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Fitout & Refurbishment Specialist

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Environmental Management Policy and Procedures

**29, Manor Crescent
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Dated: 31st March 2010

Safetywise
Solutions Limited



Environmental Management – Meeting Our Responsibilities

MarkOne Interiors Ltd recognises it has both a legal duty and a moral responsibility to manage the waste produced in the execution of its work and; in particular, any hazardous waste which might have an adverse impact on the environment. As such the business operates to an Environmental Management System (EMS) that has been developed to suit the needs of the company.

Although MarkOne Interiors is a user of substances that are potentially damaging to the environment, it is the nature of the work that these substances are combined and prepared in such ways as to produce a finished product that is not inherently harmful either to persons or the environment when used in the intended manner. MarkOne Interiors is therefore not (as a nature of our business activities) a producer of hazardous waste.

MarkOne Interiors does recognise that the incorrect disposal of materials (even inert materials) can have a cumulative effect on the environment. We will dispose of all materials in accordance with the requirements of the Principal Contractor and the Local Authority.

The Management of Waste

At all times, MarkOne Interiors will work to the principle that disposal to landfill is always the last resort. The management of waste will be dealt with according to the following hierarchy:-

- **Eliminate** – where possible prevent the creation of waste in the first place
- **Minimise** – keep the quantities of waste produced by planning ahead
- **Re-use** – any materials that can be re-used, should be re-used
- **Recycle** – better than disposal but less efficient than *not* producing waste
- **Disposal** – the last resort.

The person responsible for the implementation of this policy is the General Manager.

Elimination / Minimisation of Waste

It is both a legal and moral requirement, and simple good business sense, that that amount of waste produced is minimised wherever possible. It is the policy of MarkOne Interiors that all contracts will be planned accordingly to leave a bare minimum of spare materials at the end of the job.

Re-use and Recycling of Waste

Where possible, any partially used raw materials will be kept for further use on other jobs. Any raw materials which cannot be saved in this way (e.g. due to the materials spoiling over time) will be disposed of according to the Principal Contractors instructions or the requirements of the Local Authority.

It is the policy of MarkOne Interiors to undertake recycling measures where it is reasonably practicable to do so. In accordance with the Local Authority rules, MarkOne Interiors will separate all waste produced into Recyclable, Green and General Waste.

MarkOne Interiors acknowledges that individual Local Authorities use varied methods of recycling and therefore have different definitions as to what constitutes recyclable waste. Any waste which is to be disposed of at the client's premises shall be separated according to those local rules.

Safe Disposal of Waste

The Environment Agency, which is charged with enforcing legislation regarding the disposal of waste in the England and Wales, considers the producers of waste to be responsible for ensuring it is disposed of safely, even after it has left the control of the producer. MarkOne Interiors will therefore be required to ensure that all persons or companies engaged to remove and dispose of waste on its behalf are authorised to do so.

MarkOne Interiors will ensure that all persons carrying waste hold a current and valid Waste Carrier Licence for the type of waste in question. We will also ensure that any sites to which waste is being taken are authorised by the Local Authority to take, process and otherwise dispose of the waste being received.

In each case a Waste Transfer Note will also be required (copies to be held by the transport driver and MarkOne Interiors) to confirm the nature of the waste and that it is to be taken to the pre-arranged site for which a licence is held. This will be required on each occasion except for regular collection of general waste, in which case the waste carrier may issue a 'season ticket' covering all collections within a defined period (typically of one year).

Accidental Release of Hazardous Substances

MarkOne Interiors follows good practices in the handling and use of all substances. In the event that substances which are potentially harmful to the environment are released, those measures as described in the COSHH assessments will be followed in containing and collecting the spillage.

COSHH assessments for all substances without exception are taken to all jobs on all occasions. All employees are made aware of the contents of these assessments and their purpose.

Site Waste Management Plans (SWMP)

MarkOne Interiors acknowledges that any contract valued at more than £300,000 will require the development of a Site Waste Management Plan (SWMP). Generally, the SWMP will be a requirement of our Client and/or the Principle Contractor. For the vast majority of our projects, the development of a SWMP will not be a direct requirement of MarkOne Interiors. However, the Company does recognise and acknowledge its responsibility to work with and co-operate with the owner of any SWMP that applies to any site on which we operate as regards to its successful implementation.

