

Form No.	COM-POL-42	MARLOWE	Last Review	Sep 2023
Revision	2020v2	FIRE & SECURITY GROUP	Reviewed By	A Bolton



ENVIRONMENTAL MANAGEMENT POLICY

Document Owner:

Rob Flinn, Chief Executive Officer

Date: 30th September 2023

A blue ink signature of Rob Flinn, consisting of stylized, overlapping loops and a trailing flourish.

Author:

Alan Bolton, Head of HSQE

Date: 30th September 2023

A black ink signature of Alan Bolton, featuring a series of connected, fluid loops and a long, sweeping tail.

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1.0 VISION & CONTEXT

Marlowe Fire & Security Group (the Company) trade throughout the UK supported by multiple locations made up of various companies supported by their central support office based in Salford, Manchester, M50 2GT:

Marlowe Fire & Security Limited (05239777)
Fire Alarm Fabrication Protection Limited (02565127)
Clymac Limited (03019000)
Morgan Fire Protection Ltd (02002176)
Marlowe Kitchen Fire Suppression Limited (08451949)
Marlowe Smoke Control Limited (06904844)
Griffin Fire (01475478)
ACL (01804961)
Hadrian Technology Ltd (03775634)
MRFS Group Limited (14209813)
MJ Fire Safety (06313953)
Victory Fire Limited (02694384)

The Company provides quality installations and maintenance of fire and security systems to public, private, commercial, and industrial customers. In addition, the Company provides maintenance for fixed and portable fire extinguishing equipment as well as carrying out life safety fire risk assessments.

In addition, the Company has produced this Environmental Management Manual to comply with all the requirements of ISO 14001:2015 and to continually improve the Company's environmental performance. The manual also describes the policy, objectives, and responsibilities applicable to the Company's operations associated with activities. For this reason, the Company has achieved formal accreditations for:

- Quality Management Standard ISO 9001:2015.
- Occupational Health and Safety Standard ISO 45001:2018

2.0 ENVIRONMENTAL POLICY STATEMENT

Marlowe Fire & Security Group (Marlowe Fire & Security Limited, B.B.C Fire Protection Limited, Fire Alarm Fabrication Services Limited, Marlowe Kitchen Fire Suppression Limited, and MRFS Group Limited) is committed to continually improve and promote sound environmental practice by means of our Environmental Management System as well being committed to the Company's compliance obligations. We believe that environmental protection is a strategic business issue and is an integral part of our commitment to protect the environment whilst carrying out our business activities. The Company is accredited to ISO14001:2015. The Company are committed to meeting any applicable Security Industry agreed codes of practice and all product and service standards that relate to our defined scope.

The Company recognises and accepts its responsibility to minimise, wherever possible, its impact on the environment and to comply with all statutory environmental, legal requirements and compliance obligations.

We shall endeavor, always, to promote the use of sustainable resources whilst eliminating or reducing practices that are wasteful or damaging to the environment. Although the activities of Marlowe Fire & Security Group are not considered to pose a major impact on the environment, we are committed to minimise any negative effects. As well as the annual objectives set, the aims of our company will always be:

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- To protect the natural environment.
- To reduce the use of all natural resources.
- Reduce the creation of unnecessary waste at source and point of delivery.
- Prevent and / or minimise pollution caused by the company's activities.
- Promote the reuse and recycling of products where possible.
- Ensure management and staff members receive training on environmental issues.
- Measure Continual Improvement of the Environmental Management System to enhance environmental performance.

We will encourage all employees to act in a way that will improve rather than harm the environment, by making all employees aware of the potential environmental effects of their activities and the environmental benefits of improved performance and will encourage / support initiatives that contribute to an improved environment at work.

Marlowe Fire & Security Group is committed to adopting a sustainable waste management program and a sustainable sourcing policy by adopting the most environmentally sympathetic means to support this service delivery. All employees are responsible for working towards the objectives contained within this policy.

The Environmental Management Policy and supporting procedures shall be reviewed at least annually or following significant legislative changes, where improvements have been identified shall be communicated to all staff and made available to visitors of Marlowe Fire & Security Group who may use the premises and who may request it.

Signature:		Date:	30th September 2023
Name:	Rob Flinn	Position:	Chief Executive Officer

The signatory review above applied to the full suite of Marlowe Fire & Security Group Policies and Procedures.

3.0 ORGANISATION STRUCTURE

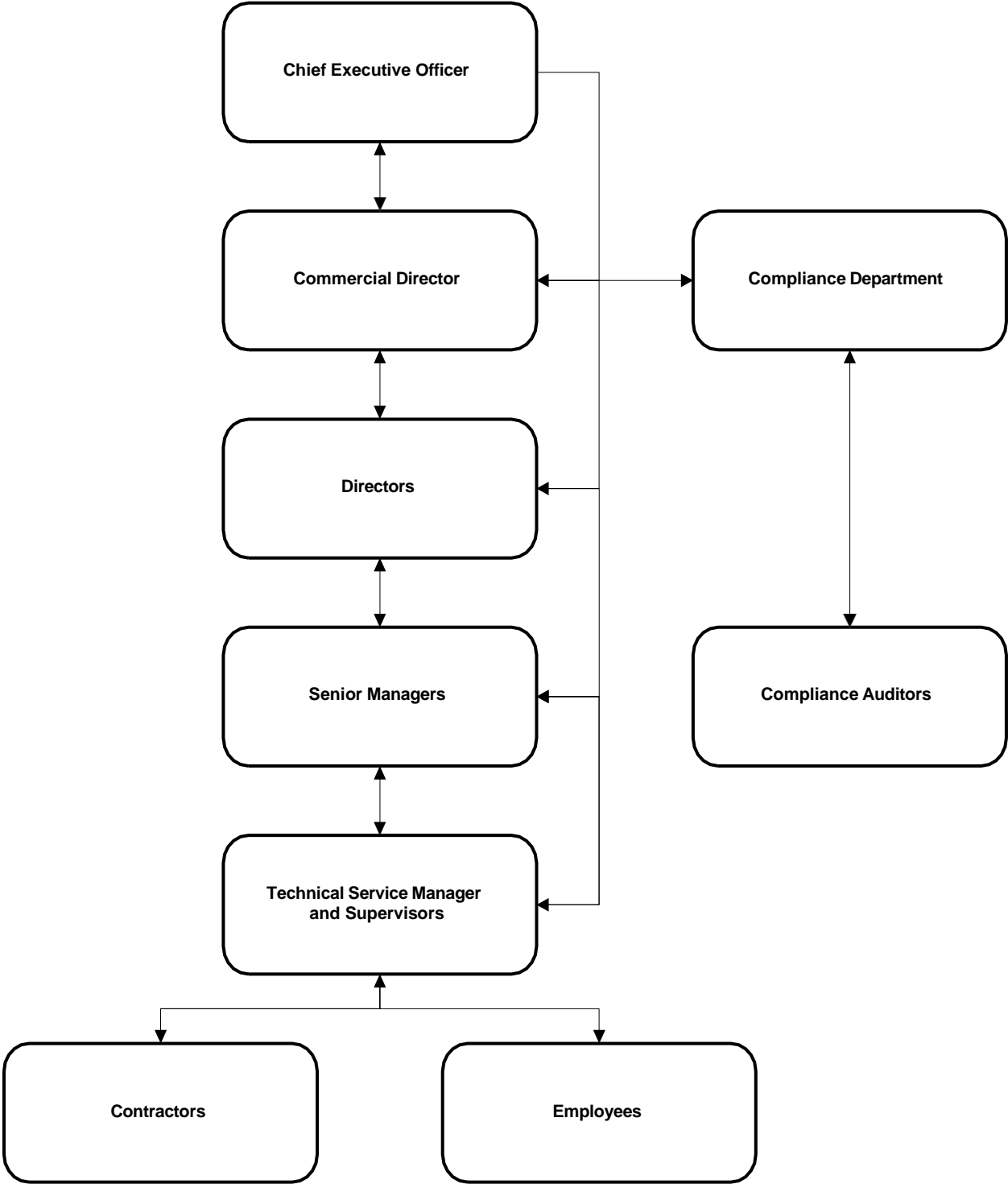
The Company has identified the individual roles and responsibilities for the management, implementation, and monitoring of the Company's Environmental Management System (EMS). The diagram below highlights the hierarchy of Environmental responsibilities and the support and means for the reporting of all Environmental issues.



