

# Health & Safety Policy - Exel Contracts Ltd

## Exel Contracts Ltd

### GENERAL STATEMENT OF INTENT

Exel Contracts Limited recognises and accepts its health and safety duties for providing a safe and healthy working environment for its workers and other visitors to its premises as well as the health and safety of all the working sites visited by its staff under the Health and safety at Work Act 1974, the Fire Precautions (workplace) Regulations 1997, the Management of Health and Safety at Work Regulations 1999 (as amended 2006) and other relevant legislation and common law duties of care.

People are the most important asset to this company, and therefore we are totally committed to ensuring their health, safety and welfare at all times.

There is no necessary conflict between humanitarian and commercial consideration. Profits and safety are not in competition. On the contrary, safety is good business and best practice.

From a legal perspective, Exel Contracts is committed to ensuring that it complies with all relevant health and safety legislation and ensure that all staff are kept updated on any changes and all such changes are documented. Where it is reasonably practicable to do so, the company will strive to go beyond the requirements of legislation.

Exel Contracts is committed to ongoing monitoring and review processes, so that continual improvement in the management of health and safety can be achieved.

Our general intentions are:-

- To provide adequate control of the Health and Safety risks arising from our work activities;
- To identify risks and set in place programmes to remove or reduce those risks which include a safe working environment and safe systems of work;
- To consult with our employees on matters affecting their Health & Safety;
- To provide and maintain safe plant and equipment;
- To ensure safe handling and use of substances;
- To provide information, instruction and supervision for employees;
- To ensure all employees are competent to do their tasks, and to give them adequate training;
- To ensure that the Health & Safety of the general public is protected;
- To ensure that adequate consideration is given to the protection of the environment;
- To prevent accidents and cases of work related ill health;
- To maintain safe and healthy working conditions; and
- To review and revise this policy at regular intervals.

**Signed:**

**Position held:** Director

**Date:** 24th April 2018

**Review:** 24th April 2019

## • Organisation

*Overall and final responsibility for health and safety is that of:*

Paul London

*Day-to-day responsibility for ensuring this policy is put into practice is delegated to:*

Danniella Wiltshire

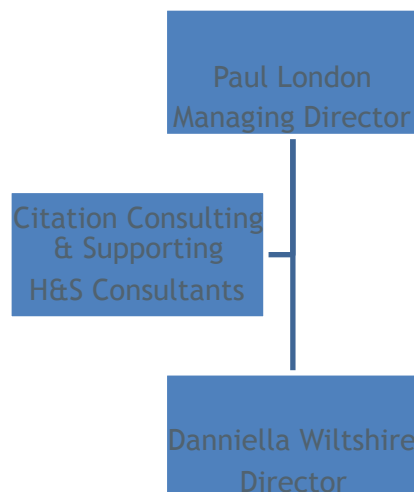
## ⇒ Employees' Duties

All employees are required to:

- Co-operate with supervisors and managers on health and safety matters;
- Not interfere with anything provided to safeguard their health and safety;
- Take reasonable care of the health and safety of themselves and others; and
- Report all health and safety concerns to a responsible person (as detailed in this policy statement).
- Ensure all designated Citation online courses are completed within the time frame expected.
- To ensure that a safe system of work is implemented when on site at all times.
- Comply fully with all Risk and Method documents provided.
- To comply with safe working practices.
- To wear Personal Protective Equipment and clothing where necessary

Non-compliance with health and safety rules and procedures can result in disciplinary action, which may include immediate dismissal if appropriate.

## ⇒ Organisation chart



## • Arrangements for

All company policies and procedures in relation to health and safety are regarded as supplementary to this policy.

### ➤ Risk Assessment

In accordance with the Management of Health and Safety at Work Regulations 1999, the company will carry out risk assessments of all activities that present a risk to employees or others. These risk assessments will be carried out in line with Health & Safety Executive guidance, and the procedure for doing so is as follows:

1. Identify the significant hazards involved in our activity.
2. Decide who might be harmed and how.
3. Evaluate the level of risk and decide if existing precautions are sufficient, or if more needs to be done.
4. Record the significant findings of the assessment.
5. Review the assessment when things change, or there is reason to believe that it is no longer valid.

***Risk assessments will be undertaken by:***

The relevant person who has firstly attended site and has the authority, knowledge and experience. All risk assessments will be checked and signed by Paul London, Danniella Wiltshire, Ellen Cropp or Hannah London prior to being sent to client or site.