A SWMP does not make any further legal demands of those persons or companies expected to comply with it. However, it does provide clearly documented instructions for how waste is to be managed on a specific project and allows for the monitoring of waste production in order to help minimise its impact on the environment, the client and the company.

It is the policy of MarkOne Interiors to abide by the principles of a SWMP at all times (including the hierarchy described above) and we will develop a SWMP where appropriate. Where MarkOne Interiors is the Principal Contractor then appropriate guidance will be sought on the development and implementation of the SWMP, the primary source of information being the Environment Agency and www.netregs.gov.uk which provides environmental guidance for small and medium-sized businesses in the UK.

MarkOne Interiors also recognises that for some projects the development of a SWMP might be advantageous even if it is not required in law.

MarkOne Interiors Limited

ENVIRONMENTAL POLICY STATEMENT

It is the Policy of MarkOne Interiors Limited that the following principles are implemented at our Company Head Office and on all construction sites within the scope of our operations.

- The Company Directors shall take the responsibility for the implementation and further development of its Environmental Policy and the Environmental Management System implemented by the Company
- The Company will keep itself informed of relevant legislation and codes of practice on environmental matters related to its operations make best endeavours to ensure that its employees are aware of and are adequately informed of the relevant requirements of this legislation.
- The Company will assess and regularly re-assess the environmental impact of the Company's activities.
- Whilst construction is in progress, the Company will take all reasonable precautions that are consistent with our Clients' instructions to protect against environmental damage, disruption or nuisance on or adjoining the sites on which we operate. The Company will, at all times, endeavour to keep its sites clean and tidy and also any adjoining areas that may be affected by traffic to and from those sites and to prevent pollution of the air, ground or water by noise, fumes, dust or the disposal of construction materials.
- The Company will identify the activities within each project which could have an impact on the environment, and recommend to our Clients such products and materials that have derived from sustainable sources and/or that are reusable or recyclable.
- The Company will use the products and materials that have the least damaging effect on the environment and with the Clients approval shall make every effort to conserve the use of materials and energy and where feasible and financially practical, recycle all materials.
- Any environmental problems encountered in carrying out the works according to the Client's instructions will be brought to the attention of the Client and of any competent authority with a view to finding a satisfactory solution.
- The Company will commit itself to achieve a year on year improvement in the environmental performance of our work and will hold in the highest regard the local (and where appropriate the wider) environment
- The Company will promote and support environmental measures at all levels within our Company of "best practices" to encourage environmental improvement and to minimise, where necessary, the potential for any environmental damage that may be caused by our operations.
- Contract Managers within the Company will conduct environmental audits of all our operations and functions to ensure that the risk of environmental pollution is minimised and to monitor the impact of our works on the local (and where appropriate the wider) environment.
- The Company will ensure that it acts in a socially responsible manner in dealing with environmental issues. To this end we will (where appropriate) develop closer links with other

organisations in order to improve the control and reduction of all forms of pollution generated by our site operations.

- We will actively encourage our suppliers to demonstrate a commitment to environmental improvement in its dealings with the Company
- We will maximise awareness and understanding of, and education about, environmental issues within our Company through the effective monitoring and maintenance of this policy.
- We will strive to achieve high standards of site cleanliness and we shall endeavour to minimise and reduce any environmental nuisance as a result of our site operations.
- We will reinstate sites and working areas to leave them no worse than they were found.
- We will continue to critically examine the Company's energy policy and introduce energy savings wherever possible, reducing costs and the use of fuel resources.

This policy is to be communicated to all Clients, Employees, Suppliers and Sub-contractors.

In order to achieve the objectives stated in the Environmental Policy, it is the policy of the Company to establish and maintain an effective and efficient Environmental Management System, planned and developed in conjunction with other management functions.

Determination of environmental performance within the business and compliance with statutory requirements will be made on the basis of objective evidence of environmental reporting.

Mark Kelly (Managing Director, MarkOne Interiors Limited)

Dated: 31st March 2010

Environmental Management within MarkOne Interiors Limited

An environmental assessment of the Company's environmental aspects and impacts is carried out and documented in the form of Environmental Assessment Reports & Audits.

Environmental Audits are carried out as follows;

Head Office The Company will aim to reduce the impact on the environment due to the daily operations at our Head Office. This will include recycling of office consumables, reduction in the use of paper through electronic storage technologies, management of electrical supply and the heating of the buildings and other such measures as may be appropriate; where a clear benefit to the environment is identified.

