

GSI CONTRACT SERVICES LIMITED

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Environmental Policy

Statement of Intent

Section

1

1.0 Statement of Intent.

GSI Contract Services Limited accepts its responsibility to reduce wherever possible, its negative impacts on the environment.

GSI Contract Services Limited acknowledges the role it has to play in protecting the environment and as such recognises the need for the principles of responsible environmental management and sustainable development to become an integral part of its day-to-day activities and future strategic planning.

The Company has identified the following key areas which need to be controlled together with goals that must be achieved if its environmental aims are to be realised.

It is therefore committed to

- Applying the principles of sustainable development in both present and future decisions.
- Identifying the significant environmental impacts arising from its activities.
- Reducing, and where practicable, eliminating any adverse impacts on the environment, which could arise through its activities.
- Adopting environmental management systems and procedures to maximise environmental standards.
- Minimising the potential outcomes that could result from waste production, and energy and water use.
- Conserving energy, water and other resources to reduce CO₂ emissions levels.
- Promoting the efficient reuse and recycling of materials.
- Minimising the amount of waste that the Company produces.
- Reducing and where practicable preventing pollution.
- Diligently exercising a 'duty of care' to ensure responsible and lawful disposal of all waste produced.
- Reducing the impact of transport on the local environment arising from vehicles brought onto the Company's sites and those which are used for our business activities.
- Complying with, and wherever practical, exceeding the requirements of all applicable environmental legal requirements.
- Working with and assisting suppliers, contractors, customers and clients to develop a concerted approach in protecting the environment ensuring that procurement policies have regard to the environmental performance of organisations that provide goods or services.
- Measuring environmental performance in terms of meeting environmental objectives and targets.
- Striving to continually improve environmental performance through a series of realistic objectives and targets with appropriate performance indicators.

- Considering future environmental factors in respect of the Company's possible future expansion, and seeking where practical to minimise environmental impacts.
- Providing the resources required for the effective implementation of this policy and using them efficiently through promoting the policy of using sustainable resources, by discouraging wasteful practices, and by setting targets through monitoring environmental programmes.
- Raising awareness amongst staff and other users by providing necessary information and training to implement this continued improvement programme.
- Undertaking regular audits, reviews and monitoring to ensure that the environmental management system is being fulfilled.
- We are committed to prevent pollution

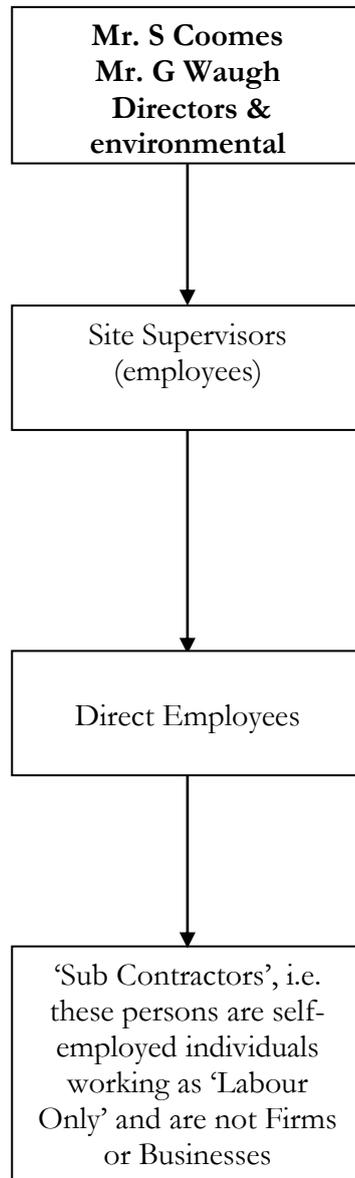
Signed by: _____



Date: 19th January 2018

For and on behalf of:
GSI Contract Services Limited

Chain Of Command for Environmental Management



Implementation

2.0 Environmental Protection Act.

GSI Contract Services Limited is aware of the principle in law that the polluter must pay for any environmental damage which might have arisen, as a result of the commercial activities of the Company.

2.1 The Control of Hazardous Substances.

It is our stated policy on our approach to the control of substances hazardous to health used in work activities. This Company, therefore, will ensure the collection of up to date health and safety data sheets for substances hazardous to health.