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3.0 CONTEXT OF THE ORGANISATION

3.1 Understanding the Organisation and its Context



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The following are internal issues of concern that have been or may be raised by internal interested parties and are relevant to our purpose and strategic direction.

Type	Issue	Bias
Technological	We are researching and looking into new ways to reduce the need for paper and traveling e.g., Employee Portal and Conference Call Facilities – reduction in CO ² and paper waste.	Positive
Technological	The use of outdated air-conditioning units – installed air-conditioning systems which use outdated and HCFC gases.	Negative
Technological	The use of updated technology for IT equipment, e.g., LED panels – reduce the amount of electricity used.	Positive
Facilities	All locations can recycle with sufficient waste receptacles within the building.	Positive
Employee Base (Behavioral)	Driving behaviors in terms of aggressive acceleration and braking.	Negative
Employee Base (Behavioral)	The lack of commitment to separate waste into the correct waste streams prior to collection.	Negative
Employee Base (Behavioral)	The lack of knowledge and dedication to reduce the amount of electricity used.	Negative

The following are external issues of concern that have been or may be raised by external interested parties and are relevant to our purpose and strategic direction.

Type	Issue	Bias
Society & Culture	The Country is slowly becoming more Environmentally aware of their own actions as well as their waste outputs.	Positive
Statutory/Regulatory	Due to the targets set upon the United Kingdom, stricter legislation and regulation is being introduced and enforced.	Positive
Shareholders	Want continuous growth and revenue and the increase of waste will require an increase of waste disposal.	Negative
Statutory/Regulatory & Technology	Due to the update in Legislation / Regulation and advances of technology, old equipment (air-conditioning units) becomes outdated and insufficient.	Negative
Shareholders	Want continuous growth and revenue and the increase of waste will require an increase of waste disposal.	Negative
Local Authorities	Will have their own disposal methods, thus differing between regions.	Neutral
Overall Environment	Due to the Company's Day to day activities, the amount of CO ² emitted is quite large as well as general, recyclable, WEEE and Hazardous waste in which both the Admin and Engineering staff produce.	Negative

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3.2 Understanding the Needs and Expectations of Interested Parties

Interested parties are those stakeholders who receive our products and services, which may be impacted by them, or those parties who may otherwise have a significant interest in our company.

Interested Party	Internal/ External	Interest – Reason	Needs and Expectations (Compliance Obligations)
Customers	External	Direct recipient of our products and services, therefore, waste from certain services and packaging is produced.	Removal of waste produced on site and disposed of in an environmentally friendly way.
Employees	Internal	Responsible for the separation and dispose of waste produced via activities and services.	Separation between waste streams e.g., general waste and recyclable waste.
Suppliers	External	By sending supplies to ourselves, most are packaged and delivered, thus creating waste and CO ² emissions.	Dispose of waste produced via packaging. Reduce number of deliveries.
Regulators *Refer to Appendix 5'	External	Dictate controlling regulations that impact on the EMS and our products & services.	Ensure the Company complies with direct regulations.
Public	External	Whilst at low risk, some members of the public may encounter our waste streams.	Ensure all waste streams are disposed of in the correct manner. Reduce unnecessary pollution.
Certification Body	External	Assess our conformity to ISO 14001:2015, so must be kept notified of changes to the EMS.	Ensure we comply with ISO 14001:2015.
Governmental Bodies	External	In any circumstances in which the Environment is severely affected, the Governmental body would need to be alerted.	Ensure we communicate any breaches of legislation and any pollution caused by the Company's activities.
Waste Transfer/Disposal Companies	External	Physically deal with the Company's waste and transfer / disposes of the waste to the correct requirements/ standards and generates a profit.	Ensure we separate our waste accordingly and not to contaminate any waste streams.
Shareholders	Internal	For the Company to grow and revenue to increase to ensure the continued running of the Company as well as a financial benefit.	Ensure we comply with all legislation, regulation, and standards.

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Contractors	External	May have a direct impact upon the environment of the Company and its customers.	To be updated and informed of any required actions.
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3.3 Determining the Scope of the Environmental Management System

The Company shall establish and maintain an Environmental Management System (EMS) compliant to ISO 14001:2015 that will assist the Company and its interested parties in continual improvement of its environmental aspects and impacts. In addition, each Company within the Marlowe Fire & Security Group is outlined below detailing its exact activities.

Marlowe Fire & Security Ltd: The organisation's scope of certification covers the following disciplines:

The design, supply, installation, commissioning, maintenance, and monitoring or:

- Security Systems
- Fire Alarm Systems
- Suppression Systems

The supply, installation, commissioning, and maintenance of:

- Portable Fire Extinguishers.

All the above activities are carried out in accordance with the following scheme and

standards:

BS EN 50131-1 & PD6662:	Design, specification, installation, testing and maintenance of Intruder Alarm Systems including conformance to DD263.
BS 8243:	Installation and Configuration of Intruder Alarm Systems designed to generate confirmed alarm conditions.
BS 9263:	Intruder & Hold-up Alarm Systems, commissioning, maintenance & remote support
BS 5839:	Design, specification, installation, testing and maintenance of Fire Alarms as described in the four designated modules under BAFE SP203 scheme.
NCP109:	NSI Code of Practice for the design, installation, and maintenance of access control systems.
NCP104:	NSI Code of Practice for the design, installation, and maintenance of CCTV systems.
NCP120:	NSI Code of Practice for the planning, Installation commission and maintenance of Intruder alarms.
EN 50133:	Alarm systems: access control systems for use in security application, system requirements.
BS 8418:	Design, specification, installation, testing and maintenance of Detector Activated CCTV systems.
SP101:	Competency of Portable Fire Extinguisher

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Organisations and Technicians.