Individual Contracts An Environmental Audit shall be undertaken at the pre-contract stage of a project, or in any instance, prior to work commencing on site. This Environmental Audit shall be undertaken by our Site Managers / Supervisors with the aim of identifying (a.) environmental challenges (operations that could have an adverse effect on the environment) and identifying (b.) environmental opportunities (aspects to our work that can present a clear benefit to the environment).

Each identified challenge to our environmental performance is reviewed to establish methods of minimising its effect on the environment. This Environmental Audit is undertaken at the head office on an annual basis, and on a continual basis for each individual contract. All Legislative requirements are taken account of in the environmental assessments.

Each Environmental Assessment is reviewed at regular management meetings and updated where appropriate.

Legal and Other Requirements

The Company maintains an up to date library of environmental legislation. A review of the legal and regulatory requirements of each contract is carried out, possibly in conjunction with the Client or their advisors, as part of the pre-contract stage of each project.

Current relevant legislation and regulations include:

1. Environmental Protection Act 1990
2. The Pollution Prevention Control Act 1999
3. National Society for Clean Air and Environmental Protection Pollution Handbook.
4. Waste Management Regulations
5. Special Waste Regulations 1996
6. Duty of Care Regulations 1991
7. The Clean Air Act 1993
8. The Building Regulations 1991
9. The COSHH Regulations 2002
10. Contaminated Land Legislation
11. Wildlife and Countryside Act 1981 and 1985
12. The Town and Country Planning Act
13. New Integrated Pollution Prevention & Control (IPPC)

New legislation is reviewed as part of our day to day company management activities, to establish its relevance in regard to the Company's activities

Environmental Management Programme

Following each review of environmental aspects and impacts, realistic targets are set and recorded in method statements, contract specific, and a specific objectives and targets table for the Head Office function.

Contract Specific:

The following details shall be documented, when necessary, for site specific operations:

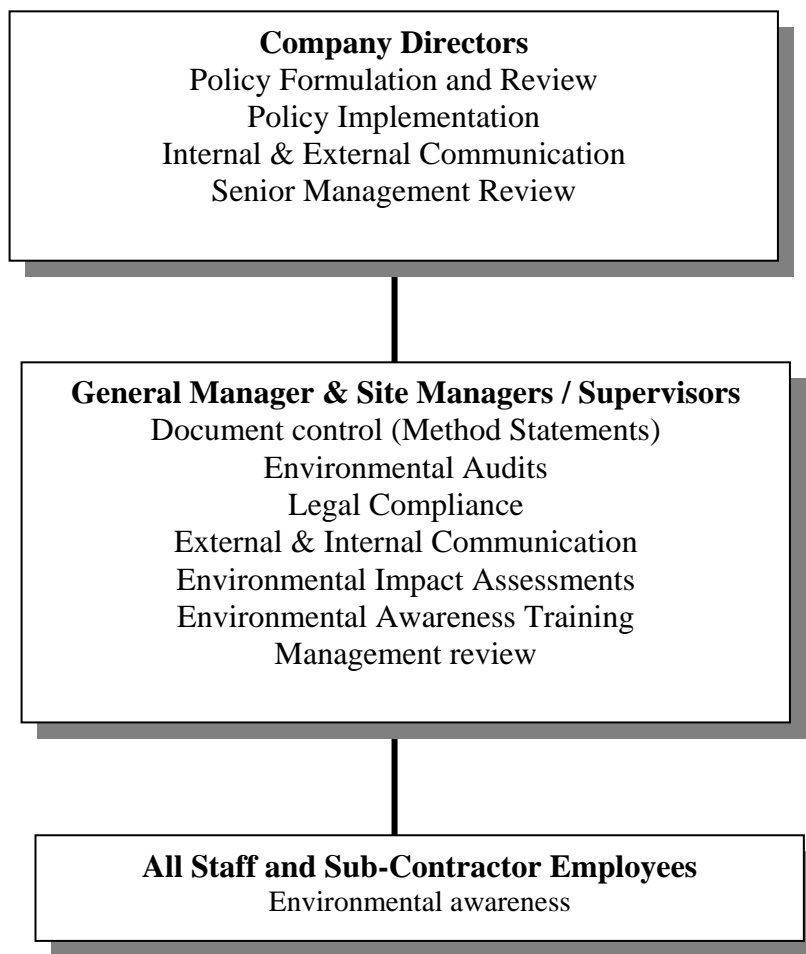
1. Work Method Statements and associated Risk Assessments
2. Implementation targets
3. Delegated responsibility for implementation of environmental measures.
4. Resources required to meet environmental challenges and introduce environmental opportunities

Copies of the Method Statements are retained in the Site Safety, Health and Environmental File. The originals are held in the project file held at the head office.

