



# INTERNAL AUDIT REPORT

Environmental Management System  
FIA 2-Star Environmental Accreditation  
Full system Audit

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Organisation: Jota Group  
Date & Time: 12/11/2024  
Audit Title (scope): FIA 2-Star Environmental Accreditation Full system - Part 1 Core  
Reference Standards: FIA 2-Star Environmental Accreditation  
Reference Procedures: All  
Audit Location: Stubby Grove Farm, Bells Yew, Green TN3 9BT  
Remote  
Auditor Name: Oliver Leaney (External Environmental Consultant)  
Auditees: Tim Rocker (Sustainability Manager)

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### Introduction and Objectives of this Audit:

This audit aims to provide an overview of the management processes and documentation, confirming their presence and highlighting areas requiring attention. It is, in effect, an 'Integrated Management System Audit'.

This audit will systematically sample requirements of the applicable standards, reviewing documented information and current practices and records. This audit does not intend to investigate each subject thoroughly, in-depth, but rather to carry out an overall 'full review', highlighting relative compliance to the standard and indicating potential weaker areas for ongoing development.

NB: This audit is conducted against the requirements of:

- FIA 2-Star Environmental Accreditation

#### Key

	Best Practice		Observation / Opportunity for Improvement		Nonconformity
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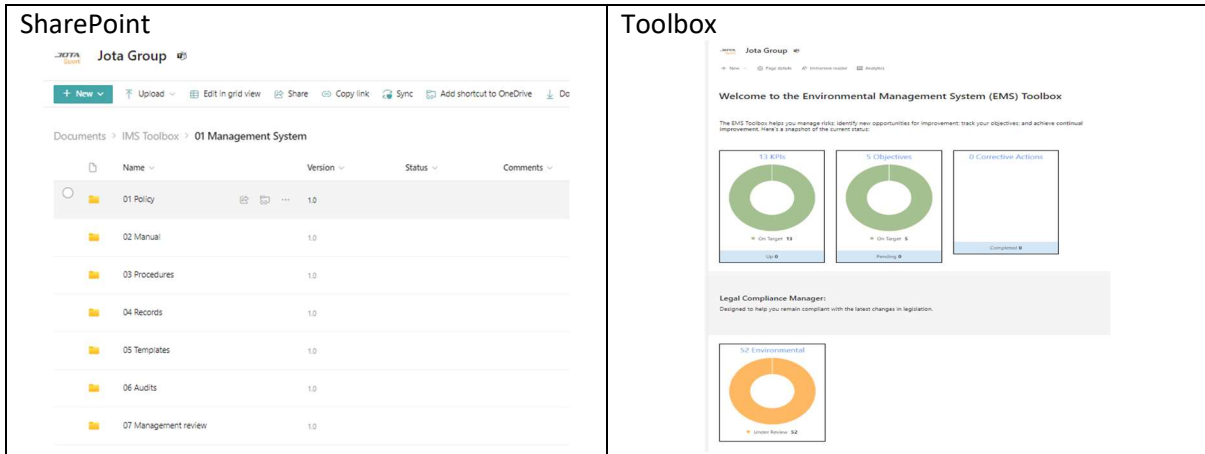
This audit is based upon discussion, observation, and sampling of documentation in the time available; therefore, nonconformities may exist that have not been identified.

## Table of Findings

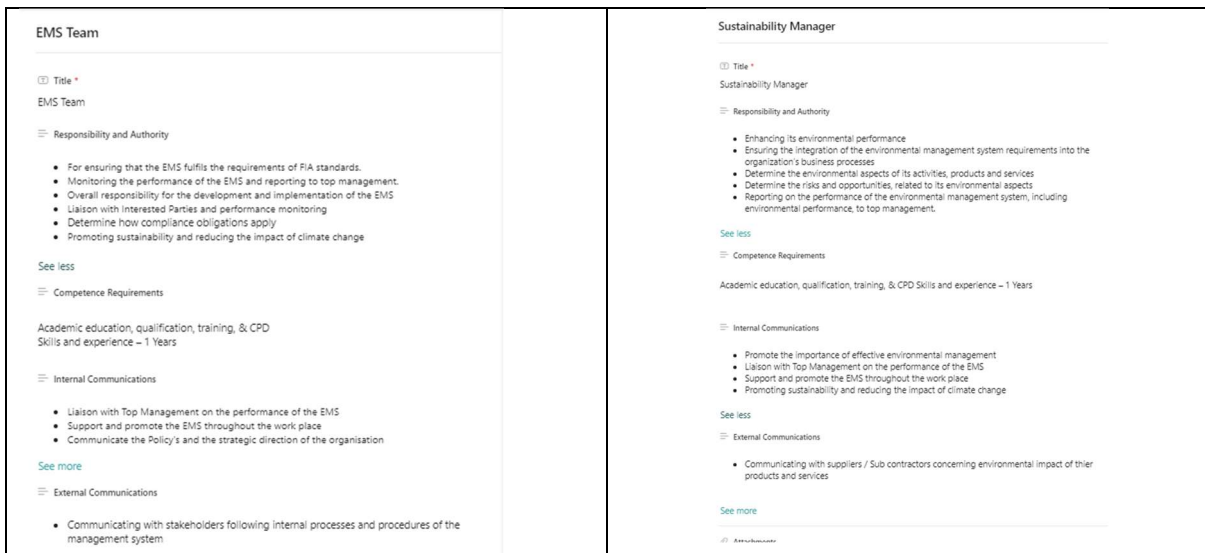
OFI—The auditor would recommend updating the status report. Best practice would require a quartile review. It is advised to hold a Q3/4 review on each objective. The auditor will want to see the status, progress or not, and what you have been / are doing. ....	7
OFI—The auditor would advise the organisation to be more specific about how it is going to reduce its carbon footprint. Transportation greatly impacts the environment, and its industry is based on the fastest combustion engine using fossil fuels. The auditor would want to see more specifications for the objective with a five-year goal, considering less carbon-intensive alternatives, e.g. moving into Formula E.....	7
OFI – The auditor did not evidence any controls in communicating the EMS to Temporary staff. It may be an opportunity to review this. ....	9
OFI—This section of the audit (1-10) would be an opportunity to review the KPIs for the relevant standard environmental control areas. Information from the GAP analysis identifies a comprehensive list of questions that these KPIs should answer. ....	11
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# 1. The Organisation and its Senior Management demonstrate a clear commitment to Environmental Management