ST104:	Registered Service Technicians Scheme Contract Maintenance of Portable Fire Extinguishers.
SP203-1:	Design, installation, commissioning and maintenance of Fire Detection and Fire Alarm systems.
SP203-3	Design, installation, commissioning & maintenance of Fixed Gaseous Fire Suppression Systems
SP205-1:	Life Safety Fire Risk Assessment.
BS 5306:	Fire extinguishing installation and equipment on premises – Part 3: Commissioning and maintenance of portable fire extinguishers – Code of practice.
BS 5979:	Remote Centers Receiving Signals from Fire and Security Systems – Code of Practice
BS7858:	Security Screening – Code of Practice
Practice	

The activities are carried out in the following locations:

Head Office	Lowry House, 5 Central Park, Ohio Avenue, Salford, M50 2GT
Regional Office (North)	1 Diamond Court, Newcastle upon Tyne, NE3
2EN Regional Office (Midlands)	6-10 Rising Lea, Risley, Derby, DE72 3SS
Alarm Receiving Centre	Unit 1 Leacroft Road, Birchwood, Warrington, WA3 2AA.

The scope also considers the external and internal issues identified in section 4.1 and the requirements of relevant interested parties referred to in 4.2 of this manual and in addition to the above, the Company also maintains Wet Risers, Gas Suppression systems and Sprinkler Systems.

Marlowe Kitchen Fire Suppression Limited: The organisation's scope of certification covers the following disciplines:

BS EN ISO 9001:	Quality Systems: Specification for Manufacture, Installation and Servicing.
SP206:	Design, installation, commissioning & maintenance of Fixed Gaseous Fire Suppression Systems.

The activities are carried out at the following location: 9 Brunel Cl, Wellingborough NN8 6QX.

MRFS Group Limited

SP203-1:	Design, installation, commissioning & maintenance of Fire Detection and Fire Alarm Systems
ISO 9001:	Quality Systems: Maintaining of Portable Fire Extinguishers
BS 5839:	Design, specification, installation, testing and maintenance of Fire Alarms as described in the four designated modules

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under BAFE SP203 scheme.

BS7858	Security Screening – Code of Practice
PD6662:	Design, specification, installation, testing and maintenance of Intruder Alarm Systems including conformance to DD263.
NCP104:	NSI Code of Practice for the design, installation, and maintenance of CCTV systems.
NCP109:	NSI Code of Practice for the design, installation, and maintenance of access control systems.

The activities are carried out in the following location: 3 Roebuck Place, 110 Roebuck Rd, Chessington KT9 1EU.

Morgan Fire Protection Limited: The organisation's scope of certification covers the following disciplines:

SP101:	Competency of Portable Fire Extinguisher Organisations and Technicians.
ST104:	Registered Service Technicians Scheme Contract Maintenance of Portable Fire Extinguishers.
BS 5306:	Fire extinguishing installation and equipment on premises – Part 3: Commissioning and maintenance of portable fire extinguishers – Code of practice.
ISO 9001:	Quality Systems: Maintaining of Portable Fire Extinguishers
ISO 14001:	Environmental Management Systems
ISO 45001:	Occupational Health and Safety Management Systems.

The activities are carried out at the following locations:14-16 Hillgrove Business Park, Nazeing Road, Nazeing, Essex, ENg 2HB.

Hadrian Technology Limited: The organisation's scope of certification covers the following disciplines:

The supply, Installation, Commission & Maintenance of

- CCTV Systems

All the above activities are carried out in accordance with the following Schemes and standards:

SSAIB	SS2003
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The activities are carried out at the following location: 1 Diamond Court, Newcastle Upon Tyne, Tyne, and Wear, NE3 2EN.

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Clymac Limited: The organisation's scope of certification covers the following disciplines:

- Fire and Security Installation

The supply, installation, commissioning, and maintenance of:

- CCTV Systems
- Security Systems
- Fire Systems

BS EN ISO 9001:	Quality Systems: Specification for Manufacture, Installation and Servicing.
BS 7858:	Security Screening – Code of Practice.
PD 6662:	Intruder and Hold-up Alarm Systems.
NCP 104:	Video Surveillance Systems (CCTV).
NCP 109:	Access Control Systems.
ISO 9001:	Quality Systems: Maintaining of Portable Fire Extinguishers.
LSP 1014:	Commissioning and servicing fire detection and alarm systems.
LSP 1204:	Design, Installation, Commissioning, and Servicing of Gas Extinguishing Systems.

The activities are carried out at the following location: Cloud way Court, Belton Road, Loughborough, LE11 1LW.

MJ Fire The organisation's scope of certification covers the following disciplines:

- Fire Protection

The supply, installation, commissioning, and maintenance of:

- Fire Extinguishing Services
- Fire Alarm Systems
- Emergency Lighting
- Fire Evacuation Services

SP101:	Competency of Portable Fire Extinguisher Organisations and Technicians.
SP105	Competency of Organisations for the Service and Maintenance of Dry/Wet Risers.
SP203-1	Design, Installation, Commissioning, Handover, Maintenance and Verification of Fire Detection and Fire Alarm Systems.

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BS 5839: Design, specification, installation, testing and maintenance of Fire Alarms as described in the four designated modules under BAFA. SP203 scheme.

IFCC 3159: Inspection of Installation of Passive Fire Protection, Assessment and Verification of the Quality Control System, Competency assessment of individuals.

ISO 9001: Quality Systems: Maintaining Portable Fire Extinguishers.

The activities are carried out at the following location: Unit D16 Lions Business Park, Dering Way, Gravesend, Kent, DA12 2DN.

Victory Fire The organisation's scope of certification covers the following disciplines:

- Fire Protection

The supply, installation, commissioning, and maintenance of:

- Fire Alarms
- Fire Extinguishers
- Fire Risk Assessment

SP101: Competency of Portable Fire Extinguisher Organisations and Technicians.
SP203-1: Design, installation, commissioning & maintenance of Fire Detection and Fire Alarm Systems.

BS 5839: Design, specification, installation, testing and maintenance of Fire Alarms as described in the four designated modules under BAFA. SP203 scheme.

ISO 9001: Quality Systems: Maintaining Portable Fire Extinguishers.

The activities are carried out at the following location: Unit 30 Thurrock Commercial Centre, Juliette Way, Purfleet, Essex, RM15 4YG.