This information will be made available to those of our employees using hazardous substances at work. These can include gases, vapours, liquids, fumes, dusts and solids and can be components of a mixture of materials and micro-organisms. Our substances' purchasing policy will operate on the principle of elimination of hazardous substances, or at least to substitute hazardous substances with a safer product.

Suitable and sufficient controls will be put in place to prevent substances which have been identified as being harmful to the environment from entering water courses, or other such biomes.

2.2 The Working Environment.

Workplace environmental standards are of paramount importance to GSI Contract Services Limited. We are aware of the Workplace (Health, Safety and Welfare) Regulations 1992, which came fully into force on 1.1.1996.

2.3 Lighting.

It is our policy to ensure suitable and sufficient lighting within every workplace occupied by our employees, which can be the Company premises but also client sites. Lighting shall, so far as is reasonably practicable, be by natural light. There is a requirement to maintain suitable and sufficient emergency lighting, to ensure persons at work/ customers are not exposed to danger.

2.4 Heating and Cooling.

The policy is to provide and maintain a reasonable working temperature within all of our premises. We shall not use any method of heating or cooling which results in escape into our premises, or the wider environment, any fumes, gases or vapours, of such a character and to such an extent, that might be injurious or offensive. Temperatures within the Company premises shall be monitored and to this end we will provide suitable thermometers for display in proper locations, to enable workplace temperatures to be measured.

2.5 Cleanliness and Waste Materials.

All furniture, fittings, and furnishings will be kept sufficiently clean. All floor surfaces, walls and ceilings inside of our buildings, will be kept sufficiently clean. The process of cleaning will not itself create a risk to health and safety, or be detrimental to the environment.

Waste materials will be minimised not be allowed to accumulate, except in suitable receptacles. There are proper controls in place for the collection and disposal of controlled waste both from the Company premises and client sites.

2.6 Room Dimensions and Space.

All of the rooms in which employees are at work, have sufficient floor areas, height and unoccupied space, for the purposes of their health and safety, so far as is reasonably practicable.

2.7 Maintenance of Workplaces, of Equipment, Devices and Systems.

All work equipment, devices and systems are maintained in an efficient state, in efficient working order and in good repair.

2.8 Housekeeping, Handling and the Storage of Materials.

These aspects are part and parcel of our approach stated under 'Cleanliness and Waste Materials' above. However, suffice it to say here, that the respective workplaces, including all client sites shall demonstrate good housekeeping standards in relation to the delivery, distribution and storage of components used in seating builds. Materials and components will be distributed by mechanical means where reasonably practicable and we shall always attempt to have systems of work to minimise the risk of injury from manual handling operations.

2.9 Smoking at Work and Odours.

Suitable arrangements are in place to ensure compliance with the 'smoke-free' workplace requirements for the Health Act 2006.

2.10 Noise.

We shall discharge the general duty to reduce the risk of hearing damage to the lowest level that is reasonably practicable. This will apply to the entire working environment but it is also of significance to external operations at client sites.

2.11 Radiation.

It is the policy of the Company to select and introduce work equipment that is classified as having 'low radiation' emissions, such as the display screen equipment (DSE) provided for the use by our employees.

2.12 Fire Extinguishing Equipment.

We are aware that the agent HALON has been found to contribute to the depletion of the atmospheric OZONE layer. Because it attacks Ozone, Halon has been prohibited from use as an extinguishing agent in fire fighting systems. Protecting the environment means protecting the OZONE layer and not damaging the atmosphere.

2.13 Environmental Monitoring.

If there is any doubt concerning the adverse environmental impact arising from any of our activities and operations (even if carried out by others on our behalf), we will carry out, or require any other employer involved, to undertake a suitable form of environmental monitoring. This will be to determine that the work activities will not give rise to any level of atmospheric pollution.

2.14 Work Activities and a Policy for Protection of the Environment.

GSI Contract Services Limited is committed to operating in a manner that provides the required degree of protection for:

- all water courses with which we may have contact or effect in some way, tree life and the quality of soil,
- the foundations of buildings and other structures.

We will require the proper degree of controls for the application of chemicals to ensure that there is no pollution to the environment.

The other elements that form part of this Policy are those relating to noise abatement in the environment from work activities; fire protection in relation to natural vegetation, buildings and animal life; a duty of care in relation to waste disposal; and the re-instatement of those areas in which this organisation or its agents have been involved with their respective operations.

We are also aware of our obligations under the Environmental Damage (Prevention and Remediation) Regulations 2009 in protecting sites of special scientific interest, protected species and natural habitats, surface or ground water and land.