The auditor has been invited to the organisation management system, which is located on an online platform called Microsoft Teams. The management system consists of two areas:  
 SharePoint – Processes and procedures  
 Toolbox – Interactive risk assessment software that includes an audit program, legal register, objectives, and corrective action log.



The auditor has sampled the roles and responsibilities section of the Toolbox, where it has been evidenced that a Sustainability Manager & the EMS Team have been communicated:



The Policy (version 1.6) has been identified in the Management system and is in line with the ISO14001:2025 requirements. Director Sam Hignett signed it on 07/11/2024, which demonstrates leadership commitment.



**ENVIRONMENTAL POLICY**

- This Policy Statement outlines our endorsement and approach to environmental management within JOTA Group and intends to communicate to all personnel the overall aim of our Environmental Management System.
- At JOTA Group, we regard environmental issues to be especially important, and we shall aim to limit the environmental impact that our business has wherever feasible possible. For regulatory and Corporate Social Responsibility reasons, we shall:
- Commit to environmental protection and prevention of pollution and shall fulfil our applicable legal/ compliance obligations.
- Apply best practices and standards to meet JOTA Group's objectives and to assist clients in meeting their objectives and targets.
- Maintain awareness of the aspects of our operations that can impact the environment (e.g., use of electricity, sustainable purchasing choices, waste production, etc).
- Endeavour to influence others outside of our organisation, especially if there is an opportunity for substitution to less environmentally damaging options.

Considering our significant environmental aspects and the principles laid out by this environmental policy statement, we define and monitor environmental objectives and targets through the management processes, against which continual improvement can be demonstrated.  
I have prepared this statement as my commitment to environmental management at JOTA Group. This message shall be communicated and understood throughout the company, and I expect all persons working on our behalf to share these values.  
This policy statement shall be made available to the public upon request and subject to annual review to ensure its continued suitability.

This policy statement has been approved and authorised by the following:  
**Name:** Sam Hignett  
**Position:** Director  
**Date:** 07.11.2024  
**Signature:**

ENVIRONMENTAL POLICY  
See Statement for the latest version. This document is uncontrolled if printed or downloaded. Page 1 of 1

Environmental responsibilities have been communicated to the leadership team through the roles and responsibilities section of the Toolbox. Below is a sample taken that describes their responsibilities:

**Leadership Team**

Title \*

Leadership Team

Responsibility and Authority

- Overall responsibility for service development
- Liaison with the management team and performance monitoring
- Delivering EMS Training and Awareness
- Liaising and coordinating other individuals who hold specific duties within the EMS. Ensuring EMS policies are understood and followed by employees
- Liaison with the management team and performance monitoring
- Promoting a security focus

See less

Competence Requirements

Academic education, qualification, training, & CPD Skills and experience – 1 Years

Internal Communications

- To ensure that all employees are aware of the Environment Policy, the objectives, the success achieved against the targets set and the role they play in helping achieve them.
- Support and promote the EMS throughout the work place
- Communicate the support of the EMS Manager

See more

The management system's scope can be identified in the manual (version 1); the current scope is “The engineering, build, preparation and running of racing cars for competitive sport.”

Championship.

**THE SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM**

This document sets out the scope of the EMS of JOTA Group as follows:

**Organisation:** JOTA Group

**Scope:** The engineering, build, preparation and running of racing cars for competitive sport.

**Location:** Stubby Grove Farm, Bells Yew, Green TN3 9BT

**Standard:** FIA 2-Star Environmental Accreditation

## 2. Clearly defined Environmental Objectives and Targets are established

The auditor has sampled the EMS Procedures, which is currently on version 1.2. This document communicates how the organisation maintains their environmental objectives:

### OBJECTIVES

As outlined within the policy statements and referred to in the previous chapter, the management team routinely defines and monitors objectives for reduced Environmental Impact.

Objectives shall be in keeping with the 'SMARTER' principle:

- S Specific** - The definition of objectives must clearly describe the desired improvement.
- M Measurable** - It must be possible to verify achievement via evidence or numerically.
- A Agreed** - The management team shall review & approve the objectives.
- R Realistic** - There should not be a reason why the objective cannot be achieved.
- T Timely** - It shall be defined to what programme or timeframe the objective applies.
- E Evaluated** - Available evidence should allow for decisions on the level of success achieved.
- R Reviewed** - There will be a formal process for the review and setting of objectives.

The EMS Team shall monitor the objectives and relative performance against them through periodic meetings, monitoring of data and/or through management meetings.

### DOCUMENTED INFORMATION

The EMS is the collective term used to describe occupational activities (processes) and written information to control and reflect this (policies, manuals, procedures, arrangements, forms, etc.).

