

Apprenticeships
Are Us



ENVIRONMENTAL SUSTAINABILITY POLICY

INTRODUCTION

As a registered charity with the *Australian Charities and Not-for-profits Commission (ACNC)*, ARU adheres to the *ACNC Governance Standards*, which encourage charities to act in a manner that promotes the public good. Environmental sustainability is a core part of ARU's commitment to acting ethically and responsibly. This policy is designed to align ARU's operations with the ACNC's expectations of ethical and responsible management, ensuring that environmental concerns are factored into decision-making processes.

Apprenticeships Are Us Limited (ARU) acknowledges the undeniable reality of climate change, which is significantly impacting various weather patterns and climatic extremes worldwide. As highlighted by the Intergovernmental Panel on Climate Change (IPCC) and esteemed organisations, there is indisputable evidence that human activities have led to warming effects on the atmosphere, oceans, and terrestrial landscapes. Substantial, immediate, and persistent alterations in human decisions, behaviours, and actions are imperative to curtail the adverse effects of human-induced climate change.

ARU is deeply committed to reassessing its individual, collective, and systemic practices to effectively address the challenges presented by climate change to the environment. In response to these challenges, ARU is dedicated to engaging in active listening and learning from the rich knowledge, traditions, and practices of Aboriginal and Torres Strait Islander communities. ARU acknowledges and reveres the profound connection that Aboriginal and Torres Strait Islander peoples have maintained with the land for thousands of years, honouring their ongoing stewardship and guardianship of the continent's lands and waters.

PURPOSE

Apprenticeships Are Us Ltd (ARU) is a Registered Group Training Organisation (GTO) and is required to comply with the *National Standards for Group Training Organisations*. These standards support environmentally sustainable practices in the workplace and operations, particularly as they relate to the training and placement of apprentices and trainees. This policy aligns with *National Standard 3 – Risk Management*, which includes environmental risk management and sustainability in GTO practices.

The purpose of this policy and its procedures is to guide ARU in:

1. responding to the challenges of climate change;
2. integrating a philosophy of sustainability in its activities and standards;
3. embedding and promoting sound environmental practices in all operations, services and products; and
4. fostering responsible, sustainable and climate-conscious decisions and behaviours at an organisational level, including among management, staff, volunteers, our ARU Board, our beneficiaries, Host Businesses, stakeholders and suppliers.

This policy will better enable ARU to apply a sustainability lens to its activities and operations. As the causes of climate change and its impacts on the environment are widely understood by the IPCC and the world's leading

scientists and organisations, it is the aim of ARU's to consider, find and implement meaningful ways to minimise its impact on the environment and contribute to solutions that seek to limit climate change.

SCOPE

This policy applies to:

- all ARU directors and Responsible Persons
- all ARU employees
- all volunteers
- all Host Businesses
- all contractors, suppliers and service providers
- all apprentices and trainees engaged through ARU
- all ARU-controlled workplaces, events, operations and partnerships

This policy applies to all operations nationally and is binding on all ARU business units.

LEGISLATIVE AND REGULATORY FRAMEWORK

This Policy is governed by the following legislation, standards and frameworks:

Statutory Requirements

- *Environmental Protection Act* (jurisdictional equivalents)
- *Clean Air Act 1963 (Cth)*
- *Waste Management and Pollution Control Act 1998 (NT)*
- *Corporations Act 2001 (Cth)* – directors' duties, best-interest obligations & risk oversight
- *ACNC Act 2012 (Cth)* – Governance Standards 1, 2, 5 and 6
- *Fair Work Act 2009* – workplace obligations relating to environmental conditions
- *Work Health and Safety Acts* – environmental WHS hazards
- *Modern Slavery Act 2018* – supply chain transparency

Sector Standards

- National Standards for Group Training Organisations – Standard 3 (Risk Management)
- Australian Accounting Standards (AASB)
- ISO 14001 – Environmental Management Systems
- ISO 26000 – Social Responsibility
- UN Sustainable Development Goals (SDG 7, 12, 13)

Internal Governance Instruments

- ARU Board Charter
- ARU Risk Management Framework
- ARU Code of Ethics

- ARU Host Business Agreement
- ARU Procurement Policy
- ARU WHS Framework

DEFINITIONS

For the purpose of this policy, the definition of:

“Sustainability”

The integration of environmental, social, cultural and economic considerations to ensure long-term ecological balance and responsible use of resources.

