



Owens Group

SHEQ Policy

(Safety, Health, Environmental, and Quality)

ISO 9001, 14001 & 45001 & BRC

August 2020



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1.0

MANAGEMENT SYSTEM POLICY STATEMENT

Owens Group is a complete logistic solutions management provider.

The Company is committed to the prevention of injury and ill health and intends to provide, maintain and seek to continually improve safe and healthy working conditions, equipment and systems of work for all employees. We also accept our responsibility for the health and safety of our clients, contractors and others who may be affected by our activities.

The Company is committed to the prevention of pollution and has reviewed all services provided and deem our impact on the environment as low. However, the Company is committed to the protection and enhancement of local and global environments and ensuring that all activities are carried out in a sustainable way.

As Managing Director of Owens Group, I am responsible with our Board of Directors for the establishment of a Safety, Health, Environmental & Quality Policy, set by the Board. Owens Group is fully committed to: -

- providing suitable and effective safety, health, environmental and quality training for all staff in order to assist employees to perform their work safely and efficiently
- make available such safety devices and protective equipment as may be appropriate and ensure that such equipment is utilised when needed
- maintain a continuing interest in safety, health, environmental, and quality matters applicable to the activities in which we are involved
- management setting an example in all safety, health, environmental, and quality matters
- actively carry out risk assessments for all aspects of the business and regularly audit these in order to demonstrate efficiency and effectiveness to ensure all risks are of an acceptable level
- ensuring that our customers receive the best service practically possible to meet their requirements
- being aware of and complying with all legislation and regulations including applicable standards (ISO, BRC, FORS & CLOCS).
- assessing the safety, health, environmental and quality impacts of all working practices, including the safe storage, distribution of customer products.
- maximising the use of local products and local workforce wherever possible
- ensuring the potential consequences, both legal and customer focused, of any departure from the requirements of this policy are understood
- Developing a set of safety, health, environmental and quality objectives, targets and action plans and ensuring relevant data is available.



- Support the purchasing of safe, environmental, energy efficient and quality products and services
- reviewing this policy and its action plans annually (as a minimum) with a view to ensuring continuous improvement is being achieved

Signed.....

Huw Owen - Managing Director

Date 1st August 2020



Introduction

This document is the Safety, Health, Environment, and Quality Policy Manual of Owens Group. It is intended that this document and all other related documents shall be available to all employees of Owens through the Company's intranet system. It should be understood that all employees have an interest in this document. Any employee can request changes to this and any related documents.

2. Management Responsibility

The Operations Director (OD) will be responsible to the Managing Director (MD) for the preparation and implementation of the Management System Policy and for ensuring that it is integrated into the company's normal management procedures, thereby receiving equal priority with its normal business

2.1 Management Review

The OD or his chosen representative shall organise a management review of the safety, health, environment and quality system annually. The purpose of this review is to ensure its continuing suitability, adequacy, effectiveness and compliance with BS EN ISO 45001:2018, BS EN ISO 9001:2015 & BS EN ISO 14001:2015

The OD shall chair the management review meeting.

Issues discussed at this review will include: -

- Results of audits and evaluation of compliance
- Participation and consultation
- Customer feedback
- Process performance and customer conformity
- Changes that could affect the safety, health, environment and quality management systems
- Management Representative report
- Company and location safety, health, environment and quality management objectives, targets and actions
- Extent to which the objectives and targets have been met



- Review of management system policy
- Resource needs
- Status of preventive and corrective actions, including accident investigation
- Evaluation of compliance with legal, customer and other requirements
- Effectiveness of communication, both external and internal, and the results of any complaints raised
- Safety, health, environment and quality performance of the Company
- Follow up actions from previous Management Reviews
- Any change in circumstances, including legal, customer or other requirements
- Reference Library
- Recommendations for continual improvement

The minutes of the Management Review Meeting will be posted on the Company intranet and made available to all employees.

The OD shall appoint competent persons as Manager at each Owens site who will have responsibility for operations at their respective site. Their duties shall include meeting the scope, objectives, targets and actions of Owens Safety, Health, Environment and Quality Policy. They will communicate with all employees at their site to ensure they are aware of their responsibilities with regard to safety, health, environment and quality.

