



LANFORCE ENERGY ENVIRONMENTAL MANAGEMENT POLICY

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LANFORCE TRADING (PVT) LIMITED ENVIRONMENTAL MANAGEMENT POLICY

1. INTRODUCTION

Our Mission

Strive to prevent, eliminate, and reduce waste and pollution by improving operations and recycling/reusing materials whenever possible, conserve natural resources and comply with all statutory and regulatory requirements.

Our Vision

- Continuous improvement of environmental management, integration of environmental protection to all activities of the organisation;
- Use of environmentally sustainable technologies and practices for prevention of pollution (air, water and land) and the continual improvement in environmental performance;
- Strict compliance with legal requirements related to the management of chemical substances and proper waste disposal;
- Conserve natural resources and energy by minimising their consumption and wastage;
- Encourage car sharing to employees and guests to reduce CO2 emissions into the atmosphere;
- Building awareness of our work force, customers and vendors on environmental issues and responsibilities;
- Promote innovative thinking in the development and implementation of new ideas relating to the environmental integrity;
- Measure performance using regular comprehensive audits;
- Establish environmental targets and objectives to improve performance.

The environmental policy shall be communicated to all employees and made available to all interested parties.

2. Environmental Risk Management

Environmental risk management is important to Lanforce because we seek to understand and to mitigate significant risks that may confront us or our clients. Lanforce will encourage employees to assess and appropriately mitigate material environmental risks in their business. Our due diligence and risk management processes are designed to give appropriate attention to significant environmental issues.

3. Personnel Key Responsibilities

The objective of this requirement is to identify and set out clear roles and responsibilities of all employees to avoid repetition of activities on environmental management.

Directors

Endorse and support the Environmental Management plans, communicate and ensure commitment.

Managers

- Ensuring that employees are operating in an environmentally friendly and in a safe and healthy manner;
- Provide necessary equipment and resources for implementation of Environmental Health Safety (EHS) & Social Management Systems (SMS);
- Delegate responsibility to operations managers at each site for EHS&SMS implementation.

HR Manager

- Responsible to implement and monitor EHS&SMS policies and programs;
- Interface with regulatory bodies.
- Ensure that all reasonable steps are taken to prevent accidents;
- Waste minimisation and proper management through adopted plans and procedures;
 - Report any major environmental incidents that may have an impact on the environment;
 - Provide employees and contractors with the relevant environmental instructions and guidance;
- Hazardous material storage, handling and transportation;
- Develop employee participation and awareness;
- Manage the site sustainability program;
- Ensure Materials Safety Data Sheets are provided for all hazardous materials delivered to workplace;

- Ensuring employees are trained in all issues relating to occupational health, safety and environmental issues.

OSHE Representative

- Regularly inspect and monitor all activities for adherence to proper environment management;
- Ensure that all equipment used is properly serviced and that all precautions are in place to prevent the likelihood of an environmental incident occurring.
- Regular reporting on site environmental management
- Attend regular OHSE Committee meetings.

All Employees

Report any incidents/accidents on environmental misconduct.

4. Pollution Prevention

Sewer Effluents

Sewer effluents shall lead to Municipal for treatment and shall conform to the standards of laws. Pipes leading to sewer tanks shall be inspected from time to time to ensure there are no percolation and no ground water contamination from the pipes.

Air Pollution

The emission level of pollutants shall adhere to standards of Zimbabwe.

Control measures will be taken to control the fugitive dust emissions into the atmosphere.

Noise Pollution

Some of the activities involved in the operations may result in high noise levels surrounding the area. Measures to control noise from the operations shall be put in place e.g., proper inspection

of equipment, plant and machinery switched off when not in use and regular checks of sound levels around the area, and use of earmuffs/ear plugs.

Discharge of Pollutants (REF, Zimbabwe Environmental Management Act)

(1). No person shall discharge or emit any pollutant into environment, except in accordance with this Act.

(2). It shall be the duty of person to prevent the discharge or emission of any. pollutant into the environment otherwise than in accordance with this Act and to comply with such general or specific directions of the Minister or Director for preventing, minimizing or cleaning up, removing or disposing of any pollutant discharged or emitted into the environment

(3) Any person who discharges or emits any pollutant into the environment otherwise than in accordance with this Act may be imprisoned or fined or both and be required by the Minister to clean up, remove or dispose of the pollutant in such manner and within such period as the Minister shall direct.

Prohibition of Pollutants (Ref Environmental Management Act)

No person shall pollute or peat or cause any other person to pollute the environment

Climate Change

Lanforce recognises that the climate is changing and that emissions from human activity are one of the leading factors requiring immediate attention. We are aware of the benefits of reducing greenhouse gas emissions. Also, we are aware that many countries have policies regulating greenhouse gas emissions. As such our activities aim at investing in energy efficiency, and to lower carbon-based energy consumption.