Will ensure that should an incident occur that affects any of the above, all practical steps will be taken to prevent further damage, and to inform the Environment Agency or Local Authority.

2.15 Quality Assurance and Purchasing Policy.

It is the custom and practice of this Company to have a purchasing policy for substances used in work activities; work equipment; personal protective equipment, that conforms to the principle that selection and purchase is on the basis of the safest substance/ item of equipment and the most environmentally 'friendly'.

2.16 Transport Arrangements.

Wherever possible we will ensure that the use of vehicles as part of our work activities is to be used in such a way as so to minimise our impact on the environment. The minimum number of vehicles necessary will be used to travel to site.

Vehicles are subject to routine maintenance, servicing and 'MOT' testing, so as to ensure that our vehicles do not exceed current immersion levels, or discharge oils and other fluids.

2.17 Minimising waste.

Wherever possible the quantity of waste created by the company will be kept to a minimum. Any materials that are not used 'on-site' such as timber etc. We will ensure that all waste is dealt with in accordance with the relevant regulations appropriate to its category. This includes the Waste Electrical and Electronic Equipment Regulation 2006 and the Hazardous Waste Regulations 2005, and the Site Waste Management Plan Regulations 2008.

2.18 The Site Waste Management Plans Regulations 2008.

The company is aware of the above Regulations which came into force from 6th April 2008. Therefore where the company act as Principal Contractor a site waste management plan, where the threshold value of the projects are exceeded, will be prepared and updated as appropriate identifying waste that is either disposed of, re-used, recycled, or otherwise recovered.

The person responsible for ensuring the Site Waste Management Plan is completed is the Contracts Director. The plan will be made available and updated as required. All registration documents and waste transfer notes will be kept in the Site Waste Management Plan or at least referenced in the plan.

Checks will be carried out on sub-contractors to ensure they comply with the plan and are legally compliant. This will be the defined responsibility of the Contracts Director. The company has prepared some general guidance for the effective management of site waste as follows.

Buying and Storing Materials

- Order the amount of materials you need as accurately as possible;
- Arrange for 'just in time' deliveries to reduce storage and material losses;
- Consider the source of materials (Is the company certified with environmental standards? Quality materials and recycled materials may prove cheaper).
- Consider the packaging used for materials delivered to the site -can this be reduced or recycled.
- Ensure that deliveries are rejected if damaged or incomplete
- Make sure storage areas are safe, secure and weatherproof (where required)
- Store liquids away from drains, burns and in bunded areas to prevent pollution.

Site Activities

- Recycle suitable spoil, demolition materials, prunings, and surplus construction material arising from the works on site to avoid the need to transport materials.
- Keep the site tidy to reduce material losses and waste.

Training and awareness

- Promote good practice awareness as part of health and safety induction / training for workers onsite.

Waste Segregation

- Segregate different types of waste as they are generated using different skips where possible (given the space available). At a minimum there should be skips for wood, inert and mixed materials, although a skip for metals may generate some income. If there is a shortage of space and not enough room for multiple skips get a licensed waste management company to deal with waste - they may be able to recover recycle materials from mixed skips.
- Use the Waste Aware Construction website where you can create posters in line with the National Colour Coding Scheme to identify skips easily.

Staying on the right side of the law

- Complete waste transfer notes before any waste leaves the site
- Ensure all waste carriers have a valid waste carriers registration certificate
- Ensure all wastes are disposed of at a correctly licensed site
- Complete notification for hazardous waste removal and transfer.

3.0 Environmental Aspects.

The company has identified the environmental aspects pertaining to the business operations and these are recorded and maintained with the management review. The review meeting attendees take account of the severity of the environmental aspects and the company's ability to influence them, so they can determine which are significant. Maintained in Appendix 1

4.0 Competency.

We have established a training procedure to ensure that all employees whose work may have a significant impact on the environment receive training on the importance of complying with the requirements of the environmental policy, procedures and other requirements of the EMS; the significant environmental effects associated with their work, the environmental benefits of improved performance, and the potential consequences of departing from specified procedures.

Company management will assess relevant environmental training needs for the coming year based on the competency framework.

All new staff will undergo environmental awareness training as part of the induction process. Key staff will receive higher-level training as required.

