



Green Compliance plc

Group Health, Safety and Environmental Policy

March 2014.

Introduction

This policy details arrangements for the management of health, safety and environmental risks across the Green Compliance plc Group. The Group's operations cover a range of compliance services for clients primarily centring on water hygiene and water treatment but including other ancillary compliance services. In the course of their undertakings, Group companies carry out their work using predominantly in-house resource, but also make use of sub-contracted staff. Green Compliance plc will take all reasonable steps, to ensure that its activities do not place the health and safety of its employees, sub-contractors or any third parties at risk. Furthermore, Green Compliance plc will take all reasonable steps to ensure that its activities do not cause harm to the environment and meet the Regulations pertaining. Green Compliance plc acknowledges its obligations in all cases, including residual liability where sub-contractors or third parties are employed and will use due diligence to ensure that they adhere to our standards.

This policy document is intended to detail where accountability and ownership lie in the management of health, safety and environmental risks across the Group. It is also intended to explain the organisation of resources to meet health, safety and environmental management responsibilities and also the arrangements in place to implement the Policy. This policy is to be viewed as a key pillar of the Green Compliance plc corporate strategy.

Commitment

As the senior company executive responsible for health, safety and environmental management, I affirm that it is our policy to ensure the health, safety and welfare of all our employees while at work; in addition we accept that we have a duty of care to employees of our sub-contractors, as well as to our clients' staff and to any other persons who may be affected by our work activities such as members of the public. It is also our policy to fully comply with all applicable legal requirements and with all other requirements to which we subscribe, which relate to our health, safety and environmental risks. Furthermore, we undertake to influence, as far as reasonably practicable, the legal compliance of our clients with respect to health, safety and environmental regulations. Our employees, sub-contractors and consultants are to use the utmost due diligence to achieve compliance.

I require all Group companies to share my commitment by:

- raising health, safety and environmental quality standards
- reducing work place risks
- reducing the carbon footprint of our activities
- preventing pollution
- increasing the sustainability of our operations
- following a process of continual improvement in managing the health, safety and environmental risks of our business

Health, safety and environmental risk management is to be viewed as an integral function of our business risk management activities and will be resourced adequately. An integrated Risk Management System (covering health, safety and environmental risks) will be established to meet our needs, and all staff, whether Green Compliance plc employees, or sub-contractors must co-operate fully in raising standards of risk management performance.

Health, Safety and Environmental Strategy/Key Risk Management Objectives

Our Health, Safety and Environmental Strategy is to manage the health and safety risks and environmental impacts inherent in our business and, through a process of continual improvement, raise our standard of performance.

Our Key Risk Management Objectives are:

1. To ensure compliance with applicable legal requirements and with all other requirements to which Green Compliance plc subscribes.
2. To manage the health, safety and environmental aspects of our activities, setting targets as appropriate.
3. To regularly review Green Compliance plc health, safety and environmental performance and monitor progress towards our objectives.

4. To maintain an effective health safety and environmental management system, maintain safe and healthy working conditions, maintain safe plant and equipment, work to safe methods and procedures and ensure the provision of safe materials.
5. To reduce energy consumption; to reduce the amount of waste at source and increase the percentage recycled; to conserve water supplies.
7. To encourage bio-diversity.
8. To develop the health, safety and environmental skills base in order to achieve a culture of continual improvement.
9. To procure goods and services from suppliers and sub-contractors who share our vision of responsibility and sustainability.
10. To influence our clients in the adoption of safer, healthier and more sustainable approaches to their business.

Organisation and Key Responsibilities

As Chief Executive Officer of Green Compliance plc, I am ultimately responsible for all safety, health, and environmental management matters within the Group. The Group Board has appointed the Director – Shared Services as Board representative with specific responsibility for safety, health and environmental management at a strategic level. Safety, health and environmental responsibilities and authority are delegated to the Regional Directors of each Group subsidiary for the work streams under their control. A Divisional Safety, Health and Environmental Committees has been established across the Group to monitor the implementation of this policy and its integration across the Group. On a half yearly basis representatives from this Committee attend Group Health and Safety Committee.

The Group Board has appointed an internal Health and Safety Manager to advise on the content, execution and review of this policy. This role is also responsible for monitoring the integration of Group and subsidiary policies; developing the overall Risk Management System; monitoring health safety and environmental performance; maintaining the system for health, safety and environmental assessment; developing the training strategy; audit of the Risk Management System and review to confirm its appropriateness to the Business.