***Approval for the required action to remove or control risks will be given by:***

Paul London or Danniella Wiltshire

### ➤ Health & Safety Management System

Exel Contracts operates a documented health and safety management system provided by our health and safety consultants, Citation Consulting & Support. The system consists of actions for the company to complete and implement, and can be viewed on request.

***The health and safety management system is the responsibility of:***

*Danniella Wiltshire*

### ➤ Consultation with Employees

Exel Contracts will consult with its employees in accordance with the Safety Representative and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996.

***Consultation with employees will be provided by:***

*Danniella Wiltshire*

## ➤ Safe Plant and Equipment

Exel Contracts will ensure that all plant and equipment is suitable, appropriate for each job and the operator has the relevant qualifications and training to safely operate without risks to health and safety, in accordance with legislation such as the Provision and Use of Work Equipment Regulations 1998, the Lifting Operations and Lifting Equipment Regulations 1998 and the Electricity at Work Regulations 1989.

*Responsibility for identifying all plant and equipment needing maintenance is that of:*

*Mark Ferris and Paul London*

*Responsibility for ensuring that effective maintenance procedures are drawn up is that of:*

*Danniella Wiltshire*

*Responsibility for ensuring that all identified maintenance is implemented is that of:*

*Danniella Wiltshire*

*Any problems with plant or equipment should be reported to:*

*Mark Ferris, Danniella Wiltshire or Paul London*

*Responsibility for checking that new plant and equipment meets health and safety standards before it is purchased is that of:*

*Paul London, Mark Ferris or Danniella Wiltshire*

## ➤ Safe Handling and Use of Substances

Exel Contracts will assess and control health risks from exposure to hazardous substances in accordance with the Control of Substances Hazardous to Health Regulations (COSHH) 2002.

*Responsibility for identifying all substances that need a COSHH assessment is that of:*

*Danniella Wiltshire, Mark Ferris or Paul London*

*COSHH assessments will be carried out by:*

*Danniella Wiltshire or Nicola McGhee*

*Approval for the required action to remove or control risks will be given by:*

*Paul London or Danniella Wiltshire*

## ➤ Information, Instruction and Supervision

*The Health and Safety Law poster is displayed:*

**By the Main Entrance**

Exel Contracts employs Citation Consulting & Support to act as our competent advisors on health and safety issues. They can be contacted at any time for advice, but in the first instance please contact Danniella Wiltshire, who is authorised to contact Citation Consulting & Support if necessary.

*Supervision of young workers/trainees will be arranged/undertaken/monitored by:*

*Danniella Wiltshire*

*Responsibility for ensuring that our employees who work at locations under the control of other employers are given relevant health and safety information is that of:*

*Danniella Wiltshire*

## ➤ Training and Competency

*Induction training for all new employees is the responsibility of:*

*Danniella Wiltshire*

*Job specific training will be provided by:*

Recognised suitable supplier

*Specific tasks requiring special training are:*

Asbestos awareness, PASMA training, First Aid at Work, Harness training and all online e-learning as directed by Danniella Wiltshire

*Training records are kept at Nutty's Farmhouse, Childerditch Lane, Brentwood, CM13 3EH and are updated and monitored by Nicola McGhee under the direction supervision of Danniella Wiltshire:*

*Training will be identified, arranged and monitored by:*

*Nicola McGhee and Danniella Wiltshire*

## ➤ Accidents, First Aid and Work Related Ill-Health

*First aid boxes are kept at/by:*

Nutty's Farmhouse, Childerditch Lane, Brentwood, CM13 3EH in both kitchen areas and every vehicle owned and used by employees of Exel Contracts.

*The appointed persons are:*

All office staff

*All accidents and work related ill-health are recorded in the accident book, which is kept at/by:*

*Nutty's Farmhouse, Childerditch Lane, Brentwood, CM13 3EH by Danniella Wiltshire*

*Responsibility for reporting accidents, diseases and dangerous occurrences to the enforcing authority is that of:*

*Danniella Wiltshire*

## ➤ Monitoring

*To check our working conditions, and ensure our safe working practices are being followed, we will:*

Carry out continuous informal, and where relevant, formal monitoring of all work areas and systematically monitor and review all safe working practices

*Responsibility for investigating accidents is that of:*

*Danniella Wiltshire and Paul London*

*Responsibility for investigating work-related causes of sickness absence is that of:*

