

ISS Relocations EHS Policy & Manual

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Name	Designation	Date	Sign - off
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Commercial & Confidential

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UAE, Oman, Qatar, Kuwait, Bahrain & India

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3.0 Document History

1.0. Purpose

ISS Relocations LLC has developed and implemented an Environmental Management System (EMS), which has the following purposes:

- To establish and maintain an effective global environmental management system covering the implementation of our environmental policies;
- To demonstrate to employees and third parties, our commitment to complying with all applicable environmental legislative and regulatory requirements, and to improve our environmental performance;
- To identify and provide a guide to the policies, procedures and instructions, which assist in educating our staff in the environmental system structure and requirements;
- To provide a reference document for all staff whose activities may have an influence on environmental performance;

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- To assist in the training of staff; and
- To provide auditors with an understanding of the system, to assist them in the audit process.

1.1. Scope

The requirements of this manual extend to all personnel working on behalf of ISS Relocations LLC who have been given the responsibilities for implementing and maintaining the procedures and controls described or referenced.

The scope of the Environmental Management System encompasses all the activities carried out by the Company world-wide. This includes, but is not limited, to:

- The company's premises;
- Work activities carried out at ISS Relocations LLC, customers' and third parties' premises;
- Business travel.

1.2. National Environmental Legislation

ISS Relocations LLC carries out work throughout the world. This brings with it challenges in relation to communications and regional variations in legislation and culture. Within ISS Relocations LLC, looking after our people and the societies we work in is central to our values, and because of this we have based our environmental management system on the requirements of UK health and safety legislation, as this is associated with best practice.

Where the legislation in a country or our customer's environmental standards are identified as a higher standard than specified in UK legislation, we will put in place additional controls to meet these requirements.

Where the legislation in each country is not as stringent as the UK, we will still strive to follow the requirements of its own environmental system, given cultural constraints, as we consider this best practice.

1.3. Definitions and Abbreviations

1.3.1 The following terms are used in this document

1.3.1.1 EN ISO 14001	International standard for environmental management systems
1.3.1.2 Staff	The people carrying out work on behalf of the company, this includes temporary staff and Partner Company's staff.
1.3.1.3 Business	The activities carried out by ISS Relocations LLC to achieve the commercial objectives of the Company.
1.3.1.4 Partner Company	This includes partners, representation and other suppliers involved with servicing ISS Relocations LLC customer's needs.

1.3.2 The following abbreviations are used in this document:

- | | | |
|---------|-----------------|---|
| 1.3.2.1 | EMS | Environmental management systems |
| 1.3.2.2 | ISS Relocations | ISS Relocations LLC |
| 1.3.2.3 | QHSSE | Quality, Health, Safety, Security and Environment |
| 1.3.2.4 | ILO | International Labour Office |
| 1.3.2.5 | HSE | The health and safety enforcement body in the UK – Health and Safety Executive. |

1.3.3 References

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|---------|--------------|---|
| 1.3.3.1 | EN ISO 14001 | International standard for environmental management systems |
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1.4. Introduction

1.4.1 ISS Relocations LLC

ISS Relocations LLC is recognised as a premium supplier of end to end supply chain services. We have owned offices and affiliate office representation in more than 100 countries worldwide.

We provide a comprehensive range of sustainable solutions tailored for all your individual logistics needs.

1.4.2 Vision, Mission and Values

Vision:

Our vision is to be recognised worldwide as a leader in the field of end to end supply chain solutions. We expect each member of our Senior Management Team in every country to be at the forefront of our business. With a management team dedicated to leading from the front, we become your true logistics partner.

Mission:

Our mission is simple, to always be: “Easy to Do Business With”.

Global Values:

A Partnership Approach to Our Business
Always Putting Our Customers First
Seeking Continuous Sustainable Improvements
Accountability for Our Decisions
Honesty & Integrity

1.4.3 Environmental Policy Manual

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ISS Relocations is committed to the environmental protection of the world we live in.

This manual is designed to help staff understand the requirements of the Environmental Policy. By reading and understanding this manual you will be contributing towards achieving and maintaining standards in a positive environmental culture.

