

Lucas Companies

Environmental Policy

30th January 2008

Statement

As a group comprising a major painting, spraying and coatings contractor and fit out specialist working in the construction industry and general industrial fields, we have a committed Health and Safety Policy to ensure the health, safety and welfare of all employees, clients, employees and others who work in areas where our activities are being undertaken.

An additional committed objective of the company is to ensure that all our operations are conducted in such a manner as to reduce their effect on the environment to as low a level as is practicable. This is a labour intensive industry and to achieve the objectives set out in this policy I need the wholehearted support of all employees. Your experience of the workplace is seen to be a valuable asset in the maintenance of a high standard of environmental awareness and you have my personal assurance that this policy ranks with equal importance to all other policy objectives of the organisation.

Your co-operation in giving the implementation of this policy is appreciated.

D A Lucas
Managing Director

1. Policy

- 1.1 It is our duty to ensure that all our operations are conducted in an environmentally sound manner and to achieve this objective the Company will seek to promote and maintain an environmental policy which ensures that the impact of these operations upon the environment is reduced to as low as level as is practicable.
- 1.2 In the design, construction and operation of all plant, all levels of management have a duty to ensure that every reasonable practicable step will be taken to protect the environment. In addition all employees are to act responsibly to avoid damage to the environment. Where appropriate, training will be given to aid employees in the fulfilment of this duty.
- 1.3 The following organisational arrangements will be the means of achieving these objectives, and they will be reviewed on a regular basis in order to be sure that its provisions are being met.
- 1.4 In addition the Company shall adopt an attitude of openness and constructive dialogue both with public authorities and local communities.

2. Objectives

To protect the environment in which we work by,

- 2.1 The provision of facilities, plant and equipment which have been properly designed, engineered, constructed and maintained in order to minimise pollution to as low a level as is practicable.
- 2.2 Complying with all applicable statutory obligations concerning the environment.
- 2.3 Establishing and implementing suitable arrangements for safe use, handling, storage and transport of potentially polluting articles and substances.
- 2.4 Providing information, training and supervision so that personnel may work in an environmentally aware manner.
- 2.5 Providing testing and keeping up-to-date procedures for effective response to any foreseeable release or emissions.
- 2.6 Providing competent advice to all levels of management on environmental matters concerning Company operations.
- 2.7 Developing amongst employees an environmentally aware attitude.
- 2.8 Ensuring that sub-contractors and visitors comply with our environmental requirements.

2.9 Monitoring any foreseeable emissions and spills, and to take all necessary actions to prevent re-occurrences.

2.10 Carrying out regular audits to ensure compliance with these objectives.

3. Responsibilities for Implementation

3.1 The responsibility for the implementation of the Policy lies with the Board of Directors with the Managing Director responsible for the policy on their behalf. He will,

3.2 Ensure that an effective policy for the Protection of the Environment exists, is implemented and reviewed on a regular basis.

3.3 Ensure that the policy is given due attention by the Board of Directors.

3.4 Make available the necessary resources both human and financial to ensure the performance of the policy.

3.5 Ensure that adequate training instruction and supervision is provided to create the necessary awareness in all employees.

3.6 All Managers shall be responsible for the effective implementation of the objectives within their area of control.

3.7 All Managers shall keep themselves informed of all environmental incidents which arise within their area of control and shall ensure they are reported immediately in accordance with Company Procedures.

3.8 All Managers in conjunction with the Health and Safety Department shall identify environmental training needs.

3.9 All Supervisors shall be responsible for the effective implementation of the objectives within their area of control.

3.10 All Supervisors shall keep themselves informed of all environmental incidents which arise within their area of control and shall ensure they are reported immediately in accordance with company procedures.

3.11 All levels of management and supervision are expected to have a working knowledge of relevant statutory requirements, company procedures and to ensure that all employees under their control are aware of the appropriate precautions and are carrying them out.

3.12 The Health and Safety Department have a duty to monitor the effectiveness of the policy.

3.13 The Health and Safety Department are responsible for advising, co-ordinating and consulting with everyone concerned to enable the objectives of the policy to be achieved and maintained.

3.14 To assist the Health and Safety Department in carrying out these duties, they will need to consult with available services within the industry and other recognised authorities and organisations.

4. Employees

All employees are accountable for ensuring that they,

- 4.1 Understand fully and apply correctly any environmental provisions or procedures supplied by the Company in the course of, and applicable to, their work.
- 4.2 Do not interfere with or misuse any plant or equipment and in particular anything provided for pollution control purposes.
- 4.3 Co-operate fully with line management to ensure that the Company carries out its work in compliance with the law as well as its own standards.
- 4.4 Report immediately to line management any incorrect procedure, incident, occurrence, defective tools, equipment or hazard which has come to their attention in the course of their work and which may have adverse impact on the environment.

5. Advisory Committee

- 5.1 The Company's Health and Safety Advisory Committee meets under the Chairmanship of the Managing Director or nominated senior manager.
- 5.2 This committee will keep under review the environmental policy.
- 5.3 It will receive all environmental related reports and audits and implement any actions which maybe contained within.
- 5.4 The Committee shall review and investigate any such changes as are deemed necessary in order to achieve Company Objectives for Environment Performance.