Day to day responsibilities for health, safety and environmental management rest with each employee, sub-contractor, or any other representative of Green Compliance plc. These responsibilities follow the line management structure. I hold each manager responsible for the health, safety and environmental management arrangements within their department. Each manager is to ensure that local policy and procedure is congruent with the requirements of this policy document and our Risk Management System. Implementation and monitoring of the practical application of health, safety and environmental management practices and procedures is a fundamental responsibility of each manager. Our duty of care requires managers, supervisors, employees and sub-contractors to take ownership of potential risks and implement appropriate remedial action. Specific risk management responsibilities across the Group are summarised below (greater detail is provided at Annex A):

Position	Responsibilities
Group Chief Executive Officer	- Ultimate responsibility for health, safety and environmental management arrangements.
Director – Shared Services	- Board Director responsible for health, safety and environmental matters. Chair of Group Environment, Health and Safety Committee.
Health & Safety Manager	- Responsibility for implementing this policy, completing reviews annually and upon any changes. Developing and driving strategies to ensure continual performance improvement
Regional Directors of Water Division	Responsible for the implementation of Group Policy across the companies under their control. Responsible for monitoring health, safety and environmental performance across their operations and for reporting results against agreed KPIs. Ensure that their business units are represented on the Group Environment, Safety and Health Committee.

Line Managers and Supervisors	-	Responsible for the health, safety and welfare of the staff/contractors under their control, as well as for preventing pollution and environmental harm.
Employees	-	To risk assess activities, develop safe systems and work in accordance with them. To communicate issues of concern with regard to health, safety and environment. To co-operate fully with client's risk management arrangements and site-specific requirements.
Sub-contractors	-	To risk assess activities, develop safe systems and work in accordance with them. To communicate issues of concern with regard to health, safety and environment. To co-operate fully with both Green Compliance plc and its client's risk management arrangements and site-specific requirements.

A table detailing full health, safety and environmental accountabilities and responsibilities is at Annex A. An organisation chart is at Annex B.

Practical Arrangements

In order to implement this policy a number of practical arrangements are to be made within the Risk management System. These arrangements will contain the necessary guidance, templates and forms to enable managers at all levels to meet their responsibilities. These arrangements relate to (amongst others):

- Identification of health and safety hazards and assessment of risks.
- Identification of environmental aspects and quantification of environmental impacts
- Health, safety and environmental management procedures
- Training
- Communication of health, safety and environmental information
- Health, safety and environmental performance reporting
- Emergency management arrangements and contingency planning
- Accident/incident reporting and investigation
- Maintenance of plant, equipment and building fabric
- Legislation, regulations and guidance applicable to Green Compliance plc
- Management of contractors
- Procurement of goods and services

All managers, staff and sub-contractors are expected to understand and apply these arrangements to the activities which are under their control, or over which they may exert influence.

A statement summarising this policy is at Annex C.

Policy Reviews

This Policy will be revised at least annually, or as required in the light of structural or organisational changes and developments.

Signed.....

