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Environmental Policy and Procedures

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1 Introduction

As demand for resources and global consumption increases, TCC, Recordsure and Momenta (the Company) recognises the significant role safeguarding the environment plays in the future of the planet.

The environmental aim of the company is for a long-term, sustainable business that is designed to encourage colleagues and suppliers to make a positive impact on the environment and improve the sustainability of activities.

This policy adheres to the ISO14001 Environmental Management System (EMS) standard.

1.1 Purpose

The Company aims to deliver value for all stakeholders including colleagues, clients, suppliers, business partners, and the wider community through communicating commitments, performance and other information related to the environment.

This Environmental Policy and Procedures is part of the Integrated Management System (IMS) and underlines the Company's commitment to the laws, regulations, and other policy mechanisms concerning environmental and sustainability issues.

The Company recognises that sustainability requires an ethical culture and effective management of the 'triple bottom line,' assessing financial, social, and environmental risks and seeking opportunities to promote long-term change and minimise the impact the business has on the environment.

This policy aims to recognise and understand the impact the company has on the environment as well as highlight key activities undertaken as a business.

TCC, Recordsure and Momenta do not have any specific legal reporting requirements for the environment. All legislation relating to the environment is logged within the Legislation Register.

External and internal issues are identified that are relevant to the company's ability to achieve the intended outcomes of its environmental management system. Such issues include environmental conditions being affected by or capable of affecting the organization. These issues and subsequent interested parties are identified as part of the IMS.

This policy document has been prepared to share with colleagues. Failure by staff or associates to comply with the guidance within may be deemed suitable for disciplinary procedures.

1.2 Scope

The scope for the environment policy and management system certified under ISO14001 is:
All the company's activities that take place in the offices and areas that are under the company's direct control.

1.3 Roles and Responsibilities

Chief Information Security Officer (CISO) and Chief Information Officer

- Establishes objectives.
- Liaising with SLT as the senior management representative.
- Communication with external third parties.
- Ensuring application of EMS controls.
- Measuring and monitoring of performance.

Quality Business Manager (QBM):

- Identifies environmental aspects and impacts using the evaluation form.
- Undertakes annual review of the evaluation forms or where there is a significant change.
- Creates, reviews and updates policy documents.
- Training on Environmental Awareness.
- Communication of EMS to top management via IMS meetings and management review.
- Undertake the emissions calculations, completes environmental due diligence for client and updates the Carbon Reduction Plan.
- Facilitates internal audits.

Green Team:

- Encourage a cultural change in the company to emphasise openness and awareness of environmental issues by:
 - Identifying and implementing green initiatives.
 - Communication of environmental awareness.

Business Support Team:

- Maintains the Training Log.
- Supports the QBM.

Internal Auditor

- Undertakes internal audits in line with the internal audit schedule.

The competency for individuals in relation to the environmental management system are detailed in the Continual Service Improvement Plan (CSIP).

1.4 Key Documents

The following documents are key elements of the EMS as part of the IMS:

- IMS Policy: policy for IMS which includes environmental, information security, quality, health, and safety.
- IMS Overview: includes leadership and commitment, internal and external factors, risk management, training and competence, document review and planning.
- Carbon Reduction Plan: Monitors emissions for the company
- CSIP: Incidents, actions, outstanding and completed, competency, interested parties and risk assessments.
- Legal Register: All legislation for the company including data protection, health and safety and the environment.
- Internal audit process and schedule.
- IMS regular meetings and annual management review.

- Impact evaluation and reviews.
- Supplier Management Policy, due diligence and supplier forms and the Approved Supplier List.

1.5 Environment Definitions

Environment: surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelationships.

Environmental Aspect: element of an organisation's activities, products or services that interacts or can interact with the environment.

Environmental Impact: any change to the environment, whether adverse or beneficial or partially resulting from the organisations aspects.

Environmental Condition: state or characteristic of the environment as determined at a certain point in time.

2 Risk Assessment and Impact Evaluation

The Company undertakes baseline risk evaluations to determine the potential impact on the environment of our activities. These evaluations identify the risk, and consequentially aspects and impacts, of our activities on the environment which in turn enables the company to determine significance. On that basis the objectives are formulated to mitigate these significant impacts in line with company's business objectives.

The key processes in place for both TCC, Recordsure and Momenta have been evaluated and the process described below, and the following steps are undertaken as part of the evaluations:

Step 1 – Provide a description of activity or process.

Step 2 – Identify legislation or other requirements such as policy relevant to this activity or process.

Step 3 – Identify details of any prescribed process authorisation, utility consent or local authority condition applicable to this process or activity.

