

THE MOORHEAD GROUP

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Environmental Policy

Statement Of Intent

Section

1

1.0 Statement Of Intent.

The Moorhead Group is committed to conducting its activities and operations with due regard to protecting the environment. Both the internal workplace environment and also the wider external environment, therefore, interact.

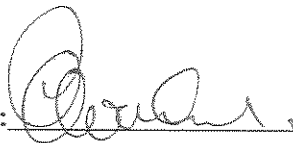
We shall ensure that all by-products do not in any way have a detrimental impact upon the wider environment itself.

We consider that a pro-active Environmental Policy is one that evaluates the possible environmental impact resulting from the conduct of all of its activities.

The key points of its strategy to achieve this are:

- Minimise waste by evaluating operations and ensuring they are as efficient as possible.
- Minimise toxic emissions through the selection and use of its vehicles and machinery and the source of its power requirement.
- Actively promote recycling both internally and amongst its customers and suppliers.
- Source and promote a product range to minimise the environmental impact of both production and distribution.
- Meet or exceed all the environmental legislation that relates to the Company.

Signed by: _____



Date

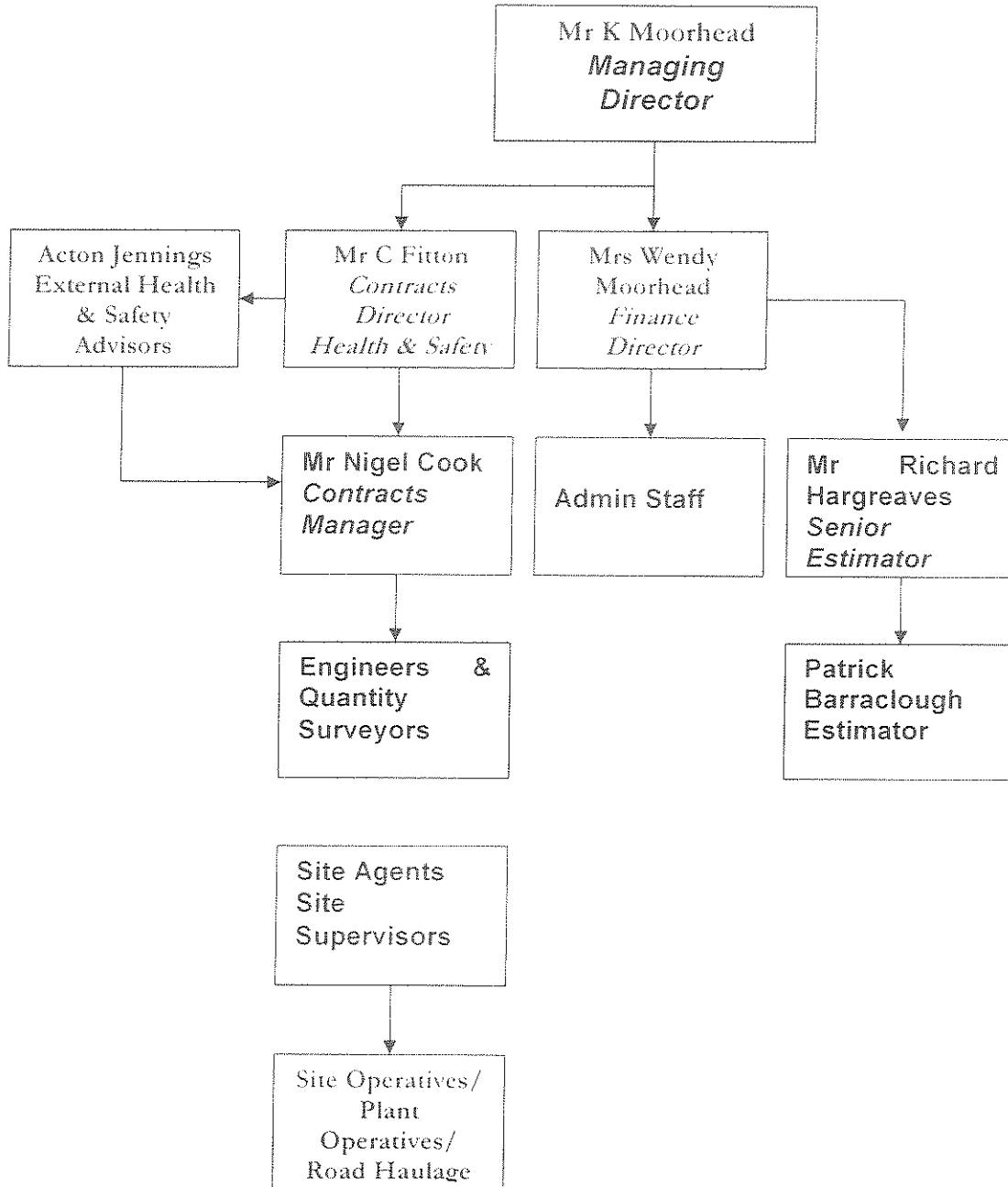
15.03.2013

2013

For and on behalf of:

The Moorhead Group

Chain Of Command For Environmental Management



Implementation

2.0 Environmental Protection Act.

The Moorhead Group 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 The Moorhead Group. 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 and 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.

The Moorhead Group 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 pesticides and associated 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 will ensure that the use of vehicles as part of our work activities are 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 have 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.

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 The Moorhead Group, changes in current legislation, or the perceived demands of Society.