



Thames & Newcastle Limited

Environmental

Management System

(EMS)

Approved by: Stanley Leask

Job Role: Director

Signed: *Stanley Leask*

Date:

This policy must be reviewed by the following date: Apr 15, 2026

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Approved By:	Stanley Leask
Review Date:	Apr 15, 2026

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General Statement of Intent: Environmental

We are committed to reducing our impact on the environment. We strive to reduce our environmental impact by:

- Continually monitoring legislative changes and developments and make changes to our policy and practice to ensure compliance.
- Ensure the responsible use of energy (in our case, principally electricity) throughout our business by conserving energy wherever possible, monitoring and improving energy consumption and efficiency on a regular basis, and encouraging best practice within our company and by our business associates.
- Conserve natural resources by reusing and recycling packaging and stationary materials, purchasing recycled materials where appropriate, and using recyclable packaging and other materials wherever possible.
- Be a responsible member of the local business community and its immediate area in the way that we impact on the environment that we share, and to act promptly and effectively to correct any problems or incidents that might affect the environment or the health or safety of our staff, of our business neighbours or of the inhabitants of the area.
- Use products that we know to be safe to use, energy-efficient in operation, protective of the environment, and that can be reused, recycled or disposed of safely.
- Make all employees aware of this policy and their responsibilities for environmental issues.
- Undertake regular and comprehensive self-assessments of our compliance with this policy and report to the management meeting.
- Review and update this policy on an annual basis, or more frequently if required.

In practical terms:

- Non-essential electrical equipment will be switched off whenever possible.
- In particular, the office lights will be turned off overnight, and over weekends.
- Office heating will be turned down to acceptable and staff-agreed levels.
- All procurement of goods or services should consider the environmental impact of the product purchased, its packaging and delivery method. Where it is sensible, we will use second-user or recycled equipment.
- We will actively look for practical public transport alternatives for any trip.
- We will aim to share lifts whenever two or more staff are visiting the same site and have a similar route or part of the journey.
- We will attempt to reduce travel in general by careful planning of meetings with clients and travelling to sites in groups.
- All Paper, Plastics and Glass consumed within the office will be recycled, separately from other refuse. All confidential paper matter will be shredded before recycling.

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Introduction

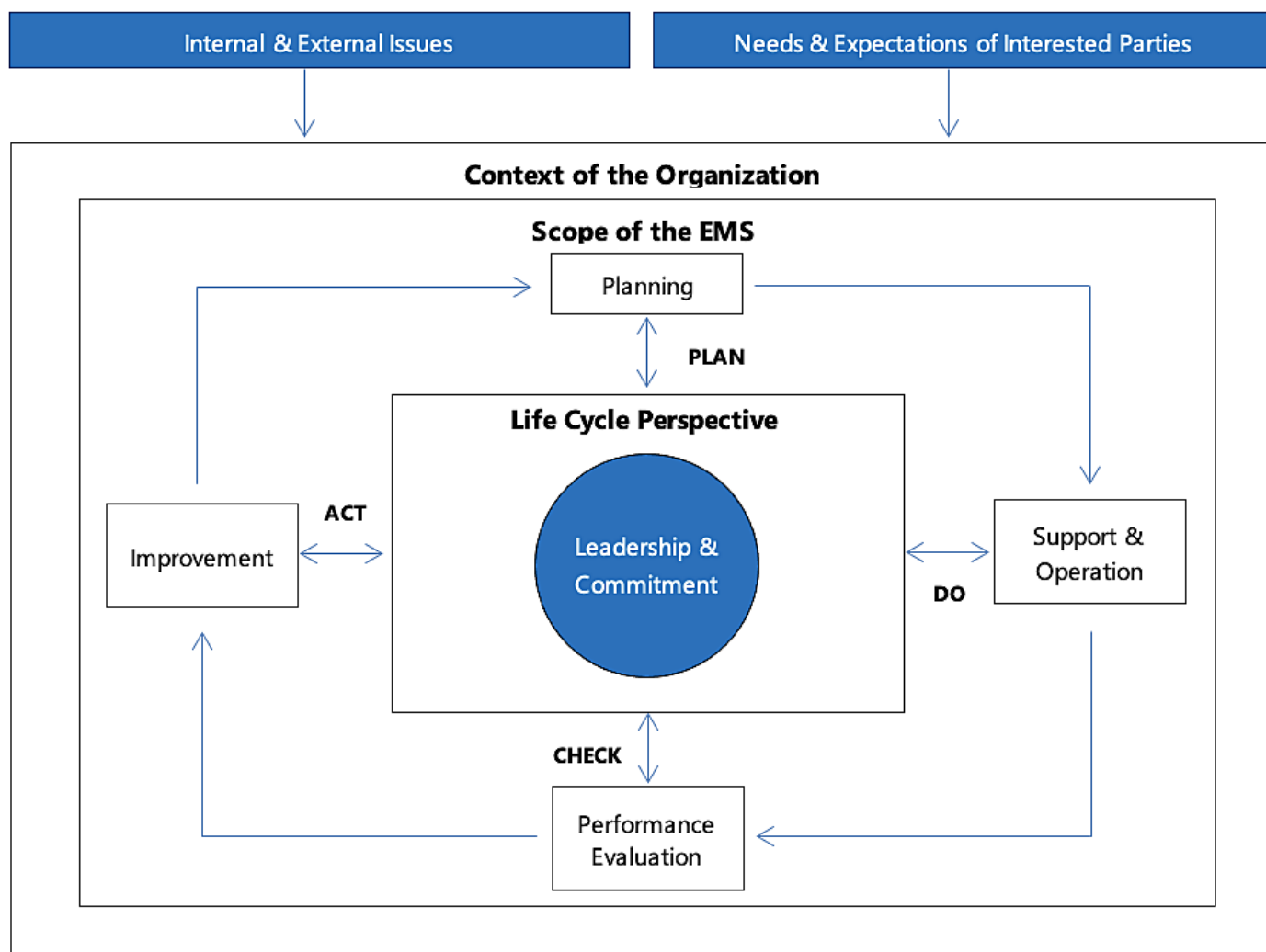
Thames & Newcastle Limited has developed and implemented this Environmental Management System (EMS) which uses ISO 14001 as a framework with the overall aim and objective of improving how we manage environmental factors and to better satisfy the needs and expectations of our customers, stakeholders and interested parties.