Alarm Communication Limited [ACL] The organisation's scope of certification covers the following disciplines:

- Fire Protection
- CCTV Security Systems

The supply, installation, commissioning, and maintenance of:

- Fire Detection and Alarm Systems
- Emergency Lighting Systems
- Fire Suppression Systems
- CCTV Systems
- Access Control Systems

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- Intruder Alarm Systems

SP203-1: Design, installation, commissioning & maintenance of Fire Detection and Fire Alarm Systems

BS EN ISO 9001: Quality Systems: Specification for Manufacture, Installation and Servicing

ISO 14001: Effective Environmental Management Systems

The activities are carried out at the following locations: 2 Albany Court, Albany Park, Frimley, Surrey, GU16 7PL.

Griffin Fire: The organisation's scope of certification covers the following disciplines:

- Fire Protection

The supply, installation, commissioning, and maintenance of:

- Fire Extinguishers
- Fire Alarms
- Emergency Lighting
- Smoke Vents
- Fire Safety Signage

SP101: Competency of Portable Fire Extinguisher Organisations and Technicians.

SP203-1 Design, Installation, Commissioning, Handover, Maintenance and Verification of Fire Detection and Fire Alarm Systems.

ISO 14001: Effective Environmental Management Systems

ISO 9001: Quality Systems: Specification for Manufacture, Installation and Servicing.

The activities are carried out at the following location: London Fields, Block A, Bayford Street Business Centre, Bayford Street, London, E8 3SE.

Marlowe Smoke Control Limited The organisation's scope of certification covers the following disciplines:

- Fire Protection

The supply, installation, commissioning, and maintenance of:

- Smoke Ventilation.

The activities are carried out at the following location: Unit 1, Bons Farm, Stapleford Road, Stapleford Tawney, Essex, RM4 1RP.

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3.4 Environmental Management System

The EMS has been prepared by the Company and shall be maintained by all relevant stakeholders and where available, will be continually improved upon to ensure the requirements of ISO 14001:2015 and any relevant standards and legislation are adhered to.

All core procedures shall be reviewed on an annual basis by the Compliance Department; however, they have been prepared by the relevant Stakeholders. Core procedures have been prepared to ensure that the inputs and outputs are relevant, they interact with one another, and they determine and apply the correct criteria and methods, determine the correct resources needed and assign responsibility and authority to the correct personnel. During the continual improvement, the core procedures will be evaluated to ensure they achieve their intended results and to improve the procedures as well as the EMS.

The company shall ensure it maintains and retains documented information relevant to the EMS.

4.0 LEADERSHIP

4.1 Leadership and Commitment

The CEO has overall responsibility for the EMS. The CEO carries this out by:

- Taking accountability for the effectiveness of the EMS.
- Ensuring that the Environmental Policy and Environmental Objectives are established and are compatible with the strategic direction and the context of the organisation.
- Ensuring the integration of the EMS requirements into the organisation's business processes.
- Ensuring that the resources needed for the EMS are available.
- Communicating the importance of effective environmental management and of conforming to the EMS requirements.
- Ensuring that the EMS achieves its intended outcomes.
- Directing and supporting people to contribute to the effectiveness of the EMS.
- Promoting continual improvement.
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

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4.2 Environmental Policy

Please see section 2.0 Environmental Policy Statement.

4.3 Organisational Roles, Responsibilities and Authorities

As delegated by the CEO, the Compliance Department is responsible for the following:

- To ensure that the EMS conforms to the requirements of ISO 14001:2015.
- Ensure the effective implementation, maintenance, and reporting of the EMS, including environmental performance, to the Senior Management Team for review and assist to identify any areas of improvement upon the EMS.
- Deal with any Environmental issues on behalf of the Company if requested by the CEO.
- Liaison with Environmental Agency / Officers on all Environmental matters.
- Assisting the Learning & Development Department in the development and delivery of specific Environmental training requirements.
- Write, review, and revise Environmental Procedures along with other interested parties.
- Maintaining incident statistics for the Company.
- Report on the performance of the EMS and the environmental performance to top management.

5.0 PLANNING

5.1 Actions to Address Risk and Opportunities

5.1.1 General

The Company has established processes within the EMS that have been established with interested parties and their needs and expectations in mind, internal and external issues, compliance obligations as well as the scope of the EMS itself.

A risk / opportunities register has been established by the CEO and Compliance Department in relation to the Company's environmental aspects, compliance obligations and any other issues / requirements which may affect The Company's interested parties and/or their requirements.

The intended outcome of the risk and opportunity register is to:

- Give assurance that the EMS can achieve its intended outcomes.
- Prevent or reduce undesired effects, including the potential for external environmental conditions to affect the organisation.
- Achieve continual improvement.

For emergency situations that the Company has deemed relevant to its activities, please refer to COM-POL-44 Business Continuity Policy and Procedure and COM-POL-32 Environmental Emergency

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Preparedness and Response Policy.

The company maintains a risk and opportunities register as well as several processes that fall within the EMS and the Company's Quality Management System/ISMS.

5.1.2 Environmental Aspects

The Company maintains procedures to identify the environmental aspects of its activities, products, and services, including any new and modified activities that have a significant impact which it has control over or which it can be expected to have an influence. In addition, any abnormal and reasonably foreseeable emergency situations have been addressed in COM-POL-44 Business Continuity Policy and Procedure and COM-POL-32 Environmental Emergency Preparedness and Response Policy.

The aspects analysis information (focused on significant impacts) is established and maintained by the Compliance Department, Aspects & Impacts Analysis Database.

The Company identified the following as all the Environmental impacts from the business:

- Generation of hazardous (electrical) waste.
- Emissions from vehicles.
- Generation of general waste.
- Generation of confidential waste.
- Use of toner.
- Generation of recyclable waste.
- Energy usage, internal and external.
- The use of fluorinated gases (internal only).

These, and the legislation they relate to, can be found in COM-PRO-02 Aspects and Impacts Procedure. Aspects shall be reviewed at the annual Management Review and be communicated to all relevant staff alongside the annual objectives.

5.1.3 Compliance Obligations

The Company has identified legal requirements and accompanying legislation that are applicable to its activities and is kept up to date through its membership of industry and environmental associations. These include but may not be limited to the National Security Inspectorate, British Standards Institute, British Security Industry Association and the Institute of Environmental Management and Assessment.

All standards and regulations that apply to the Company are recorded in COM-POL-45 – Legislation and Regulation Register and all are considered when establishing, implementing, maintaining, and continually improving the EMS.

5.1.4 Planning Action

The significant aspects which have been identified in COM-PRO-02 Aspects and Impacts Procedure are discussed during both the HSQE Party Meeting and the Management Review. During these meetings, any actions to address the aspects are discussed and if agreed by the attendees, they will be implemented by the Compliance Department and relevant Senior Director. This ensures that the Company continually improves upon its environmental impact.

