

## Environmental Policy

### Introduction

Synergy Medical knows that we must live within our environmental limits to ensure the natural resources needed for life remain for future generations, and as such is an energy and environmentally aware company. The current Environmental Policy document details the company's commitment to incorporating environmental considerations at every level within the decision making process. This is exemplified by:-

- Working to the current regulatory requirements regarding environmental protection.
- Working to minimise any environmental impact of business activity and to continually improve environmental performance reducing our carbon footprint.
- To work with others in the community to encourage a greater understanding of environmental issues.

The purpose of implementing this strategy is to enhance this work and to become actively involved in making a real difference in the local environment. Furthermore we seek to ensure Synergy Medical continually improve in this area and can lead in terms good practice for other small and medium businesses.

This statement of policy formalises the company's current working practice regarding environmental issues.

Synergy Medical recognises the importance of environmental protection and will comply with all relevant environmental regulations, legislation and approved codes of practice relating to the process and activities of the company. It is the company objective to co-operate with, and maintain good relations with all regulatory authorities and bodies.

It is the declared policy of the company to carry out all appropriate and agreed measures reasonably practicable to seek and meet, exceed or develop all requirements to improve environmental performance. Clear objectives and targets will be identified.

The aims are recorded and endorsed by the Company director in the Environmental Policy document and will be to, wherever possible:

### Establish sound environmental management by:-

- Comply with all relevant legislation & codes of practice
- Develop & review objectives and targets to drive environmental improvement.
- Consider environmental issues in the decision making process
- Develop relationships with key stakeholders to recognise our responsibilities.
- Educate and communicate with all staff to ensure they are aware of their responsibilities.

### Ensure the effective use and consumption of all resources by:-

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- Promote the philosophy of Reduce; Reuse; Recycle
- Promote the efficient use of resource

To co-operate with:-

- The local community, government and legislative bodies with a shared vision of a good and trusted neighbour.

The company will foster environmental awareness and understanding in all employees, suppliers, customers, sub-contractors and the public. Where practicable, the company will provide information and assistance to customers on environmental issues arising from its products and services. It is the company policy to report on the company's environmental objectives, targets and performances at regular intervals.

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## Responsibilities

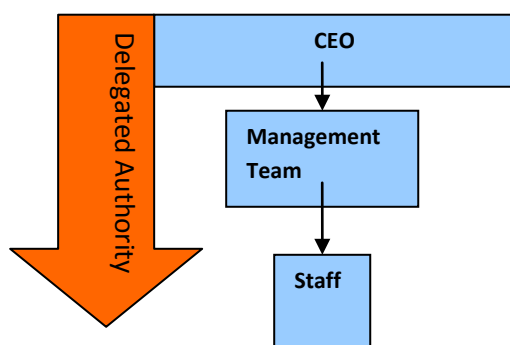
In order to determine the means and support mechanisms necessary for the effective implementation of the Company's environmental policy and objectives, levels of authority, roles and responsibilities will be clearly defined and communicated.

The CEO will undertake to provide resources essential to the implementation and control of the environmental management system. Resources include human resources and specialised skills, technology and financial resources.

The CEO, irrespective of other responsibilities, shall have defined roles and responsibilities for:

- (a) Ensuring that environmental management system requirements are established implemented and maintained in accordance with ISO 14001 framework requirements.
- (b) Ensuring that the effectiveness of the environmental management systems is periodically reviewed and reported on, as a basis for continual improvement.

Other key responsibilities will be identified and recorded. **Refer to Appendix 1** Authorities may be delegated throughout the organisation and these responsibilities will be defined as above.



## Communication

Synergy Medical will consistently inform staff about the strategy, their successes and how they can help and become involved. An environmental notice board will provide key information and progress achieved. An Environmental Scorecard will be developed which will allow all staff to monitor the progress being made, whether that is the greater use of recycling, the use of more sustainable materials, reduced energy consumption, reduced mileage etc. A benchmark exercise will be carried out to give a starting point for improvements, which will also be communicated to staff and allow us to achieve our aim of reducing our environmental footprint.

Synergy Medical will encourage the use of new technology where it contributes towards delivery of this strategy.

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An annual update on the implementation of this strategy will be provided.

### Risk Management

Synergy Medical acknowledges that through the implementation of an environmental strategy significant risks are reduced. These include the ability to respond quickly to new and general legislation and the ability to reduce the impact of energy consumption on the local and global environment. Furthermore it will ensure our reputation grows as an environmentally and socially responsible business.

