



Environmental Policy (Inc. REACH)

STATEMENT OF GENERAL POLICY

POLICY AIMS AND SCOPE

TB Davies (Cardiff) Limited is committed to ensuring that all of our business is conducted in an environmentally responsible manner. All TB Davies employees are responsible for taking actions in reducing any adverse environmental impacts. Wherever possible, this responsibility will also extend to any other agencies TB Davies works with.

Our commitment:

- To comply with all relevant government legislation in relation to environmental awareness
- To minimise or eliminate any adverse impacts on the environment in the way the company operates
- To consider, and utilise wherever possible, any opportunities to improve the environment
- To increase employee awareness of the environmental impacts of their work as well as this environmental policy and their associated responsibilities
- To utilise eco-friendly alternative packaging where possible in line with operational and financial constraints
- To improve cost efficiency, productivity and working environments in relation to areas outlined in this policy

Mat Gray
Director

David Gray
Managing Director

Issue Date: October, 18th, 2017
Review Date: October 18th, 2018

Registered Office: TB Davies (Cardiff) Limited, Lewis Road, Cardiff, CF24 5EB
Company Registration No. 534073

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RESPONSIBILITIES

Overall and final responsibility for environmental matters is that of:

Mat Gray,
Company Director

All employees are responsible for ensuring this policy is fully implemented and that action is taken, where necessary, to ensure that everyone at TB Davies is complying with the policy. Employees will ensure that any breaches of this policy are reported to a director and that they will support any actions or sanctions which are necessitated as a result. Employees will ensure that they maintain awareness of current developments and changes in legislation. Training and development will be offered where changing requirements, updated or new legislation is introduced or where refresher training is needed.

Breaches of this policy by employees will not be acceptable and will be dealt with under the disciplinary procedures. In serious cases, this could lead to dismissal of the individual(s) concerned. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy however, applies to all employees and any associated persons acting on our behalf. This includes employees at all levels, directors, agency workers, volunteers, contractors, third party consultants or representatives, suppliers and any other interested parties.

AIMS

In ensuring that TB Davies complies with environmental legislation:

- We are committed to minimising any adverse environmental impacts through reducing pollutants or carbon emissions
- We will conserve energy and water wherever possible through utilising solar panels, energy efficient lighting (LED) and automatic turning off of lights (motion sensors)
- We will use sustainable resources wherever possible, using recyclable packaging whenever practicable and reviewing sustainability on an ongoing basis
- We will adopt methods in order to ensure efficient and economical use of fuels, sourcing from local providers wherever possible
- We will recycle all materials and packaging where this is possible at our dedicated recycling location
- We will report on Key Performance Indicators in relation to identifying trends in transportation distances, to be reviewed by Company Directors and with the aim of reducing environmental impact where practicable
- We will continue with our own internal audit processes and those with external agencies such as the Carbon Trust as well as monitoring our own suppliers' environmental awareness and compliance as deemed appropriate by the Company Directors.
- We will seek to identify ways in which the environment can be enhanced, particularly when planning new building developments

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REACH COMPLIANCE

REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) is a European Union Commission (EUC) Regulation on chemicals and their safe use.

TB Davies fully supports the aims of REACH in protecting human health and the environment through more advanced and earlier identification of intrinsic properties of chemical substances. TB Davies is committed to meeting all applicable REACH requirements and providing our customers with information about substances in our products as required.

Registration of substances which are used in the manufacturing of articles, under REACH, does not apply to TB Davies products. However, the company is committed to ensuring this remains the case and making any necessary adjustments should they become necessary.

As defined in REACH Article 3(3), TB Davies products are “articles” and do not release substances under their normal use. As the products do not contain Substances of Very High Concern (SVHC), it is not necessary to provide recipients with information regarding the concentration limit of SVHCs.

TB Davies will work with our suppliers to ensure that all SVHCs are notified to the European Chemicals Agency, if necessary, to comply with the requirements of REACH.

TB Davies provides consistent assurance to our customers that our products are in full compliance with the EU REACH regulations.

CONFLICT MATERIALS

TB Davies is committed to ensuring that there are no Conflict Materials or Palm Oil used in the supply or manufacturing of any of our products. TB Davies is also committed to notify all customers and relevant third parties if Conflict Materials or Palm Oil is used in production at any point in the future – in as timely a manner as is practicable.

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RESPONSIBLY SOURCED TIMBER

TB Davies is FSC (Forest Stewardship Council) accredited and committed to supporting responsible forest management. TB Davies will work with all suppliers to ensure any timber-based products are from a sustainable source and work with them towards full chain of custody accreditation from a

recognised third party such as FSC or PEFC where practical. This policy extends from finished products and packaging through to printed marketing materials and any timber based product used in the day-to-day running of the business.

RAISING CONCERNS AND REPORTING UNETHICAL PRACTICE

Employees or associated persons who:

- a) notice or witness a breach of this policy; OR
- b) unintentionally or intentionally breach this policy;

must notify a Director with immediate effect. Failure to do so is considered a breach of this policy in and of itself.

This policy also links to our Community Responsibility Policy.

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| DECLARATION | |
| I / we understand that acceptance of this policy will be used to assess my / our organisation's suitability to become a prospective supplier of TB Davies (Cardiff) Limited and that information will be held on computer and manually for this purpose in accordance with the Data Protection Act. I / we commit to informing TB Davies of any changes to supply including REACH which may impact on TB Davies' supply chain, as quickly as possible. | |
| Name: | Position: |
| Business Name: | Address: |
| Signature: | Date: |