2.2 Site Management (Direct Aspects)

The Manager will be responsible for all matters on that site which relate to safety, health, environment and quality, and for implementing the Company's Safety, Health, Environmental and Quality Policy. They are responsible for: -

- ensuring compliance with all planning conditions, discharge consents (if appropriate) and other environmental requirements
- taking steps to reduce noise, fumes, vibration and other impacts, thereby avoiding complaints arising out of activities on the site
- ensuring that the site is kept in a clean and tidy manner and for maintaining a high standard of appearance at the site
- ensuring energy usage is kept to a minimum
- ensuring all buildings and structures are maintained to a standard commensurate with use



- ensuring that any complaints are recorded and dealt with fairly and promptly.
- complying with the company work instructions

2.3 Waste Materials

The Company's policy with regard to any waste material generated at any site, or as a result of its activities elsewhere, is to dispose of such materials in accordance with relevant licences and other requirements and with due regard to the environment, and to reduce as far as practicable the quantity of waste generated.

The Manager of the relevant site will: -

- employ every effort to apply the discipline of effective waste management
- dispose of all sewerage and waste in accordance with the relevant requirements
- establish a waste management scheme for the site for which he is responsible
- Identify and ensure that all substances which may be hazardous to health are used, stored and disposed of in a safe manner and in accordance with relevant legislation.

2.4 Energy Efficiency

The Company's policy is to promote energy efficiency and identify means to reduce energy usage at sites, not only from an environmental, energy point of view, but from a business point of view. This includes the most efficient use of all sources of power, heat and light.

The Manager, of the relevant site, will be responsible for: -

- initiating schemes to promote energy conservation

2.5 Transport

In order to minimise the environmental, energy impact of its vehicles, the Company will endeavour to improve the efficiency of its vehicles and reduce the resources it uses. Managers will ensure that: -

- Vehicles are serviced and maintained regularly and exhaust emission checks are routinely carried out.
- The company operates an efficient collection of vehicles, monitoring fuel consumption, driver performance and compliance to driver's hours, and the working time directive.

2.6 Legal and Other Requirements

In order to ensure the Company maintains its knowledge of all current legal requirements, it subscribes to a series of updating services.

The Company is committed to ensuring that it undertakes whatever is required to meet, implement and maintain its safety, health, environmental and quality management systems, and to comply with all legal and customer requirements.



Owens Group is committed to its employees' active participation in the continual development of this Safety, Health, Environmental and Quality Policy. This will be achieved through regular meetings and encouraging consultation.

The allocation of duties and the particular arrangements which will be made to implement this policy are detailed in this document and in the Management Systems process.

This policy will be kept up to date, in line with any new legislation and changes in business activities. To this end, the policy, and the way in which it has been operated, shall be reviewed: -

- whenever there is a reason to suspect it is no longer appropriate; or
- there has been a significant change in duties, responsibilities or legislation; and
- in any event at least once every 12 months.

This Safety, Health Environmental and Quality Policy will be communicated to all new employees and will be available to all employees via the Company intranet (where requested, hard copies will be issued or may be downloaded from the Company intranet). All contractors will be made aware of this Policy and, in particular, their responsibilities contained herein. Any other interested parties may request a copy of this Safety, Health Environmental and Quality Policy.

2.7 Objectives, Targets and Actions Programme

Each year we will establish, implement and maintain documented safety, health, environment and quality objectives and targets for each of our sites. Current objectives targets and actions are attached as Appendix 1 of this Policy.

The objectives, targets and actions shall be measured, where practicable and be consistent with our Safety, Health, Environment and Quality Policy.

The Company will review and update objectives, targets and actions annually, based on updated information on legal and other requirements, including the use of technology, finance, operational, business and customer requirements. The objectives and targets will normally be based on a calendar year and will be included in the Company's Business Plan for the year.

The appointed Managers at each site will have the responsibility for achieving the objectives, targets and actions set out in this Policy and ensuring that relevant data is available to be analysed against them.

An organisation chart for Owens Group can be found on the company IT system.

3. Management Representatives

The Management Representative shall: -

- have overall responsibility for the establishment of processes required by the safety, health, environment and quality management systems and shall ensure that these processes are implemented and maintained
- Present a report at the management review meeting on the performance and legal compliance of the safety, health, environment and quality system and any improvements that are required. This



will include information gained from audit, inspection, meetings, updating of SHEQ information, new regulations, insurance meetings, accident investigations etc. Note: Information can be obtained from both internal and external sources.

