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WASTE & ENVIRONMENTAL MANAGEMENT PLAN

ENVIRONMENTAL GOVERNANCE, WASTE SEGREGATION, SPILL CONTINGENCY & SUSTAINABLE OPERATIONS

ENTERPRISE ENVIRONMENTAL MANDATE: This Waste & Environmental Management Plan establishes mandatory operational protocols for waste minimization, hazardous material containment, spill response, ecological protection, and environmental compliance across all 6 core business divisions of EuniServ Limited (RC NO: 9729797). Formulated in strict alignment with ISO 14001:2015, NOSDRA, NUPRC (EGASPIN), and NESREA guidelines, this document guarantees zero uncontrolled environmental discharges, responsible waste chain-of-custody, and sustainable engineering practices across West Africa.

1. EXECUTIVE ENVIRONMENTAL POLICY STATEMENT & STRATEGIC OBJECTIVES

1.1 Executive Policy Directive

Executive Management at EuniServ Limited regards environmental protection and ecological preservation as fundamental obligations integral to enterprise sustainability. Operating as a *Specialized Energy, Industrial Procurement & Technical Supply Chain Partner*, EuniServ Limited is committed to conducting all activities—spanning Industrial Procurement & Energy Supplies, Solar Energy & Renewable Power Infrastructure, Fleet Management & Transport Logistics, Modular Accommodation & Site Facilities, Medical Devices & Pharmaceutical Procurement, and Supermarket & Retail Operations—under strict environmental controls that protect ecosystems, prevent pollution, and safeguard public health.

1.2 Corporate Environmental Objectives & Target Metrics

- Zero Major Environmental Incidents:** Maintain a corporate target of Zero Major Chemical, Hydrocarbon, or Fuel Spills (> 1 Barrel) into soil, groundwater, or surface water bodies across all operational sites, staging hubs, retail outlets, and transit corridors.
- 100% Waste Chain-of-Custody Compliance:** Ensure 100% of hazardous, industrial, e-waste, bio-medical, and commercial waste streams are tracked from source generation to final disposal via licensed NUPRC/NOSDRA/NESREA-accredited waste managers.
- Maximum Waste Diversion & Recycling:** Achieve a minimum 70% waste recycling/reuse rate across scrap metal offcuts, UPVC piping remnants, timber packaging, plastic containers, and paper waste streams.
- 100% Statutory Compliance:** Maintain full compliance with environmental regulatory frameworks enforced by NOSDRA, NUPRC (EGASPIN), NESREA, NAFDAC, and State Environmental Protection Agencies (SEPA's).

2. ENTERPRISE SCOPE & SERVICE-SPECIFIC ENVIRONMENTAL ASPECT FRAMEWORK

This Management Plan applies to all operations, facilities, warehouse staging yards, retail outlets, and field project locations governed by EuniServ Limited across its 6 core business divisions:



EUNISERV CORE DIVISION	OPERATIONAL SCOPE & ENVIRONMENTAL ASPECTS	PRIMARY ENVIRONMENTAL CONTROLS & MITIGATION STANDARDS
1. Industrial Procurement & Energy Supplies	Handling, staging, and pre-dispatch testing of OEM mechanical equipment, fluid handling systems, electrical switchgear, heavy cables, valves, UPVC piping, gaskets, and MRO safety gear. • Mechanical & Fluid Handling • Electrical Infrastructure & Power • Instrumentation & Process Control • MRO & Safety Gear	Secondary containment bunding for oil-coated components and hydraulic test fluids, packaging waste segregation, dry climate-controlled indoor storage to prevent surface runoff contamination.
2. Solar Energy & Renewable Power Infrastructure	Turnkey engineering, staging, array mounting, inverter bench-testing, energy auditing, and end-of-life recycling for renewable power systems (5–30 kVA). • Turnkey Power Configurations • PV Solar Array Installation • Balance of Plant (BoP) & Appliances • Energy Auditing & Maintenance	Strict storage temperature controls for LiFePO ₄ battery cells, specialized e-waste recycling protocols, zero land disposal of lithium or PV cell materials, and cardboard/wooden pallet recycling.
3. Fleet Management & Transport Logistics	Corporate vehicle hire, heavy equipment transport, haulage, freight movement, and field dispatch across regional transit corridors under Journey Management Plans. • Vehicle Hire & Logistics • Haulage & Freight Operations • Dedicated Fleet Management	Vehicle exhaust emissions monitoring, pre-dispatch drip-pan staging at Port Harcourt yards, 200L mobile hydrophobic spill kits on all haulage trucks, and IVMS satellite eco-driving tracking.
4. Modular Accommodation & Site Facilities	Yard fabrication, outfitting, crane offloading, site preparation, and deployment of insulated 20ft/40ft container offices, living units, and auxiliary structures. • Site Offices & Living Units • Auxiliary Prefab Structures • Turnkey Site Preparation	Rockwool dust capture with N95/P100 HEPA filtration during installation, low-VOC paint spraying booths, structural scrap steel recycling, and sealed wastewater holding tank connections.
5. Medical Devices & Pharmaceutical Procurement	Warehousing, cold-chain handling, and distribution of diagnostic equipment, clinical tools, medical consumables, field first aid kits, and hospital PPE. • Diagnostic & Clinical Gear • Medical Consumables & PPE • ISO-Aligned Supply Handling	Bio-hazardous medical waste isolation, CFC-free refrigerant cold-chain compliance, WHO/NAFDAC-compliant disposal of expired consumables via high-temperature incineration.
6. Supermarket & Retail Operations	Downstream distribution, bulk FMCG merchandise handling, cold storage, retail store inventory management, and customer packaging controls. • Bulk FMCG & Downstream Supply • Store Inventory & Merchandising	Commercial retail packaging waste reduction, energy-efficient LED and inverter refrigeration controls, cardboard recycling, and food/organic waste segregation.



