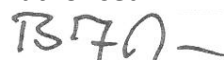




Environmental Policy

Date: 18th October 2016 Issue: 14 Review Date: October 2017	TSG-COM-POL-002
TWELVE MONTH OBJECTIVE - To ensure all sites work in an Environmentally effective manner and all Officers are aware of our Environmental Policy during 2016	
SCOPE TSG is committed to the continual improvement of its environmental performance, with a view to reducing environmental impacts, to levels not exceeding those corresponding to economically viable applications of best available practices and techniques. The purpose of this policy is to explain the Company's Environmental Management System (EMS) and to define formal requirements, responsibilities and aims to ensure the conformity of this policy to ISO: 14001:2004 . The scope of this EMS applies to all TSG operations in the UK. Please also see the company's CSR Policy which runs alongside this policy.	
Contents <ol style="list-style-type: none"> 1. Normative References 2. Terms and Definitions 3. Environmental Management System Requirements 4. Annexes 5. Document History 	
Originator: Managing Director	Approved: Compliance Consultant
Authorised:  Brian Mein Chairman	Distribution: Master File Company-Wide (ARM)

ENVIRONMENTAL POLICY

1 NORMATIVE REFERENCES

No normative references are cited.

2. TERMS AND DEFINITIONS

2.1 Environment

Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.

2.2 Environmental Aspect

Element of an organisation's activities, products or services that can interact with the environment

2.3 Environmental Impact

Any change to the environment, whether adverse or, wholly or partly resulting from an organisations environmental aspect.

2.4 Prevention of Pollution

Use of processes, practices, techniques, services or energy to avoid, reduce or control, (separately or in combination), the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental aspects.

3. ENVIRONMENTAL MANAGEMENT SYSTEM REQUIREMENTS

3.1 General Requirements

TSG shall establish, document, implement, maintain and continually improve its Environmental Management System (EMS) in accordance with the requirements of ISO: 14001:2004 and determine how it will fulfill these requirements. The EMS is defined within the scope of this document.

3.2 Policy Statement

TSG is committed to the continual improvement of its environmental performance, with a view to reducing environmental impacts to levels not exceeding those corresponding to economically viable applications of best available practices and techniques. Our policy is appropriate to the nature, scale and environmental impacts of our activities, products and services in accordance with ISO 14001:2004.

This policy is the driver for implementing and improving our Environmental Management System (EMS) so that we can maintain and potentially improve our environmental performance. Our Senior Management Team (SMT) is committed to ensuring that we comply with applicable legal requirements which relate to our Environmental Aspects and other requirements, to prevent pollution and to continually improve our impacts on the environment.

This policy provides the framework upon which we set and review our environmental objectives and targets. TSG, shall document, implement and maintain this policy. This policy is communicated to all employees, clients, contractors, sub-contractors and suppliers both in the Site Assignment Reference Manual (ARM) and on the company website and electronic communication, to ensure their awareness of both this policy and their role in implementing, maintaining and improving it.

Our environmental performance will be reviewed at our Weekly Departmental Head Meetings (DHM) to monitor our progress and ensure our compliance, and this policy will be reviewed annually or sooner if required by legislative change or a significant change in our business.

TSG shall ensure this policy is available to the public on its website.



Brian Mein
Managing Director

3.3 Planning

3.3.1 Environmental Aspects

Compliance shall periodically review the environmental aspects of our activities, products and services within the defined scope of our EMS, that we can control or influence. Our procedure is to take into account, planned or new developments, or new or modified activities, products and services and determine those aspects that have, or can have, significant impact on the environment (i.e. Significant Environmental Aspects (SEAs)).

This review will take place prior to the annual Senior Management Review meetings (SMRM) as directed by the board, where we will review the materials and equipment we are using and assess their effect on the environment. These SEAs are recorded in our Register of Environmental Aspects & Impacts, TSG-COM-POL-002 Annex A, complete with identified Control Measures, and 'risk-rated' using the following methodology

- Impact The severity of the environmental impact.
- Scale The size or likelihood of the impact.
- Risk Rating The actual risk rating of the impact.

