2020	2021	2022

210.3		413.84		623.41
355.4		543.76	259.88	315.6
365.5	1,333.00	361.60	170.79	367.1
209.3	337.00	344.30	242.80	290.1
200.3	337.00	263.00		341.8
339.57	1357	261.20		
339.57		243.40	309.52	764.05
339.57		393.30	253.00	585.16
346.76	554.39			
305.00	720.13		596.10	
	532.13		223.90	
	487.05	1064.4	443.80	
3011270.00	5657700.00	3888800.00	2499790.00	3287220.00

There were some issues getting the data in the past but this has been addressed this year with the installation of water meters.

REVIEW & IMPROVEMENT

Process Function Clause

Evidence collected (interviews, documents...)

9 Internal Audit

9.2 of the Manual is relevant here.

The company have Audit Planner 2022. The audits cover all areas of the standard and the Waste Management Plan.

Internal audits are carried out by Mark Benson. All audits are signed off by the Administration Director The company have IMS Internal audit template. All Internal audits for 2022 have been completed on 08/09/22. The Internal Audit Report is detailed and no non conformances or observations were raised, there were comments noting how the company addresses all clauses the audit could be replicated if required.

The internal audit reports for 2020 and 2021 were also sampled. The 2021 audit raised one Non conformance which related to not having all the Waste Data – this was due to COVID and has now been addressed. There were no non conformances raised during 2020 Internal audit.

Management Review

Covered by SOP-10 Management Review

The company hold Management Review meetings at least annually and record the meetings on the Management Review Meeting template at appendix E of the EMS Manual. The most recent meeting took place on 10/04/22 and was attended by Janet Errington – Administration Director and Mark Benson – Facilities Manager

The minutes are comprehensive and show that all areas required by the standard are covered. Environmental objectives and performance in the areas of Energy and water usage are covered in details and in relation to Interested parties it was noted that monitoring of carbon emissions from the building cover the whole building and noted that it would be useful to break this down just for Sullivan and Cromwell,. Mark is actioning this. There will be another MRM in November 2022.

The Management Review meeting minutes 16/07/20, 16/10/20, 05/04/21 and 19/10/21 were also sampled and all comply with the requirements of the standard all actions have been actioned and also the minutes are comprehensive.

In addition to the MR meetings Mark and Janet meet on a bi weekly basis to discuss progress and any new developments sample the documentation for meeting on 08/11/22, covering EMS Manual SOP's, WI's and monitoring of energy and water usage.

10 Non Conformance Management

The company have received no complaints or Enforcement visits from the Environment Agency.

SOP-07 Non conformance Reporting is relevant here.

There are no non conformances raised this year. Or in 2020 but when a non conformance is raised these are recorded on the company's non conformance report and stored in the Management system.

The last NC's were raised in 2021:

Ref: 022- 18/06/21- Internal by Mark Benson- Related to First Mile Waste company not providing full details of waste types, weights etc.. collected- Route cause First Mile have reduced staffing- Action- once staff return to office data will be made available.

Ref: 023- Brodifacoum rodenticide baits in use around building by pest control company. – Remedial action removal of baits and replaced with placebo and improvement of deterrent measures and house keeping to make it less attractive to pests.

The Corrective and Preventative action has been recorded and signed off.

Continuous Improvement

The following improvements were noted:

The movement of the EMS to Net Docs improves accessibility and retrieveability of information contained within the EMS.

Carbon and water Reduction Plans

Introduction of the recycling of Coffee Grounds.

The Global Environmental Task Force is a positive in sharing ideas and moving forward.

New Battery Back ups in case of power outages

New Lighting Modules.

Recommendation

Overall the management system from the sample taken conforms with the requirements of ISO14001:2015 throughout the certification period. There have been one observations and Non conformances raised during the audit period. Which is testament to the maintenance of the management system. *Therefore recertification is recommended.*

The auditor would like to thank the company for its help and hospitality during the audit.