*Danniella Wiltshire*

*Responsibility for acting on investigation findings to prevent a recurrence is that of:*

*Danniella Wiltshire*

## ➤ Emergency Procedures - Fire and Evacuation

*Responsibility for ensuring the fire risk assessment is undertaken and completed is that of:*

*Danniella Wiltshire, Nicola McGhee and Hannah London*

*Escape routes are checked by/every:*

Hannah London, daily

*Fire extinguishers are maintained and checked by/every:*

The Contractor, every 12 months

*Emergency evacuation will be tested every:*

6 months

## ➤ Abrasive Wheels

The Company will take all reasonable steps to ensure the health and safety of all employees who work with grinding machines that incorporate abrasive wheels. When properly used, abrasive wheels serve an important purpose. However, it is acknowledged that health and safety hazards may arise from the use of this equipment.

It is the policy of the Company to ensure that any risks are reduced to a minimum. *Danniella Wiltshire* will carry out an assessment of the work activity and take measures to reduce the risks found as a result of the assessment to ensure that all equipment used for grinding operations is maintained in good condition and is suitable for the task. *Danniella Wiltshire* will advise all employees, including new employees, who work or will work with abrasive wheels, of the risks to their health and safety and of the results of any assessments carried out. Risk and Method Statements are to be produced and acknowledged prior to any use of such equipment and where necessary Hot works permits will be implemented.

## ⇒ Control of Asbestos Containing Materials

The Company understands that materials containing asbestos when incorrectly handled can present a risk to the health and safety of employees and others visiting the site.

In particular it is the responsibility of *Paul London* or *Danniella Wiltshire* to ensure that:

- A survey is carried out in order to identify asbestos containing or other potentially hazardous materials on site.
- Where appropriate, dispose of any such materials in a safe manner using licensed and accredited contractors.
- Where risk assessment indicates the risk of removal to be greater than the risk of leaving in situ, to keep a register of and to conspicuously mark such materials so as to ensure safe working processes are employed in the case of subsequent damage, maintenance or removal.
- A copy of asbestos registers are to be retained for each and every site. If this is not available then caution should be given to engineers to make them aware that there may be asbestos present.
- All employees complete an Asbestos awareness course.

## ⇒ Control of Contractors

As site occupiers the Company will plan, co-ordinate, control and monitor the activities of Contract Companies to effectively minimise the risks presented to our employees, other persons on our site and the public. Only approved Contractors will be permitted to carry out work on behalf of the Company. Sanctions will be applied to Contractors as a result of poor health and safety performance.

In particular it is the responsibility of *Danniella Wiltshire* to ensure that:

1. All Contractors comply with Company health and safety rules and are given a site induction.
2. All contractors sign in at reception whenever onsite.
3. All Contractors provide suitable Risk assessments and Method statements before commencing work on site
4. All contractors have appropriate insurances.

Contractors work activities are suitably monitored to ensure work is carried out safely in accordance with agreed safe systems of work by *Mark Ferris* or *Paul London*

## ⇒ Display Screen Equipment

Display screen equipment is used at **Exel Contracts Ltd** however, not all employees who use this equipment will be classified as a “user” under the Health and Safety (Display Screen Equipment) Regulations 1992 (amended 2002). Therefore, the full extent of these Regulations may not apply in all cases. Where an employee falls into this category a Workstation Assessment Checklist will be completed by the user in consultation with *Danniella Wiltshire*. The Office Manager will be responsible for ensuring that any control measures identified by the assessment are actioned as necessary.

All users are entitled under the Regulations to an eyesight test, to be carried out by a registered practitioner, at the organisation’s expense. The results of all such tests will be collated by *Danniella Wiltshire*. Tests should be carried out at regular intervals (as advised by the optician). Where the results of the test show that corrective appliances are necessary (specifically for DSE use only, in order to correct vision defects at the viewing distance of the screen from the user) these will be provided at the organisation’s expense, (as required by the Regulations).



## ⇒ Electricity at Work

The Company will take all reasonable steps to secure the health and safety of employees who use, operate or maintain electrical equipment. We acknowledge that work on electrical equipment can be hazardous and it is therefore our intention to reduce the risks as far as is possible.