“Climate Risk”

Risks arising from climate change including:

- **physical risks** (extreme weather, heat, flooding),
- **transitional risks** (policy changes, carbon pricing, supply chain changes),
- **adaptation risks** (costs involved in responding to physical risks), and
- **liability risks** (legal exposures associated with environmental harm).

“ESG (Environmental, Social and Governance)”

A governance lens used for assessing environmental and social impacts and organisational accountability.

“Circular Economy”

A system aimed at minimising waste and maximising resource efficiency through reuse, recycling and recovery.

“Carbon Neutrality”

Achieving net-zero carbon emissions by reducing emissions and offsetting remaining emissions.

“Responsible Person”

A director or officeholder registered with the ACNC.

“Environmental Incident”

Any unplanned event that results in or has the potential to result in environmental harm, including pollution, emissions, waste mismanagement or significant breaches of this policy.

POLICY

ARU is committed to minimising its impact on the environment, fostering sustainability, repairing past harms and seeking improved future outcomes by:

1. acknowledging and learning from Aboriginal and Torres Strait Islander peoples’ ways of knowing, being and doing in caring for country;
2. fostering an organisational culture of sustainability, where responsibility to the environment, climate, climate system and ecosystems is understood and put into practice;
3. supporting and allowing management, staff, volunteers, ARU Board, our beneficiaries, Host Businesses, stakeholders and suppliers to:

- 3.1. better understand the interrelationship between their roles or activities and climate change impacts;
and
- 3.2. engage meaningfully with their emotional responses to climate change and its impacts.
4. applying a social justice lens when considering the impacts of climate change on different or vulnerable sectors of the community, management, staff, volunteers, ARU Board, our beneficiaries, Host Businesses, stakeholders and suppliers;
5. identifying, analysing, evaluating, prioritising and addressing the physical, transitional, adaptation and liability risks associated with climate change and establishing management-level mandates for climate risk oversight, monitoring and reporting;
6. avoiding the use of products and practices that contribute to climate change, while promoting and favouring the use of products and practices that are at a minimum climate-neutral or, as a preference, have positive impacts on the environment;
7. enhancing awareness within ARU and among management, staff, volunteers, ARU Board, our beneficiaries, Host Businesses, stakeholders and suppliers, stakeholders, suppliers and the wider community about our actions in seeking to operate in an environmentally responsible manner;
8. using reasonable endeavours to conduct audits and self-assessments of 's compliance with this policy, in order to continually improve our environmental management systems and responses to climate change; and
9. maintaining an open and honest dialogue with suppliers and the wider community about ARU's performance against this policy.

In addition to ARU's commitment to sustainability, we are also bound by relevant environmental legislation, including but not limited to the *Environmental Protection Act 1994*, *Clean Air Act 1963 (Cth)*, and *Waste Management and Pollution Control Act 1998*. ARU will ensure compliance with these laws and will continually review its policies and operations to ensure they exceed these legal requirements where possible.

RESPONSIBILITIES

It is the responsibility of the ARU Board to establish and maintain policies and procedures and to bring these procedures to the Environmental Sustainability policy into effect.

It is the responsibility of the MD and other executive officers to ensure the implementation and ongoing observation of these procedures to the Environmental Sustainability policy.

ARU is committed to fostering a culture of environmental responsibility and sustainability across all levels of the organisation. Staff, management, and ARU Board members will receive ongoing training and development in environmental sustainability, ensuring they remain informed of best practices and emerging trends. This will help ARU stay ahead of regulatory changes and continuously improve its environmental performance.

This policy complies with the *Corporations Act 2001 (Cth)*, which requires directors and officers of ARU to act in the best interests of the organisation, including taking steps to ensure the organisation operates in an environmentally sustainable manner. Environmental sustainability is a key part of ARU's corporate governance and risk management obligations under the *Corporations Act*.