Bob Holt
Group Chief Executive Officer

Dated 24 March 2014

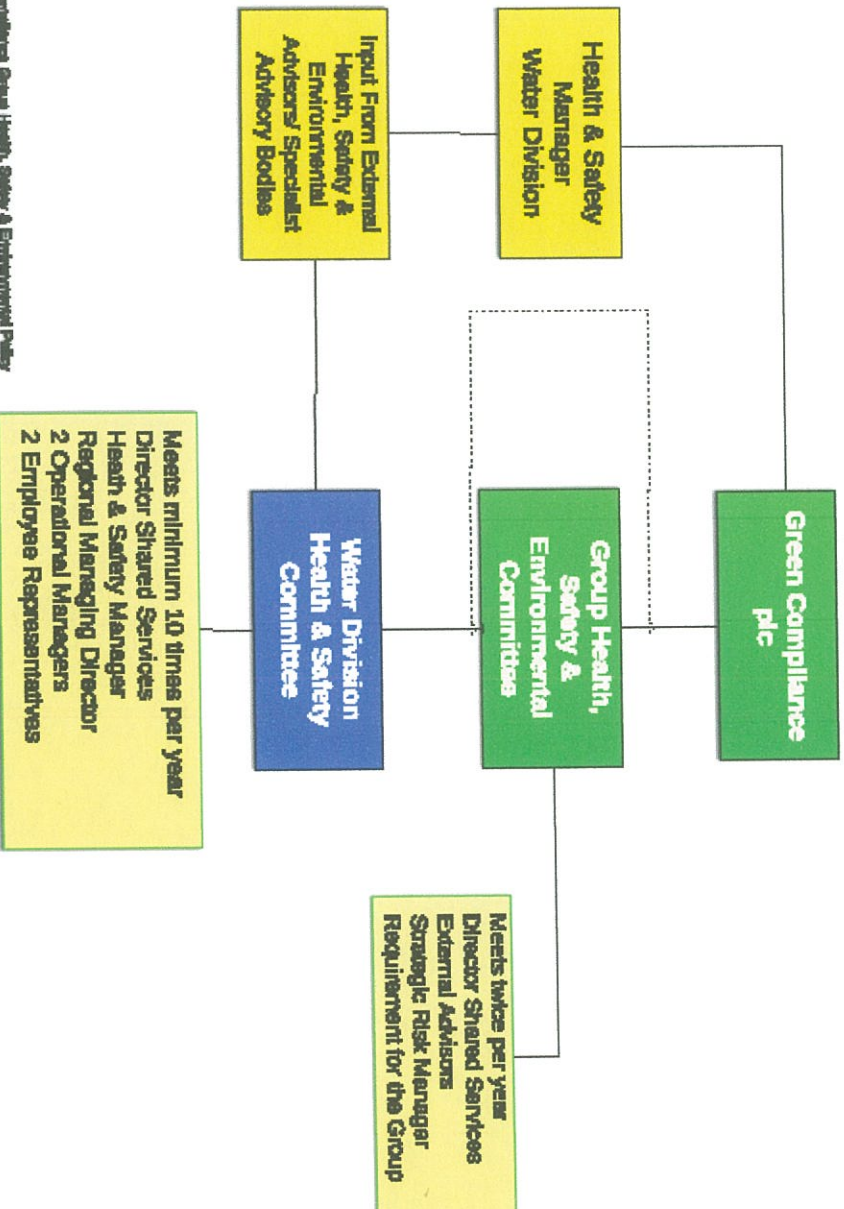
Appendices

- A. Health, Safety and Environmental Accountabilities and Responsibilities within Green Compliance plc
- B. Green Compliance plc Organisation Chart for Health, Safety and Environmental Management
- C. Green Compliance plc Group Health, Safety and Environmental Policy Statement

Group CEO	Director – Shared Services	Health & Safety Manager	Regional Directors of Water Division	Group Environment, Health and Safety Committee	Water Division Environment, Health and Safety Committee	Employees	Sub-Contractors and Suppliers of Goods and Services
<p>Ultimate responsibility for health, safety and environmental management across the Group</p> <p>Ensuring that resource and support is appropriate to the needs of the Group and subsidiaries</p>	<p>Board Director responsible for health, safety and environmental matters.</p> <p>Chair of Group Health, Safety and Environment Committee.</p> <p>Directing health, safety and environmental policy across the Group.</p> <p>Set key objectives and agree KPIs.</p> <p>Responsible for periodic risk management reports to the Board.</p> <p>Responsible for Audit of the Risk Management system to confirm its ongoing appropriateness to the needs of the Group.</p> <p>Assess impact of changes in legislation and provide timely briefing to Group subsidiaries.</p>	<p>Implementing this policy, completing reviews annually and upon any changes.</p> <p>Developing and driving strategies to ensure continual performance improvement</p> <p>Establish effective arrangements to identify and eliminate or control work related hazards and risks and promote health at work</p> <p>Producing periodic statistics for accidents, incidents and near miss reporting, identify trends where possible including ill-health.</p> <p>Continual review & update of the Health & Safety management system including changes to current legislation.</p> <p>Act as divisional competent person for risk management arrangements</p>	<p>Implementation of Group policy across the companies under their control.</p> <p>Monitoring health, safety and environmental performance in accordance with Group requirements.</p> <p>Reporting performance in accordance with Group requirements and against Group KPIs to Group timescales.</p> <p>Act as senior line manager for the companies under their control.</p> <p>Ensuring appropriate managerial and supervisory staff are in place across the companies under their control in order that line management responsibilities can be delegated effectively.</p> <p>Appoint health, safety and environmental committee representative to the Group HS&E Committee.</p>	<p>Meet regularly to review the risk management arrangements for the Group.</p> <p>Develop risk management strategy for the Group.</p> <p>Agree key objectives and KPIs for measuring performance.</p> <p>Receive and consolidate reports from each Group subsidiary for upward reporting to the Board.</p> <p>Monitor RIDDOR and other accident/incident reports and trends in ill-health.</p> <p>Draft reports and papers for consideration by the Board as required.</p> <p>Monitor non-conformances.</p>	<p>Publish and maintain the Risk Management System.</p> <p>Liaison with accreditation body for ISO certification as appropriate.</p> <p>Ensure that the Risk Management System remains legislatively compliant.</p> <p>Act as internal consultant to the plc Board and subsidiary companies on health, safety and environmental matters.</p> <p>Advise on legislative changes affecting the Group.</p> <p>Act as secretary to the Environment, Health and Safety Committee.</p> <p>Act as Group Competent Person for risk management arrangements.</p>	<p>To co-operate with all safety, health and environmental protection arrangements in place.</p> <p>To ensure that they take due regard for their own health and safety and for the health and safety of anyone else who may be at risk from the work undertaken.</p> <p>To risk assess activities, develop safe systems and work in accordance with them.</p> <p>To co-operate fully with the client's risk management arrangements and site-specific arrangements.</p> <p>To communicate issues of concern with regard to health, safety and environment.</p>	<p>To co-operate with all safety, health and environmental protection arrangements in place.</p> <p>To ensure that they take due regard for their own health and safety and for the health and safety of anyone else who may be at risk from the work undertaken.</p> <p>To risk assess activities, develop safe systems and work in accordance with them.</p> <p>To co-operate fully with both Green Compliance and its client's risk management arrangements and site-specific arrangements.</p> <p>To communicate issues of concern with regard to health, safety and environment.</p>