In particular it is the responsibility of *Danniella Wiltshire* to ensure that:

- Only competent people operating safe working systems are permitted to maintain electrical equipment.
- Wherever practicable, electrical equipment will be Isolated whenever any maintenance work is required to be carried out. Wherever live working is unavoidable it will be subject to a strict Permit to work system with adequate controls in place to prevent injury.
- Fixed and portable electrical equipment will be periodically inspected by competent people, any equipment found to be defective will be withdrawn from use for repair or disposal.

A register of portable electrical equipment is maintained and such equipment is checked by a competent person on a regular basis to ensure its continued safety.

## ⇒ Machinery Safety

The Company will take all reasonable steps to protect the health and safety of employees who work on or near machinery

In particular it is the responsibility of *Paul London or Danniella Wiltshire* to ensure that:

- A Risk Assessment is carried out on all existing machinery to ensure that all machines are adequately guarded and are safe for use.
- Any new machinery which we may from time to time purchase, Is specified, designed and supplied to the company in accordance with appropriate standards.
- Before any new machinery is brought into use a Risk Assessment is carried out and that the machine is in a safe condition.
- Appropriate training is given to all machinery operators.
- New and existing machinery is maintained so far as is necessary, to prevent danger to employees and others.
- Machinery is not operated unless guards and other safety devices are fitted and operating correctly.

Safe systems of Work are in place for Machinery maintenance operations including suitable isolation procedures.

## ⇒ Manual Handling

Statistics show that poor manual handling is one of ‘the most common causes of injury at the workplace, these injuries often have long-term effects. Company policy is to reduce the risk of manual handling injuries as far as is reasonably practicable and to provide guidance to employees on the measures that should be taken to ensure safe lifting and carrying.

In particular it is the responsibility of *Danniella Wiltshire* to ensure that:

- A Risk Assessment of manual handling and lifting tasks is carried out.
- Operations which involve manual handling are eliminated, so far as is reasonably practicable, and where this is not reasonably practicable, that appropriate lifting aids are provided.
- The design and layout of the workplace is considered and changes are made where practicable.
- Training is given to all employees on the correct ways to handle and lift and materials/equipment.

## ⇒ Hand-arm Vibration Syndrome & Whole body Vibration Syndrome

The company will carry out a written assessment of the risks arising from Hand-arm Vibration Syndrome & Whole body Vibration Syndrome. Where possible the Company will purchase tools and equipment that have Vibration Control built in and will seek to modify existing equipment to reduce vibration levels

Employees will receive training in the correct use of tools and equipment and how to recognise the early symptoms of injury.

Where necessary job rotation will be employed to give breaks from the vibration

Suitable Personal Protective Equipment will be provided to ensure fingers, hands and, in the case of whole body vibration, whole body, are sufficiently protected from cold whilst using vibrating equipment

Employees using high vibration tools and equipment will be subject to regular Health surveillance.

Employees will be provided with Risk and Method Statements clearly showing the level of risk determined around such equipment.

## ⇒ New and Expectant Mothers

The Company has strong obligations towards its staff who become pregnant and on into the period after they have given birth. The Management of Health and Safety at Work Regulations require all organisations to assess workplace risks for all employees. Where women of childbearing age are employed the assessment must also cover risks specific to new and expectant mothers.

When a member of staff informs the Company that she is pregnant, it is the responsibility of **Danniella Wiltshire**

to ensure that an assessment of the safety implications of that person's work is carried out in full consultation with her, as soon as possible. The results are to be recorded, copied to the individual and filed in the personal file. As the pregnancy progresses, and also at return to work, the assessment should be reviewed with the person.

If **Exel Contracts Ltd** becomes aware of an outbreak of Rubella (German Measles) in the staff, the expectant mother will be informed promptly.

## ⇒ Noise Control

The Company will take all reasonable steps to ensure that the risk of hearing damage to employees working with noisy equipment or in a noisy environment is reduced to the lowest practicable level. In accordance with the Control of Noise at Work Regulations 2005 it is the responsibility of **Paul London** and/or **Danniella Wiltshire**

to ensure that:

- A suitable and sufficient Noise Assessment is carried out by a competent person.
- Noise is reduced by engineering means as far as reasonably practicable, where this is not reasonably practicable; employees will be given suitable and appropriate hearing protection.
- Where appropriate, hearing protection areas are designated.
- Where appropriate Information instruction and training is provided and hearing protection available.

Where appropriate suitable signs are displayed to remind those at risk to wear the appropriate protection and to identify mandatory hearing protection areas.