Any compliance obligations identified in COM-POL-45 – Legislation and Regulation Register are

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continually monitored by the Compliance Department. If any known breaches occur, the Compliance Department will report this to the HSQE Working Party and the Board of Directors for review. The relevant stakeholders will then carry out any actions required to comply with the obligations as well as report it to the correct body e.g., Environment Agency.

Risks and opportunities that have been identified rest with a relevant stakeholder (Senior Director). It is their responsibility to ensure that any risk / opportunity is addressed by either themselves or a delegated member of staff to mitigate the risk, or to carry out the opportunity.

Any actions that require integration / implementation into the EMS (or other business processes will be discussed during the HSQE Meeting, or the Management review and appropriate actions will be distributed to the relevant stakeholders. Any action that is undertaken will be reviewed to ensure either confirms that the action has been completed or if further action is required.

The Management Review takes place on an annual basis at the start of the year and the HSQE Party meeting takes place 6 months later, thus allowing the Senior Management Team / relevant stakeholders to meet twice a year to review the EMS. During these meetings, the environmental statistics which are collected and reported by the Compliance Department are reviewed alongside the environmental objectives.

This allows the attendees to review the statistics to evaluate the effectiveness of any action taken to improve the EMS.

All actions are considered in line with technological options as well as the Company's financial, operational, and business requirements.

5.2 Environmental Objectives and Planning to Achieve Them

5.2.1 Environmental Objectives

The Company, stakeholders and other interested parties contribute to establish the Company's current environmental position by use of the "Aspects & Impacts Analysis Database" and gathered external information and sets out its objectives and targets from this base. Any issues that have a legal impact on the business are prioritized.

These objectives are discussed and agreed by the HSQE Working Party / Management Review at regular intervals and are set to ensure they are consistent with the Environmental Management Policy. Any objective set will be tracked, measured, and monitored with the use of the Aspects & Impacts Analysis Database. Once the objectives and targets have been set, they will be communicated to the relevant interested parties. These will be reviewed annually, or unless there is a major change in the business.

The objectives can be found on COM-POL-22 – Health, Safety, Quality and Environmental Objectives.

5.2.2 Planning Actions to Achieve Environmental Objectives

When planning the objectives and targets, what will be done to achieve the target will be discussed and the relevant actions taken accordingly. In addition to this, the CEO will appoint relevant

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and suitable levels of resources to ensure the objectives and targets are achievable.

If the objective is set against a certain aspect / impact, it will be allocated to the relevant Senior Management team members as well as the Compliance Department. However, overall responsibility rests

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with the CEO. All objectives are set for annual review, or if required due to unforeseen circumstances, with any results being generated by the Aspects & Impacts Database Analysis.

Any integration into the current EMS will be discussed to foresee any issues.

6.0 SUPPORT

6.1 Resources

The CEO has overall responsibility of resources required for the establishment, implementation, maintenance, and continual improvement of the Environmental Management System. But he will receive input from the Compliance, Human Resource, Operations, and the IT Departments in terms of the resources required for an effective Environmental Management System.

6.2 Competence

The CEO has overall responsibility for the identification, evaluation, recording and fulfilment of training relation to the EMS. However, this role is delegated to the Compliance Department to carry out. Personnel (including subcontractors) whose activities may create a significant impact on the environment must receive appropriate training. Records of training are held centrally in the Human Resources and Learning & Development Department utilising the electronic personnel files.

The Compliance Department and the relevant Line Manager(s) must consider the competence of the Employee dependent on their work and how it may affect environmental performance. Where necessary, the Employee will be provided with appropriate education, training, or experience.

Any environmental aspect that has been identified shall be reviewed to ensure any training necessary to reduce the impact on the environment or EMS is reduced. If required, the appropriate level of competency will be sought to ensure the actions taken by the Company are effective whilst considering the environmental impact.

6.3 Awareness

All Employees receive the Environmental Policy at induction and sign to acknowledge that they have read and understood the contents of the policy. Any Sub-Contractor doing work on behalf of the Company must either have an accredited EMS or work under the Company's EMS.

The main aspects of the Company are held in COM-PRO-02 Aspects and Impacts Procedure which is located on the Employee Portal which can be accessed by all Employees at any time.

The Compliance Department produces an annual report on the Company's environmental performance which is reviewed in the Management Review and HSQE Party Meetings. Compliance will also distribute the report to the Employees together with the annual objectives.

Any further information related to either the effectiveness of the EMS or implications of not conforming to it are communicated via a memo, distributed via email, or on the Employee Portal.

6.4 Communication

6.4.1 General

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The Company has established and implemented COM-PRO-06 Communication Procedure and is maintained by the Compliance Department. Within the process, it has detailed what shall be communicated, when it will be communicated, who it will be communicated to and how it will be done. It has been established taking account of the Company's compliance obligations as well as ensuring that the information comes from reliable sources and that it is in a constant format.

All Employees are encouraged to report any environmental issues to their Line Managers and the Compliance Department. The Compliance Department shall respond to relevant communications in relation to the EMS.

The Company shall retain all documented information as evidence of our communications to both internal and external bodies.

6.4.2 Internal Communication

The Compliance Department is responsible for any internal communications in relation to the EMS. Any communications will be sent to the relevant internal interested parties, dependent on level and function. If there are any changes to the EMS, this will be communicated to all internal interested parties via email and the Employee Portal.

COM-PRO-06 Communication Procedure encourages any internal interested parties to report / communicate any discussion points surrounding the EMS to both their Line Manager and the Compliance Department.

6.4.3 External Communication

The Environmental Policy Statement is made available to all external interested parties via the Company's website. The full Environmental Policy is available upon request.

Any other information will be distributed to external parties if deemed necessary by the Company and its EMS.

6.5 Documented Information

6.5.1 General

The EMS includes both internal and external documented information required by the standard and deemed necessary by the Company. The extensive list can be found on the register of controlled documents.

6.5.2 Creating and Updating

Any / all documented information follows COM-PRO-08 Documentation and Data Control Procedure which details the steps required to create and maintain documents within the EMS. All documented information is given a title, reference number and date of creation / revision.

The format of any / all documented information within the EMS if electronic and utilizes Microsoft software, e.g., Word, Excel etc. Due to the Company's areas of operations, all documented information is provided in English only.

Documented information is reviewed for adequacy and approved by authorised persons prior to its

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release. Changes to documents are reviewed and approved by the same functions as performed in its original release. This is carried out on an annual basis unless deemed unnecessary.

6.5.3 Control of Documented Information

The Company has the process COM-PRO-07 Control of Records Procedure in place to ensure all documented information, if required, is controlled as required by ISO 9001:2015, ISO 14001:2015 and ISO 45001 2018.

Any documented information which is required for the EMS to function correctly and efficiently is identified and controlled via the Compliance Department. Any documented information that has been identified is made available to all staff via the Employee Portal, whilst ensuring it is suitable for distribution. It is also input into the Company's document register.