5.0 Objectives & targets

We are committed to continually improving our environmental performance. This will be achieved, in part, by setting annual objectives and targets. These are based on the information contained in the Environmental Aspects & Impacts Register and the Regulatory Register below.

In setting the annual objectives and targets the organisation considers;

- Environmental policy commitments
- Legal requirements
- Environmental impacts
- Views of interested parties (both internal and external)
- Government strategies
- Technological options
- Other relevant issues

The objectives and targets are approved and signed off at Directors Team level. Directors Team assign responsibility and timescales for completion of the targets. This is documented as part of the Annual Management Review Meeting minutes.

4.0 Review.

This policy - in the same way as our Health & Safety Policy - will be subjected to continuous review and revision in line with the development of GSI Contract Services Limited, changes in current UK legislation, or the perceived demands of Society.

Appendix 1 – Environmental aspects/impacts record.

COMPANY NAME: GSI CONTRACT SERVICES LIMITED

DATE: 16th May 2016

No	Aspect	Impacts	Risk Evaluation		
			L	C	R
1	OFFICE – use of water for amenities.	Generation of domestic wastewater / depletion of natural sources.	1	2	2
2	OFFICE – Use of recyclable or reusable resources such as paper.	Generation of office wastes leading to depletion of renewable sources	1	1	1
3	OFFICE – Use of new paper	Use of paper for printing leading to depletion of renewable sources	1	2	2
4	OFFICE – Use of energy for lighting	Generation of greenhouse gases and contribution to the carbon footprint.	2	2	4
5	OFFICE – Use of energy for climate control	Generation of greenhouse gases and contribution to the carbon footprint.	2	2	4
6	OFFICE – Use of energy for electronic equipment.	Generation of greenhouse gases and contribution to the carbon footprint.	2	2	4
7	OFFICE – Use of vehicles to work	Exhaust emissions contributing to climate change / use of fuels depleting non-renewable sources.	2	2	4
8	SITE – Generation and disposal of waste/packaging.	Disposal of hazardous waste – leakage into watercourse or drain system.	2	2	4
9	SITE – Usage of paint on site.	Leaks into drains/watercourses causing pollution.	2	3	6
10	SITE – use of power tools (electrical).	Generation of noise/dust fumes. Use of energy from non-renewable sources.	2	2	4
11	SITE – Use of vehicles to site	Exhaust emissions contributing to climate change / use of fuels depleting non-renewable sources.	2	2	4
12	SITE – Use of petrol spray pumps	Exhaust emissions contributing to climate change / use of fuels depleting non-renewable sources.	2	2	4
13	SITE – Generation of empty	Waste into land fill	2	2	4

	paint tins.				
14	SITE – Generation and pallets/packaging.	Waste into land fill	2	2	4
15	SITE – Spraying of solvent paints	Leaks into drains/watercourses causing pollution.	2	2	4
11					
12					

Key: L= Likelihood, C= Consequence. R= Risk

RISK ESTIMATOR

Likelihood	Definition	Score
<i>Certain</i>	<i>Once a year</i>	<i>4</i>
<i>Probable</i>	<i>An incident which is reasonable foreseeable</i>	<i>3</i>
<i>Possible</i>	<i>An incident which may occur</i>	<i>2</i>
<i>Unlikely</i>	<i>An incident which is extremely unlikely to occur</i>	<i>1</i>

Consequence	Definition	Score
<i>Severe</i>	<i>High environmental impact Is causing or may cause breach of law Causing complaints and/or concern to stakeholders</i>	<i>4</i>
<i>Medium</i>	<i>Medium environmental impact Small change causing breach of law Small change causing complaints and/or concerns of stakeholders</i>	<i>3</i>
<i>Low</i>	<i>Slight environmental impact Controlled by law but very unlikely to be a breach Highly unlikely to cause complaints and/or concern to stakeholders</i>	<i>2</i>
<i>Negligible</i>	<i>Negligible environmental impact Not controlled by law No risk of complaints or concerns to stakeholders.</i>	<i>1</i>

APPENDIX 2 – LEGAL COMPLIANCE EVALUATION.