When implemented correctly, this EMS shall:

- 1. Further enhance our environmental performance by protecting the environment and reducing our environmental impact.
- 2. Ensure compliance with our obligations concerning any potential effect of environmental conditions. And,
- 3. Control how we set and achieve environmental objectives.

The below figure depicts the methodology used for the development of our EMS. We utilise the plan, do, check and act process approach, to implement and deliver management system objectives, stakeholder requirements and environmental compliance.

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This EMS manual is used to familiarise our customers, interested parties, or individuals with the controls that have been implemented and to assure them that the integrity of our EMS is maintained and is focused on meeting its intended outcomes.

This manual also describes the structure and interactions of our EMS, delineates authorities, inter relationships and responsibilities of personnel who operate within the boundaries of our Environmental Management System.

Definitions

This document does not introduce any new definitions but rather relies on the following:

- Terms typically used in standards and regulations as they relate to our EMS or services. And
- Standard business terminology, and terms and vocabulary commonly used in our industry.

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Our Company

Organisational Context

Thames & Newcastle Limited is committed to defining our position in the marketplace and understanding how relevant factors arising from internal and external issues influence our strategic direction, our organizational context, or the ability of our EMS to achieve its intended outcomes. Such issues include factors that are capable of being affected by, or capable of affecting our organization. Broadly, these issues are defined as:

1. **Internal Issues:** conditions related to our organizational activities, products, services, strategic direction, culture, people, knowledge, processes and systems. Using SWOT analysis provides our organization with framework for reviewing and evaluating our strategies, and the position and direction of our organization, business propositions and other ideas.
2. **External Issues:** conditions related to cultural, social, political, legal, regulatory, financial, technological, economic, competition at local, national or international levels. Using PESTLE analysis provides our organization with framework for measuring our market and growth potential according to external political, economic, social, technological, legal and environmental factors.
3. **Environmental Issues:** Conditions related to climate, air quality water quality, land use, natural resource availability or biodiversity that can either affect our organization's purpose, or be affected by our environmental aspects and impacts, which Thames & Newcastle Limited must manage.

Although we acknowledge that ISO 14001 does not require our organizational context to be maintained as documented information, we maintain and retain; in addition to this document, the following documented information that describes our organizational context.

1. SWOT Analysis Templates for Internal Issues
2. PESTLE Analysis Templates for external issues;
3. Environmental Aspects & Impacts Registers for environmental issues;
4. Business plans, strategy documents, operational procedures;
5. Analysis of technology and competitors;
6. Technical reports from experts and/or consultants;
7. Minutes of meetings, process maps and reports, etc

Where required, Thames & Newcastle Limited collates and assesses information about these influential factors to ensure that a continual understanding of the relevance of each factor is derived and maintained. To facilitate the understanding of our context, we regularly consider issues that influence our business during management review meetings, the results of which are conveyed via minutes and business planning documents.

The output from this activity is evident as an input to determining the scope of our EMS and its processes, as well as, the consideration of risks and opportunities that may affect our EMS, and the resulting actions that we take to address them.

Relevant Interested Parties

Thames & Newcastle Limited recognizes that we have a unique set of interested parties whose needs and

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expectations (requirements) change and develop over time. Only a limited set of requirements are relevant to our EMS, and which are considered and managed as a compliance obligation. The criteria for our compliance obligations include the following parameters.

All:

- Relevant legal requirements.
- Corporate requirements imposed by upper levels of our Company. And,
- Relevant requirements of relevant interested parties that our organization decides to comply with, these may either be contractual (customers) or voluntary (environmental commitments).



By asking 'how the interested party (or their requirements) might affect our ability to achieve the intended outcomes of our environmental management system?' we are able to determine and document the relevant interested party requirements.

Although not specifically required by ISO 14001, we maintain an Interested Party Matrix that aligns a list of relevant interested parties to their corresponding needs and expectations; with an indication of which of these has been accepted as a compliance obligation. Such needs and expectations, and whether they are critical to the success of our EMS, broadly include the examples shown in the table below.

Interested Party	Requirements	EMS Critical	Compliance Obligation
Customers	Supply of services to specification	Yes	Contractual
Employees	Safe working Environment	Yes	Legal
	Continued Employment	No	Not Applicable
Regulatory	Compliance with the law and regulatory reporting	Yes	Legal
Community	Social Responsibility	Yes	Voluntary

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The outputs from this process are typically used to inform the following sections and processes of the EMS:

1. Management system scope.
2. Management system processes.
3. Actions to address risk and opportunities that affect the EMS.
4. Environmental aspect and impacts.
5. Compliance obligations.
6. Communications.

Management System Scope

Thames & Newcastle Limited has assessed and established the scope of our EMS so we can implement our objectives and overall Environmental Policy General Statement of Intent.

Based on the nature of our work, we have varying levels of influence and control which may restrict us from being able to implement this EMS in full on a particular site. We are committed to implementing this EMS in full on all Workplaces that are under our control.