### Emergency Preparedness

Synergy Medical will establish and maintain procedures to identify potential for and respond to accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them.

The business shall review and revise, where necessary, its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations. [Refer to Appendix 2.](#)

The Company shall also periodically test such procedures where practicable and records will be maintained.

### Monitoring & Measurement

Key characteristics of business operations and activities that have a significant impact on the environment will be recorded.

- Reduce and/or limit the amount of waste produced.
- Reduce and/or limit the consumption of raw materials, water and fuels.
- Reduce and/or limit the production of pollutants to water, land and air.
- Increase the use of recyclable and renewable materials.
- Limit the noise within and around the site.
- Lessen the risk to employees and the public from processes and activities associated with company.

2015 figures collected illustrate consumption of:-

Electricity	122463 kwh
Petrol	2592 litres
Diesel	29997 litres

Carbon footprint calculated as:-

66.62 tonnes CO <sub>2</sub> e
6.04 tonnes CO <sub>2</sub> e
80.10 tonnes CO <sub>2</sub> e

Total for 2011 = 152.76 tonnes CO<sub>2</sub>

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This analysis will continue throughout 2016 (graphed) to illustrate trends and reduction targets.

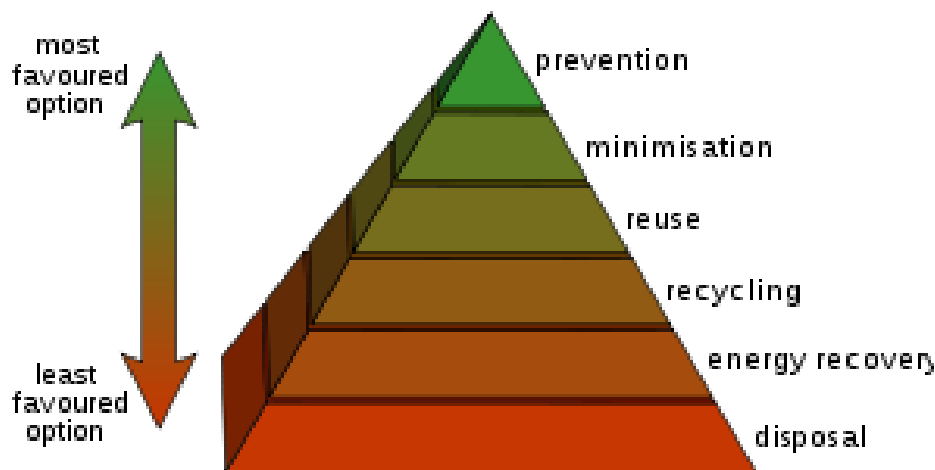
## Key Environmental Aspects / Impacts

Synergy Medical will identify those Environmental Aspects of its activities, products and services that can be controlled and over which it can be expected to have an influence. This will enable the Company to determine those which have or can have significant impacts on the Environment. Risk assessment processes may be used to identify the level of risk and hazard.

The Company will ensure that the aspects related to these significant impacts are fully considered when environmental objectives and targets are set. Its activities will be constantly reviewed so as to monitor known environmental Impacts and identify/evaluate potential new ones. The Aspects identified will be reviewed at regular intervals to establish the impact on this Environmental Strategy.

It is Synergy Medical's policy to reduce the waste sent to landfill by 2 % year on year.

The firm's primary focus is to reduce resources used and the levels of waste produced. Where reasonably practicable items are reused. Where this is not possible, but it is reasonably practicable, items are sent for recycling. As a last resort, waste items are sent for disposal by incineration or landfill (landfill being the last option in our waste hierarchy).



For this first environmental strategy we propose to focus on the most direct environmental impacts made by Synergy Medical. They are:

- Energy Consumption
- Recycling Waste
- Water
- Transport / Fuel consumption

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## Energy Consumption

### Electricity

Our aim is to reduce the energy consumed within our direct control. This is the energy use within our offices. A benchmarking exercise will feed into environmental scorecard; to enable a manual, monthly measurement of improvement to be made and for future targets to be set, but this will always have to be considered in line with workloads. Refer to Appendix 7

**Targets:** to be agreed after initial benchmarking exercise.

## Waste

### General

Synergy Medical is committed to the principle of the 3 Rs: Reduce, Reuse, Recycle.