We all have a responsibility to co-operate with management, our customers and our colleagues, to carry out duties in an environmentally friendly manner and to adhere to all environmental instructions.

Where you see activities being undertaken by colleagues, or customers, that may lead to a pollution incident, you have a duty to stop them and where you are competent, advise them on the controls to be used when carrying out that activity.

If you have any observations or concerns regarding the environment, or information contained within this manual then please refer the matter directly to the Senior Management Team.

With your commitment and co-operation, environmental aspects can be managed effectively to the benefit of our staff, customers and third parties who may be affected by our undertakings.

The objective of this documented environmental management system is to enable us to define our environmental arrangements, communicate these arrangements and facilitate an environmentally friendly working environment for those involved and affected by our operations.

1.5. Global Environmental Management System

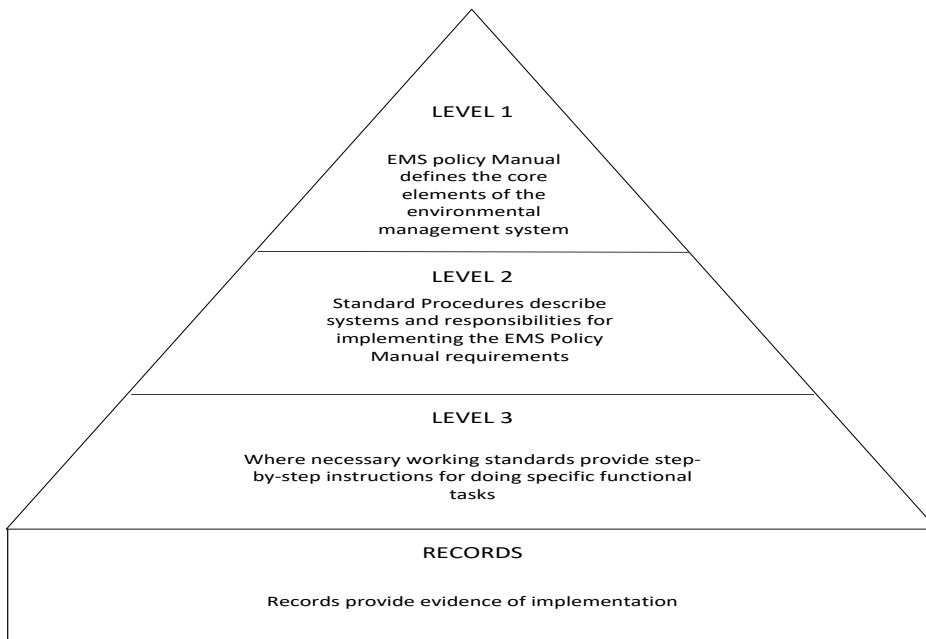
1.5.1 General

ISS Relocations LLC has implemented an environmental management system. This provides a systematic approach to the implementation of environmental initiatives and assists us in controlling environmental risks and improving our performance in this area.

The ISS Relocations LLC environmental management system is based on the requirements of UK legislation and the associated Approved Codes of Practice. Whilst ISS Relocations LLC considers this to be best practice world-wide, there may be regional variances and in some cases these may be more stringent than defined in the ISS Relocations LLC environmental management system, therefore, it is important to ensure where this is identified that local systems are put in place to ensure compliance with the local legislation.

1.5.2 Documents

The documents within the system are regularly reviewed and when necessary improved to meet the needs of our business and consist of three levels and records.



1.5.3 Control & Distribution

The controlled copies of this manual and environmental procedures are kept centrally. Copies that are printed are uncontrolled and not subject to updating.

1.6 Environmental Policy

Our vision is to be recognised, worldwide, as a leader in the field of end to end supply chain solutions.

ISS Relocations LLC is committed to providing a consistently high standard of service. We recognise that through our role we can play a role in assisting our customers in the sound management and monitoring of environmental issues.

As a leading global company, ISS Relocations LLC has a strong commitment to the prevention of pollution, the safeguarding of the environment and public health whilst carrying out our operational activities.

Our Senior Management Team and Employees are committed to an effective environmental management system that will help us accomplish its strategic business objectives.