The functional and organisational boundaries for different work locations are summarised below:

Type of Workplace	Functional Boundary	Organisational Boundary	Can we Control or Influence?
Workplaces under our control	All work activities that are performed and managed by our Employees or Sub-Contractors	Complete Organisational Control	Yes, we can control and influence these activities
Workplaces not under our control	Work activities that Thames & Newcastle Limited perform in workplaces that we are not directly in control of	Working to our own risk assessments but not involved in direct management or running of workplace	We can influence these workplaces by conforming with Management Systems and local site rules

This EMS covers all activities and services undertaken by Thames & Newcastle Limited as we are able to either control or influence these depending on the Type of Workplace as described above.

Despite there being no legal requirement to keep an EMS manual, we do so to help demonstrate compliance with Environmental Management to our Employees, Customers and for External auditing purposes.

Management System Processes

Our Processes are designed taking in to consideration the continual improvement principles of:

- Plan.
- Do.
- Check.

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- Act.

So that we can achieve our objectives, Thames & Newcastle Limited has implemented this EMS; which is founded on robust management principles that are integrated with routine/daily management activities that Thames & Newcastle Limited controls.

To summarise, the processes determined within our EMS are developed to address the following:

1. Supplier, manufacturer, internal and external issues.
2. Material, resource and energy usage.
3. Waste and emissions generation.
4. Design, operation, production and logistics.
5. Activities, products, and services.
6. Customers and end-users.

We will perform an annual review of these processes to determine the strengths of our approach and also identify any potential areas for improvement. The annual review will be supported by regular proactive monitoring by all, the records of which may not always be recorded.

Where available, Thames & Newcastle Limited will use trends and statistical data related to non-conformities, environmental aspects, obligations, targets, objectives and corrective actions, as well as, monitoring and measurement results, audit results and compliance data, to ensure that objective, and responsible management decisions are made.

Leadership & Governance

Leadership & Commitment

The Company Director/s provide positive leadership for the implementation and maintenance of this EMS. This positive leadership encompasses the development and implementation of:

- Business strategy.
- Policies.
- Objectives & Targets.
- Project-specific plans.

This includes defining the relevant responsibilities, accountability, authority and methods of communication to ensure effective and safe performance.

The Policies that are either developed or ratified by the Company Director are communicated to all Stakeholders within the company in order to:

1. Create and sustain shared values of fairness and ethical behavior.
2. Establish a culture of trust and integrity.
3. Encourage commitment to environmental issues.
4. Provide people with the required resources, training and authority to act with accountability.
5. Inspire, encourage and recognize people's contribution.

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In addition, our corporate policies, objectives and targets are communicated and deployed throughout the business via individual, team and department performance objectives which are established and discussed during performance reviews.

Environmental Policy

The environmental policy general statement of intent is our direction and framework for establishing key corporate level performance measures, as well as related objectives and targets.

The Director ensures that our corporate policies are established and documented, and that the policies are available to all interested parties on a case by case basis.

In addition to this, the Director has overall responsibility for defining, documenting, implementing and reviewing our environmental policy in consultation with the management teams and other personnel, or their representatives. The policy is reviewed at least at regular intervals no later than the date in the footer of this document, as part of the management review programme or at a frequency determined by:

- Changes in organisational context.
- Changing needs and expectations of relevant interested parties.
- Environmental aspects that are presented through the planning process.
- Compliance obligations that are presented through the planning process.

Our environmental policy is communicated to all employees at all levels throughout the company via training, regular internal communications and reinforcement during performance reviews. Employee understanding of our policies and objectives is determined during any methods deemed appropriate.

Thames & Newcastle Limited is committed to transparent in relation to communication, maintaining integrity in relation to serving our customers, fairness and concern for all employees and any sub-contractors (if used) and responsibility to the communities within which we operate. Our vision is to exceed customer expectations for environmental, safety, sustainability, cost, delivery and value.

Sustainability Policy

In line with our Environmental Management System and Environmental Management Policy, we will seek to continuously improve our sustainability through an ongoing programme to reduce or remove environmentally damaging activities. We will also encourage activities that, where possible, improve our sustainability procedures and conserve the environment.

Our arrangements include

- Assign key duty holders within the business who will be responsible for Sustainability management
- Taking the environment and sustainability into account when making any form of business decision and strategy implementation
- Give information, instruction and training to staff at all levels on Sustainability
- Minimise the use of all materials, supplies and energy. Because of this we will seek and monitor the use of renewable and recyclable materials and components

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- Minimising overall waste, reusing resources where reasonably practicable
- Monitor our Sustainability performance and seek improvement and further control where required
- Monitoring our carbon footprint and be open to new ideas on how to reduce it
- Ensure any contractors working for us are suitably assessed for their sustainability competence

This Sustainability Policy is communicated to all employees at all levels throughout the company via training, regular internal communications and reinforcement during performance reviews. Employee understanding of our policies and objectives is determined during any methods deemed appropriate.

Carbon Reduction Arrangements

We recognise our duty as a business to monitor and improve our carbon output to lessen our impact on the environment. There is a strong consensus that human activity are increasing world temperatures leading to climate and environmental breakdown.

Because of this, we are committed to reducing our Carbon Emissions. We will do this in line with our Environmental Management System. We will ensure that we

- Assign competent persons within the business to assist in the management of Carbon Emissions
- Provide information, instruction and training to everyone in the business on Carbon Emissions
- Monitor and record our Carbon Emissions with effective tools
- Ensure that Scope 1, 2 and 3 emissions are recorded and reported where required to do so
- Complete a Carbon Reduction Plan
- Implement control measures across the business to reduce our Carbon Emissions and continually review the effectiveness of those controls

Our Carbon Reduction Arrangements will be monitored and reviewed in line with our Environmental Management System.