For any risks associated with a high score, an objective should be set to monitor and reduce the risk. Below is the risk acceptance RAG system:

#### RISK ACCEPTANCE

The Risk Rating and Acceptance criteria are determined by:

Score	Rating	Risks	Opportunities
1 - 4	Low	Acceptable; no treatment required.	Not worth pursuing; no action is required
5 - 11	Medium	Risk treatment to be considered.	Opportunity to be considered.
12- 16	High	Unacceptable, Risk Treatment Plan required.	Acceptable: Raise a SMART objective to pursue the opportunity or a Significant Aspect.

Risks with the highest impact rating are prioritised first.

Objectives have been identified on the Toolbox. These areas are:

Title	Payback	Aims	Target	Agreed Plan	Start Date	Target Date	Agreed	Assigned to	Status	Related KPIs	Reviewed	Status report
Reduce carbon footprint	Long	Reduce energy consumption in all activities and along the product / service lifecycle. Reduce carbon footprint.	There is a commitment to reduction of carbon footprint in all areas relating to associated significant aspects.	Review opportunities for carbon saving.	01/01/2024	31/12/2024	Yes	Leadership Team	On Target	Carbon Footprint, Energy consumption and efficiency, Significant aspects	04/11/2024	2024 Review Q4
Improve internal training program	Long	Improve competences and training.	The Company is committed to a training policy that ensures all personnel have the necessary competence and training to perform their duties.	Set individual objectives through staff appraisals. Record the results in a Training Matrix. Complete annual reviews.	01/01/2024	31/12/2024	Yes	HR Manager	On Target	Employee Competency Management Review	04/11/2024	Objective uploaded to toolbox.
Improve infrastructure	Long	Improve product or process efficiency, infrastructure improvements. Reduce energy consumption in all activities and along the product / service lifecycle.	To review resources to ensure the most effective controls are in place for environmental management and aid improvements in sustainability.	Review resources available. Complete management review. Agree budget for infrastructure improvements.	01/01/2024	31/12/2024	Yes	Team Manager	On Target	Management Review Significant aspects	04/11/2024	Objective uploaded to toolbox.
Zero waste to landfill and increase recycling	Medium	Reduce waste and increase recycling.	Zero landfill, all recyclable materials segregated and recycled.	100% segregation of recyclable waste. Remainder to waste energy recovery.	01/01/2024	31/12/2024	Yes	Leadership Team	On Target	Waste and Recycling Significant aspects	04/11/2024	Objective uploaded to toolbox.
Implement Environmental Management System	Short	Increase the maturity of the EMS and its value to the organisation.	Compliant with PA 2 Bar Requirements	Project plan to implement EMS with AISS.	01/01/2024	31/12/2024	Yes	Sustainability Manager	On Target	Certifications, Corrective Actions, Employee Competency, Internal Audits, Legal Compliance, Management Review, Maturity of controls.	04/11/2024	Objective uploaded to toolbox.

OFI—The auditor would recommend updating the status report. Best practice would require a quartile review. It is advised to hold a Q3/4 review on each objective. The auditor will want to see the status, progress or not, and what you have been / are doing.

The auditor has reviewed the Environmental Aspects register, and the high-risk areas have objectives associated with them:

Risk Type	Aspect	Life Cycle	Aspect Type	Operating Co.	Title	Details	Controls	Probability	Impact	Risk Rating	Trend	Aims	Evaluation/Treatment	Risk Stage
Transportation-delivery	Transport Carbon	Normal	Use of company vehicles	Local air quality, global warming, consumption of non-re...	Local air quality, global warming, consumption of non-re...	Energy Management Sustainable Procurement Equipment Maintenance	5	5	25	↔ Level	Promote sustainable travel options Reduce carbon footprint	See Objective for risk treatment...	Treatment	
Transportation-delivery	Transport Carbon Procurement	Normal	Transport of materials to site	Local air quality, global warming, consumption of non-re...	Local air quality, global warming, consumption of non-re...	Approved Supplier Process Monitoring and Measuring Energy Management Sustainable Procurement	5	5	25	↔ Level	Promote sustainable travel options Reduce carbon footprint Promote sustainable procurement	See Objective for risk treatment...	Treatment	
Transportation-delivery	Transport Carbon	Normal	Transport of people and equipment to and from site meetings	Local air quality, global warming, consumption of non-re...	Local air quality, global warming, consumption of non-re...	Energy Management Monitoring and Measuring Sustainable Procurement	5	5	25	↔ Level	Promote sustainable travel options Reduce carbon footprint	See Objective for risk treatment...	Treatment	
Final disposal	Waste	Normal	Generation of factory and office waste	Disposal of hazardous and non-hazardous waste	Disposal of hazardous and non-hazardous waste	Audit Waste Management Documented Procedures	5	5	25	↔ Level	Reduce waste and increase recycling	See Objective for risk treatment...	Treatment	
Production	Energy Carbon Air	Normal	Use of gas for domestic boiler	Consumption of non-renewable resource and Local air q...	Consumption of non-renewable resource and Local air q...	Energy Management Equipment Maintenance	5	5	25	↔ Level	Reduce carbon footprint Reduce energy consumption in all activities	See Objective for risk treatment...	Treatment	
Production	Energy Carbon Air	Normal	Use of oil-powered boiler for heating	Consumption of non-renewable resource, Local air quali...	Consumption of non-renewable resource, Local air quali...	Energy Management Equipment Maintenance	5	5	25	↔ Level	Reduce carbon footprint Reduce energy consumption in all activities	See Objective for risk treatment...	Treatment	
Production	Procurement	Normal	Consumption of materials	Consumption of resources	Consumption of resources	Approved Supplier Process Compliance Management Operational Processes Documented Procedures	5	5	25	↔ Level	Promote sustainable procurement	Accept the Risk, Monitor through...	Monitoring	
Production	Ground/Water	Normal	Generation of effluent and storage in IMRC tank	Generation of waste water harmful to the environment	Generation of waste water harmful to the environment	Equipment Maintenance Monitoring and Measuring	5	5	25	↔ Level	Prevention of pollution	Accept the Risk, Maintain existin...	Monitoring	
Production	Waste	Normal	Disposal of end of life items (eg. ink, tyres)	Generation of waste items to be returned to the manufa...	Generation of waste items to be returned to the manufa...	Waste Management	5	5	25	↔ Level	Reduce waste and increase recycling	Accept the Risk, Monitor through...	Monitoring	

OFI—The auditor would advise the organisation to be more specific about how it is going to reduce its carbon footprint. Transportation greatly impacts the environment, and its industry is based on the fastest combustion engine using fossil fuels. The auditor would want to see more specifications for the objective with a five-year goal, considering less carbon-intensive alternatives, e.g. moving into Formula E.