Step 4 – Identify details of Aspects and Impacts: Normal, Abnormal or Emergency Situations:

- Normal: (planned/regular activity)
- Abnormal (planned/infrequent activity)
- Emergency (unplanned/unexpected activity)

Each line identifies the potential environmental aspects and impacts of the activity (source). The source should consider lifecycle perspective.

Step 5 – Identify the Details of Waste Streams emanating from this process.

Step 6 – Identify details of Known Past Impacts/Potential Future Impacts.

Step 7 – Identify the significance of this process on aspects relating to the environment. Using the following categories: S= Significant, N= Not Significant, or P= Positive

Significance is quantified or qualified through client requirements legislation requirements, cost, or volume.

Step 8 – Identify if any contractors, service providers or other parties operate any part of this process on our behalf that has the potential to have a significant impact on the environment.

Step 9 – Details of Current Operational Controls.

Step 10 – Details of Actions or Monitoring Requirements (including Objectives and Targets)

Step 11 – Add any other relevant comments or information.

These evaluations are reviewed on an annual basis and are logged in the CSIP, and any new actions are managed to completion in the CSIP as part of the IMS.

The three evaluations that have been undertaken are:

1. Office: Site Management in Leeds
2. Supplier: Indirect: Upstream/Downstream/Lifecycle
3. Remote Working: Management of home environment

2.1 Office

Site Management covering activities that pertain to the running and management of the company in the Office. The evaluation has identified the following significant aspects:

1. Use of raw materials/natural resources
2. Use of energy
3. Generation and disposal of waste

The office in Leeds consists of six desks in a fully serviced office which is shared with other companies and therefore the company does not have any contracts with energy suppliers.

In addition from April 2025 TCC holdings acquired Momenta Interim Management Limited who contract an full serviced office of 12 desks one day a week and again the company does not have any contracts with energy suppliers.

2.2 Supplier

The Upstream/Downstream evaluation covers purchasing and supply activities where it is believed we can influence good environmental practice and encompasses analysis of product and service lifecycle. As only digital data is provided to clients, the start of this process life is the suppliers, and the end of life is with the company. The evaluation has identified that there are no significant aspects.

2.3 Remote Working

Remote or home working environment covering activities that pertain working of individuals at home or away from the office. The evaluation has identified the following significant aspects:

1. Use of raw materials/natural resources
2. Generation and disposal of waste

3 Objectives

Managing the environmental impact of TCC and Recordsure's activities with a sense of responsibility, the company identifies and applies the necessary improvements and development activities that minimise or eliminate negative environmental impact.

The company uses a risk-based approach following the Plan-Do-Check-Act methodology to assess organisational activities and identify areas where negative impact can be minimised.

The company aims to adopt of the highest environmental standards in all areas of operation to:

- Minimise waste and be as efficient as possible through careful and efficient use of all materials and energy.
- Purchase sustainable products wherever feasible (e.g., recycled, FSC or low environmental impact products and energy from renewable sources)
- Educate employees in good environmental practice and encourage employee involvement in supporting environmental initiatives internally and externally.

Following the evaluation of the environmental impact of the company within the scope, the objectives relating to the environment as part of the IMS are:

- Management and maintenance of a business wide IMS that is fully compliant with and independently certified to ISO14001: 2015: Environmental Management. Owner: CEO
- Continuing compliance with all legal requirements specifically the Environmental Protection Act 1990: Owner: CISO
- Commit and implement controls to be Carbon NetZero by 2030. Owner: CISO
- Manage the company's supply chain through environmental due diligence on our suppliers with the following KPIs:
 - Company to have completed environmental due diligence on 100% of mission critical suppliers.
 - Company to have completed environmental due diligence on 100% of all other suppliers: Owner: CISO.
- Support green initiatives for example lifestyle changes within the office and at home. Owner: CISO.

3.1 Waste Hierarchy

The company's ethos on the lifecycle of product and processes used by the company is based on the waste hierarchy as detailed in the diagram below:



4 Use of Raw Materials/Natural Resources

We have responsibility for purchasing office consumables, including IT equipment for office and remote working and responsible management of resources, this has been designated as Significant. In the first instance TCC, Recordsure and Momenta carefully considers the requirement to procure the goods in the first place and only does so where there is a business need.

The company aims to develop mutually beneficial relationships with suppliers based on sustainable procurement. The business is committed to only working with suppliers that meet the business and sustainability standards.

The company expects suppliers to:

- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business. For example, waste companies have the correct waste disposal permits in place. These are logged on the Approved Supplier List.
- Seek to maintain continuous improvement in their supply chain relationship.
- Ensure they adopt and implement acceptable environmental, product quality, product stewardship, legal standards and to ensure that these issues are managed within the supply chain for any products supplied to the company.