## ➤ Personal Protective Equipment

The Company will provide Personal Protective Equipment when the risk presented by a work activity cannot be adequately controlled by other means, in doing so we acknowledge that health and safety hazards will have already been identified. It is our policy to ensure - through the proper use of PPE - that the hazards are reduced to the lowest level practicable.

In particular it is the responsibility of *Danniella Wiltshire* to ensure that:

- Any PPE supplied provides the maximum protection for the particular hazard.
- Employees are given such information and instruction as is necessary to enable them to understand the importance of wearing PPE where required.
- Training is given to employees to enable them to wear and maintain items of PPE correctly.

Company policy determines that where its employees are provided with PPE to protect their health and safety they must use it at all times. Periodic checks are made and words of advice are given if PPE is not worn/used in the correct manner. This is monitored and if repeated disciplinary action will be taken and the engineer will be removed from site with immediate effect.

## ➤ Slip, Trips and falls

Inadequate provision of workspace can lead to increased risks of slip, trip and falling injury. To minimise the possibility the following precautions will be followed.

- When planning new workplaces or when making alterations to existing ones, adequate pre-planning must take place.
- In offices, ensure that when estimating the space per employee, the space taken up by the office furniture is taken into account.
- As well as the simple space per employee, the layout of the workspace must be considered to ensure that no risks are created by the provision of inadequate access.
- Ensuring that all potential slip and trip hazards in the workplace are identified.
- The layout of the work area should be arranged to minimise the risks of trips and falls caused by obstructions.
- Cabling and wiring should be arranged in such a way as to eliminate, as far as possible, any potential trip hazards.
- Adequate provision should be made for storage within the work area to prevent the accumulation of obstructions.
- Regular workplace inspections should be carried out to ensure that good housekeeping standards are maintained.

Where necessary the appropriate risk assessments and risk reduction methods will be in place, this will be checked and agreed by *Danniella Wiltshire*, Ellen Cropp or Hannah London.

## ➤ Temporary and Casual Staff

It is Company policy to protect the Health and Safety of all its employees, including those who work for relatively short periods of time.

In particular it is the responsibility of *Paul London, Danniella Wiltshire or Mark Ferris* to ensure that:

- Temporary and Casual employees are informed of any special skills, qualifications or requirements that are needed to enable them to function safely and without risk to health.
- Temporary and Casual employees are subject to basic induction training in respect of safe working and site safety.
- Temporary and Casual employees are provided with a copy of all Risk and Method Statements relevant to the works they are employed to complete.

## ➤ Visitors

The company acknowledges its responsibility to ensure the health and safety of all persons who come into contact - either directly or indirectly - with its work activities - this includes visitors to Company premises. All visitors are requested to agree and comply with health and safety instruction given before signing in at reception.

In particular it is the responsibility of the person meeting the visitor to ensure that visitors are informed of any particular hazards, which they might expect to encounter during their time on-site, and to inform them of any precautions that they should take.

## ➤ Working Alone

The Company will assess the hazards and risks associated with lone-workers and take steps to minimise them so far as is reasonable practicable.

In particular *it is the responsibility of Danniella Wiltshire* to ensure that:

- Equipment used by lone workers is properly maintained.
- Special training is provided for lone workers where required.
- Communication (Mobiles and/or radios are to be fully charged and in full working order) is established with any lone worker, which is appropriate to the circumstances.
- The lone policy is adhered to
- The Risk and Method Statement covers lone working

All Staff are reminded of their responsibility to notify a supervisor or manager if they are or intend to work in a department alone, either during or outside normal working hours.

## ➤ Working at Height

Working at height remains one of the biggest causes of fatalities and major injuries. Common cases include falls from ladders and through fragile surfaces. 'Work at height' means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury (for example a fall through a fragile roof).

The Company will make sure work is properly planned, supervised and carried out by competent people with the skills, knowledge and experience to do the job. The Company will ensure the right type of equipment for working at height is used.

The Company will take a sensible approach when considering precautions. Low-risk, relatively straightforward tasks will require less effort when it comes to planning and there may be some low-risk situations where common sense tells you no particular precautions are necessary.

Before working at height work through these simple steps:

- avoid work at height where it's *reasonably practicable* This means *balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble. However, you do not need to take action if it would be grossly disproportionate to the level of risk.* to do so
- where work at height cannot be easily avoided, prevent falls using either an existing place of work that is already safe or the right type of equipment
- minimise the distance and consequences of a fall, by using the right type of equipment where the risk cannot be eliminated.