GOVERNANCE AND ACCOUNTABILITY

ARU recognises its obligation under the Corporations Act and ACNC Governance Standards to ensure responsible and ethical management of environmental risks.

The ARU Board is responsible for:

- setting ARU's environmental sustainability strategy;
- embedding sustainability in governance, risk and performance frameworks;
- monitoring climate and environmental risks quarterly;
- ensuring ARU has adequate resources to support sustainability initiatives;
- overseeing environmental compliance and due diligence;
- reviewing sustainability performance in the Annual Information Statement (AIS).

The Managing Director is responsible for:

- operationalising environmental strategies;
- ensuring environmental risk controls are implemented;
- establishing measurement and reporting systems;
- escalating environmental incidents to the ARU Board.

Environmental responsibility is integrated into ARU's broader corporate governance obligations.

RISK MANAGEMENT AND REPORTING

Environmental and climate-related risks must be recorded in ARU's Risk Register and reviewed in accordance with ARU's Risk Management Framework.

ARU will:

- identify and analyse climate, environmental and supply chain risks;
- assign risk owners and mitigation strategies;
- report high-rated risks to the ARUs Board each quarter;
- include environmental risk assessment in Host Business onboarding;
- document all environmental incidents in the Incident Register;
- review environmental performance annually.

This satisfies GTO Standard 3 and ACNC Governance Standard 5.

PROCESSES

1. ARU will use reasonable endeavours to incorporate perspectives on climate change, including through:
 - 1.1. inviting elders or representatives to share their wisdom at training sessions, functions or events;
 - 1.2. encouraging staff to attend relevant workshops; and

- 1.3.promoting the reading of relevant research, books and reports.
2. ARU will use reasonable endeavours to develop guidelines for management, staff, volunteers, ARU Board, our beneficiaries, Host Businesses, stakeholders and suppliers.
3. ARU to adopt sound environmental work practices that incorporate:
 - 3.1. Aboriginal and Torres Strait Islander Peoples’ perspectives;
 - 3.2. a social justice lens that considers the impacts of climate change on different or vulnerable sectors of the community, management, staff, volunteers, ARU Board, our beneficiaries, Host Businesses, stakeholders and suppliers; and
 - 3.3. the latest in research on the causes, impacts and solutions to climate change.
4. ARU will use reasonable endeavours to ensure:
 - 4.1. appropriate and relevant training is provided;
 - 4.2. appropriate time, funds or resources are allocated; and
 - 4.3. best practice psychological and behavioural change approaches are adopted, to ensure sustainability practices are embraced and embedded across all areas of the organisation.
5. ARU will use reasonable endeavours to ensure that ARU Board members, staff and management are:
 - 5.1. appropriately inducted and trained in their responsibilities for climate risk oversight, monitoring and reporting; and
 - 5.2. cognisant of their ongoing responsibilities to identify, analyse, evaluate, prioritise and address the physical, transitional, adaptation and liability risks associated with climate change.
6. ARU will use reasonable endeavours to ensure its:
 - 6.1. ARU will continue to ensure that its banking and financial service providers, as well as any investments, align with its environmental sustainability objectives. In particular, ARU will avoid investments in companies or sectors that are known to engage in environmentally harmful practices, such as fossil fuel extraction or unsustainable forestry.; and
 - 6.2. investments are not in fossil fuel industries.
7. ARU will use reasonable endeavours to conserve energy, including by improving energy efficiency.
8. ARU will use reasonable endeavours to ensure that its operations, events, services and products are efficient in their use of energy and protective of the environment.
9. ARU will use reasonable endeavours to avoid the unnecessary purchase of materials.
10. ARU will use reasonable endeavours to reuse and recycle materials, purchase recycled materials and use recyclable packaging or other similar materials.
11. ARU will use reasonable endeavours to prevent air, water or other pollution and dispose of waste safely and responsibly.
12. ARU will use reasonable endeavours to monitor, consider and reduce supply chain emissions.