Roles & Responsibilities

The following general roles and responsibilities are determined and implemented throughout the company:

Director

The Director is responsible for:

1. Development and approval of the EMS and General Statement of Intent for environmental management
2. Effective implementation and ongoing operation of the Environmental Management System.
3. Ensuring resources are available for to obtain or update specialised skills to manage and reduce our environmental impacts that arise from our work.
4. Allocating resources to ensure that continual improvements can be achieved.
5. Ensuring that the EMS remains effective, suitable and adequate.

Managers & Supervisors

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All Managers & Supervisors demonstrate their commitment to the development and improvement of the EMS through the provision of necessary resources, through their proactive involvement in continual improvement activities. Emphasis is placed on improving both the effectiveness and efficiency of key system processes.

All Managers & Supervisors are responsible for the execution of the plan and the implementation of this EMS manual.

Employees & Sub-Contractors

All employees are responsible for actioning our policies and procedures applicable to the processes that they perform. Personnel responsible for service quality have the authority to stop the job so that they can correct environmental related issues. Employees are motivated and empowered to identify and report any known or potential problems, and to recommend solutions to aid subsequent risk management and corrective action activities.

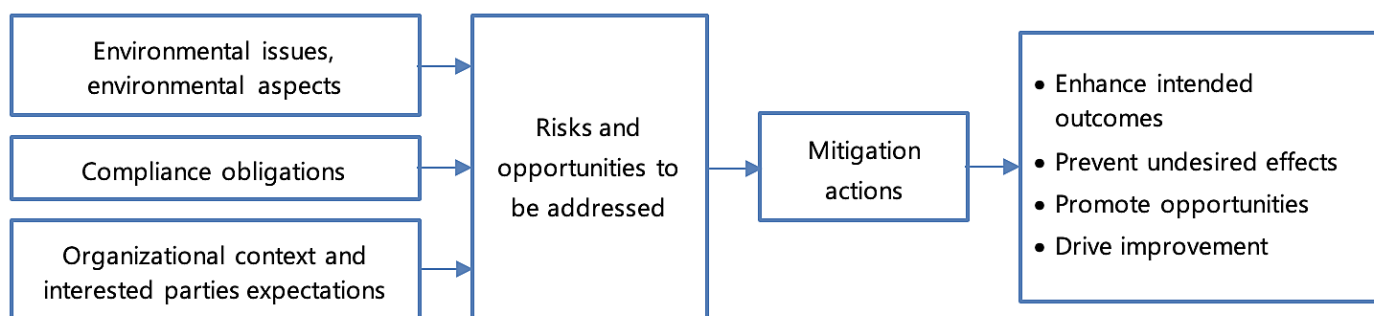
Management System Planning

Addressing Risk & Opportunities

General

We recognise for this EMS to be successfully implemented and executed, we must consider and manage the risks and opportunities relating to our stakeholders, and our external and internal context. This process uses the information collected during context and strategy evaluations (via SWOT & PESTLE analysis) and stakeholder and interested party analysis.

Using Risk & Opportunity Registers, responsible managers consider relevant risks and opportunities in order to help determine any necessary action that ensures our EMS meets its intended outcomes; manages external environmental conditions and achieves continual improvement.



Once the significant or material risks and opportunities are identified from the activities that we undertake, Thames & Newcastle Limited plans actions to avoid or mitigate perceived risks, or to take advantage of opportunities. Action is taken in a variety of ways using our EMS system processes via management reviews, setting objectives, targets and policies, operational control or emergency preparedness planning, supplier evaluation, and other appropriate processes.

The Director is responsible for incorporating risk based thinking in to our organization's culture. This includes the establishment of risk management procedures and processes to ensure the effective risk and opportunity management principles are undertaken throughout the lifecycle of our EMS, our services, and activities by:

1. Providing sufficient resources to carry out risk and opportunity management activities.

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2. Assigning responsibilities and authorities for risk and opportunity management activities.
3. Reviewing information and results from audits and risk and opportunity management activities.

Environmental Aspects

Thames & Newcastle Limited identifies relevant environmental aspects and their subsequent impacts that pertain to our business operations, obligations and customer requirements. If the Environmental aspects and impacts are recorded, it will be done so within an Environmental Aspects & Impacts Register. For each identified aspect, the operating conditions, environmental impacts and perceived significance are summarized without the need to provide an exhaustive list of all activities where there may be some generic and specialist impacts.

Within the Environmental Aspects & Impacts Register, an assessment of the potential environmental impact of each aspect is assessed and recorded, along with related targets and objectives. A scoring system is used to identify the significance of each environmental aspect with regards to relevant current and past activities, products, services and planned or new system or process developments.

The scoring process allows consideration of normal, abnormal and emergency operating conditions where applicable. The risks and opportunities encountered during the life cycle of our environmental aspects are considered when determining the significance of each impact.

The subsequent output from this identification process takes account of the severity of pertinent environmental aspects and our organization's ability to influence them, in order to determine key issues and requirements that pose adverse or beneficial effects in a prioritized way to:

1. Ensure that the EMS can achieve its intended outcomes.
2. Prevent or reduce undesired effects.
3. Achieve continual improvement.

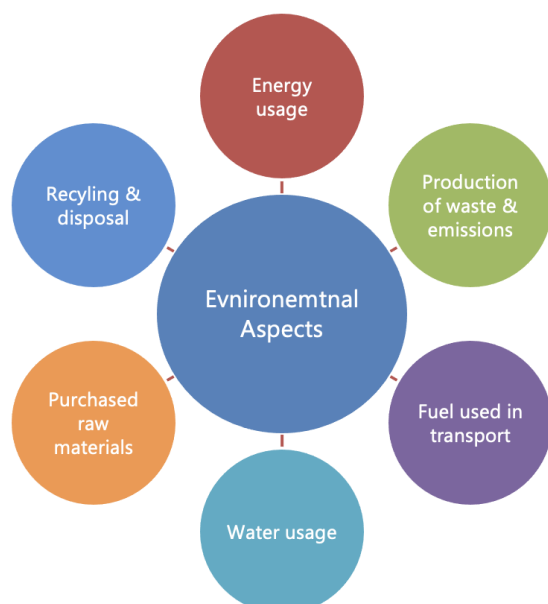
Environmental aspects that we address include those:

1. With significant environmental impacts.
2. That affects compliance with our obligations.
3. Which are priority issues for the organization (e.g. which affect strategy, policy or objectives).