**Reduce:** By reprioritising schedules, workloads and using multi skilled tradesmen, we are able to reduced time and manpower whilst keeping to all our KPIs and quality standards.

**Reuse:** By salvaging products (i.e. steel products, timber, aluminium) that can be re-used and by good site management we ensure that materials are not over ordered and spare materials can be used on other properties, avoiding waste.

**Recycle:** We ensure our waste is recycled as much as possible and targets will be reviewed after this benchmark exercise.

In line with the Government's Halving Waste to Landfill initiative, we are open to and actively look for ways to improve our performance in these areas. Staff and subcontractors are instructed, as part of our company ethos, to seek ways of reducing waste, whether innovative or simple, and suggestions are discussed and implemented where appropriate.

At all times, we are careful to ensure that we strike a good balance between providing a high quality service to clients while maintaining our environmental commitments, considering the overall impact of any changes to product specification or on-site disposal procedures.

### Waste Paper & Cardboard

All waste paper & cardboard produced as a result of unused packaging, obsolete information and other documentation is either shredded or/and disposed of in the proper manner. "Fresh Start waste services" collects all waste and deposits it at licensed sites in accordance with the Environmental Protection Act – Duty of Care.

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### Packaging (Plastic, Shrink wrap etc)

It may be necessary to dispose of surplus packaging from delivered products. Some of this packaging will be re-used to protect items in transport to the user site; all surplus packaging will be disposed of by delivery to recognised reclamation services.

### Wood / Metals (stainless steel, aluminium etc)

This is one area of the business where we instigate the maximum “reuse policy” as off-cuts are considered prior to the use of new materials.

**Targets:** to be agreed after initial benchmarking exercise.

### Water

Water is considered a limited resource. We will monitor the consumption of water by taking manual, monthly readings, which will not only allow us to be more aware of what is being used and possible areas for reductions, but will also allow us to highlight potential leaks where water can be wasted. [Refer to Appendix 6](#)

**Targets:** to be agreed after initial benchmarking exercise.

### Transport

Synergy Medical has a number of vehicles in the conduct of its business and is aware of the need to monitor and control, where possible, the effects on the environment from exhaust pollution. All vehicles are serviced in line with manufacturer recommendations to ensure that they run as efficiently as possible.

It is recognised that travel and haulage will always be a feature of working life as it is an essential role of Synergy Medical. Despite this, we work to reduce this where ever possible and will seek to encourage staff to use alternative modes of transport and we will use technology to reduce business miles where appropriate. Effective logistic planning and management will ensure we are keeping our mileage to a minimum.

Records of all vehicle information will be retained (service/MOT/miles travelled/ Fuel/mpg etc).

**Targets:** following review and more detailed analysis we will seek to set targets for emissions and mileage, however, this will always have to be considered in line with workload.

### Non Conformance & Corrective and Preventive Action

Non-conformance may arise from a number of sources i.e. monitoring, audits, management reviews, customer & supplier issues or simple observations.

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The business has established and will maintain procedures for defining responsibility and authority and for handling and investigating non-conformances, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. (Refer to QA procedures 12 & 13)

Any corrective or preventive action taken to eliminate the causes of actual and/or potential non-conformance's will sensibly be appropriate and proportionate to the magnitude of the problems and commensurate with the environmental impacts encountered.

The company will implement and record any changes in the documented procedures resulting from corrective and preventive action.

### **Documentation Control / Records**

Procedures are available to control all documents and records required by the business systems and will address the revision, approval, distribution, storage and removal of documents. (Refer to QA procedures 4 & 15)

### **Internal Audit**

The Current internal audit process that supports the Quality Management System (Refer to QA procedure 16) will also encompass the requirement for the "Evaluation of Compliance" to this strategy document. Refer to Appendix 4

Trained personnel will undertake independent reviews / audits of processes and their results.

### **Management Review**

The CEO, at regular intervals, will review this strategy and the results and measures contained within these processes. This may be included within the current QA Management Review process (Refer to QA procedure 1).

Minutes and findings/actions will be recorded. Changes to the strategy will be documented and approved.

### **Procurement**

Synergy Medical is committed to provide quality services and products which are cost effective and which fulfil the needs of customers. Essential to this is the development of improved procurement techniques, taking advantage of economies of scale and doing this within our ethical stance, wherever appropriate and/or possible. This forms part of our approach to value for money.