To that end, ISS Relocations LLC shall:

- Commit to the prevention of pollution, reduction of waste, the reduction of consumable resources, and the promotion of recycling.
- Commit to comply with all applicable current legislation and other environmental requirements to which the company subscribes.
- Commit to promote environmental sustainability to our suppliers and sub-contractors.

-
- Strive to continually improve the environmental management through setting and reviewing environmental objectives and targets.
 - Communicate all pertinent environmental issues and their environmental responsibilities to employees.
 - Make the environmental programme an integral part of current and changing business strategies.

Implementing and communicating this policy and making it available to our customers in response to request and enquiries are primary management objectives.

ABHILASH NAIR - Chief Executive Officer

Date: 01/07/2019

1.8.5 QA & HSSE

QA & HSSE is responsible for managing and updating the environmental management system and keeping the Board of Directors up to date with the business duties in relation to environment.

1.8.6 IT

IT is responsible for ensuring that the technology used by the business is suitable to deliver the Board of Directors objectives for the business, including environmental support and reporting.

1.8.7 Staff & Partner Company's Staff responsibilities

Every staff member and Partner Company's staff member working on behalf of ISS Relocations has a responsibility to ensure they follow the ISS Relocations global quality, health and safety and environmental policies, procedures and work instructions, to highlight any deficiencies found and suggest improvements to ensure that best practices are consistently applied.

1.9. Planning

1.9.1 Environmental Aspects

ISS Relocations LLC determines the significant environmental aspects of its activities, products and services (that we have control or influence over), as per our Environmental Aspects Identification procedure.

Significant environmental aspects identified will be included within the Register of Significant Environmental Aspects.

We will not automatically communicate our identified environmental aspects and impacts. Any request for information relating to the company's identified environmental aspects and impacts will be considered by the QA & HSSE on an individual basis and will make an appropriate response to the request following due consideration.

1.9.2 Legal and Other Requirements

The 'Legal List & Other Requirements' register is used to record relevant legal and other requirements that may affect the Company's activities.

The Company will review the legislation register at quarterly intervals against changes in current legislation and will review the other details on a contract by contract basis

The Legal team is accountable for ensuring that staff have access to and awareness of all applicable environmental legislation applicable to the business activities. This includes employing personnel or retaining outside assistance from persons who have training and experience in environmental legislation and standards appropriate to the scale and complexity of the work being undertaken.

Compliance to legal and other requirements will be assessed through audit and carrying out site assessments.

1.9.3 Objectives and Targets

Objectives and targets are established and documented, as per procedure *Objectives, Targets, Programmes, Monitoring and Measurement*. The views of interested parties, technological options, financial, operational and business requirements may also be considered when setting objectives and targets.

Compliance with applicable law is a fundamental policy commitment, objective and target for ISS Relocations LLC. Objectives and targets to prevent pollution and continually improve the EMS may also be set.

ISS Relocations LLC uses its normal business planning process to set and fund its environmental objectives and targets.

When an objective or target is not being met or may not be achievable within the given timeframe, this will be documented, and new objective or target may be implemented after consultation with the relevant staff involved.

1.9.4 Environmental Management Programme

Environmental management programmes are used to document the methods to be used for ensuring that the objectives and targets are achieved and that there is commitment to continuous improvement.

ISS Relocations LLC uses and revises relevant procedures or parts of its EMS, including significant environmental aspects, objectives and targets and implementation programmes when necessary to address change (such as modified processes, the introduction of new equipment or materials) or new information (such as results of audits, management reviews or changes in legal requirements).

2.0. Implementation and Operation

2.0.1.1 Staff Responsibilities

All staff have a duty to:

- Observe company health, safety, security, environment and quality policy management rules always and cooperate with the company and their colleagues.
- Not intentionally or recklessly misuse anything provided in the interests of health, safety, security, environment and quality.
- Report all incidents where there is potential to cause pollution or a negative environmental impact via the incident report form
- Always use the equipment that is provided in the interests of environmental control or safety and health.
- Report any shortcomings in the protection arrangements for health, safety or environment to their line manager.

2.0.1.2 Visitors to ISS Relocations Premises

- Visitors to company premises, including members of the public, are the responsibility of the staff member being visited. Visitors must be made aware of the specific site arrangements and emergency procedures.
- Visitors must comply with health, safety and environmental precautions.