Environmental aspects which pose a significant impact are subject to risk management, corrective action, and monitoring and measurement as appropriate. The EMS is structured to identify and manage these aspects in order to control or limit potential impacts and risks that may affect our organization or EMS conformity.

The significance of our company's aspects is reviewed as required, including proposals for new processes, services or developments and environmental aspects arising are also considered and assessed for significance. New aspects are added to the Environmental Aspects & Impacts Register as necessary and operational control is altered accordingly.

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Compliance Obligations

We review relevant environmental legislation directly related to our known environmental aspects and impacts using the NET-Regs service www.netregs.gov.uk which is a service provided by the UK Environment Agency. Legal and compliance obligations are reviewed on a regular basis with assistance from the automatic emails received from NET-Regs whenever legislation is updated or is newly published.

When recorded, all relevant legislation and other requirements applicable to our environmental aspects and impacts are compiled into a Register of Compliance Obligations. The introduction of new legislation and changes to current legislation is principally monitored through the following sources of information:

- NETRegs service www.netregs.gov.uk
- Recycling <https://wrap.org.uk/>
- Environment www.environment-agency.gov.uk
- Environment and Health & Safety www.cedrec.com/home/index.htm
- Legislation updates: www.legislationupdateservice.co.uk
- Sustainability and Environmental <https://www.iema.net/about-us>

We also use guidance provided by the Environment Agency that breaks down the requirements of common legislation: <https://www.gov.uk/government/organisations/environment-agency/services-information>.

Planning Action

Our EMS is planned and implemented in order to meet our corporate objectives. The planning process involves establishing and communicating our corporate policies, objectives and associated operational procedures.

This document establishes our overall plan for establishing, maintaining and improving our EMS. Any changes are conducted in a controlled manner to ensure that no unintended threats affect the EMS and are documented using the Risk & Opportunity Register.

Whenever management system changes are planned, we will ensure that all personnel are made aware of any changes which affect them, and that subsequent monitoring is undertaken to ensure that EMS changes are effectively

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implemented and that they do not adversely impact other processes.

All identified significant environmental aspects, and associated risks and opportunities that need to be addressed are used to prioritize action our action planning in order to manage and mitigate these aspects. In order to manage the risks associated with any change, they must be identified and assessed. These types of change may be:

1. Planned or unplanned.
2. Sudden or gradual.
3. Temporary or permanent.

The change process applies to the following activities or items which may foreseeably undergo change:

1. Plant and equipment.
2. Materials used, their composition and properties.
3. By-products/wastes generated.
4. Drawings and engineered processes.
5. Operating and maintenance procedures.
6. Emergency procedures or changes to business resilience.
7. Electronic system software.
8. Organizational structures and responsibilities.
9. Personnel changes, training or competency requirements.
10. Individual roles and responsibilities.
11. Regulatory and statutory requirements.
12. Activities, products and services.

The management review makes recommendations to ensure that risks and opportunities that could affect the intended outcomes of our EMS are taken into account and planned for via the most appropriate business processes.

EMS Objectives

Environmental Objectives

Thames & Newcastle Limited sets out our objectives and targets and this information can be found within the General Statement of Intent: Environmental. Improvements in environmental performance are generally incremental and proportionate to the size of our company and the activities that we undertake.

The Objectives and Targets that we set will:

- Be consistent with our existing policies and context.
- Contribute to the prevention of incidents and reduce their impact(s).
- Eliminate (where possible) or reduce pollution.
- Provide a basis for continual improvement.

Planning Actions to Achieve Environmental Objectives

When setting objectives and targets, we will ensure that they are consistent with the needs and expectations of our interested parties, and with our corporate targets and policies. In addition, technological options, financial, operational and business requirements are considered.

Progress will be regularly reviewed routinely and incorporates any proposed developments for modified activities,

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products or services.

KPIs and objectives for our organization include the following aspects:

- Energy and carbon reduction.
- Potable water reduction.
- Land development and refurbishments (including Biodiversity).
- Pollution prevention and waste management.
- Sustainable procurement.
- Commuting and business travel.
- Environmental Management System.

Support Resources

Resources at Thames & Newcastle Limited include human resources and specialized skills, infrastructure, technology, work environment and financial resources and include the requirements for the establishment, implementation, maintenance and continual improvement of the EMS.

Resource allocation is undertaken in consideration of the capability and constraints on existing internal resources, as well as needs related to supplier or interested party expectations. Resources and resource allocation are assessed during management reviews and include the following as required:

- People.
- Infrastructure.
- Work environment.
- Information.
- Suppliers and partners.
- Natural and financial resources.

Environmental impacts present at our facilities or which exist intrinsically within our equipment and process, or maintenance programmes, include:

- Transportation and material handling.
- Equipment management, maintenance and repair.
- General Facilities maintenance and repair.

As a business, we have a general responsibility for managing and mitigating the use of natural resources (non-renewable electricity, natural gas, and water) which is identified and managed as a significant environmental aspect, and to ensure that our operations remain compliant with relevant parts of:

- Our corporate policies and objectives;
- EMS management plans;
- Local Authority conditions;
- Compliance obligations and other requirements:
 - The Climate Change Act.
 - The Energy Performance of Buildings (England and Wales) Regulations.