Head Office: Held in the Environmental file, identifies the current areas where the Head Office functions impact on the environment. Defines the targets related to the identified environmental challenges and opportunities within the Head Office work environment. The targets are updated, when required during the annual environmental audit process. Head Office Environmental Audits form part of the records kept in the Environment file.

MANAGEMENT STRUCTURE & RESPONSIBILITY

(This is a management structure relating to environmental matters and not necessarily to other management functions and responsibilities).



Environmental Awareness & Training

Procedures are maintained in the Company's Quality Procedure Manual for ensuring that all staff whose work may create a significant impact upon the environment has received appropriate training.

Such training includes awareness of:

1. The importance of conformance with the Environmental Policy and procedures and with the requirements of the Environmental Management System
2. The significant environmental impacts (actual or potential) of their work activities and the environmental benefits of improved personal performance
3. Their roles and responsibilities in achieving conformance with the requirements of the Environmental Management System, including emergency preparedness and response requirements
4. The potential consequences of departure from the specified operating procedures.

Site Operatives (Directly employed and Sub-Contractor)

As part of the site-specific contract induction, all contract staff and sub-contractor employees are trained in the implementation of the Method Statements and Work Instructions developed during the pre-contract planning.

Each Site Operative will be issued with a copy of the MarkOne Interiors' Site Operatives Handbook which includes information on protecting the environment and environmental awareness. Site Toolbox Talk training sessions also address environmental performance; our Site Managers and Supervisors use the ConstructionSkills publication GT700 as the reference material for all toolbox talk training sessions. Records of those attending all toolbox talk training sessions are maintained on site in the Site Safety, Health & Environmental File.

Managers & Supervisors:

All Site Managers have access to the ConstructionSkills publication GE700 which covers environmental management on construction sites. It is the policy of MarkOne Interiors that our Site Managers attend the SMSTS Training Course provided by ConstructionSkills to raise awareness to the environmental implications of our operations as well as safety and health issues.

All Managers and Supervisors shall attend a six monthly meeting, or as deemed necessary, which shall include environmental awareness as part of the agenda. The meeting shall serve to inform staff on new environmental policies and procedures and to redress existing policies and procedures.

Communications of an Environmental Management Nature

All communications of an environmental nature from external interested parties are passed to the Contracts Manager or in their absence, a Senior Manager or Director. Any external communications of an environmental nature are given a verbal and/or written response according to the nature or sensitivity of the enquiry.

A record is kept of the nature of the communication in either the corresponding project file or, for head office related communication, in the Environment file.

Environmental Management System (EMS) Documentation

The Environmental Management System documentation and other associated Management Systems and associated documentation are maintained and include:

1. This Environmental Policy and the Environmental Management System
2. The Quality Assurance Policy and the Quality Management System
3. The Health & Safety Policy Statement and the Safety Management System
4. Environmental Site and Head Office audits
5. Work Method Statements and associated Risk Assessments

EMS Document Control

Procedures are maintained in the Company's Quality Procedure Manual for ensuring that all environmental documents are controlled. An environmental file is maintained at the Head Office containing the following documents:

- This Environmental Policy and Procedure
- The Company Quality Management System
- The Company Safety Management System
- Site and Head Office Environmental Audits
- Work Method Statements and associated Risk Assessments
- Environmental Communication
- COSHH Assessments and suppliers Material Safety Data Sheets
- Environmental Non-conformances
- Supplier Assessment Reports

As a document is updated or revised, the issue status of the document shall be changed.

EMS Operational Control

Operational control over environmental management is maintained by use of:

1. This Environmental Policy and Procedure
2. The Company Quality Management System
3. The Company Safety Management System
4. Site Environmental Audits
5. Site Health & Safety Inspection Reports
6. Head Office Environmental Audits

7. Method Statements and associated Risk Assessments.
8. Work instructions issued by the Client
9. The schedule of current relevant environmental legislation.
10. Environmental Training Records

Environmental Assessments and Work Method Statements include, where appropriate, specific operating criteria around the identified significant environmental challenges and opportunities relating to the site. Procedures are maintained in the Company's Quality Procedure Manual for purchasing goods and services used by the Company.