We believe that the best way to reduce emissions is through a mix of technology changes, encouraging the transfer of clean energy technologies, and improved energy efficiency.

Waste Management

Lanforce shall provide the proper measures for waste handling, storage, transportation and disposal during the Operation.

It is the policy of our Company to do what is necessary all the time to comply with the legislation related to waste management and to strive for the improvement of site environmental and hygienic conditions in all areas under its control.

This is going to be achieved
by:

- Avoiding or minimising waste;
- Re-use / re-cycling waste materials where possible;
- Installing appropriate facilities for segregation of waste classes;
- Diverting waste to other sites for beneficial use;
- Adopting better management practices;
 - Waste segregation;
 - Sorting;
 - Reduction.

Waste Classification

All waste shall be identified and stored in different labelled bins at the site allocated area. Only then can waste be transported for easy disposal. Training shall be given for proper handling of the waste to designated disposal area.

Hazardous Waste

Hazardous waste shares properties of a hazardous material such as toxicity, reactivity and corrosiveness or any physical, chemical or biological state that may cause harm to human health or the environment if improperly handled, stored or disposed of. Workers handling hazardous waste shall be required to be provided with the plan that outlines a plan for proper transportation and disposal of the waste, required Personal Protective Equipment (gloves, gum boots/safety boots, face masks), and steps to follow in case of the chemicals spill over. Worker's handling, transporting hazardous waste shall be given proper training of how to handle hazardous waste.

A licence pertaining to waste shall be obtained as stated in the Zimbabwe Environmental Management Act 2002 No 20.27 section 71 subsection 1 says "Any person who intends to transport wastes within Zimbabwe, or to operate a wastes disposal site or plant or to generate hazardous waste of a prescribed type or quantity, shall prior to doing so, apply to the Board for the grant of an appropriate waste licence".

Transportation of Waste

The regular movement of waste, both within sites and beyond site boundaries for disposal, will be required. This transport will be provided by trained personnel only and will be conducted as per the site waste management plan/procedures.

Authorised third parties can enter contract in order to transport and dump waste accordingly as regards the local laws

Generated Waste

Most waste generated by Lanforce is non-hazardous and hazardous packaging material

Office – hazardous waste produced at the office is toner, fluorescent tubes (lights) and cartridge and non-hazardous waste include paper, plastics and domestic waste.

Warehouse – Waste generated at the warehouse is non-hazardous i.e., wood pallets, plastics and used PPE and hazardous packaging material.

Workshop – Waste generated at the workshop area includes used grinding disks, plastics and metals.

Field Digesters – Waste generated from digesters includes Slurry

Kitchen- Waste generated from the kitchen includes plastics, household waste, cartons and paper.

General Waste Disposal Methods

Our Company will take steps to minimize waste throughout our premises. We will conduct waste stream audits at our larger facilities to identify areas needing improvement and initiate efforts to reduce waste volumes. We will endeavour to increase recycling opportunities and volumes where possible and seek to use low-impact product disposal methods for our waste.

Hazardous Waste Disposal

In-order to ensure that hazardous waste reaches its correct destination a system will be implemented to monitor where the waste is generated, the person responsible for disposal and the destination of the waste.

Records shall be kept from where waste is generated, waste name and its final disposal at a licensed waste disposal facility.

Waste Monitoring

To monitor waste, the company shall make sure that there is:

- Visual inspection of waste collection and disposal;
- Visual inspection of waste storage;
- Regularly checking of waste slips/records;
- Visual inspection of hazardous materials handling and storage areas.

Hazardous Materials

Hazardous products shall be separated from non-hazardous products. All hazardous products shall be stored properly as per procedures to prevent or control accident release to air, water and soil. Material Safety Data Sheets shall be made available to give guidance on proper storage, handling and transportation of the hazardous chemicals.

Small/Non-Hazardous Spill

Spills that do not endanger workers in the immediate area may be cleaned up by personnel who have been trained and are properly equipped to handle the situation. The person cleaning must be aware of;

- (1) The hazards of the chemical(s) involved.
- (2) The amount of the chemical(s) spilled.

- (3) Know possible spill locations.
- (4) Have cleaning materials or kits.