- ensure that all employees of the Company are aware of the importance of meeting the requirements of BS EN ISO 45001:2018, BS EN ISO 9001:2015, and BS EN ISO 14001:2015, customer requirements and ensuring customer satisfaction.

4 General

The Company's aims are: -

1 The provision and delivery of customer loads.

2 To continue to grow the business in order to generate value for money for our Members and customers and re-investment in the Company's assets and staff.

3 To further develop its staff through additional qualifications and competences and sharing a set of core values and beliefs.

The Company's scope of certification is: -

Owens core business is sustaining long term logistical arrangements with well-established companies regarding the warehousing, order-picking & delivery of Third-party product in an ethical & responsible manner.

When planning to meet the requirements of the scope of the safety, health, environment and quality policy Owens will: -

- take into account all activities including routine and non-routine
- consider the impact of its activities on all persons whether that activity is carried out on or off site
- take into account competence, behaviour, capability and other human factors
- Identify all hazards, from whatever source, which could affect the safety, health environment and quality which may have an effect on its scope, employees, contractors, visitors or neighbours.
- take into account infrastructure, equipment, and materials on or off site whether supplied by Owens or by any other source.
- review the impact of changes to organisation, work activities and materials on safety, health, environment and quality
- take into account any modification (permanent or temporary) to its management systems (BS EN 45001:2018, BS EN ISO 9001:2015, BS EN ISO 14001:2015 and BRC) and their impact on its operations, processes and activities



- ensure its legal obligations are met with regard to risk assessment and the controls implemented to reduce the identified risks to an acceptable level
- take into account the design of work areas, processes, installations, machinery, equipment, operating procedures and work organisation including their interaction with human capabilities
- ensure hazard identification and risk assessment are designed to be proactive as opposed to being reactive to incidents
- identify, prioritise and document all risks and the necessary controls to reduce the identified risks to an acceptable level.

When identifying or updating controls Owens will consider how to eliminate the risk, the substitution of the risk (for a lesser risk), controls and the use of warnings such as signs and work instructions. As a last resort Owens will consider the supplying and using personal protective equipment.

5. Competence, Training and Awareness

The OD in consultation with the Management Representative shall decide on the competence levels required for Owens employees.

The Company will ensure that all employees who perform tasks that may or will have an impact on safety, health, environment and quality such as those identified in this Policy, are competent on the basis of education, training or experience, to ensure that the impacts are understood, implemented and that negative impacts are removed where possible, and where not possible, are minimised to an acceptable level. Records of competence will be retained.

Where training or other actions are required this shall be provided to ensure traceability and competence.

All training carried out on behalf of Owens to ensure competency of Owens Group personnel shall be evaluated on completion of the training to ensure its effectiveness.

All employees of Owens shall be made aware of the requirements of the safety, health, environment and quality management systems, that they are an integral part of the system and encouraged to input into the safety, health, environment and quality management systems.

Training records shall be established for all employees indicating their areas of competence, experience, education and training.

Managers shall be responsible for ensuring that employees have the necessary requirements to ensure statutory compliance and that customer satisfaction is achieved.



6 Service Provision (Interaction with the safety, health, environment and quality management systems)

The initial form for the provision of all services is the 'Contract Review' form.

Forms and records controlled within the safety, health, environment and quality management systems shall provide the interaction between the service provision and the safety, health, environment and quality management systems.

Where the provision of a service by Owens is provided by persons other than Owens employees, Owens shall ensure that these persons meet the same standard of competence as required by an Owens employee who may have provided the same service.

6.1 Service Provision (Product realisation)

Owens Group shall plan the process of service provision. Details shall be documented on or attached to the Contract Review Form.

When planning the provision of any services to a customer, the following shall be considered:

- Safety, health, environmental, energy and quality requirements and impacts (direct and indirect)
- Customer requirements
- Competence
- Documentation
- Resources e.g. personnel, classroom, vehicles, course material, spare parts, new equipment and any other requirements to ensure customer satisfaction.
- Records of inspection and test required by the customer
- Standards required to be met by the customer
- Other records required by the customer
- Delivery dates
- Follow up required after delivery



- Statutory, regulatory or other requirements that the customer should be aware of
- Owens requirements.