In particular it is the responsibility of *Danniella Wiltshire* to ensure that a risk assessment is carried out for all activities that involve work at height and that safe working procedures are identified and communicated to employees before authorisation to carry out the work is given.

All staff are given training on Working at Height via e-learning Citation and tool box talks

All staff are responsible for reporting the need for any such activity to management prior to commencement.

## ➤ Welfare

The following are always provided by Exel Contracts Ltd:

- Toilets, with hand washing facilities.
- All toilets are equipped with a hygienic means of drying hands.
- A supply of wholesome drinking water that is readily accessible and appropriately marked.
- A reasonable temperature that will be at least 16 degrees Celsius unless the activities involve severe physical effort in which case the temperature will be at least 13 degrees Celsius.
- Suitable and sufficient lighting that is, so far as is reasonably practicable natural lighting to enable people to work, use facilities and move around the workplace without experiencing eyestrain.
- A clean working environment. The premises will be kept clean and tidy with all traffic routes cleaned at least once a week and any accumulation of dirt and refuse removed at least daily. Toilets are cleaned and disinfected daily.
- Windows and doors that are made from safety material or protected against breakage. They are also be appropriately marked to make them apparent.
- A place where employees can store outdoor and personal clothing whilst at work. This facility will be clean and well ventilated to enable wet clothes to dry.



### GENERAL STATEMENT OF INTENT

The company believes that continuous improvement in environmental management is an essential element within its overall business plan - minimising waste, consumption of resources and pollution goes hand in hand with high productivity and quality standards. This policy therefore applies to, and will be integrated with, all business activities, products and services with the potential to adversely affect the environment on a local or global scale.

We recognise and accept our legal duty of care toward the environment and are committed not only to complying with our legal duties and with other requirements to which we subscribe but to exceed these requirements where reasonably practicable.

Energy generation and consumption is a major contributor to the production of greenhouse gases and global warming. Although our use of energy is limited primarily to energy efficient IT equipment we will nevertheless seek to manage our use of energy, reducing consumption and continuously improving efficiency wherever possible.

We will seek to identify all processes that generate waste and will seek to avoid environmentally harmful disposal by eliminating, minimising or reusing waste products wherever reasonably practicable or, where this cannot be achieved, identifying and taking advantage of opportunities for recycling.

The basis of our environmental management system will be an ongoing review of business activities and the identification of aspects of our work that could have an impact upon the environment and the implementation of ongoing steps to eliminate, minimize or manage them so that adverse environmental effects are minimised.

To enable us to measure our environmental performance we will review the suitability of Environmental Policy and the performance of Environmental Management System in order to promote continual improvement year on year in our environmental performance.

**Signed:**

**Position held: Director**

**Date: 24<sup>th</sup> March 2018**

**Review 24<sup>th</sup> March 2019**

## • Scope

The scope of the Environmental Management System extends to all products and services produced by **Exel Contracts Ltd.**

Included within this definition and in addition to planned operating conditions are non-routine activities and foreseeable emergency situations.

The environmental management system will also apply to those aspects of the activities of suppliers and service providers over which we have, or could have an influence and the environmental performance of our business partners.

## • Organisation

The organisation established to implement this Environmental Policy is:

Overall responsibilities                      **Paul London**

Day to day duties                              **Danniella Wiltshire**

## • Arrangements

<b>Contents</b>	<b>Page</b>
<i>Legal Compliance</i>	3
<i>Prevention of Pollution</i>	3
<i>Management of Waste</i>	3
<i>Carbon Management</i>	4
<i>Conservation of Water Resources</i>	4
<i>Sustainability</i>	4
<i>Corporate Social Responsibility</i>	4

## ➤ Legal Compliance

The company is aware that an ever increasing range of legislation is being introduced both by the UK Government and directly from the European Union intended to protect the local and global environments and to attempt to ensure the sustainable use of the earth's limited natural resources.

We recognise the importance of compliance with these requirements both to the business itself and to the wider environment and are committed to taking all reasonable steps, on an ongoing basis to identify those legal constraints within which we are required to work and pledge to comply fully with both the letter and spirit of the law as it applies to our activities and those of our partners where we are able to exert a meaningful influence.

We will identify legal requirements relevant to our activities and will ensure that relevant details of such requirements are communicated in an effective manner to our staff. Any actual breaches of our legal responsibilities will be fully investigated and a report submitted for consideration by senior management so that corrective and preventative action may be taken to ensure that no further breaches take place.

