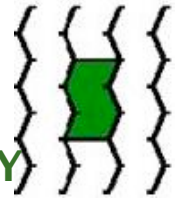


R. SWAIN & SONS LTD

ENVIRONMENTAL & SUSTAINABILITY POLICY



The Company is committed to integrating environmental best practice into all its business activities and to promoting sustainability.

ENVIRONMENTAL

The Company accepts its environmental responsibilities and recognises its obligation to reduce the impact of business activities on the environment. The Company will achieve this through a policy of continual improvement in environmental performance.

To achieve these objectives, the Company will:

- adopt best practice and assist, where possible, in developing innovative solutions to the environmental issues and problems facing its sector;
- conduct its activities in full knowledge of, and compliance with, the requirements of applicable environmental legislation and Approved Codes of Practice;
- assess the environmental impact of all past, current and likely future operations, and fully integrate environmental considerations and objectives into its business decisions;
- prevent pollution and minimise emissions;
- reduce the production of waste and develop effective waste management and recycling procedures, as well as disposing of unavoidable waste in such a way as to minimise its environmental impact;
- develop and implement integrated logistics policies, and encourage the use of environmentally friendly means of transport by staff;
- establish environmental objectives and targets, and measure performance against these targets;
- raise awareness amongst members of staff through appropriate education and training, encouraging them to become more environmentally responsible;
- encourage awareness of, and commitment to, improved environmental performance amongst suppliers and customers;
- work within the local community and with others, to take into account their environmental concerns and develop and pursue environmental initiatives;
- communicate this policy to members of staff, and consult with them to ensure that they take an active role in its implementation and review; and
- monitor and review its environmental performance and publish and communicate this performance to staff and other concerned parties.

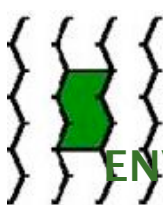
Each employee is responsible for his/her adherence to the principles of this policy.

SUSTAINABILITY

The Company is committed to promoting sustainability. We aim to follow and to promote good sustainability practice to reduce the environmental impacts of all our activities.

Principles

Our sustainability objective is based on the following principles:



R. SWAIN & SONS LTD

ENVIRONMENTAL & SUSTAINABILITY POLICY



- To ensure compliance with all applicable legislation, regulations and codes of practice.
- To integrate sustainability considerations into all relevant business decisions.
- To ensure that our staff are aware of our Policy and are committed to implementing and improving it.
- To minimise the impact on sustainability of all office and transportation activities.
- To review, annually report, and to continually strive to improve our sustainability performance.

Practical steps

In order to put these principles into practice we will:

Travel and meetings

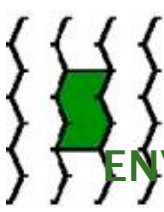
- 1) Walk, cycle and/or use public transport to attend meetings, site visits etc where practical and cost effective.
- 2) Avoid travel to meetings etc where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and ensure efficient timing of meetings to avoid multiple trips. These options are also often more time efficient, while not sacrificing the benefits of regular contact with clients and partners.

Purchase of equipment and consumption of resources

- 1) Minimise our use of paper and other office consumables, for example by double-sided all paper used, and identifying opportunities to reduce waste.
- 2) As far as possible arrange for the reuse or recycling of office waste, including paper, computer supplies and redundant equipment.
- 3) Reduce the energy consumption of office equipment by purchasing energy efficient equipment and by good housekeeping.
- 4) Purchase electricity from a supplier committed to renewable energy. Seek to maximize the proportion from renewable energy sources, whilst also supporting investment in new renewable energy schemes.
- 5) Ensure that timber furniture and any other timber products are recycled or from well-managed, sustainable sources and are Forest Stewardship Council (FSC) certified.

Operations

- 1) Maximise use of vehicles from other depots on loads going in the vicinity of or en route to their depots.
- 2) All vehicles to be limited to 52mph and drivers encouraged to drive with consideration and anticipation of braking needs to optimize fuel efficiency.
- 3) Where possible and practical, combine loads to reduce number of road journeys.
- 4) Monitor driving standards and encourage awareness and consideration of environmental impact.



R. SWAIN & SONS LTD ENVIRONMENTAL & SUSTAINABILITY POLICY



Each employee is responsible for his/her adherence to the principles of this policy.

The contents of this policy and the way in which it is being implemented will be reviewed on an annual basis.

R. Swain

20.5.2013