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- The Renewable Heat Incentive Scheme Regulations.
- Water Resources Act.
- Health and Safety at Work Act 1974
- Building Regulations.
- BREEAM.
- COSHH Regulations.
- CRC Energy Efficiency Commitment Scheme.
- Climate Change Levy Regulations.

The operation and maintenance of plant and equipment that have the potential to impact EHQMS performance, as defined through risk analysis, is maintained, inspected and tested to ensure it meets design descriptions and specifications. Documentation for critical processes, plant, and equipment is retained and made available, and includes as applicable:

- Codes of Practice and relevant legislation.
- Risk Assessments.
- Operating procedures and operating criteria.
- Engineering drawings, specifications and engineering standards.
- Maintenance, inspection and testing strategies.
- The characteristics of the product or materials essential for safe and proper use.

Competence

Competency needs are identified within the company training procedure. Core competencies for roles are located within Job Descriptions.

To ensure competence of our personnel, job descriptions have been prepared identifying the qualifications, experience and responsibilities that are required for each position that affects product and system conformity. Qualifications include desired requirements for education, skills and experience. Appropriate qualifications, along with the provision of any required training, provide the competence required for each position.

All employees are made aware of the relevance and importance of their activities and how they contribute to the achievement of our policies and objectives. The company operates a formal system to ensure that all employees within the company are adequately trained to enable them to perform their assigned duties.

Where required; competency training and monitoring is conducted in-house, although for more specialist skills, external courses are arranged. The effectiveness of training is evaluated and recorded. The company induction includes an introduction to our policies and objectives.

Awareness

All employees are trained on the relevance and importance of their activities and how they contribute to the achievement of our policies and objectives. The company operates a formal system to ensure that all employees within the organization are adequately trained to enable them to perform their assigned duties.

Where required; awareness training and monitoring is conducted in-house, although for more specialist skills, external seminars or courses are arranged. The effectiveness of awareness training is evaluated and recorded. The company induction includes an introduction to our organization's policy statements and objectives.

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Communication Support

General

Thames & Newcastle Limited communicates information internally regarding our EMS and its effectiveness, through documented training, Proactive monitoring such as inspections, general walkabouts and continual improvement processes.

Internal Communication

Communications regarding how employees contribute to the achievement of objectives are also conveyed and reinforced during employee performance reviews. Issues about our EMS that may be communicated internally include:

- Day-to-day operations and general awareness.
- Environmental policy.
- Information on achieving objectives and targets.
- Risk and opportunities.

Top management and their direct reports are responsible for communicating the corporate policies as well as the importance of meeting customer, statutory and regulatory requirements to employees within their respective departments. They ensure the environmental policy is understood and applied to the daily work of the organization through the establishment of measurable goals and objectives. Internal communication occurs on an on-going basis and is achieved through various mechanisms as appropriate:

- Regular meetings and briefings.
- Training sessions and training material.
- Display boards, memorandums, letters.
- Website, e-mails.
- Product and process performance data analysis and audit results.
- Targets, objectives, scorecards, KPIs, management system manual and procedures.
- Corrective action and non-conformance reports.
- Minutes of ad-hoc and scheduled meetings.

External Communication

Communications regarding how employees contribute to the achievement of objectives are also conveyed and reinforced during employee performance reviews.

Thames & Newcastle Limited determines the need to communicate information externally to our interested parties regarding the effectiveness of our EMS. In most instances, external interested parties (such as customers, neighboring communities, etc.) are the main driving force for our organization to implement our EMS. The various processes or means of external communication may include as appropriate:

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Interested Parties	Needs & Expectations	Possible Communication	methods	of
Customers	Price, Value, Quality	Emails, Publications, Questionnaires, Telephone calls		
Owners & Shareholders	Profitability & Growth	Annual reports		
Suppliers	Beneficial relationships	Emails, Publications, Questionnaires, Telephone calls		
Regulatory & Statutory	Compliance & Reporting	Regulatory verbal inspection/audits	Compliance discussion	Reports, during

All external communications must be authorised before being released. Where required, advice appropriate to the context of the communication may be sought concerning the content and dissemination of certain external communications.

Internet - Information on our EMS, the identified significant environmental aspects and an overview of the sustainability related activities are communicated externally to interested parties via our website.

Enquiries - Thames & Newcastle Limited is subject to both the Freedom of Information Act and Environmental Information Regulations both of which require a response to external requests for information within specific timescales.

Responses to external communications are recorded if they are transmitted by email or letter. In each case the response is retained and controlled per the requirements for documented information.

Documented Information

Management System Documents

Thames & Newcastle Limited applies the following criteria to all types of documented information so we can assess whether the information is required for demonstrating the effectiveness of our EMS and whether it should be formally controlled.

1. Communicates a message internally or externally.
2. Provides evidence of conformity with our EMS.
3. Provides knowledge sharing.

Should any of the above criteria be met Thames & Newcastle Limited will ensure that it is retained and/or maintained as a form of documented information.

Creating & Updating

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When documented information is created, Thames & Newcastle Limited will ensure that it remains legible and clearly described. All Documented Information is subject to inspection to ensure that it is adequate and suitable.