The company operates a supplier management procedure and selection process for new suppliers. The supplier management process includes an assessment of the following:

- Modern day slavery: requirement and statement
- Antibribery: requirement and policy
- Health and Safety: Risk assessment, insurance, competency, COSHH
- Data Protection: compliance with data protection Act 2018, privacy notice.
- Information security: independent audit of information security
- Human Resources: Vetting and training standards
- Environmental: legal compliance including packaging and waste permits and Carbon Reporting.

The criteria above are used to assess the supplier, and the company will only contract with suppliers with acceptable procedures and policies.

Mission critical suppliers are identified and reviewed on an annual basis. Further detail is within the supplier management procedure.

4.1 Procurement and Prevention Policy

As part of adherence to the waste hierarchy TCC, Recordsure and Momenta have adopted the following Procurement Policy. All goods are only purchased if necessary for the running of the business and all have to be approved via the invoicing process. All suppliers are required to have due diligence completed. Within the office, desks and chairs are provided by the landlord.

The following table details the additional controls in place for products purchased for the company.

Description of product/process	Controls in place
Paper	Prevention: Limited printing in place due to limited numbers in the office. Printer only prints when individual logs on.
Ink Cartridges	Prevention: Limited printing in place due to limited numbers in the office. Printer only prints when individual logs on.
Office stationery	Prevention: small number of envelopes, pens and paper purchased.
IT equipment: laptops	Prevention: TechOps: install memory to prolong lifetime of the laptop. Reuse: All checked for reuse where possible.
IT equipment: monitors	Prevention: Individuals keep monitors be returned so can be used in other employment. Limited to employees only. Reuse: All checked for reuse where possible.
IT equipment: small items: keyboard/mice/headphones/cables	Prevention: Individuals keep monitors. Limited to employees only Reuse: All checked for reuse where possible.
Health and safety equipment: footrests, back rests, wrist support, chairs	Prevention: only provide where need identified. Items do not need to be returned so can be used in other employment.
Courier	Prevention: only use where necessary. Individuals collect and drop off in the office where possible.
Packaging for sending out laptops	Packaging reused wherever possible. Associates: Informed to keep packaging in order to send back to the company. Collect from the office where possible.

5 Use of Energy

As a business we strive to reduce energy demand across the business to save money (climate change levy and increasing cost of energy) and reduce indirect environmental impact associated with the generation of energy. Where possible we proactively choose energy suppliers who offer 100% sustainable energy.

We will seek to implement energy saving best practice if opportunities present themselves to seek reduction in use and associated indirect impacts of energy generation supply chain.

5.1 Emissions Reporting

Emissions reporting is the first, and one of the most important steps a company can take to reduce its company's footprint. Greenhouse gases (GHGs) drive global warming. The most common GHGs are carbon

dioxide, methane, and nitrous oxide. CO₂e Carbon dioxide equivalent. This is the universal metric when we talk about emissions.

There are three types of emission data that can be collected:

- Scope 1 Emissions: This refers to direct emissions from organisation owned or controlled resources. For example, emissions from fuel combustion by the company, company vehicles and on-site manufacturing.
- Scope 2 Emissions: These are indirect emissions from the generation of purchased electricity, heat, and steam used by the company.
- Scope 3 Emissions: These include all other indirect emissions that occur in a company's value chain and includes purchased goods and services, business travel, employee commuting, waste disposal, leased assets, transportation, and distribution.

The company have assessed the company emissions and introduced a Carbon Reduction Plan.

5.2 Energy Use

The company occupies a multi-tenanted fully serviced office in Leeds. All energy sources – electricity and water, are provided by the landlord as part of the contract and the company does not have any supplier contracts or direct control with any energy suppliers.

5.3 Travel

The company aims to reduce the impact of travel on the environment by minimising travel.

Meetings are encouraged to be undertaken via an online portal for example Microsoft Teams and Google Meet.

Business travel is only necessary to fulfil a business need. Where business travel is required:

- Colleagues are encouraged to travel via public transport where possible.
- If a car is required, then to car share where possible.
- Air travel is only undertaken on an exceptional basis.

Working from home is enabled where possible. Cycle to work scheme in place.

5.4 Net Zero

The company has committed to the SME climate change hub with a commitment to be carbon net-zero by 2030. The company is committed to reducing emissions as much as possible.

Some companies try to reduce their impact by offsetting their emissions without tackling the underlying problems. However, offsetting cannot be regarded as an alternative to rapid and deep cuts to emissions and the company is committed to make those drastic emissions cuts and to restore and protect nature.

6 Waste Management

6.1 Waste and Recycling Policy

As identified in the environment evaluation form for the office, waste is generated through the following processes with the corresponding controls in place.