### 3. Communication, Training and Consultation on Environmental Issues are carried out

The auditor has sampled the EMS Procedures, currently on version 1.2. This communicates the following areas

- Training and Awareness
- Suppliers
- Internal and external communication (inc complaints)

## Training & Awareness



### TRAINING

#### TRAINING NEEDS ASSESSMENT

All new members of staff and those whose roles and responsibilities change (promoted or transferred) will receive the necessary induction and training for them to do their jobs effectively, and review meetings will be held at three and/or six months' service to monitor progress.

Every employee will have an annual appraisal or, in some cases, a biannual, known as a Performance Development Plan (PDP) meeting, at which performance against previously set business/work and Training and Development objectives will be reviewed. Moreover, individual objectives will be agreed upon for the following year, and relevant potential career paths and any associated elements will be agreed upon.

On a regular basis, a representative of the HR department will have discussions with Directors to identify and prioritise any other training that may be required to meet business needs.

#### TRAINING DELIVERY AND EVALUATION

Training is programmed by Human Resources and delivered accordingly. The attendance records and a copy of the certificates are archived in the employee process. The Training/Skills Matrix is updated, if applicable.

The evaluation of the effectiveness of the training depends on the learning objectives.

Learning objectives	Examples of evaluation methods
<b>Task-based</b>	Observation of employees performing the tasks (e.g., operating a machine, using software, etc.). Self-evaluation questionnaire.
<b>Knowledge-based</b>	Evaluation questionnaire. Self-evaluation questionnaire. Indicators' monitoring (e.g., productivity, number of non-conformities, completion of new projects, etc.)
<b>Behaviour-based</b>	Indicators' monitoring (e.g., team performance, etc.) Self-evaluation questionnaire. Appraisals.

If the training evaluation conclusion is that it was not effective, a new training course might be planned for the employee or group of employees.

### RECRUITMENT AND INDUCTION

#### RECRUITMENT

The initial meeting between the Group Managing Director and the Director of the area that needs to recruit to establish the competences and skills of a potential applicant. The recruitment process can be done by an external company or directly by JUTA Group. Where the latter is the case, the Group Managing Director will handle the full recruitment procedure. Should the recruitment be outsourced, a Job Specification will be issued to a recruitment agency.



A review of the candidates' CVs will be conducted by the Group Managing Director, who will decide based upon the suitability of the offering role. The suitable candidate (once the decision has been made) will go through a face-to-face interview with the Group Managing Director.

The interview stages are not documented as the management team feels that notetaking can prevent free-flow communication and hinder responses. Applicants' CVs are held and referred to throughout the process.

When the process is outsourced, the selected recruitment agency will be advised of applicant feedback, and an offer will be made to the successful applicant via the agency.

Where appropriate, the candidate must send through copies of their education, relevant certificates, driving licence (if relevant), and a copy of their contract with passport. Once all this information has been collected, JUTA Group will officially accept the application.

#### INDUCTION

Personal Development starts with a relevant induction for all staff, which includes short- and medium-term objectives being agreed upon and training being identified. This enables employees to carry out their new duties at an early stage.

Prior to the commencement of work, any individual working on behalf of JUTA Group will be subject to a comprehensive induction process, which will be documented and kept on their employee file.

The employee file also includes key records such as CVs, certificates (where applicable), etc. **Formal training may be required to meet certain competencies needed, be authorised to carry out certain tasks, or operate specific equipment and undertake tests or software. The line manager will identify training requirements and plan for these as appropriate.**

All employees will be made aware of the EMS, and records will be maintained.

The awareness covers:

- The Policy.
- The Objectives.
- Relevant Documented Procedures.
- Role and Responsibilities associated with the role.

Assessments of new employees are done throughout their induction period for suitability by the Director.

All new members of staff and those whose roles and responsibilities change will receive the necessary induction and training for them to do their jobs effectively, and review meetings will be held at three and/or six months' service to monitor progress.

**It is especially acknowledged that induction and the identification of areas for Training and Development are equally important for those being promoted and transferred into new roles or given new responsibilities.**

## Suppliers

Action".

### SUPPLIERS

#### SCOPE

JUTA Group ensures that the performance of suppliers of products and services does not compromise the Environmental performance.

To achieve that, it determines the procedures for the initial selection and continual evaluation of the performance of these suppliers.

The following types of products and services suppliers are included in this procedure:

- Environmental monitoring services.
- Others considered as relevant.

#### EXTERNAL PROVIDERS' INITIAL SELECTION AND CONTINUOUS EVALUATION

Potential providers must undergo a thorough evaluation before they can begin working with JUTA Group, based on several important criteria:

- **Conformity to our Responsible Procurement Policy:** Providers must align with our standards for social, environmental, and ethical responsibility.
- **Certification & Environmental Practices:** Providers should have certifications for management systems and demonstrate sustainable practices through documented policies and procedures.
- **Compliance:** The service or product must meet the specified requirements.
- **Price:** Costs are evaluated alongside other factors to ensure value.
- **Reputation:** Providers with a solid track record are preferred.