13. ARU will use reasonable endeavours to give preference to renewable over non-renewable energy sources when feasible.
14. ARU will consider any carbon-offsetting opportunities that may be available.
15. ARU will use reasonable endeavours to utilise its particular knowledge and experience to contribute to environmentally sustainable techniques, technology, knowledge and methods.
16. ARU will use reasonable endeavours to contribute to the maintenance and increase of biodiversity through its management of its property.
17. ARU will use reasonable endeavours to meet or exceed all applicable government requirements and voluntary requirements generally observed in its field.
18. ARU will use reasonable endeavours to conduct audits and self-assessments of its compliance with the Environmental Sustainability policy and these procedures in order to continually improve its environmental management system.
19. ARU and its management will maintain an open and honest dialogue with staff, volunteers, stakeholders and the community about the environmental sustainability performance of its operations, services and products.
20. ARU will use reasonable endeavours to ensure that staff, volunteers and suppliers are informed of and expected to follow the Environmental Sustainability policy and these procedures and to report any environmental concerns to management. Management will use reasonable endeavours to consider any reported concerns and take appropriate action as it sees fit.
21. ARU will ensure that all waste management processes, including recycling and disposal practices, comply with local environmental regulations and industry best practices. Waste audits will be conducted periodically to monitor compliance and identify areas where ARU can further reduce its environmental footprint. The use of recyclable, biodegradable, or renewable materials will be prioritised wherever feasible.

At ARU, we are steadfastly committed to environmental sustainability, acknowledging our responsibility to minimise our ecological footprint and contribute positively to the environment. Our dedication to environmental sustainability is entrenched in compliance with relevant environmental legislation and standards, including but not limited to the *Environmental Protection Act, Clean Air Act, and Waste Management Regulations*. Through stringent adherence to these laws, we strive to ensure that our operations not only meet legal requirements but also proactively contribute to the preservation of our planet's natural resources. We pledge to continually assess and improve our practices, integrating sustainable measures into our operations, and fostering a culture of environmental responsibility within our organisation.

ARU is committed to transparency in its sustainability efforts. In compliance with *ACNC Governance Standards*, ARU will publicly report its environmental performance in its Annual Information Statement (AIS). This includes detailing initiatives, achievements, and areas for improvement related to our environmental impact. These reports ensure that ARU is accountable not only to its Board and stakeholders but also to the broader community.

ENVIRONMENTAL INCIDENT REPORTING AND RESPONSE

ARU will ensure environmental incidents are:

- reported immediately to management;
- assessed for impact and regulatory obligations;
- escalated to the ARU Board, where significant;
- recorded in the Environmental Incident Register;
- investigated promptly;
- followed by corrective and preventative actions.

Significant incidents will be reported to the relevant environmental regulators.

SUPPLIER AND HOST BUSINESS REQUIREMENTS

All suppliers, contractors and Host Businesses engaged by ARU must:

- comply with relevant environmental laws;
- minimise pollution, waste and energy consumption;
- support recycling, reuse and sustainable procurement practices;
- not engage in environmentally destructive practices;
- disclose environmental incidents that occur in relation to apprentices or ARU operations;
- agree to ARU's sustainability expectations;
- maintain transparent supply chains free of human and environmental exploitation.

ARU may discontinue engagement where suppliers or Host Businesses fail to comply.

MEASUREMENT AND CONTINUOUS IMPROVEMENT

ARU will develop sustainability performance indicators including:

- energy consumption
- business travel emissions
- waste volumes and recycling rates
- procurement of recycled materials
- paper reduction
- Host Business environmental compliance metrics
- supply chain emissions

The Managing Director will report annually to the ARU Board on environmental performance and improvements.

TRANSPARENCY, DISCLOSURE AND ANTI-GREENWASHING

ARU commits to ensuring that all environmental, climate and sustainability statements:

- are accurate,
- can be substantiated,
- are supported by evidence, and
- are not misleading or deceptive.

All public sustainability claims must be approved by the Managing Director to ensure compliance with:

- Australian Consumer Law,
- ACNC AIS reporting requirements, and
- ASIC greenwashing guidance (INFO 271).

AUTHORISATION

Michael Wentworth



Managing Director
Apprenticeships Are Us Limited

DOCUMENT CONTROL

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1.1	M. Wentworth	08/12/2022	All	N/A
1.2	M. Wentworth	28/11/2023	All	Cover page, information update
1.3	M. Wentworth	31/10/2024	All	Information update
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