3. ENVIRONMENTAL GOVERNANCE, ROLES & RESPONSIBILITIES

EuniServ Limited assigns clear organizational accountability for environmental management across all business activities:

3.1 Board & Executive Responsibilities

- **Executive Director, Technical Operations & Logistics (Kalaiyo Soala Raymond):** Holds primary executive oversight for environmental policy execution, spill contingency activation, hazardous/e-waste disposal authorization, and site environmental compliance sign-offs.
- **Executive Director, Strategy & Commercial Operations (Mkpah Eunice Maurice):** Oversees statutory environmental permitting, regulatory liaison with NUPRC/NOSDRA/NESREA/NAFDAC, third-party waste manager vetting, and commercial SLA compliance.

3.2 Operational & Field Environmental Roles

- **Environmental / EHSQ Manager:** Responsible for executing environmental impact assessments, conducting site environmental audits, maintaining waste manifest logs, leading spill investigations, and managing statutory reporting.
- **Warehouse Staging & Retail Operations Supervisors:** Manage waste segregation skip stations, ensure secondary containment integrity for chemical/oil drums, verify spill kit readiness, and enforce housekeeping standards.
- **Field Engineers, Technicians & Freight Drivers:** Execute daily task-level environmental controls, report near-miss spills immediately, adhere to waste segregation rules, and maintain clean job sites.

4. WASTE MANAGEMENT ARCHITECTURE & SEGREGATION PROTOCOLS

EuniServ Limited enforces the Waste Management Hierarchy: **(1) Source Reduction, (2) Reuse, (3) Recycling, (4) Treatment, and (5) Responsible Disposal.** All generated waste must be segregated at source using color-coded receptacles:

WASTE CATEGORY	CONTAINER CODE	TYPICAL WASTE STREAM ITEMS	HANDLING, STORAGE & FINAL DISPOSAL METHOD
Hazardous Industrial Waste	RED	Used lube oil, oily rags, solvent containers, paint sludge, hydraulic fluids, chemical spill absorbents from machinery servicing.	Stored in banded, labeled steel drums in secure hazardous waste yards. Evacuated strictly by NUPRC/NOSDRA-certified hazardous waste contractors.
Non-Hazardous Industrial Waste	BLUE	Steel offcuts (ISMC channels), UPVC pipe trimmings, copper wire offcuts, metal strapping, empty clean drums, timber pallets.	Stored in heavy-duty scrap skips. Transferred to certified scrap metal and plastic recyclers in Port Harcourt for reprocessing.
Organic & Retail Commercial Waste	BROWN	Spoiled food items from retail/supermarket operations, site clearing brush/vegetation from turnkey site preparation.	Mulched for local soil stabilization or transferred to municipal composting facilities. Open burning is strictly prohibited under all circumstances.
Domestic & Office Solid Waste	GREEN	Paper, cardboard packaging, plastic wrap, beverage containers, office trash from modular units and retail hubs.	Collected in covered, vermin-proof bins. Evacuated weekly by municipal waste management authorities to approved landfills.
Electronic & Battery Waste (E-Waste)	YELLOW	Spent LiFePO4 battery cells, damaged PV modules, failed MPPT boards, electronic wiring, diagnostic meters, IT hardware.	Stored in dry, climate-monitored e-waste staging zones. Transferred to licensed e-waste recycling specialists for component recovery.
Medical & Bio-Hazardous Waste	YELLOW (Bio)	Expired medical consumables, field first aid dressings, diagnostic test kits, discarded PPE from medical supply handling.	Segregated in sealed bio-hazard bags/sharps boxes. Disposed of via high-temperature incineration by NAFDAC-accredited medical waste facilities.



5. SPILL PREVENTION & EMERGENCY RESPONSE PLAN (SPERP)

5.1 Secondary Containment & Preventive Engineering

To eliminate soil and groundwater contamination, EuniServ enforces rigid engineering controls for liquid storage:

- **Secondary Containment Bunding:** All chemical totes, fuel drums, lube oil storage, and portable diesel generators must be staged within secondary containment bunds sized to hold a minimum of 110% of the largest single container's capacity or 25% of total combined volume.
- **Spill Response Kit Staging:** Standard 200-Liter hydrophobic spill response kits containing absorbent pads, booms, granular absorbent, neoprene drain covers, and chemical-resistant gloves must be stationed at all staging yards, solar installation sites, and material haulage trucks.