The approval process is managed by the department responsible for the purchase, and approved suppliers are added to the Approved Supplier List. In cases where procurement is centralised, supplier selection is based on information from the department using the service or product. For long-standing suppliers without a documented selection process, an initial assessment is conducted before their continued use.

#### CONTINUAL EVALUATION

Suppliers will be assessed on a job-per-job basis after Supplier Approval has been granted. Records of these assessments are not maintained unless an issue has occurred. In this case, communication with the supplier will be kept for future performance evaluation.



At least once per year, the supplier performance data is collated, and the existing suppliers are evaluated.

The criteria for evaluation are:

- Meet JUTA Group's requirements.
- Quality of work or service provided.
- Responsiveness to complaints.
- Quality of reports prepared.
- Deliveries on time.

Each supplier is evaluated on a scale from 1 to 10, with 10 being the best performance. The score ratio is based on a score of 10 being the best and one being the worst. If a supplier's performance drops and stays below a score of 7, a performance review is carried out by the Managing Director, which can lead to the supplier being removed from the list. Alternatively, JUTA Group will agree on improvements that the supplier needs to put in place and will re-assess the supplier's performance after an agreed time has lapsed.

Providers that are able to provide services or products that meet more requirements have a higher evaluation and, therefore, are in a better position to supply.

The evaluation is recorded in the Approved Suppliers' List.

### EMERGENCY PREPAREDNESS

#### INTRODUCTION

## Internal & external communications

### COMMUNICATION

#### MANAGEMENT MEETINGS

Management meetings are held principally on a three monthly basis. These meetings are between Top Management and JUTA Group employees. These meetings act as an opportunity to highlight key issues (including corrective and preventative action) and monitor project progress. These meetings have documented structure, but minutes are not conducted as it is felt that it would hinder the flow of the meeting.

When significant news or changes to the company are planned or occur, these are communicated to key personnel directly at these meetings.

The Management team are in continual discourse regarding all elements of the business.

#### INTERNAL COMMUNICATION

JUTA Group will ensure that the relevant sections of the EMS are accessible at all levels within the company. This includes the manual and the procedures.

JUTA Group will ensure that all employees are aware of Environmental Policy.

JUTA Group will ensure that all employees are aware of the company's significant environmental aspects, the potential impact on the environment, and the role they play in mitigating these.

JUTA Group's employees will be made aware of the Environmental objectives, the success achieved against the targets set and the role they play in helping achieve them.

JUTA Group will ensure that relevant individuals are aware of compliance obligations related to their role and the responsibilities associated with these obligations.



JUTA Group will utilise:

- Meetings
- Shared drives on the servers
- Email
- Notice boards

**To ensure that this information is communicated, accessible, correct and regularly updated.**

#### EXTERNAL COMMUNICATION

JUTA Group will agree which areas of the EMS, including Objectives, Aspects, and Impacts, are to be communicated externally. JUTA Group's Environmental Policy will be made available on request.

External communications (including complaints) will be dealt with upon receipt. External communications will be documented and maintained as part of the EMS records or other documented procedures. All complaints relating to the EMS will be reported to the EMS Manager and the Group Managing Director, who will agree on what action will be taken. If the complaint is deemed to be a non-conformity, it is also treated according to the Non-Conformities and Corrective Actions procedure.

#### PLANNING FOR CHANGE

Whenever there is a change planned to be introduced with an impact on the EMS, the change is

OFI – The auditor did not evidence any controls in communicating the EMS to Temporary staff. It may be an opportunity to review this.

## 4. Compliance with relevant Environmental Regulatory Requirements is demonstrated

The auditor sampled the statutory and regulatory compliance procedures in the EMS Procedures. Below is a sample of the document:

**STATUTORY AND REGULATORY COMPLIANCE**  
IDENTIFICATION OF LEGAL AND OTHER REQUIREMENTS

JOTA Group identifies and reviews the statutory and regulatory requirements that apply to its activities, processes, and infrastructure within the defined scope of the Management System. These can be originated from contracts with suppliers and sub-contractors, legal requirements, legally binding standards or requirements that the organisation has decided to adhere to. These requirements shall be accessible, understood, and applied within the context of JOTA Group.

These requirements are embedded into the EMS documentation and verified through normal verification activities, like internal audits and internal indicators calculation.

**LEGAL REGISTER**


JOTA Group maintains a register of all relevant legislation and other requirements pertinent to the scope of the EMS, embedded into the EMS Toolbox Tool. As such the organisation utilises the legal register services that are included as part of the EMS Toolbox Tool.

**UPDATING THE LEGAL REGISTER**

The legal register services provided as part of the EMS Toolbox Tool is a Parent and Child System where the parent legal register listing is managed, reviewed, and updated by the AVISO Team.

The AVISO Team monitors several websites, including:

EMS Procedures  
See SharePoint for the latest version. This document is uncontrolled if downloaded or printed. Page 5 of 30



- <http://www.legislation.gov.uk/>
- <https://www.gov.uk/>
- <http://www.environment-agency.gov.uk>
- <http://www.legislation.gov.uk/all?them=e=environment>
- <https://www.gov.uk/browse/business/waste-environment>
- <https://www.gov.uk/browse/business/waste-environment/environmental-regulations>
- <https://www.gov.uk/environmental-management/waste>

Whenever new, suspended, revoked, or repealed legislation is identified, the AVISO Parent Legal Register will be updated. Changes to the parent legal register are then pushed out to the child sites for review by JOTA Group. These changes to the Legal Registers are communicated to by the AVISO Team to the JOTA Group via a Monthly Legal Register Update Newsletter.