All electronic documented information is adequately protected via the Company's anti-virus software which is maintained via the IT department. As well as this, all Employees are provided with personal log in details to allow visibility of controlled access throughout the IT systems within the Company and to limit the risk of losing document integrity.

The distribution / access / retrieval and use of any documented information will be controlled via the Compliance Department. In most cases, the documented information will be provided in PDF format to prevent the unauthorized editing of a controlled document. This will be done via the Employee Portal or email.

The storage and preservation of documented information will be done via a secure drive which is only accessible to a handful of nominated personnel and Senior Directors. This ensures that only a few Employees within the Company have the ability to amend documented information, which will ensure the legibility remains preserved.

All documented information undergoes version control, and all previous versions are retained. The retention time scale is inputted onto the document register.

Any external documented information which is deemed necessary for the planning and operation of the EMS is identified and controlled via the Company's external document register.

7.0 OPERATION

7.1 Operational Planning and Control

INS-PRO-04 Recycling and Disposal of Waste on Site Procedure and COM-PRO-04 Management of Waste Procedure have both been established to meet the EMS requirements and are both controlled by the relevant stakeholder.

Any / all waste that is produced by the Company is returned to a Regional Office in which it is segregated and disposed of via the correct waste stream. Any electrical item that is deemed faulty shall first undergo restoration to try and reuse the equipment instead of recycling / disposal.

Stock is only ordered when required by the Engineer and sent out with multiple different items thus reducing the amount of packaging produced.

The Company shall provide any necessary information to external bodies e.g. contractors.

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Any relevant information in relation to potential environmental impact is communicated to the relevant personnel.

The life cycle for all products and services is considered at all intervals; manufacturing, procurement; distribution, usage, and end of life. The Company has no control at the manufacture ring stage; however, the Company, during the procurement stage, utilises reputable products from well-known brands and undertakes supply chain review. This allows us to ensure that only the best products are used whilst ensuring we meet requirements of sector regulations and ISO 14001:2015. During distribution stage, pre-approved suppliers are used, thus meaning bulk product ordering takes place to reduce the number of deliveries, which reduced the overall CO₂ and CO_{2e} emissions and reduce the total amount of packaging used during transportation.

Usage of the products is heavily influenced by regulations and legislation e.g. fire detectors must be replaced after 10 years, fire extinguishers replaced every 5 years (they require a discharge and refill which the Company are not accredited to carry out). For this reason, there is little the Company can do to reduce usage other than offer guidance on the requirements and usage to try and extend life expectancy and reduce the chances of misuse and damage.

At the end of the life cycle process, the Company ensures that any waste is sent back for repair, reused (in terms of packaging etc.) or disposed of whilst taking into consideration its waste stream. The Company utilises an ISO 14001 accredited disposal company to ensure that the waste is handled and disposed of to the best of our abilities. The target set out by the deposal company is a 0% landfill disposal route.

Information and guidance will be communicated to all required stakeholders in terms of environmental requirements. This will also include potential significant environmental impacts associated with transportation, delivery, use, end-of-life treatment and final disposal of product and services.

All aspects and impacts are considered with life cycle being taken into consideration. Please refer to COM-PRO-02 Aspects and Impacts Procedure

7.2 Emergency Preparedness and Response

The Company has COM-POL-32 Environmental Emergency Preparedness and Response Policy in case of an emergency in relation to the environment or the EMS.

The Company's activities present a low environmental impact; however, COM-POL-32 – Environmental Emergency Preparedness and Response Policy has detailed the relevant emergency situations that may occur with relevant action points detailing how to respond or mitigate the impacts.

Annual tests will be carried out on the system, in varying circumstances, to review the process and to continually improve upon the processes and actions.

The processes and planned response actions will be reviewed by the Compliance Department on an annual inspection to ensure any changes in compliance obligations is captured as well as ensure the action points are up to date and remain pertinent to the emergency. Any changes will be communicated to the relevant stakeholders.

Any training / information required in relation to emergency preparedness, including sequential training will be provided to the relevant stakeholders and be kept within their training files.

8.0 PERFORMANCE EVALUATION

8.1 Monitoring, Measurement, Analysis and Evaluation

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8.1.1 General

The Compliance Department monitors, measures, analyses, and evaluates the environmental performance of the Company.

The aspects of the Company are measured (if applicable) by taking meter readings, fuel reports and invoice details and are input into the Aspects & Impacts Analysis Database. The information is then formatted to the correct measurements (e.g., kWh, L, CO²) and inputted into a graph. The results are then measured and analysed against the current objectives during the HSQE Party Meeting and the Management Review. As for noise disturbance, the Company will carry out noise reading via a calibrated noise meter. Refer to INS-TEM-05 Calibration of Measuring Test Equipment

Noise Controls

- o Section 61 application and consent from Environmental Health Officers.
- o Regular noise monitoring of noise stations and work activities by the compliance department
- o Use of noise reduction techniques on plants and equipment.
- o Restrict number of simultaneous operations
- o Restrict working hours
- o Switch off sources of noise when not in use
- o Locate noise sources away from public and behind shields.
- o Inspection and maintenance of plant and equipment.

Responsibilities

Site Management to monitor noise levels
Site management to plan noisy activities

Request suppliers of plant and equipment to supply plant and equipment in good working order and with noise reduction controls fitted...

Stop work if noise is more than predicted levels and reassess work requirements.

The reports shall be communicated to the relevant stakeholders on an annual basis to show how the Company is performing against the EMS. Any / all documented information shall be retained.

8.1.2 Evaluation of Compliance

The Company reviews its compliance every 6 months. This is carried out by the Compliance Department with any actions required being communicated during either the HSQE Party Meeting or at the Management Review. Any actions will be discussed with the relevant stakeholders to ensure the action can be implemented and integrated into the EMS. All actions and changes are documented within COM-POL-45 – Legislation and Regulation Register.

Please refer to COM-PRO-05 – Legal Requirements Procedure

8.2 Internal Audit

8.2.1 General

The Compliance Department shall undertake internal audits as required to comply with ISO 14001:2015 and with the requirements of the Company's EMS and activities. They will be carried out on an annual basis, prior to the external audit and the aim of the audit is to ensure that the EMS has been effectively

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implemented and maintained.

8.2.2 Internal Audit Program

The Compliance Department is tasked with carrying out the internal audit on the EMS. Any audits that are required for the Company's EMS, QMS/ISMS and any other accreditation / management system are contained within AT01 – Audit Tracker, which details when and how often the audits are due.

All performance / information regarding the internal audits is communicated during both the HSQE Party Meeting and the Management Review. Any urgent issues are discussed directly with the CEO.