2.0.2 Training, Awareness and Competence

The Company training and competency procedures address the environmental competence and awareness required of its employees.

The Company identifies all necessary training needs and competencies and ensures all employees are made aware of their roles and responsibilities in the EMS, particularly with respect to those activities related to significant environmental aspects.

Employees are briefed in:

- The importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system.
- The significant environmental impacts, actual and potential, of their work activities and the environmental benefits of improved personal performance.
- Their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements.
- The potential consequences of departure from specific operating procedures.

Relevant employees shall have the appropriate training, competence and awareness so that their activities are conducted in a manner consistent with the EMS.

2.0.3 Communication

The Company QHSSE Communication procedure addresses communication of environmentally related information to employees and to third parties. Internal communication shall be enough to allow employees to understand their roles and meet their responsibilities within the EMS, and for management to lead and support the EMS. The QHSSE communication procedure identifies how ISS Relocations LLC receives, documents and responds to communication requests from external parties (such as communication from regulatory agencies).

2.0.4 Environmental Management System Documentation This Manual describes the core elements of the ISS Relocations LLC EMS. This Manual refers to procedures that describe specific requirements of the EMS in greater detail. Documented work procedures are established at the functional level as appropriate. Records providing evidence of various environmental activities and events have been established and maintained.

2.0.5 Operational Control

Operational controls are implemented within ISS Relocations LLC. They can also consist of specific work instruction and procedures, stipulating operating criteria, to direct employees on how to do their jobs.

2.0.6 Emergency Preparedness and Response

The Company has established an Emergency Preparedness and Response procedure, identifying and responding to scenarios that are reasonably foreseeable. The emergency response plan defines and draws upon the cross functional expertise necessary to consider, mitigating the impact and related issues such as worker health and safety, media relations, insurance and reporting requirements.

The emergency response procedures are reviewed regularly, also for adequacy after a related incident or the planned testing of the procedure and revised as necessary.

2.1. Checking and Corrective Action

2.1.1 Monitoring and Measurement

All ISS Relocations work areas will be subjected to regular inspections and internal audits. The environmental inspections and audits will be combined with the health and safety inspections and internal audits and will be submitted to the Management Team. Operational control procedures control the activity being measured. The procedures include checks to ensure that relevant operational controls are being followed.

Performance monitoring and measurement information is periodically reported to QA & HSSE as part of the review.

Conformance to the Company's environmental objectives and targets is monitored through the Management Review process.

2.1.2 Non-conformance, Corrective and Preventive Action

The Company uses the Corrective and Preventive Action Procedure, for handling, investigating, mitigating impacts, correcting and preventing re-occurrences of non-conformances. Changes in documented procedures, due to corrective actions will be recorded and implemented.

Non-conformances include the failure to conform to EMS, applicable legislation and other requirements, operational controls and work instructions, environmental incidents and recommendations from external reports. A critical element of corrective action taken, appropriate to the problem and impact, is to avoid recurrence of the problem.

2.1.3 Records

The Company maintains records enough to demonstrate that the EMS has been implemented in accordance with the EMS requirements.

2.1.4 Environmental Management System Audit

The EMS is periodically audited, EMS audits evaluate and verify conformance to planned arrangements and to the requirements of the standard and ensure that the EMS is effectively implemented.

The audit results are presented to senior management for review at management review meetings.

2.2 Management Review

The Company periodically reviews the suitability, adequacy, and effectiveness of the EMS. The management review can be integrated with regular senior management business reviews that occur on a more frequent basis.

The management review process may also address the environmental issues associated with changes in the volumes of work, new equipment and processes, and the related changes to policy, objectives or other elements of the environmental management system

3.0 Document History

This document will be reviewed at regular intervals and updated accordingly. The details of the revisions will be identified and recorded. Changes to the Appendices will potentially occur more frequently and therefore the Appendices are classed as stand-alone documents in their own rights and document controlled independently of this Policy Manual.

Revision	Details of Revision/s	By Whom	Date
01	Reviewed for issue	Abhilash Nair	01/07/2019