Owens Group shall review all of the above requirements prior to tendering or accepting a contract or order and shall ensure that all customer, statutory, regulatory and Owens requirements can be met.

7. Documentation and Records

A list of all documentation required by Owens shall be maintained by the Management Systems Quality Controller and shall be available on the Company Intranet.

All documents available within the Owens safety, health, environment and quality management systems shall:

- be approved for adequacy prior to use
- be reviewed and updated as necessary
- be re-approved as required
- have all changes and revisions identified
- be placed on the Company Intranet (where possible) with the distribution of relevant hard copies controlled
- be legible and identifiable
- be traceable to the original
- have all obsolete documents removed from their points of use?
- ensure hard copies of obsolete documents are retained by the Quality System Controller for audit purposes, and suitably identified to prevent their unintended use

A list of all records required by Owens shall be maintained.

The following processes are included in this manual: -

- Document control
- Records control
- Operational Control
- Emergency preparedness and response
- Control of non-conforming product



- Corrective action
- Preventive action
- Audit
- Monitoring and measurement
- Evaluation of compliance
- Management review
- Competence training and awareness
- Design & Development
- Contract Review

Where required, these processes shall be available in the form of flow charts on the Company Intranet.

Owens shall use work instructions for detailed processes as determined by the Management Representative and these shall be included on the List of Controlled Documents available on the Company Intranet.

8. Emergency Preparedness Response and Incident Investigation

8.1 In the event of an unforeseen safety, health, environmental or quality incident, e.g. an oil leak (vehicle), each site will have the means of dealing with, isolating and (if necessary) cleaning up such occurrences (e.g. spill kit).

All employees will be made aware of the need to react immediately to any emergency situation. We are committed to report on and review any emergency situation that arises within the Company's sites or processes and to testing our emergency response. This will be undertaken in conjunction with other training requirements.

We will: -

- identify potential emergency situations
- establish implement and maintain procedures to ensure we are capable of responding to emergency situations
- practice our response to emergency situations

The above will be achieved, in part, by complying with the requirements of Owens Group and the training requirements there in, and the creation of an occupational standard that we can/will measure against.



8.2 Following an emergency or incident Owens will investigate all events requiring an emergency response and will: -

- 1 Determine any deficiencies in our safety, health, environmental, energy or quality management systems that might have contributed to the emergency or incident
- 2 Identify any corrective actions
- 3 Identify any preventative actions
- 4 Identify opportunities for continual improvement
- 5 Communicate the results of any investigation into an emergency or incident using the company intranet.
- 9 Communication, Participation and Consultation

9. Communication

9.1 External

Where any changes to a contract, order or tender are required, these changes shall be communicated to the customer. The changes shall be reviewed as the original contract, or order, to ensure the customer's satisfaction.

Where the customer provides no clear statement of their requirements, Owens shall ensure the customer is notified of the details of the service to be provided and ensure the customer acknowledges acceptance.

Owens shall ensure that a suitable communications system is set up between the customer and Owens so that any information regarding the service to be provided is brought to the attention of the appropriate person in the customer's organisation.

Communication can be by any means agreed between Owens and the customer.

On completion of the service provision as sample (10%) of customers shall be asked for feedback on the service provided. This feedback should provide the customer's perception of Owens and whether they can identify any improvements in the services provided.

Any customers who request a copy of our Safety, Health, Environment and Quality Policy Manual will be provided with one by whatever means requested.

9.2 Internal

As a company, we have established an internal communication, participation and consultation route for all employees. This is achieved by the use of: -

- Company intranet



- Newsletter
- Meetings (group or individual)
- Competence review
- Appraisal
- Documents (signed for where required)

10. Design and Development

- Not Applicable.

11.0 Purchase & Supply

Purchase requisitions shall include the following: -

- standards to be met
- requirements of this Policy

All purchased items shall be approved prior to release for use. The level of approval shall depend on the importance of the item. When required for traceability or any other purpose, an inspection and test record shall be prepared and filed accordingly.