Further information relating to listed legislation and guidance is provided via AVISO provided topic specific information webpages that can be accessed through the "Further Information" hyperlinks provided.

The AVISO provided topic specific information webpages provide an outline of the following areas:

- Purpose Requirements of the Legislation or Guidance outlining the purpose, the key requirements and who the legislation or guidance applies to.
- Summary of Evidence outlining the potential evidence of compliance.
- Country in which the Legislation or Guidance is applicable.
- Exemptions outlining the potential exemptions to the Legislation or Guidance.
- Further Reading providing a link to the official Legislation or Guidance document, links to any other approved guidance documents and links to the information of the associated ISO standards.
- Amendments provides a link to the official amendment's webpage provided by the Legislation or Guidance publisher and communicating any amendments that have been applied to the Legislation or Guidance.
- Changes/Updates provides a link to the official Changes and updates webpage provided by the Legislation or Guidance publisher and communicating any amendments, changes or updates that have been applied to other Legislation or Guidance by the published document.

Additionally, as part of the Legal Register service provision provided by AVISO, a Monthly Legal Update Newsletter is published detailing any new, amended or upcoming legislation and guidance that has been identified.

The JOTA Group IMS Team reviews their legal register on a regular basis and inform the AVISO Team of any changes to the legal register of they might require.

On review to the legal register, if a potential breach of legislation is identified, the Leadership Team will be contacted immediately, and corrective action will be agreed upon and then assessed for adequacy.

It states that their external ISO consultants, AVISO, update the legal register every quarter. Below is a sample of the legal register located on Toolbox:

RowID	Title	Question	Applicable	Compliance T...	Further Info	Suggested Interested P...	Evidence of Compliance	Compliant	Countries	Modified	Legal Regime...
LE003	All relevant legal compliance obligations	Do interested parties require legal compliance	Yes	Quality, Environmental, Information Security, Health and Safety	Further information	Customers, Employees, Suppliers, Directors, Regulators, Government	Legal Register	Compliant	UK	2 hours ago	Interested Parties Requirements
AT017	Climate Change Act 2009, No. 27 (as amended)	Does your organisation operate within the United Kingdom and engage in activities or operations that may contribute to greenhouse gas emissions or have an impact on climate change?	Yes	Environmental	Further information	Customers, Employees, Directors, Suppliers, Regulators, Government	Environmental Program Planning Process Emergency Response Procedures Policies and Procedures Training and Awareness	Compliant	England	2 hours ago	Atmosphere
W0014	Commission Decision 2000/632/EC, No. 932 (as amended)	Does your organisation produce, store, or manage any types of waste listed in the European Waste Catalogue (EWC) as specified in Commission Decision 2000/632/EC?	Yes	Environmental Sustainability	Further information	Customers, Employees, Directors, Suppliers, Regulators, Government	Waste Logs EWC Codes Waste Transfer Notes Disposal Certificates Waste Consignment Notes Inventory Records Waste Audit Reports Compliance Certificates Training Records Inspection Reports	Compliant	UK	2 hours ago	Waste Generation and Control, Local and Wider Environment, Hazardous substances
DN001	Control of Pollution (Oil Storage) (England) Regulations 2001, No. 2954 (as amended)	Is oil stored and contained on the property (above 200 litres)	Yes	Environmental	Further information	Employees, Directors, Suppliers, Regulators, Customers	Hazard Identification, Risk Assessment and controls Policies and Procedures Training and Awareness Emergency Response Procedures	Compliant	UK	2 hours ago	Drain Water and Spillage
W0032	Control of Pollution Act 1974, No. 40 (as amended)	Does your organisation engage in activities that have the potential to release pollutants into the environment, such as air, water, or land, within the UK?	Yes	Environmental	Further information	Employees, Directors, Regulators	Documentation of Environmental Impact Assessments Pollution Prevention Plans Waste Management Records Air Quality Monitoring Data Water Pollution Control Measures Noise and Vibration Assessments Chemical and Hazardous Substance Management Training Records Incident Reports Compliance Reports and Audits Renewable Energy and Energy Efficiency Initiatives Permits and Licenses	Compliant	UK	2 hours ago	Local and Wider Environment

This has been reviewed and is up to date.

## 5. Environmental performance is Measured and Monitored

Section 8 of the standard communicates the following areas of environmental impact:

1. Energy use (8)
2. Water consumption (9)
3. Waste Management (10)
4. Issues related to ground & water pollution are identified and managed (11)
5. Supply chain / Procurement of materials (12)
6. Transport (13)
7. Biodiversity and Heritage (14)
8. Noise (15)
9. Air Quality (16)
10. Carbon emissions (17)

KPI Associated with the above requirements:

<div style="border: 1px solid black; padding: 5px;"> <h3 style="margin: 0;">Areas – 1,9,6 &amp; 10</h3> <p><b>Carbon Footprint</b></p> <hr/> <p><input type="checkbox"/> Title *</p> <p>Carbon Footprint</p> <p><input type="checkbox"/> Guidance for Implementation</p> <p>Carbon Footprint Inventory Report showing carbon calculations for:</p> <ul style="list-style-type: none"> <li>- Consumed energy</li> <li>- Vehicle miles</li> <li>- Air conditioning maintenance logs</li> <li>- Fire equipment maintenance logs</li> </ul> <p><a href="#">See less</a></p> <p><input checked="" type="checkbox"/> Category</p> <p>IMS Documentation</p> <p><input type="checkbox"/> Record (Where)</p> <p>Carbon Footprint Inventory Report</p> </div>	<div style="border: 1px solid black; padding: 5px;"> <h3 style="margin: 0;">Areas - 3</h3> <p style="text-align: right;"><a href="#">Edit all</a></p> <hr/> <p><b>Waste and Recycling</b></p> <hr/> <p><input type="checkbox"/> Title *</p> <p>Waste and Recycling</p> <p><input type="checkbox"/> Guidance for Implementation</p> <p>Control of waste streams and waste carriers</p> <p><input checked="" type="checkbox"/> Category</p> <p>Infrastructure</p> <p><input type="checkbox"/> Record (Where)</p> <p>Waste Carrier Licences Waste Transfer notes</p> <p><input checked="" type="checkbox"/> Frequency (when)</p> <p>Annually</p> </div>
<div style="border: 1px solid black; padding: 5px;"> <h3 style="margin: 0;">Areas - 5</h3> <div style="border: 1px solid gray; padding: 5px;"> <p><b>Supplier Performance</b></p> <hr/> <p><input type="checkbox"/> Title *</p> <p>Supplier Performance</p> <p><input type="checkbox"/> Guidance for Implementation</p> <p>The supplier has a direct impact on your business' performance, because of this factor controls are in place to monitor the performance making sure you receive a quality service.</p> <p><input checked="" type="checkbox"/> Category</p> <p>Competencies</p> <p><input type="checkbox"/> Record (Where)</p> <p>Approved Supplier list Supplier performance indicators Supplier questionnaire</p> <p><input checked="" type="checkbox"/> Frequency (when)</p> <p>Annually</p> <p><input checked="" type="checkbox"/> Status</p> <p>On Target</p> </div> </div>	

OFI—This section of the audit (1-10) would be an opportunity to review the KPIs for the relevant standard environmental control areas. Information from the GAP analysis identifies a comprehensive list of questions that these KPIs should answer.

Areas of risk identified from the 1-10 list

<p><b>Areas - 4</b></p> <p>Spillage of hazardous materials (including chemicals, oil and fuel)      Pollution of ground, groundwater and effluent</p>	<p><b>Areas - 2</b></p> <p>Domestic water use      Consumption of water resource</p>
<p><b>Areas - 8</b></p> <p>Engine testing      Noise emissions and local air quality. Impact on neighbo...</p>	<p><b>Areas - 3</b></p> <p>Incorrect segregation of waste      Pollution associated with landfill, including GHG emissio</p>
<p><b>Areas - 6, 10</b></p> <p>Use of company vehicles      Local air quality, global warming, consumption of non-re...</p> <p>Transport of materials to site      Local air quality, global warming, consumption of non-re...</p> <p>Transport of people and equipment to and from race meetings      Local air quality, global warming, consumption of non-re...</p>	<p><b>Areas - 5</b></p> <p>Purchase of materials and services      Supplier selection of non-sustainable options</p>
<p><b>Areas - 7</b></p> <p>Site location in the environment      Impact on biodiversity and nuisance to neighbours</p>	<p><b>Areas - 3</b></p> <p>Generation of factory and office waste      Disposal of hazardous and non-hazardous wastes</p>
<p><b>Areas - 1</b></p> <p>Use of gas for domestic boiler      Consumption of non-renewable resource and Local air q...      Energy Management Equipment Maintenance</p> <p>Use of oil-powered boiler for heating      Consumption of non-renewable resource, Local air qualit...      Energy Management Equipment Maintenance</p>	<p><b>Areas - 9</b></p> <p>Trackside operations      Fuel consumption, emissions to air, noise emissions.</p>

All of these environmental risk areas have an output of an objective linked to them.

6. Processes for Internal Auditing (check performance), Documentation and Record Keeping are established

The procedure for internal audits has been identified and is located in the EMS Procedures document. Below is the section:



## INTERNAL AUDIT

### INTERNAL AUDIT PROGRAMME

Responsibility for planning and conducting internal audits shall be allocated to an auditor who is impartial to the process/area being audited and competent based on training and experience. Management system processes are reviewed, and an annual Internal Audit Programme is planned.

The programme shall define activities to be audited and within which month(s) the audits are due. Each relevant activity shall be audited within every calendar year; however, complex, critical, or uncertain areas may be subject to more frequent audits and/or greater depth of investigation.

Risk has been appointed through discussions with senior management. Areas identified\* as high risk will be audited a minimum of twice annually. Medium-risk areas will be audited a minimum of annually. Low-risk areas will be audited on a biennial basis.

The raising of a non-compliant issue through the internal or external audit process will initiate a review of the individual risk. Other factors that could lead to a change in the risk rating include but are not limited to statutory and regulatory compliance issues, complaints from stakeholders, and issues identified through the Risk Register.

\*All areas have been initially deemed medium risk for the launch of the system.

The internal audit programme is embedded into the EMS Toolbox Tool.

### CONDUCTING

The auditor shall plan and conduct the audit by arranging the availability of the key personnel, reviewing previous audit findings (from the findings chart), and obtaining access to any applicable procedures and documented information. Auditing may be undertaken through a variety of techniques – the auditor is to judge which audit approach best suits the situation.

Process Auditing would consider a particular work area or activity, sampling the effectiveness of operational controls, communication, adherence to requirements and record-keeping throughout the natural sequence of events. (e.g., following audit samples through a linear chain of control).

Compliance Auditing is more focused on individual subject(s), raising distinct questions/answers.

System Auditing is checklist-based and is used to make a simple confirmation of key elements.

### DOCUMENTED INFORMATION

Audit findings shall be recorded onto a template Internal Audit Form. The header of this document includes basic details such as Date, Audit Title, Auditor, Auditees, Standards applicable, Reference documents and Location. The content of the audit record will vary depending on the subject matter and audit approach used, but this could typically include a commentary of findings/samples to demonstrate compliance, objective evidence/photos, questions/answers, dialogue, or checklists.