Both impact and scale are graded as follows:

- Low Minor
- Medium Significant
- High Major

The Risk Rating is assessed using the following Risk Matrix:

High Impact	MED	HIGH	HIGH
Medium Impact	LOW	MED	HIGH
Low Impact	LOW	LOW	MED
	Low Scale	Med Scale	High Scale

3.3.2 Legal and Other Requirements

In order for TSG to identify its applicable legal requirements and other requirements to which we subscribe, related to its environmental aspects and determine how these requirements apply to its environmental aspects, we monitor various websites and subscribe to email updates from government bodies and other outside sources covering the Environmental issues.

Utilising outside sources such as the HSE etc, including subscribing to ELUS which update the company with regard to areas identified relevant to TSG environmental footprint. We have set up this database, identifying all areas requiring our compliance and detailing how we are complying with them. This database will form our 'TSG-COM-POL-002 – Annex D Register of Legislation', and will be taken into account when maintaining and developing our EMS.

TSG, receive a monthly environmental updates via email from Envirowise.Gov. Should our register need updating, Compliance is responsible for accessing the database and annotating details of our compliance accordingly.

Compliance will also research this database and www.netregs.gov.uk prior to updating this register, if required and report any changes at each Department Head Monthly Meeting (DHMM). Should the scope of our business change Compliance is responsible for ensuring our 'on-line' register is updated accordingly.

3.3.3 Objectives, Targets & Programmes

TSG, shall establish, implement and maintain documented Environmental Objectives and targets, TSG-COM-POL-002 Annex B at, where practicable, and consistent with this environmental policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which the organisation subscribes, and to continual improvement.

When establishing and reviewing its objectives and targets, TSG shall take into account the legal requirements and other requirements to which the organisation subscribes, and its significant environmental aspects. It shall also consider technological options, its financial, operational and business requirements, and the views of interested parties.

TSG shall establish, implement and maintain a programme(s) for achieving its objectives and targets. Programme(s) shall include:

- Designation of responsibility for achieving objectives and targets at relevant functions and levels of the organisation. Annex (TBA)
- The means and time-frame by which they are to be achieved. (DHMM)

These Objectives and Targets are measurable, where practicable, and consistent with this policy, including the commitments to prevent pollution, to compliance with applicable legal requirements and with other requirements to which we subscribe, and to continual improvement.

The progress status of these Objectives and Targets will be reviewed and minuted at the DHM meetings taking into account the legal requirements and other requirements to which we subscribe, and our significant environmental aspects. We will also consider our technical options, operational and business requirements, and the views of other interested parties. These Objectives are detailed at TSG-COM-POL-002 Annex B and summarized at TSG –COM-POL-002 Annex C.

3.4 IMPLEMENTATION AND OPERATION

3.4.1 Resources, Roles, Responsibility and Authority

The SMT will ensure the availability of resources essential to establish, implement, maintain and improve our EMS. Resources include human resources and organisation skills, organisational infrastructure, technology and financial resources.

Roles, responsibilities and authorities shall be defined, documented and communicated in this policy in order to facilitate effective environmental management. Compliance (C) is responsible and has authority for:

- Ensuring that the EMS is established implemented and maintained in accordance with the requirements of ISO 14001:2004.
- Reporting on the performance of the EMS for review, including recommendations for improvement at the DHM meetings.

Further roles and responsibilities have been defined in Section 4.3.3 and authorities will be set by the SMT as required during the SMT meetings. As directed.

3.4.2 Competence, Training and Awareness

TSG shall ensure that any person(s) performing tasks for it or on its behalf, that have the potential to cause a significant environmental impact identified by TSG, is (are) competent on the basis of appropriate education, training or experience, and will retain associated records. This awareness training will consist of:

- Initial EMS awareness training by the HR Department for all new employees during their induction followed by a signed declaration on their 'Acceptance of Employment' letter from HR.
- Annual EMS awareness refresher training by Compliance for all Head Office employees.
- Inclusion of this Policy in the site Assignment Reference Manual.
- Regular EMS awareness training completed by our SOM's during their site audits
- Reference to our EMS when required in our Safety Committee minutes which are sent to all employees.