Description of waste	Controls in place
Paper	Shredding for confidential waste- recycled by shredding company: goes to local mills in the UK to be made into recycled paper products.
Print cartridges	Disposal process in place via Revive IT: waste license in place, ISO14001 in place. Revive IT follow hierarchy and confirm for each item: reuse or recycle with full info detailed on the data destruction certificate.
IT Equipment: All	Disposal process in place via Revive IT: waste license in place, ISO14001 in place. Revive IT follow hierarchy and confirm for each item: reuse or recycle with full info detailed on the data destruction certificate.
Health and safety equipment	Individuals keep equipment.
Packaging - cardboard	Packaging from supplier and for couriering laptops - reuse in first instance, then recycle.
Packaging – Jiffy bags	Recyclable.
Kitchen/Food	Food Waste: no recycling Recycle: plastic packaging, cardboard, and paper

7 Emergency Preparedness

Emergency preparedness is paramount at TCC, Recordsure and Momenta to protect the environment from a negative environmental impact caused by an emergency situation.

An environmental incident is an occurrence or set of circumstances, because of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur. The release, either accidental or malicious, of a harmful substance, for example:

- Chemical or oil spillage.
- Uncontrolled release of a harmful substance to atmosphere.
- Uncontrolled release of a harmful substance to the sewerage system.
- Uncontrolled release of a harmful substance to a local watercourse.
- Uncontrolled release of a harmful substance to land.

As the company colleagues undertake general office duties, without any requirement for environmental permits and within landlord-controlled premises, it is not considered that a major or significant incident plan is required. The plans in place are detailed below.

7.1 Business Continuity

The company has a Business Continuity Plan (BCP) with the aim of facilitating a quick and painless return to work. The company employees and contractors work from home, with one multi-tenanted office in Leeds. The communal office space is operationally managed by the landlord.

The Business Impact Analysis has been undertaken and regularly reviewed for all business continuity scenarios and actions. The Business Impact Analysis identifies the following areas that could have a negative impact on the environment:

- Natural disaster e.g., flood or fire.
- Other disaster: e.g., terrorist incident.

Recovery plans are in place and a checklist available to ensure all areas are addressed. Rehearsals are undertaken on an annual basis and improvements implemented as required.

7.2 Fire Procedures

For the Leeds office, the company has fire procedures in place for the Leeds office and the landlord has fire procedures for the communal areas. The company has trained fire marshals in place who can assist in the event of a fire and report to Building Management Team at the muster point.

For the London office the landlord provides fire procedures and two individuals from Momenta are designated fire marshals who are trained to assist in the event of a fire. and report to Building Management Team at the muster point.

Risk assessments are undertaken on an annual basis or where there is a significant change in personnel. These are sent to all staff. The fire procedures and fire musty points are detailed within the office worker training which is undertaken on induction and on an annual basis thereafter.

7.3 Minor Environmental Incident Plan

There may be instances where a minor environmental incident occurs within the office. There are no chemicals stored within the offices however cleaning materials are stored by the landlords and in addition harmful substances could be bought into the office. Minor incidents are considered as a small spill for example less than 5 litres or less than 1 metre in diameter.

Step	Who by	When
1. Containment Clear up Spill/incident. Consider use of gloves/PPE.	Person who created the incident/Business Support	Immediately- to prevent accidents and contamination.
2. Internal Notification: to QBM.	Business Support	Immediately after containment
3. Review Actions: QBM to review whether any further action required.	QBM	Immediately

4. External Notification of stakeholders: QBM Immediately
landlord, cleaners, reporting bodies as required.

5. Reporting: Log in the continual service improvement plan with appropriate reactive and preventive action. Top management: IMS meeting report and annual Management Review.	QBM	Every two months
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This plan is detailed in the environmental and social governance training.

8 Communication and Training

Training on environmental awareness is provided on induction and on an annual basis thereafter. The awareness tests for each of the training is logged in the Mandatory Training log.

Engagement is also undertaken by the Green Team in the form of regular communication detailing ideas and initiatives.

9 Governance

This policy is owned by the CISO, on behalf of the company Board and applies to all colleagues, and relevant stakeholder groups.

This environmental policy and procedure are managed as part of the IMS. Therefore, actions from the evaluations, internal audits and ISO certifications are logged and managed to completion using the CSIP. Environmental Incidents are logged in CSIP with corresponding actions.

Environmental KPIs and key areas are discussed and minuted in the IMS meetings. These KPIs include:

- Training: completion and pass rates.
- Internal audits: completion, grading and actions.
- Supplier: due diligence completion in line with objectives.

This policy is subject to internal audit process and the objectives and KPIs are reviewed within the annual management review.

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