Note: The auditor is to apply discretion within the audit record if the subject matter is sensitive/personal.

### FINDINGS

Upon completion of the audit, a result shall be declared, and records shall indicate, if applicable:

#### FINDINGS CHART

C	Compliant with the requirements of the standard.
O	This is a finding that is not a current problem but may be a weaker area for attention.
R	A finding that is non-compliant with requirements or in breach of regulation.

C and O are discussed with auditees at the time of identification and reflected within the audit report; these may be added to the central Corrective Action Log. Where a formal R has been identified, this shall always be entered into a central corrective action logging system, stipulating actions, responsibilities, and timeframes to rectify the situation and avoid the recurrence of a similar problem in the future.

### REVIEW

Nonconformities and Corrective Actions shall be followed up to confirm closure. Internal Audit results shall form an input to verify programme completion and effectiveness.

The results of the internal audit programme will also be considered when reviewing the Risk and Opportunity Register.

### COMMUNICATION

#### MANAGEMENT MEETINGS

Management meetings are held principally on a three monthly basis. These meetings are between Top Management and JOTA Group employees. These meetings act as an opportunity to highlight key issues (including corrective and preventative action) and monitor project progress. These meetings have documented structure, but minutes are not conducted as it is felt that it would hinder the flow of the meeting.

When significant news or changes to the company are planned or occur, these are communicated to key personnel directly at these meetings.

The Management team are in continual discourse regarding all elements of the business.

It was not possible to review near misses, which was communicated in the corrective actions procedure:

### NONCONFORMITIES AND CORRECTIVE ACTIONS

#### TERMS AND DEFINITIONS

**Nonconformity:** A situation that has failed to meet planned arrangements or requirements.

**Complaint:** One of the above that is identified/reported by an external party, such as a neighbour.

**Rectification:** Steps that are taken to rectify/resolve one of the above.

**Corrective Action:** Steps that are [to be] taken to avoid or mitigate the recurrence of the event.

**Risk Mitigation:** Actions taken to eliminate the cause of or control nonconformities which may arise.

#### INTRODUCTION

This procedure sets out the procedure by which JOTA Group detects and treats nonconformities and improves issues relating to the Environment.

#### IDENTIFICATION AND RECORDING

All incidents, non-conformities, complaints, etc., are collectively referred to as 'Incidents' and shall be reported to management upon identification and details recorded onto a Corrective Actions log.

It is the responsibility of all individuals conducting work on behalf of JOTA Group to report all accidents and incidents, as these are improvement opportunities. It is the management's responsibility to record the event, investigate the cause, ensure rectification, and implement appropriate corrective actions.

#### CAUSE AND RECTIFICATION

Management shall consider identified incidents to clarify the direct and root cause. Steps taken, or to be taken, to rectify and resolve the situation shall be established and implemented. If the incident involves an external party, clear communication relating to the response shall be ensured. If the incident potentially affects other situations/locations, the need to intervene must be considered if a similar issue could arise elsewhere.

OFI—It would be advised to review the corrective action section of the procedure and ensure that the near misses procedure is communicated.

The auditor would review the document under Emergency Preparedness as not all the emergencies stated are communicated:

- Emergency response procedure for the type of :
- Communication – telephone numbers, means of
- Debriefing and post-traumatic stress procedure.

JOTA Group, through the Aspects & Impact process and identifies potential emergency situations and potential the environment and how it will respond to them, includ testing of emergency situations. The controls for mitiga in the aspects register.

The potential emergency situations include:

- Fire
- Spills
- Flood
- Personal Injury
- Air Quality Issues

OFI- A review of the section Emergency Preparedness is needed as it is missing sections identified as their emergency situations.

An Audit program has been identified in the Toolbox. Below is a section of the audit program:

Program Year	Title	Audit Scope	Planned Date	Auditee	Audit Type	Audit Method	Auditor	Completed	Finding
2024	Environmental Compliance	Legal and other requirements and compliance evaluation, Equipment & infrastructure maintenance and inspection, measurement equipment maintenance, calibration and identification, work environment (for production and for H&S)	12/11/2024	EMS Team	External (2nd Pa...	On Site	John Donnelly - AvISO		
2024	Environmental Management System	Content analysis, leadership, management review and continual improvement, Legal and other requirements and compliance evaluation, Roles & responsibilities, competence, recruitment, induction and training, Risks & Opportunities / Environmental Aspects / Sustainable Development Issues / OH&S Risks, Objectives & Action Plans, Performance Evaluation	12/11/2024	EMS Team	External (2nd Pa...	On Site	Oliver Leaney - AvISO		
2024	FIA 2 Star Accreditation	Content analysis, leadership, management review and continual improvement, Legal and other requirements and compliance evaluation, Roles & responsibilities, competence, recruitment, induction and training, Risks & Opportunities / Environmental Aspects / Sustainable Development Issues / OH&S Risks, Objectives & Action Plans, Performance Evaluation, Equipment & infrastructure maintenance and inspection, measurement equipment maintenance, calibration and identification, work environment (for production and for H&S)	16/12/2024	Sustainability Manager	External (2nd Pa...	Remote	External		

OFI—It would be an opportunity to review the requirements of the standard regarding internal audits, as the auditor would assume that an emergency preparedness or Aspects and impacts audit would need to be conducted on an annual basis. Also, it would be an opportunity to communicate an Audit Program for 2024 and 2025 on the Toolbox.

## 7. Key Environmental Aspects/Impacts are Identified and Managed

As per section 5 of this report, all 17 areas (1-10) of environmental impacts have been identified and have controls (objectives) to monitor the organisations' usage with the aim of reducing their impact on the environment.

End of report.