Access to Documented Information

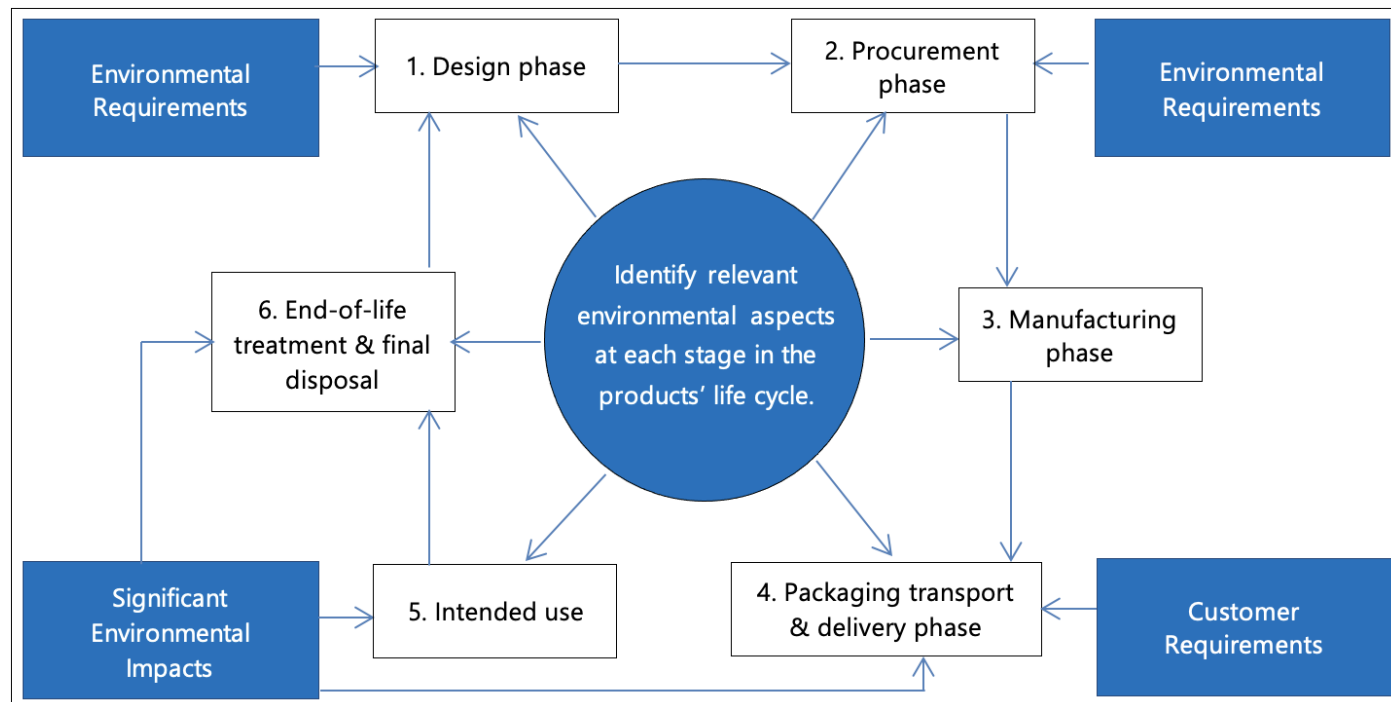
Thames & Newcastle Limited employees have access to standard forms and templates. In particular, access to CITB GE7 forms that are publicly available here: <https://www.citb.co.uk/standards-and-delivering-training/health-and-safety-publications-and-support-materials/ge700-companion-content/checklists-and-forms/>

Operation

Operation Planning & Control

Thames & Newcastle Limited considers the environmental impact and requirements that can be controlled and influenced during each phase of the lifecycle. These include phases:

1. Design.
2. Procurement.
3. Manufacturing.
4. Packaging, transport and delivery.
5. Intended use.
6. End of life and disposal.



Where required, we will seek environmental management procedures from those involved in our out-sourced process including those undertaken by contractors. The controls identified do not absolve us of the responsibility to conform

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to client, statutory and regulatory requirements but instead they enhance our capacity to manage our supply chain effectively.

Where applicable a life cycle approach is taken within the operational controls so that the environmental impacts at each stage can be controlled or influenced.

Thames & Newcastle Limited cannot control or influence all of the activities of each outsourced process. Only those where Thames & Newcastle Limited has responsibility for conforming to environmental requirements, in accordance with our aspects, impacts and compliance obligations, are controlled or influenced.

Environmental Emergency Situations

Thames & Newcastle Limited has identified the following emergency situations that may be applicable to how we operate which may lead to an undesired environmental impact or safety related risk.

1. Flood, fire, natural disaster.
2. Accident, incident, near miss, dangerous occurrence.
3. Release of chemical substance to drains.

As part of this, Thames & Newcastle Limited will address the following on sites under our control:

1. Identification of potential and actual accidents and emergency situations.
2. Proper response to emergencies and prevention or mitigation of serious environmental impacts.
3. Provisions for periodic reviews and revisions of the procedures.
4. Such reviews are always initiated after the occurrence of such events.
5. Periodic drills to test the effectiveness of emergency preparedness and response procedures.

Records of environmental incidents, near-misses and non-conformities with EMS procedures are documented. In the event of an incident, non-conformity, or near miss, members of staff involved or those witnessing the incident are responsible for reporting the event to the Company Director who is responsible for ensuring that an investigation is carried out to establish the root cause.

Performance Evaluation

Monitoring, Measurement, Analysis & Evaluation

General

Thames & Newcastle Limited applies adequate methods for determining which aspects of the EMS and its processes are to be monitored, measured and evaluated. The frequency and method that the processes are monitored, measured and evaluated is determined by:

1. Statutory and regulatory requirements.
2. Customer feedback and specification requirements.
3. Process and EMS requirements.

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4. Process performance and audit results.
5. Level of risk and types of control measure.
6. Trends in non-conformities or corrective actions.
7. Criticality for product conformity.

Where applicable, test and inspection records are retained as documented information for a minimum of three years. This documented information includes details of the final inspection authority to confirm that all critical parameters were in accordance with established requirements and specifications.

The frequency of monitoring and measuring activities as well as the types of tools and devices we use to provide evidence of valid measurements to verify specified tolerances and measurement ranges will be determined on a case by case basis. The frequency of cleaning, maintenance and calibration is considered based on the risks associated with the failure of the device upon the process and its output.