We recognise that value for money and whole life costing including; operating and maintenance costs, expected lifetimes, performance records, residual values and the potential cost of disposal, must be considered. This means that environmentally friendlier options will always be considered when carrying out any procurement activities. Suppliers will be reviewed as to their environmental commitments and questionnaires may be used to identify and record their feedback. Refer to Appendix 3

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To further minimise our environmental impact we will seek to reuse where possible internally and externally, and reduce the volume of items procured across Synergy Medical through more effective purchasing.

## People

Environmental awareness will be embedded in staff to aid them to minimise their environmental impact both at home and in the workplace, and we will promote good environmental practise and enable staff to put forward suggestions and ideas.

## Environmental Scorecard

Synergy Medical will establish and maintain an environment management programme that will translate its objectives and targets into actions.

The programme shall assign specific responsibilities for implanting those actions and provide the means (financial and human) and time frame (schedule) for achieving them.

If a project relates to new developments and new or modified activities, the programme shall be amended, where relevant, to ensure that environmental management applies to such projects.

The environmental strategy will allow Synergy Medical to consistently assess their strengths and weaknesses, identify and manage significant impacts, increase efficiency, and ensure they comply with environmental legislation, as well as providing benchmarks for further improvements.

Key benefits:

- Better regulatory compliance
- More effective use of resources & operational control
- Improved Bid / Tender processes
- Finance
- Increased sales opportunities
- Reduced carbon footprint

Synergy Medical are currently at the stage of this baseline assessment, which is looking at the overall environmental impact of identified Aspects to the business to identify opportunities and to measure and consolidate recognised opportunities for improvement.

[Refer to Appendix 5](#)

Synergy Medical follows guidance from legislation, codes of practice and best practice principles to ensure the continual improvement of its processes, in place throughout the business and to seek and implement ways to move from Standard to Good or Good to Best Practice when considering site waste management.

Synergy Medical already take steps to 'design out' waste when planning, including storage and logistical measures, and working with suppliers to manage and reduce waste. Further intermediate goals include everyday 'quick wins', such as following the principles of the

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3Rs in everything we do and longer term goals include the development of wider reaching internal targets and performance indicators.

This document is issued under the CEO's authority and places an obligation on all Synergy Medical employees and the supply chain to accept the documentation and to personally strive to consider their activities in relation to the protection of the environment.

**Appendix 1:- Management & Staff Environmental Responsibilities**

<b>Title</b>	<b>Responsibility</b>	
Administration Manager	Purchasing	
	Training and Administration	
	Collation of electricity & water consumption	
	Collation of appropriate waste transfer notes	
Director	Collation & analysis of mileage & fuel data	
All Staff	Lights are switched off when room not in use	
	Heating is turned down/switched off appropriately	
	Taps do not drip – report where necessary	

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## Appendix 2:- Emergency Preparedness and Response

### SCOPE

This procedure defines the method of identifying the potential for accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them.

### PROCEDURE

1. The CEO or her delegated individual is responsible for identifying any areas where there is the potential for an accident or emergency situation which may have a significant impact on the environment. It is recommended that a safety audit or risk assessment be conducted across the business to identify hazards and recommend improvements.
2. The CEO is then responsible for compiling Emergency Plans which detail the response procedure to minimise the environmental impacts of any accident. The plan should address such issues as fuel spillage, fire and explosion.
3. Emergency Plans will be reviewed at Management Review Meetings where any modifications required will be discussed. The CEO is responsible for implementing any actions identified as necessary.
4. The CEO will ensure that the emergency plans in place are tested at least once a year. This stage should consider the preparation of plans and actions for an evacuation of the premises. A trained fire marshal should organise and plan this eventuality. Consideration should be given to the evacuation process (check housekeeping for exit routes); signage; fire fighting equipment; alarms; drills, attendance records and the interface with the emergency services. Plans are amended where appropriate using an Amendment Request Form (see Document Control).
5. The CEO will also ensure that sufficient resources, in terms of training, equipment and personnel, are provided to enable the emergency plans to operate effectively.