The Management Representative will be responsible for ensuring that: -

- the Company pursues an annual review of purchasing specifications to examine the potential for the use of less environmentally harmful products and more energy efficient
- all items purchased are obtained in accordance with the procedures laid down under the requirements of this Policy
- the utilisation and life of products are maximised and so reduce wastage and the unnecessary consumption of resources, including packaging.
- All suppliers are issued with a note informing them that supplier safety performance is a factor on their evaluation
- All suppliers are requested a spec of the product they provide, which is filed.

12. Service Provision (Customer satisfaction)

The following procedures shall be followed in order to ensure customer satisfaction: -

- a contract review will be completed



- the customer shall be made aware of the service/product being provided
- work instructions shall be used
- equipment used shall be in good working order and have spares available where required
- equipment required for measurement purposes shall be calibrated to a recognised standard or to a standard agreed with the customer
- where measurements are required, they shall be taken prior to release
- delivery dates and methods shall be agreed and documented on the Contract Review Form
- any follow-up action required following supply of the service shall be documented on the Contact Review Form

13. Identification and Traceability

- 1 The Owens Group Safety, health, Environmental and Quality System includes procedures for identifying parts and service history from applicable drawings, or other documents, during all stages of receiving, storage, service and delivery.
- 2 Where traceability is a specified requirement, individual items are identified uniquely.
- 3 All traceability records are kept on the Stirling computer systems.
- 4 Vehicles and parts are identified by inspection, monitoring, measuring and other suitable means throughout the service process until Owens Group responsibility for the vehicle ceases.

14. Customer Property

Any product supplied to Owens by a customer for use by Owens shall be treated as if owned by Owens. It shall be clearly identified as “customer property”. If the product is lost or damaged or found to be unfit for its purpose, this shall be communicated to the customer and attached to or documented on the Contract Review Form.

This applies also to intellectual property.

15. Preservation of Product

Items purchased by Owens Group shall be protected and stored to prevent damage or non-conformance.



Products being supplied to a customer shall be protected and clearly identified during the delivery of the product.

Consideration shall be given to the handling and packaging of the product to ensure customer satisfaction upon delivery.

16. Control of Monitoring and Measuring Devices

Owens Group shall ensure that work equipment, including vehicles, used for monitoring or measuring is: -

- calibrated at specific intervals
- identified
- traceable
- calibration status identified
- protected from damage and deterioration during handling, maintenance and storage
- adjusted or re-adjusted as necessary
- safeguarded from adjustments that would invalidate the measurement result
- being used to its maximum energy efficiency

If, any equipment is found to be out of calibration this shall be reported to the Management Representative. The Management Representative shall decide what action needs to be taken in regard to equipment inspected or tested using the original calibrated unit.

17. Measurement, Analysis, and Improvement

17.1 General

Owen Group shall measure and analyse safety, health, environment and quality related items to ensure that customer satisfaction is continually monitored in order that any improvements required to the safety, health environment and quality management systems are implemented.

17.2 Monitoring and Measurements

The monitoring of SHEQ performance is necessary to allow the Company to demonstrate the application and suitability of the measures introduced to prevent and control exposure to SHEQ risks. Proactive monitoring will provide reassurance that the SHEQ system is operating as intended or that problems require remedial action. Reactive monitoring is exclusively concerned with the systematic responses to substandard performance of the SHEQ system. To effectively monitor SHEQ activities, specific



arrangements shall include both reactive and proactive monitoring with varying degrees of associated qualitative and quantitative measures.

Any customer complaint, including the resolution of the complaint, shall be documented and brought to the attention of the Management Representative, who shall decide, depending on the seriousness of the complaint, whether or not to involve the MD.

The Management Representative or the MD (depending on the MD's involvement) shall sign off customer complaints.

17.4 Processes

All Owens processes shall be subject to review as required to ensure compliance with by relevant acts, regulations, standards or customer requirements.

The processes shall be reviewed to ensure that they are effective and are as relevant as when they were implemented.

Where the process requires updating, the Management Representative shall ensure that this is carried out. The MD & OD shall approve changes to processes.

17.5 Product Conformity *(monitoring and measuring)*

Owens Group shall keep records, where required, to ensure service conformity.

Records shall show the acceptance criteria and the competent person or persons who carried out the service. Where required, a manager shall authorise the release of service for use. Where this authorisation is required it shall be shown on the appropriate record.

17.6 Control of Non-conforming Product

Where the non-conforming product is used under concession it must still conform to the original requirements for the product.