An approved suppliers list is maintained for determining which suppliers operate and/or supply, where appropriate, acceptable goods and services. See the Company's Quality Procedure Manual.

All suppliers are assessed using a Supplier Environmental Assessment Report. Products, services and materials supplied by potential or existing suppliers are assessed, either on receipt or prior to purchase, using a Supplier Environmental Request form. The form is dispatched to the supplier, when necessary, for completion. Any products/materials deemed unsuitable, such as products/materials which may, as examples:

- a) not be recycled
- b) not be supplied from a sustainable source
- c) contain ingredients that may cause harm to the environment,

shall not be used, *where financially feasible*, unless the client specifically requests use of the material/product.

In this event, a suggested alternative supply form shall be raised and dispatched to the Client for notification and (where the client deems the replacement product/materials acceptable) for approval. The suggested supply may also be generated in house, if the contract specifies that MarkOne Interiors should be responsible for selecting materials and products for use in a project.

Following receipt of approval instructions from the client, the alternative supply product / material shall be purchased accordingly, see the Quality Procedure Manual.

Specified materials are reviewed to establish their COSHH status. Any queries are referred to the supplier/manufacturer.

Emergency Preparedness & Response

Appropriate procedures are established and maintained and records kept through COSHH Assessments and the Safety Management System.

When a new products / materials are received by the company, either on site or at the head office, a COSHH Assessment shall be carried out. Details of the assessment are retained in the head office environment file. When necessary, copies of selected COSHH Assessments are held in the site Safety, Health & Environmental File.

COSHH assessments, Risk assessments and non-conformances are reviewed and revised following any unexpected incident having a significant environmental impact. Where practicable, COSHH assessments and Risk assessments are reviewed on a regular basis and records kept in the periodic site report or the Head Office Environment file, as appropriate.

Environmental Monitoring and Measurement

Environmental monitoring and measurement is carried out and documented according to:

1. The Company's operational procedures
2. Environmental Assessments
3. Method statements.

All staff, as part of their environmental awareness training are expected to report any adverse environmental observations to the relevant Site Manager / Supervisor.

Non-Conformance and Corrective and Preventive Action

A record is kept of Environmental Non-Conformances including details of:

1. The Location or Site
2. The date and nature of the non conformance
3. The magnitude of the problem
4. The corrective action taken

All Environmental Non-Conformances on site are recorded on non-conformance reports and are retained in the Head Office Environment file. Environmental Non-Conformances are reviewed at management review and appropriate preventive action evolved and subsequently implemented.

EMS Records

The following Records are kept and updated to form the Company's EMS:

1. Records of Environmental Policy Review & Revision
2. Environmental Impact Assessments
3. Work Method Statements and associated Risk Assessments
4. Internal and external environmental audit records
5. Non conformance records
6. Calibration records
7. COSHH assessments

8. Site Health, Safety & Environmental Inspections
9. Staff Training records

Environmental Management System (EMS) Audit

The EMS operated by MarkOne Interiors will be audited annually. As a responsible Contractor MarkOne Interiors is aware of (and accepts) the need for its Clients to review or even audit the environmental performance of our business. We see this as being a positive input to the working relationship that we enter into with our Clients and we will welcome such input and react accordingly.

The findings of each environmental audit are reported at the following management review.

Environmental Management Review

Following each internal and external environmental audit, and more often if decided by senior management, an environmental management review is carried out and, where appropriate, a corrective and preventative action plan is formulated. Typically management review is a function of Senior Management meetings.

Items addressed at environmental management review include:

1. The Company's Environmental Policy to ensure its continuing efficiency and relevance.
2. The EMS to ensure its continuing suitability, adequacy and effectiveness
3. Results of the preceding environmental audit
4. Non-conformances arising since the previous review
5. The effectiveness of preventive action taken arising during the previous review
6. Changes to legislation arising since the previous review
7. Changes in technology arising since the previous review
8. Correspondence received from interested parties since the previous review
9. Needs for training as result of changes arising since the previous review.

Records of the findings of the management review and any planned action are kept for a minimum period of three years as part of the Company's environmental record.

RECORD OF AMENDMENTS

MarkOne Interiors – Environmental Management Policy & Procedures

The person responsible for the maintenance of this record is: the appointed Competent Person