8.3 Management Review

The management review shall be conducted on an annual basis and include the following topics:

- The status of actions from previous management reviews.
- Changes in external and internal issues relevant to the EMS.
- The needs and expectations of interested parties.
- Significant environmental aspects.
- Risk and opportunities.
- Environmental objectives.
- Nonconformities and corrective actions.
- Monitoring and measuring results.
- Fulfilment of the Company's compliance obligations.
- Audit results.
- Adequacy of resources.
- Relevant communications from interested parties (including complaints).
- Opportunities for continual improvement.
- The outputs of the management review will include:
 - Conclusions on the continuing suitability, adequacy and effectiveness of the EMS.
 - Decisions related to continual improvement.
 - Decisions related to any need for changes to the EMS (including resources).
 - Actions, if needed, when environmental objectives have not been met.
 - Opportunities to improve integration of the EMS with other business processes.
 - Any implications for the strategic direction of the organisation.

The Management Review shall include Senior Management and be chaired by the CEO. Meeting minutes

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will be distributed to the relevant stakeholders / attendees in a reasonable time frame.

10.0 IMPROVEMENT

10.1 General

The Company has risk and opportunities register in place and will input any known opportunities and assign to the relevant stakeholder for any necessary actions to achieve the intended outcomes of the EMS.

10.2 Nonconformity and Corrective Action

All nonconformities that are identified are reported to the relevant stakeholder via COM-TEM-01 Non-Conformance Report and once raised, shall be placed on the non-conformance register. The process allows the Company / stakeholder to react to the nonconformity, take action to control and correct it and to deal with the consequences, including mitigating adverse environmental impacts.

As well as acting against the nonconformity, the stakeholder / Company shall also evaluate the need to eliminate the root cause of the nonconformity. This is done by reviewing the nonconformity, determining the root cause of the nonconformity, and determining if similar nonconformities exist or could potentially occur.

The stakeholder / Company will implement the necessary action, review the effectiveness of any corrective action taken and make changes to the EMS if required.

Please refer to COM-TEM-01 Non-Conformance Report

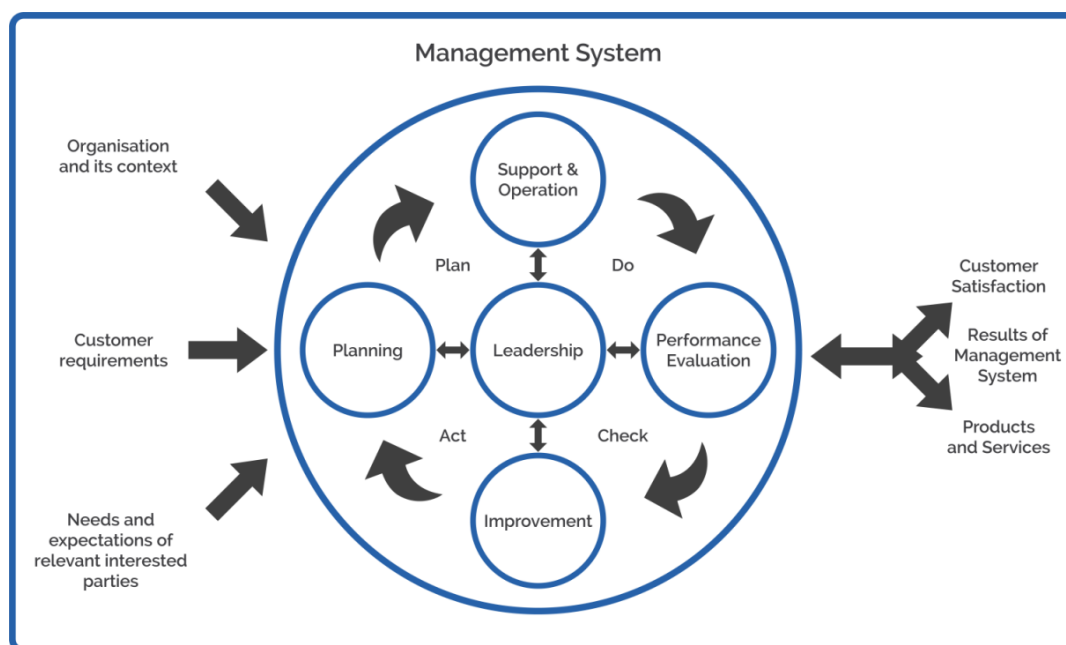
10.3 Continual Improvement

The Company shall aim to continually improve the suitability, adequacy, and effectiveness of the EMS to enhance performance.

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APPENDIX 1 – PLAN, DO, CHECK, ACT

PLAN				DO	CHECK	ACT
4. Context of the organization	5. Leadership	6. Planning	7. Support	8. Operation	9. Performance evaluation	10. Improvement
4.1 Understanding the organization and its context	5.1 Leadership and commitment	6.1 Actions to address risks and opportunities	7.1 Resources	8.1 Operational planning and control	9.1 Monitoring, measurement, analysis and evaluation	10.1 General
4.2 Understanding the needs and expectations of interested parties	5.2 Quality policy	6.2 Quality objectives and planning to achieve them	7.2 Competence	8.2 Determination of requirements for products and services	9.2 Internal audit	10.2 Nonconformity and corrective action
4.3 Determining the scope of the QMS	5.3 Organizational roles, responsibilities and authorities	6.3 Planning of changes	7.3 Awareness	8.3 Design and development of products and services	9.3 Management review	10.3 Continual improvement
4.4 QMS and its processes			7.4 Communication	8.4 Control of externally provided products and services		
			7.5 Documented information	8.5 Production and service provision		
				8.6 Release of products and services		
				8.7 Control of nonconforming process outputs, products and services		



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APPENDIX 2 – HEALTH, SAFETY AND WELFARE POLICY STATEMENT

Marlowe Fire & Security Ltd (05239777) is committed to ensuring the Health, Safety and Welfare of all employees and Contractors who may be engaged in carrying out activities on our behalf and any customers or member of the public affected by our undertakings. Marlowe Fire & Security Group recognises the importance of Health, Safety and Welfare matters and as such, strives to ensure that that they are an integral part of Marlowe Fire & Security Group's culture with commitment to continual improvement. Health, Safety and Welfare is seen as a key driver with respect to achieving success in our business objectives and the business will never knowingly compromise Health, Safety or Welfare, irrespective of market or business opportunity, Whilst it is recognised that overall responsibility for Health, Safety and Welfare rests with the Chief Executive Officer, practical application of safety responsibilities is entrusted to the Compliance Manager, to provide a working environment, which is safe and has no adverse effect on the health of any person working for or on their behalf.