5.2 Spill Classification & Escalation Protocol

Spills occurring during transport, equipment staging, or chemical handling are managed under a 3-tier escalation system:

SPILL TIER	VOLUME & ENVIRONMENTAL IMPACT SCOPE	OPERATIONAL ACTION REQUIRED	REPORTING & NOTIFICATION TIMELINE
Tier 1 (Minor)	< 1 Barrel (< 159 Liters). Contained within facility/site boundary with no threat to water bodies.	Immediate local containment using spill kit absorbents by site personnel. Clean up within 2 hours.	Internal EHSQ log entry within 12 hours. Review at daily Toolbox Talk.
Tier 2 (Moderate)	1 to 10 Barrels (159–1,590 Liters). Spills beyond immediate bunding or posing potential off-site migration.	Deploy regional emergency response team, deploy perimeter containment booms, recover free liquid.	Executive Leadership alert < 1 hour. Initial notification to NOSDRA/NUPRC within 24 hours.
Tier 3 (Major)	> 10 Barrels (> 1,590 Liters) OR any chemical/oil release impacting navigable waterways or host communities.	Full activation of Enterprise Crisis Management Team, invoke mutual aid agreements, deploy specialized skimming.	Immediate Executive notification (< 15 mins). Formal Joint Investigation Visit (JIV) with regulators within 24 hrs.

6. WATER QUALITY, AIR EMISSIONS & DUST CONTROL SAFEGUARDS

6.1 Wastewater Management & Surface Protection

Modular field infrastructure units (container offices, ablution blocks) are equipped with sealed blackwater/greywater holding tanks or connection-ready sanitary plumbing compliant with local environmental health codes. Direct discharge of untreated sewage or greywater into open soil or natural drainage channels is strictly prohibited.

6.2 Air Quality, VOC & Dust Mitigation

- **Dust Suppression in Site Preparation:** During turnkey site preparation and civil groundwork for modular installations, active water spraying trucks are deployed along haulage roads to maintain ambient dust suppression.
- **Volatile Organic Compound (VOC) Control:** Painting and anti-corrosion coating application on modular container structures must utilize low-VOC, lead-free industrial coatings executed in ventilated containment booths.
- **Fibrous Insulation Containment:** Fabrication involving 50mm Rockwool insulation requires localized vacuum extraction, mandatory worker respiratory PPE (N95/P100 HEPA), and immediate bagging of Rockwool offcuts.

7. BIODIVERSITY PROTECTION & TURNKEY SITE PREPARATION CONTROLS

For modular accommodation site preparation and field engineering scopes, EuniServ enforces ecological protection guidelines:

- **Demarcated Exclusion Zones:** Prior to site clearing, environmental surveyors establish clear clearing boundaries. Mature, non-interfering indigenous trees outside structural footprints are tagged and preserved.

- **Topsoil Management:** Stripped topsoil from civil excavation is stockpiled separately in windrows not exceeding 2 meters in height, protected from erosion, and reused for post-construction site re-vegetation.
- **Fauna Safeguards:** Site clearing activities must follow a progressive directional clearing pattern allowing resident wildlife to safely relocate into adjacent natural habitats. Hunting, poaching, or trapping by site personnel is strictly forbidden.

8. SUB-CONTRACTOR ENVIRONMENTAL MANAGEMENT & WASTE CHAIN-OF-CUSTODY

EuniServ extends its environmental standards to all sub-contractors and third-party logistics partners:

- **Waste Manager Vetting:** Third-party waste evacuation contractors must present valid operating permits from NUPRC, NOSDRA, NESREA, NAFDAC, and State Environmental Protection Agencies prior to contract award.
- **Waste Manifest System:** Every off-site transfer of waste is accompanied by a formal **Waste Chain-of-Custody Manifest (EUN-ENV-MAN-01)** detailing waste type, volume, generator, transport driver, and final receiving disposal facility sign-off.

9. STATUTORY COMPLIANCE, AUDITING & MANAGEMENT REVIEW

System effectiveness is verified through structured monitoring and regulatory audits:

- **Monthly Environmental Inspection:** Site Environmental Officers conduct monthly inspections of chemical bunds, waste skip yards, spill kit inventories, and vehicle emission logs.
- **Annual ISO 14001 Audit:** Comprehensive annual management system audit to maintain complete alignment with ISO 14001:2015 standards, verify regulatory compliance, and drive continuous environmental performance optimization.

KALAIYO SOALA RAYMOND
Executive Director, Technical Operations & Logistics
Date: August 15, 2026

MKPAH EUNICE MAURICE
Executive Director, Strategy & Commercial Operations
Date: August 15, 2026



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