## ➤ Prevention of Pollution

We recognise our fundamental responsibility to prevent pollution of the environment and will identify all environmentally harmful substances, materials and processes used by the company and seek, on an ongoing basis, to replace them with environmentally safe or less harmful alternatives where such alternatives are available at a reasonably practicable cost. We shall further ensure that all environmentally harmful substances and materials are handled safely throughout their storage, use and disposal.

## ➤ Management of Waste

We recognise the management of waste as a key priority for the business and that eliminating waste at source or minimising that which cannot be eliminated are two of the most effective ways in which we can reduce the impact that our activities have upon the environment.

Where waste is unavoidably produced, we recognise and accept the duty of care in respect of waste placed upon us by Section 34 of the Environmental Protection Act 1990. All contractors employed or used by the company to handle waste that we produce will be required to supply a valid Registration of Carriers Certificate before they are employed by the Company.

We will further ensure that the ultimate destination of our waste is determined and confirm that the site to which it is delivered holds a valid Waste Management License enabling it to lawfully receive and process our waste.

We shall ensure that at all times, waste is held securely to prevent its escape and that where hazardous waste is produced, that this waste is segregated from other waste streams and from other hazardous waste streams with which it may react.

Whenever waste produced as a result of our activities is removed from our site, we will ensure that relevant documentation is prepared and exchanged between ourselves and the contractor to which the waste is being passed. This documentation will then be returned to the company office and retained for the requisite period.

Finally, we will seek, at all relevant levels within the business to minimise the amount of waste sent to landfill, recognising that this consumes irreplaceable natural resources. Wherever possible, we will seek to eliminate, reduce or re-use waste before considering other options such as recycling or recovery. Land filling shall be considered a last resort.



## ➤ Carbon Management

We recognise the potentially detrimental effect that certain emissions produced by the company in the delivery of its products and services may have on the global environment and shall seek to reduce emissions of the 6 'greenhouse gases' (GHGs) identified in the Kyoto Protocol as contributing to climate change on an ongoing basis.

The primary source of carbon produced by the company is in our consumption of energy derived from fossil fuels. We will seek, on a continual basis, to identify opportunities to reduce the amount of energy that the business uses through an ongoing program of energy efficiency, recognising the benefits that this action will have both on the environment and on the profitability of the company.

Where energy use is unavoidable, we will encourage our energy provider to consider the viability of supplying energy derived from renewable sources. We commit to considering the environmental cost of energy production alongside and in equal measure, to its financial cost when selecting and reviewing our energy supplies.

## ➤ Conservation of Water Resources

The company recognises that clean fresh water is a finite resource and that depletion of available fresh water supplies degrades the natural environment. To the extent that we are able, we commit therefore to identifying and implementing effective water conservation practices to ensure that water use is minimised, wherever reasonably practicable.

In making these commitments, we accept that achieving the aims of this policy may require behavioural changes on the part of our employees and commit to providing the resources required to support and achieve this.

## ➤ Sustainability

The company is committed to upholding the principles agreed at the Rio Earth Summit 1992 so far as our business activities are able to exert a meaningful influence.

In support of this commitment, we shall ensure that where products or services are purchased in support of our business aims, that they are, where applicable, obtained from sources that hold a recognised certification confirming that they manage the earth's natural resources in a responsible and sustainable way and support the identity, culture and interests of indigenous people and their communities and other local communities.

## ➤ Corporate Social Responsibility

The company is committed to ensuring that we conduct our activities in a socially responsible way. In order to achieve this aim we are committed to working toward the realisation of the following corporate aspirations:

1. Establishing a strategy by which the business is able to identify the material, non-financial issues that we face and to ensure that these inform, in a real way, high level decisions and plans.
2. Engaging with our stakeholders in identifying the key responsibilities that we hold toward society and how we should respond to their views. Such engagement will involve (as applicable):
3. Considering material, non-financial issues, including our impact upon society, at senior levels within the business, ensuring that our governance of such issues is made transparent;
4. Actively managing the performance of our environmental management system and associated processes to ensure that our commitment to corporate social responsibility is realised;
5. Public disclosure of information about our material issues and how we are dealing with them;
6. Inviting an independent check of our policies and processes that support our commitment toward Corporate Social Responsibility in order to achieve and maintain the trust of our stakeholders.