The Head of Human Resources (HR) shall identify training needs associated with the Company's environmental aspects and its EMS and provide training or take other action to meet these needs, and will retain associated records.

The HR Department shall ensure TSG employees are aware of:

- The importance of conformity with this policy and procedures and with the requirements of the EMS.
- The significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance.
- Their roles and responsibilities in achieving conformity with the requirements of the EMS and the potential consequences of departure from specified procedures.

3.4.3 Communication

Compliance is responsible for ensuring the effective communication of environmental information at all levels of the Company's structure:

- Ensuring an updated copy of this policy is available to all employees on site in the ARM and for all 'Head-Office' employees in the Master Document Files held at The Foundry.
- Annual Quality Management System Training for all 'Head-Office' employees.

- The distribution of our bi-annual Safety Committee minutes to every employee.
- Environmental updates in the Company News Letter.

Compliance is responsible for receiving, documenting and responding to relevant communication from external interested parties and recording details in the HSE section of our Document Control Register.

TSG does not communicate externally about its significant environmental aspects. This decision will be reviewed by the SMT, and should we decide to communicate externally we will establish and implement a method for this external communication.

3.4.4 Documentation

Our EMS documentation shall include:

- This policy, the objectives and targets detailed in Sec 2 and the supporting documentation detailed therein.
- The description of the Scope of the EMS (Sec 1).
- The description of the main elements of the EMS and their interaction, and reference to related documents.
- Documents, including records, required by ISO: 14001.
- Documents, including records, determined by the organisation to be necessary to ensure the effective planning, operation and control of processes that relate to its significant environmental aspects. These will be held electronically by Compliance and a hardcopy held in Master File 1 within The Foundry.

3.4.5 Control of Documents

Compliance is responsible for ensuring that the documents required by our EMS are controlled in accordance with our Quality Support Process **TSG-COM-PRO-002**. This Process details the:

- Approval of documents for adequacy prior to issue.
- Review and update as necessary and re-approval of documents.
- Identification of changes and the current revision status of documents.

- Availability at point of use of the relevant versions of applicable documents.
- Procedure for ensuring that documents remain legible and readily identifiable.
- Procedure for ensuring that documents of external origin determined by the organisation to be necessary for the planning and operation of the EMS are identified and their distribution controlled, and to prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

3.4.6 Operational Control

TSG, will identify and plan its operations which are associated with the identified significant environmental aspects, consistent with this policy its objectives and targets, by ensuring this policy is maintained to avoid deviation from it and communicating this policy to our suppliers and contractors where appropriate.

These actual process controls of procurement are reflected in our Quality Objective and in our Financial Process, TSG-COM-PRO-004. The HR Director is responsible for maintaining a 'Head Office' Environmental Asset Register for all items in Control.

TSG shall monitor the waste our Officers produce and how each site 'landlord' disposes of our waste by contacting them annually, requesting details of their waste management schemes and recording their response in the Assignment Instruction Schedule and in their respective Site file.

TSG shall monitor and record its paper purchase and recycling levels periodically and record its 'bottled' water usage likewise.

3.4.7 Emergency Preparedness and Response

The TSG Security 'Business Continuity Plan' (BCP), will be implemented to identify potential/actual emergency situations and accidents that can have an impact on the environment and to confirm and co-ordinate Company response to such a situation. Compliance will co-ordinate the periodic review and testing of this Plan at each SMT.

TSG shall respond to actual emergency situations and accidents and prevent or mitigate associated adverse environmental aspects.

3.5 CHECKING

3.5.1 Monitoring and Measurement

TSG shall establish, implement and maintain a procedure to monitor and measure, on a regular basis, the key characteristics of its operation that can have a significant environmental impact. This procedure shall include the documenting of information to monitor performance, applicable operational controls and conformity with the organisations environmental objectives and targets. This is the responsibility of the BSM at the periodic SMT meeting.