Where non-conforming product has been discovered after it has formed part of an Owens process, the Management Representative shall decide on the action required ensuring that this cannot be repeated. The Management Representative shall circulate all the details of the non-conformance to all managers.

17.7 Measurement and Analysis

The Managing Director/QMR, with the Commercial Director and Operations Director are responsible and have the authority for planning, collecting and implementing the monitoring, measurement, analysis and improvement data needed:

- to demonstrate conformity of the service to Owens and customers' quality assurance requirements;
- to ensure conformity of the management system;



- to continually improve the effectiveness of the management system;
- to monitor and measure customer satisfaction levels;
- to be alert to opportunities for preventive action;
- To ensure that suppliers of parts, goods and services meet Owens quality system requirements.

4 Objectives established by Owens senior management include:

- 7.1 The determination of applicable methods, including statistical techniques, and the extent of their use;
- 7.2 The use of the quality policy;
- 7.3 audit results;
- 7.4 corrective and preventive actions and management review.

17.8 Improvement

The improvement and effectiveness of the safety, health, environment and quality management systems shall be through the use of: -

- the Management System integrated management Policy
- the objectives
- results of audits
- data analysis
- management reviews
- corrective and preventive actions

17.9 Corrective Action

The aim of corrective action is to prevent a re-occurrence of a non-conformance or to prevent a re-occurrence of customer dissatisfaction.

The following shall be taken into consideration when deciding on corrective action:

- Reviewing non-conformance.
- customer complaints
- finding the root cause of the problem
- evaluating the need for action

The corrective action shall then be implemented, where required. The corrective action shall be documented and reviewed to ensure that no re-occurrence can take place.



17.10 Preventive Action

Owens shall take preventive action to stop potential problems from developing by: -

- assessing potential problems and evaluating the cause
- implementing relevant action
- documenting and reviewing the results

18. Audits

A UKAS approved Third Party Company chosen by the Owens Group shall audit each Owens Group location to ensure compliance with BS EN ISO 45001:2018, BS EN ISO 9001:2015, and BS EN ISO 14001:2015 and provide independent certification.

Internal audits shall be carried out by personnel appointed by the OD. These employees shall not audit an area for which they have direct responsibility. Audits shall be planned taking into consideration the status and importance of the processes or areas being audited.

Every part of the Safety, Health, Environment and Quality System shall be audited at least annually. The Head Office will include internal audit, management review and reference library.

Internal audits shall be planned in advance and shall have a high priority within the management of Owens.

The OD shall be notified of internal audit dates and shall approve any changes to these dates.

Where non-conformances are posted on the Company Intranet, the Managers at all sites are required to ensure preventive action is taken in order that the non-conformance does not/has not occurred on their site.

The Management Representative shall verify the corrective action is effective and sign off all non-conformances except procedural ones (see below).

If the non-conformance involves a procedural change this shall be carried out by the Management Representative and signed off by the MD.

19 Environmental Aspects

Owens Group shall identify all the environmental aspects (direct and indirect) and the necessary control measures will be documented - Management Systems process work instruction.

Owens shall establish, implement and maintain a procedure: -

- a) To identify the environmental aspects of its activities, products and services within the defined scope of the environmental management system that it can control, and those that it can influence, taking into account planned or new developments, or new or modified activities, products and services, and
- b) To determine those aspects that have or can have significant impact(s) on the environment (i.e. significant environmental aspects)



The organization shall document this information and keep it up to date.

The organization shall ensure that the significant environmental aspects are taken into account when establishing, implementing and maintaining its environmental management system.

APPENDIX 1

OBJECTIVES, TARGETS & ACTIONS TO BE ACHIEVED 2020/21

It is each Manager's responsibility to create a plan to progress towards achieving these Policy objectives. The plans and their progress will be discussed at the periodic Accountability Meetings.

1. To implement & obtain the New ISO 14001 & 45001 Accreditations.
2. The senior management team to meet at least 3 monthly to discuss current issues.
3. All employees to have an induction and training file created.
4. Office recycling required in all depots, with bins for dry mixed recyclables.
5. A 10% reduction in customer complaints.
6. Customer wide complaints system – Joined up.
7. Budgets for all depots, nothing to be paid without an appropriate Purchase order.