Large/Hazardous Spill

If the spill is large, if the chemical is not easily identified, or if the chemical is extremely hazardous, then:

- Alert/notify personnel from affected and adjacent areas.
- If possible, use sign and/or barricade to isolate the area.
- Evacuate the area and close the door.
- If the release cannot be contained in the area, activate fire alarm.
- Safety department will send officers and will also summon a hazardous materials response team from the Occupational Environmental Health and Safety Office.
- Evacuate the room or building
- When responders arrive, provide detailed information on the spill or release.
- Do not re-enter the building until authorized to do so by emergency response personnel.

Storage and Handling of Hazardous Substances

Potential causes of chemical leakage and spillage or hazards to workers shall be properly analysed and measures put in place to control accidents; Precautions shall be taken to minimise the risk of spillage of pollutants e.g., fuel, and other chemicals and copies of MSDS for all hazardous materials shall be maintained on site.

Chemicals will be stored in a well-planned and coordinated manner. All Hazardous Material Handlers must understand and follow the elements of hazardous material storage practices listed below:

- o Store all hazardous materials in a manner to minimize exposure to staff and visitors.
- o Evaluate hazardous materials on an annual basis to determine their usability and need for disposal.
- o Review the Material Safety Data Sheet (MSDS) to confirm special storage information.
- o Do not store incompatible materials together. o Store flammable materials in flammable storage cabinets.

o Do not store acids and bases, due to their corrosive nature, within the flammable storage cabinets or in other areas immediately next to combustible, flammable, or other hazardous materials that violently react with acids or bases.

o Do not store hazardous materials in alphabetical order unless they have already been separated into their appropriate hazard classification. o Dispose of unwanted or unusable chemicals promptly in the defined manner.

Personal Protective Equipment

Appropriate Personal Protective Equipment shall be made available for hazardous material handlers to ensure they are working safely. PPE includes:

- Gloves;
- Work suits;
- Safety boots/Gum boots;
- Hard hats;
- Mask/respirator.

Environmental Emergency

Procedures Environmental incidents result in environmental harm during the operations of the Companies. Environmental emergency planning shall meet any emergency arising due to fire, explosion, spillage and leakage of gas. Fire-fighting equipment and other safety appliances shall be kept ready for use during emergency including natural disasters.

Operations

Lanforce believe that a meaningful commitment to protecting the environment must begin with a commitment to conduct our internal operations in a manner consistent with this Policy.

Energy and Greenhouse Gas Emissions

We will strive to educate and engage our employees on reducing the carbon emissions generated by their work-related transportation, undertaking initiatives such as encouraging the use of energy efficient vehicles and, discouraging unnecessary travel and by promoting technological alternatives to travel such as video conferencing, telecommuting.

Green Building

Wherever practical, we will enhance standards for buildings that Lanforce own to incorporate specifications on location, design, energy efficiency, air quality and materials used, with the goal of enabling environmental best practice.

Environmental Training

The Company shall make sure that its employees and subcontracted companies are trained in environmental aspects. Each person will be made aware and understand their duties and responsibilities. Training shall be given to employees on general environmental risks, practices and other related aspects.

Topics shall include but not limited to the following:

Dust and air quality		Material storage, handling and housekeeping
MSDS	Transportation	Proper Disposal
Cement and concrete	Required PPE	Hazardous Waste
Waste hierarchy	Surface Water	Fire Fighting
Fuel and oil	Energy & Water use	Bad Habits
Spill control	Sewage pipe blockage	Green House gases
Segregation of waste	Recycle, Reuse, Reduce	Work permits
Noise and vibration	Safety signs	Chemical Inventory

Legal and Regulatory Requirements

This aims to ensure that the information needed to carry out the processes and activities in a safe and healthy manner is current, accurate available and understandable by all personnel involved in the activities. Lanforce shall make sure forms of controlling and filling Health, Safety and Environmental Management System are to make sure the information is available and accessible for inspections, audits, or checking. For Lanforce to be fully compliant in this regard, legal and regulatory Health, Safety and Environmental requirements will be applicable in the preparation of mandatory Health and Safety Programs.

Safety Committee and Safety Meeting

The Safety Committee shall be appointed to regularly monitor on the performance of the health, safety and environmental, and meetings shall be conducted to discuss on where to

improve and where the Companies are compliant in all areas i.e., office, warehouse, shops and factories.

Risk Assessment for Tasks

All hazards, including physical, chemical and biological, shall be properly assessed in the workplaces i.e., office, warehouse, shops and factory in the activities being carried out on site. The following are some of the hazards that might cause harm in a workplace: fire runoff; chemicals; vehicles; dust; poor lighting; fumes; and lack of sufficient ventilation. People who might be at risk include employees, contractors visiting the site for deliveries or ordering products, customers in the factory/shops and visitors. Risks from identified hazards shall be properly evaluated and control measures shall be put in place to control the accidents that may rise if the risks are not controlled.