3.5.2 Evaluation of Compliance

Consistent with its commitment to compliance, TSG shall establish, implement and maintain a procedure for periodically evaluating compliance with applicable legal requirements and other requirements to which it subscribes.

Compliance is responsible for periodically evaluating company compliance to this policy as detailed in Sec 4.3.2. This policy will be subject to a minimum of one Internal Audit every 24 months by Compliance who will:

- Distil the main legal requirements we need to comply with and audit against these as an evaluation of legal compliance.
- Audit this policy against each clause of ISO 14001.
- Audit this policy to evidence that TSG are complying with it.

This will ensure the effective evaluation of our EMS by auditing against the specific legal requirements. The results of Internal Audits will be recorded.

3.5.3 Non-Conformity, Corrective and Preventative Action

The Operations Director is responsible for dealing with actual and potential nonconformity and for taking corrective and/or preventative action using the Company Service Defects System ensuring the following: Identifying and correcting non-conformity(ies) and taking action(s) to mitigate their environmental impact.

- Investigating non-conformity(ies), determining their causes and taking actions in order to avoid their reoccurrence.

- Evaluating their need for action(s) to prevent non-conformity(ies) and implementing appropriate actions designed to avoid their occurrence.
- Recording the result of corrective action(s) taken and reviewing the effectiveness of corrective action(s) and preventative action(s) taken.

Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered with the EMS being amended as necessary.

3.5.4 Control of Records

The SMT minutes will form the basis for recording Company conformity to its EMS and ISO 14001 and of highlighting the results achieved. All documents will be managed in accordance with TSG-COM-PRO-002 Section 3 'Document Control Process'.

3.5.5 Internal Audit

Compliance is responsible for the bi-annual audit of this policy, as detailed in Sec 4.5.2, to ensure that the Company EMS conforms to ISO:14001, has been properly implemented and maintained, and reports the audit findings to the SMT.

Our Audit program shall be planned, established, implemented and maintained by Compliance, taking into consideration the environmental importance of the operation and the results of previous audits. Our Audit procedure shall be established, implemented and maintained, that address:

- The responsibilities and requirements for planning and conducting audits, reporting results and retaining associated records.
- Determining of audit criteria, scope, frequency and methods.

Our EMS Internal Audit Schedule is:

- Audit - As part of the Management Review (annual)
- Internal Audit – Bi-annual

3.6 MANAGEMENT REVIEW

The SMT will review Company EMS bi-annually during the Management Review Meetings to ensure its continuing suitability, adequacy and effectiveness.

Reviews shall include assessing opportunities for improvement and the need for changes to the EMS, including this policy and its environmental objectives and targets. This review will be minuted.

Input to management reviews shall include:

- Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organisation subscribes.
- Communication(s) from external interested parties, including complaints.
- The environmental performance of the organisation.
- The extent to which objectives and targets have been met.
- Status of corrective and preventative actions.
- Follow up actions of previous management reviews.
- Changing circumstances, including developments in legal and other requirements related to its environmental aspects and recommendations for improvements.

The outputs from management reviews shall include any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of our EMS, consistent with TSG commitment to continual improvement.

4. ANNEX

- A - Register of Environmental Aspects & Impacts.
- B - Environmental Objectives
- C - Summary of Objectives
- D - Legal Compliance Register

5. DOCUMENT REVISION HISTORY

2 nd January 2009	Issue 1	Initial Document
2 ^{6th} March 2009	Issue 2	Reviewed Document
23 rd December 2009	Issue 3	Reviewed Document
7 th June 2010	Issue 4	Job Titles change
1 st April 2011	Issue 5	Company name change
16 th September 2011	Issue 6	Amended Doc to include links
14 th September 2012	Issue 7	Reviewed
16 th September 2013	Issue 8	Reviewed
13 th February 2014	Issue 9	Job title changes
26 th August 2014	Issue 10	Amended after audit
1 st October 2014	Issue 11	Reviewed
1 st July 2015	Issue 12	Amended
1 st January 2016	Issue 13	Amended
18 th October 2016	Issue 14	Amended