Group CEO	Director – Shared Services	Health & Safety Manager	Regional Directors of Water Division	Group Environment, Health and Safety Committee	Water Division Environment, Health and Safety Committee	Employees	Sub-Contractors and Suppliers of Goods and Services
		<p>Promote Cooperation and communication to achieve compliance with the Health & Safety requirements of national laws and regulations</p> <p>Develop policies and practices to raise Health, Safety and Environmental awareness to our Employees and sub-contractors</p>	<p>channels exist for risk management information throughout their Group subsidiaries.</p> <p>Ensure that all goods and services are procured in accordance with Group Procurement Policy.</p> <p>Ensure that a process is in place by which all tasks are risk assessed and significant findings cascaded to all staff and sub-contractors affected.</p> <p>Provide competent persons for local health safety and environmental management.</p> <p>Take corrective action and report non-conformances.</p>		<p>Develop competency framework and training plan in liaison with Group subsidiaries.</p> <p>Ensure that reported non-conformances are closed out.</p>		<p>All goods and services are to have associated health, safety and environmental risks assessed in a suitable and sufficient manner. Safe systems of work are to be devised to adequately control the health, safety and environmental risks identified.</p>

Appendix B
Green Compliance Job
Organisational Chart for Health, Safety &
Environmental Management



Appendix B Green Compliance Group Health, Safety & Environmental Policy

Appendix C

Green Compliance plc Group Health, Safety and Environmental Policy Statement

At Green Compliance plc, we believe that as a successful member of the business community, we have significant responsibilities towards health, safety and the environment. We will take all reasonable steps to ensure that our operations and activities do not place the health and safety of our employees, sub-contractors or any third parties at risk. Furthermore, we will take all reasonable steps to ensure that our activities do not cause harm and, where feasible, actively enhance the environment and the communities they might affect. We acknowledge our obligations in all cases, including residual liability where third party sub-contractors are employed and will use due diligence to ensure that they meet our standards.

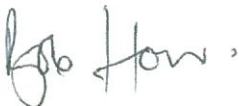
We recognise that our business activities have both direct and indirect impacts upon the environment. We are committed to managing these environmental impacts in the most effective and responsible manner using our Risk Management System to proactively raise our level of environmental performance.

We will endeavour to ensure that our policies actively promote health and safety, environmental protection, prevent pollution, improve legal compliance and minimise waste. We aim to achieve far more than mere passive compliance; we will undertake an improvement programme of positive action by setting annual and longer term objectives and targets and by continually monitoring and reviewing our health, safety and environmental performance. We will strive to:

- Continually improve our health, safety and environmental performance and report on progress each year
- Incorporate health and safety considerations and environmental stewardship into central pillars of our business strategy
- Develop policies and practices, which raise awareness and both encourage and enable our staff and sub-contractors to make a contribution towards achieving health, safety and environmental improvement
- Assess all risks, develop appropriate mitigation and control procedures, and implement safe systems of work
- Use energy and water efficiently and seek means of reducing consumption through improved management practice and technological upgrades
- Reduce consumption of materials through re-use rather than disposal, wherever possible and promote recycling
- Encourage our suppliers of goods and services to protect health and safety and to minimise the impact of their operations on the environment through our procurement policies and practices
- Prevent pollution

Our risk management activities will be appropriately resourced and I require the general principles set out above to be cascaded across all Group companies.

This document is available for public inspection on our website.



Bob Holt
Chief Executive Officer
Green Compliance plc

24 March 2014