Where necessary, to ensure the validity of results, measuring and monitoring equipment is:

1. Calibrated or verified at specified intervals, or before use.
2. Calibrated against measurement standards traceable to appropriate measurement standards.
3. Software used for monitoring and measurement is validated using defined parameters before use.
4. Protected from damage and deterioration during handling, maintenance and storage.
5. Safeguarded from adjustments that would invalidate the measurement result.
6. Identified to enable the unit's calibration status to be determined.
7. Safeguarded from use when a unit is found to be out of calibration and the results re-validated.
8. Adjusted or re-adjusted as necessary.

Evaluation of Compliance

Conformance with legislation is regularly reviewed and evidence of evaluation is maintained through the review process. Besides monitoring and measurement of operational activities, we periodically evaluate our compliance with all applicable legal requirements, obligations including other requirements to which we subscribe.

In most cases, monitoring and measurement is an on-going process intended to collect data required by legal and other requirements. The evaluation of compliance compares the data collected over a period in comparison with our stated obligations and legal requirements.

Internal Audit

General

Internal Audits or reviews are critical inputs that help us determine how effective the EMS is in relation to how we work. Internal audits are undertaken regularly throughout the year and focus on specific environmental topics such as waste management etc.

Management Review

General

To ensure the continuing suitability, adequacy and effectiveness of our EMS in meeting our strategies, Thames &

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Newcastle Limited conducts formal management review meetings at regular intervals. The requirements for conducting management review are defined and communicated.

Inputs

Data from conformance and performance measurements that are gathered at key environmental data points from various processes and activities is the core input into the Management Review of the EMS. Subsequent reported recommendations for improvement are based on the evaluation of such measurements.

Performance is primarily assured through the deployment of objectives, and through the review of our demonstrated ability to achieve desired results. The management review evaluates the need for change and to establish actions to improve our EMS, its processes and resource needs. The management review i considers the following:

1. The suitability of our EMS policies.
2. The impact of changes in compliance obligations.
3. The management of risk and opportunity.
4. EMS objectives, targets and performance indicators.
5. Changing expectations and requirements of relevant interested parties.
6. Changes in the products or organizational activities.
7. Changes to the organizational structure or change management effectiveness.
8. Communication and feedback from stakeholders.
9. Workplace, environmental, and health and safety monitoring.
10. The status of non-conformities and corrective actions.
11. Performance statistics, including summaries of safety statistics and environmental monitoring results.
12. Findings of completed audits and reviews.
13. Follow up on actions from previous management reviews.
14. Recommendations and opportunities for improving the effectiveness of the EMS.

Conformance is primarily assured through internal audits and demonstrated through a review of audit results and our demonstrated ability to detect, correct and to prevent problems. Performance is primarily assured through the deployment of objectives, and through the review of our demonstrated ability to achieve desired results.

Outputs

The primary outputs of management review meetings are management actions that are taken to make changes or improvements to our quality management system. During management review meetings, appropriate actions to be taken regarding the following issues are determined:

1. Improvement of the effectiveness of the EMS and its processes.
2. Improvement of product related to customer requirements.
3. Opportunities and risks.
4. Significant environmental aspects.
5. Resource needs.

The primary outputs of management review meetings are the actions necessary to make changes or improvements to our EMS.

Relevant outputs from the management reviews are made available for communication and consultation throughout

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the company.

Improvement

General

A range of performance evaluation tools are used to make recommendations for improvement and to achieve the intended outcomes for the EMS.

In order to determine and select opportunities for improvement or to implement any necessary actions to meet the requirements of customers and relevant interested parties, or to enhance customer satisfaction, Thames & Newcastle Limited drives improvement via the analysis of relevant data. The data inputs for the improvement process include:

1. Risk and opportunity evaluations.
2. Assessment of the changing needs and expectations of interested parties.
3. The conformity of existing products and services.
4. The effectiveness of our EMS.
5. Supplier performance.
6. Environmental performance.
7. Reducing adverse environmental impacts.
8. Increasing beneficial impacts and opportunities.
9. Levels of customer satisfaction, including complaints and feedback.
10. Internal and external audit results.
11. Corrective action and non-conformance rates.
12. Data from process and product characteristics and their trends.

Thames & Newcastle Limited also ensures that opportunities for improvement from daily feedback on operational performance are evaluated as required.

Non-Conformity & Corrective Actions

All reported non-conformities are investigated to that corrective action can be identified.

Where necessary, other competent parties are consulted to identify the root cause and plan appropriate action.

The non-conformance will be recorded together with any agreed corrective action.

Our EMS is continually improved using evidence of non-conformity, customer dissatisfaction or process weakness. Since problems may already exist, they require immediate correction and possible additional action aimed at eliminating or reducing the likelihood of its re-occurrence.

Thames & Newcastle Limited will take steps to eliminate non-conformances where possible using the following requirements:

1. Reviewing non-conformities, including customer complaints and product returns.
2. Determining the causes of product non-conformities and process deficiencies.
3. Evaluating the need for action to ensure that non-conformities do not recur.
4. Determining and implementing action needed.
5. Recording and reviewing the results of actions taken.

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The resulting corrective actions are reviewed for effectiveness and are reported to determine if changes to the EMS are required, or whether any new risks or opportunities need to be considered during planning. Documented information concerning the nature of any non-conformances and their resulting corrective actions is retained.

The corrective actions are considered effective if the specific problem was corrected and data indicates that the same or similar problems have not re-occurred. Results of data analysis and subsequent recommendations are presented to top management for review.

Improvement

Thames & Newcastle Limited continually improves the effectiveness of this EMS through the application of policies, objectives and feedback. The overall effectiveness of continual improvement program, including corrective actions taken, as well as the overall progress towards achieving corporate level improvement objectives, is assessed through our management review process.

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