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**Appendix 3:- Supplier/Contractor Environmental Questionnaire**

<b>Supplier/Contractor Environmental Questionnaire</b>	
<b>From:</b>	<b>Synergy Medical</b>    Telephone: Fax:
<b>To:</b>	Business Name: Address:    Telephone: Fax:
<b>Completed by:</b>	Name: _____ Position: _____  Signature: _____ Date: _____
<b>Description of product/service supplied</b>	

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<p>Please answer the following questions. If you would like to expand on any of your answers, please supply separate details:</p>	
<p>Do you have a written environmental policy? If yes, please enclose a copy.</p>	<b>YES / NO</b>
<p>Do you carry out environmental reviews or auditing?</p>	<b>YES / NO</b>
<p>Do you have/are you in the process of setting up an environmental management system?</p>	<b>YES / NO</b>
<p>If yes, do you comply/intend to comply with ISO 14001?</p>	<b>YES / NO</b>
<p>Do you conform to ISO 9001?</p>	<b>YES / NO</b>
<p>Do you supply this business or use in the product or services that you have:</p> <ul style="list-style-type: none"> <li>• Classified as dangerous under the CHIP 2 Regulations</li> <li>• Prescribed for release to land, air, water under the Environmental Protection (Prescribed Process and Substance) Regulations 1991?</li> <li>• Controlled by the Montreal protocol on Ozone depleting substances?</li> </ul> <p>If yes, please supply further details on a separate sheet of paper, i.e. name of substance, category, and hazard information.</p>	<b>YES / NO</b>
<p>Do you use recycled materials or products?</p>	<b>YES / NO</b>
<p>Do you offer facilities for customers to return your used products/ packaging for reuse/recycling or safe disposal?</p>	<b>YES / NO</b>
<p>Do you check the environmental performance of your suppliers?</p>	<b>YES / NO</b>

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<p>Has there been any legal action against you in respect of the environment in the last 5 years?</p>				<p><b>YES / NO</b></p>
<p>Is there any environment related criminal or civil action pending?</p>				<p><b>YES / NO</b></p>
<p>Do you have managers/directors with specific responsibility for environmental issues? If yes, please state name and position:</p>				<p><b>YES / NO</b></p>
<p>Do you comply with industry codes of practice? If yes, please name.</p>				<p><b>YES / NO</b></p>
<p>Are there any environmental initiatives you are carrying out /have carried out? If yes, please supply details:</p>				<p><b>YES / NO</b></p>
Document Ref	Prepared By	Approved By	Issue Date	Issue No.
APPX 3				

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**Appendix 4:- Environmental Audit Sheet**

Item	Question	Evidence	Satisfactory
1	Is the strategy document at the correct issue?		
2	Have responsibilities been clearly defined for all tasks?		
3	Is Environmental Policy signed and on display?		
4	Is Environmental notice board topical?		
5	Have emergency procedures been tested and recorded?		
6	Check that Electricity recording is topical, graphed and reviewed.		
7	Check that Water recording is topical, graphed and reviewed.		
8	Are waste paper products separated for collection?		
9	Have all waste metals been segregated for collected?		
10	Are Waste Transfer Notes complete & correctly filed?		
11	Are fuel and mileage records topical, complete and reviewed?		
12	Are vehicle service and MOT dates topical?		
13	Have any corrective or preventive actions been addressed and closed?		
14	Has Management Review addressed and recorded a review of the environmental strategy with clear actions?		
15	Have supplier questionnaires been issued and analysed?		
16	Review scorecard trends to identify actions required.		
<b>Signed.....</b>		<b>Date.....</b>	

Note:- Any issues or opportunities for improvement should be addressed via the internal audit and corrective action processes.

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### Appendix 5: Environmental Scorecard

The following illustration is a review of current trends of the aspects identified that could have an effect on the local environment is left uncontrolled or unmeasured.

Topic	Previous position	Current position	Trend Status /	Comments
Water consumption				
Electricity usage				
Fuel Oil consumption				
Petrol consumption				
Diesel consumption				
Steel purchased/recycled ratio				
Aluminium purchased/recycled ratio				

Note:- The use of traffic lights highlights immediate areas of concern for discussion.

**Appendix 6:- Water Consumption Log**

DATE	READING	USAGE		DATE	READING	USAGE

Document Ref	Prepared by	Approved by	Issue date	Issue No.	Page
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**Appendix 7:- Electricity Consumption Log**

<b>DATE</b>	<b>READING</b>	<b>USAGE</b>		<b>DATE</b>	<b>READING</b>	<b>USAGE</b>

<b>Document Ref</b>	<b>Prepared by</b>	<b>Approved by</b>	<b>Issue date</b>	<b>Issue No.</b>	<b>Page</b>
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