Environmental Management System		
Register of Applicable Legislation		
Author: Graeme Waugh	Date: May 2013	Approved
Issue: 1	Date of review: November 2013	Page 1 of 2
Applicable Legislation / Duty of Care		
Ref	Title	
EL1	Environmental Protection Act 1990 Section 34 requires the need to consider Duty of Care with regard to special and inert waste.	
EL2	Environmental Protection Act 1990 Section 34 requires the need to consider Duty of Care with regard to safeguarding access to property and preventing accidental or deliberate environmental contamination	
EL3	Water Resources Act 1991) with regard to knowingly permit any poisonous, noxious or polluting matter or nay solid waste matter to enter any controlled waters.	
EL4	Control of Pollution Act 1974 (Part II) as amended by the Environmental Act 1995, with regard	

	to the discharge of rainwater through the surface water drains to controlled waters
EL5	Fires / Bonfires - Clean Air Act 1993, Section 2. Environmental Protection Act 1990/ Environment Act 1995, para 195 of Schedule 22 Environmental Protection Act 1990 Part III, as amended.
EL6	Vehicle Air Pollution - Road Traffic Act 1988. Road Vehicles(Construction and Use) Regulations 1988, as amended. Environment Act 1995. The Road Traffic (Vehicle Emissions) (Fixed Penalty) Regulations 1997.
EL8	Noise - Construction Sites Control of Pollution Act 1974, S60.(COPA) Environmental Protection Act 1990, Part III

EL9	<p>Storage/Spillage of liquids - Water Resources Act 1991, sections 85, 92, 161, 161 A and 219. Schedule 22 to the Environment Act 1995. Environmental Protection Act 1990 Groundwater Regulations 1998 Environmental Protection Act 1990</p> <p>It is an offence to cause or knowingly permit any poisonous, noxious or polluting matter or any solid waste matter to enter any controlled waters.</p> <p>The Environment Agency may carry out works to prevent or clean up water pollution and recover costs from the potential polluter or polluter.</p>
EL10	<p>Control of Waste - Waste (England and Wales) Regulations 2011. These regulations came into force on 29 March 2011, the regulations update some aspects of waste controls. From 28 September 2011 Regulation 12 of the regulations comes into force, this means all our transfer notes and, for hazardous waste, consignment notes, must contain a declaration that the waste hierarchy has been considered in deciding the most appropriate waste management option for that waste.</p> <p>We must also include on the waste transfer note the 2007 Standard Industrial Classification (SIC) code of the person transferring the waste and continue to use the 2003 SIC codes on hazardous waste consignment notes.</p> <p>The regulations also require the separate collection of waste paper, metal, plastic and glass from 1 January 2015.</p>
EL 11	<p>Waste Duty of Care – Environmental Protection Act 1990 Part II Environmental Protection (Duty of Care) Regulations 1991</p> <p>Persons concerned with controlled waste are under a Duty of Care to:</p> <ul style="list-style-type: none"> · prevent any other person committing the offence of depositing, treating or keeping of controlled waste without a waste management license or in a manner likely to cause harm to health or the environment;

	<ul style="list-style-type: none"> · prevent the escape of waste; · ensure that waste is transferred to an authorised person or to a person authorised to transport waste; and · ensure the waste is accompanied by a written description of the waste. <p>There must also be a transfer note satisfying the requirements of the Environmental Protection (Duty of Care) Regulation, 1991. A properly completed transfer note will also satisfy the requirement to provide a written description. It is not necessary if a consignment note is required.</p>
EL12	<p>Hazardous Waste - Hazardous Waste Regulations 2005.</p> <p>These regulations for hazardous waste come into force on 16 July 2005. They require producers of hazardous waste to notify (register) their premises. Restrict mixing and requires separation of waste streams where appropriate.</p> <p>Provide cradle to grave documentation for the movement of hazardous waste.</p> <p>We will register sites that produce > 500 Kg of hazardous waste with the environment agency.</p>

EL13	<p>Storage of solids – Environmental Protection Act 1990 (There is a general duty to prevent the escape of solid materials from sites. Materials must be kept in containers or properly secured areas. All such containers or areas must be regularly maintained to prevent escape and damage properly rectified. Care must be taken with materials, which are prone to escape e.g. powders, paper.)</p>
EL 14	<p>Electrical & Electronic Equipment - Waste Electrical and Electronic Equipment (WEEE) Regulations 2007.</p> <p>The Waste Electrical and Electronic Equipment Regulations (“the WEEE Regulations”) came into force on 2 January 2007,</p> <p>They aim to prevent WEEE arising, to encourage reuse, recycling and recovery of WEEE and to improve the environmental performance of all operators involved in the lifecycle of electrical and electronic equipment, especially those dealing with WEEE.</p>

Planned review date – May 2017