The main objectives of the Health, Safety and Welfare Policy are:

- To comply with all current and relevant health and safety legislation and subscriptions.
- To prevent and reduce personal injuries to our personnel and those affected by our activities.
- Ensuring health and safety is applicable to all staff and remains a key management responsibility.
- To allocate sufficient resources, including technologies, to provide and maintain a place of work that is, so far as is reasonably practicable, safe, and healthy.
- To ensure that all relevant Health, Safety and Welfare information, instruction and training related to work and responsibilities is communicated to all persons engaged in the operation of Marlowe Fire & Security Group's' undertakings, and to persons using Marlowe Fire & Security Group premises.
- To ensure that suitable and sufficient systems and procedures are put into place for the safety of all persons at Marlowe Fire & Security Group premises in the event of an emergency.
- To ensure the provision of suitable first aid facilities and the availability of professional medical advice.
- To promote a positive Health and Safety Culture that includes all areas of Marlowe Fire & Security Group.
- To establish realistic Health & Safety improvement objectives
- To firmly seek involvement and participation from our people to achieve such objectives.
- To continuously improve our safety systems and performance.
- To conform and maintain the Company's ISO 45001 accreditation.

The Health, Safety and Welfare Policy and supporting suite of Safety Policy and Procedure documents shall be reviewed regularly, at a minimum of every year or following significant legislative changes, where improvements have been identified or where accident investigation identifies the need. It will be communicated to all staff via company Inductions, websites, Intranet, notice boards and issued to remote personnel. It will be made available to visitors to Marlowe Fire & Security Group who may use the premises.

APPENDIX 3 – QUALITY POLICY STATEMENT

As our business continues to evolve and grow it is critical, we have a robust Quality Management System/ISMS in place. The QMS/ISMS does not simply exist, but the business is committed to its structure and content at all levels ensuring delivery of its products and services. Commitment is provided by all top management and is cascaded throughout the business to all interested parties as we aim to achieve the following:

In 2017 our business generated combined annual revenues of £50m and delivered a 5% operating profit. Our mission is to double the Division's revenue to £100m and increase its operating profit by 15% by 2023.

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For simplicity we call this our P100/15 plan.

Following some good organic growth and strategic acquisitions, we are already progressing ahead of schedule. This year (2018/19) we are on track to exceed £62m in revenue with over 600 employees.

As an individual Business, Marlowe Fire & Security, we must all make the most of the synergies available to us as a wider Division, and we must work closer together to reap the benefits available to us through our growing market presence and brand recognition.

The intention is to maintain the autonomous and entrepreneurial nature of our businesses, led by their individual management teams, there are many areas where collaborative working across all Business Units will not only improve our cost efficiency, brand recognition and sourcing but will also enable us to lead the market regarding best practice, compliance, and innovation.

- Core to this plan are centralised functions supporting departmental leaders inclusive of IT, Integration, HR, Finance, Compliance, Marketing, and the Alarm Receiving Centre (ARC):
- We want to retain the autonomy, leadership, and entrepreneurial spirit of each business unit.
- We want to leverage the central synergies and best practice of specialist support areas like HR, Finance, Compliance, Marketing, Procurement, and IT
- We want to develop ways of improving efficiency and benefiting from our engineering route density coverage by being able to cross utilise resource across the Division.
- We want to drive effectiveness in sales by developing our regional customer base, creating a better balance between regional and major national accounts.
- We want to benefit from the large market presence that we collectively enjoy as a division.

It was agreed that we will not achieve the above by continuing to operate as singular entities, with independent processes and brand identities. Therefore, this robust Quality Management System/ISMS will help us achieve our goals.

APPENDIX 4 – GROUP INFORMATION TECHNOLOGY POLICY STATEMENT

The Company's electronic communications systems and equipment are required to promote effective communication and working practices and are critical to the success of the business. This Policy outlines the standards the Company requires of the users of its systems, the circumstances in which the Company will monitor use of its systems and the action that may be taken in respect of any breach of this Policy.

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APPENDIX 5 – RESPONSIBILTIIY AND AUTHORITY

Responsible Personnel	Responsibility	Authority
CEO	<p>Taking accountability for the effectiveness of the EMS.</p> <p>Ensuring that the Environmental Policy and Environmental Objectives are established and are compatible with the strategic direction and the context of the organisation.</p> <p>Ensuring the integration of the EMS requirements into the organisation's business processes.</p> <p>Ensuring that the resources needed for the EMS are available.</p> <p>Communicating the importance of effective environmental management and of conforming to the EMS requirements.</p> <p>Ensuring that the EMS achieves its intended outcomes.</p> <p>Directing and supporting people to contribute to the effectiveness of the EMS.</p> <p>Promoting continual improvement.</p> <p>Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.</p>	<p>Over authority sits with the CEO and any final decision/action is to be communicated back to him.</p> <p>Communication with all interest parties.</p>

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HSQE Working Party/Management Review & Stakeholders	<p>Define policy and objectives.</p> <p>Define responsibilities and authority (if not defined by ISO 14001:2015)</p> <p>Provide adequate resources to accomplish EMS objectives (fed from CEO).</p> <p>Conduct management reviews.</p>	<p>Take actions to ensure that the EMS is maintained to improve environmental performance and minimise the Company's environmental impact.</p>
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Compliance Department (Compliance Manager & SHEQ Coordinator) and Relevant Stakeholders	<p>Ensure that ISO 14001:2015 policy manual requirements are implemented and maintained.</p> <p>Present EMS updates to management through both the HSQE Working Party and Management Review.</p>	<p>Recommend and implement changes to the EMS (with stakeholder approval).</p> <p>Communicate to all relevant stakeholders / interested parties.</p>
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Internal EMS Auditor(s)	<p>Perform audits on the EMS as per ISO 14001:2015.</p> <p>Report results.</p> <p>Review corrective actions.</p>	<p>Take appropriate action to audit discrepancies.</p>
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<p>Directors Managers Supervisors Procurement Staff Engineering Staff</p>	<p>Follow directions of the EMS policy and procedures.</p> <p>Liaise with the Compliance Department to develop strategies to improve environmental performance.</p> <p>Strive to achieve compliance with defined environmental objectives.</p> <p>Report all non- conformances to the Compliance Department.</p> <p>Conserve natural resources and energy.</p> <p>Minimise waste.</p> <p>Complete relevant documentation to support and maintain the EMS.</p> <p>Train and empower all employees to minimise their impact on the environment.</p>	<p>Make decisions on working activities that may affect environmental performance.</p> <p>Recommend corrective actions and processes.</p> <p>Take actions to make sure EMS standards are met.</p> <p>Ensure all corrective actions are implemented and completed.</p> <p>Suspend any activity that may cause environmental impact or damage.</p> <p>Consult with relevant stakeholder / the Compliance Department.</p>
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APPENDIX 6 – REGULATORY BODIES

Marlowe Fire & Security Group has several Regulators due to the industry we operate in. This includes:

- British Approvals for Fire Equipment (BAFE)
- British Standards Institution (BSI)
- British Security Industry Association (BSIA)
- Fire Industry Association (FIA)
- ISOQAR
- National Security Inspectorate (NSI)

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APPENDIX 7 – MARLOWE FIRE & SECURITY ENVIRONMENTAL MANAGEMENT ORGANISATIONAL ORGANOGAM

