

Keison International Ltd & VoIPon Solutions

ENVIRONMENTAL MANAGEMENT DOCUMENT

0.0 Introduction

Keison International Ltd provides a worldwide procurement and distribution service on behalf of its customers. To achieve this, the company has developed an integrated business process that controls the fulfillment of customer requirements from the initial enquiry to the finally delivered product.

Keison International Ltd recognise the social and economic importance of protecting the Environment and also understands that their business activities impact on the environment and the wider community as a whole.

This document provides the framework for achieving and verifying the effectiveness of the company's environmental management system and also provides direction to the documented provisions for its implementation.

1.0 Scope

Keison International Ltd distribute and supply a wide range of Industrial and Laboratory products throughout the world. These products are specified by ourselves, end-user's and / or intermediaries and are sourced from a large database of suppliers.

VoIPon Solutions a division of Keison International Ltd distribute and supply a wide range of VoIP equipment throughout the world. These products are specified by ourselves, end-user's and / or intermediaries and are sourced from a large database of suppliers.

The Core Processes of the business are described in Appendix A of this document.

2.0 Reference Publications

In developing the environmental management system, the company has worked to the most recent revision of the relevant ISO standards, as follows:

ISO 14001:2004 Environmental management systems – Requirements
ISO 14004:2004 Environmental management systems – General guidelines

3.0 Terms and definitions

All terms and definitions used in this document and associated procedures, processes and records shall be in accordance with ISO 14001:2004. Where the term 'product' is used, this also includes 'services'.

4.0 Environmental management system requirements

4.1 General requirements – The Environmental Management System (EMS) is based on the *Plan-Do-Check-Act* (PDCA) methodology. PDCA can be briefly described as follows: -

- **Plan:** *establish the objectives and processes necessary to deliver results in accordance with the organisation's Environmental policy*
- **Do:** *implement the processes.*
- **Check:** *monitor and measure processes against Environmental policy, objectives, legal and other requirements, and report the results.*

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- **Act:** take actions to continually improve Environmental performance.

The Company has established methods and documented provisions for implementing, maintaining and continually improving the EMS, which are described in the following sections of this document. The document includes, or makes reference to, the structure, responsibilities, practices, procedures, processes, and resources for implementing and operating the EMS.

4.2 Environmental Policy

The Director and Managers of Keison International Limited recognise the social and economic importance of protecting the environment and are fully committed to complying with the requirements of the Environmental Protection Act 1990.

To support the stated commitment, it is management policy to integrate environmental considerations into the business decision making process.

In order to maintain and sustain the Company's Environmental Policy, it is necessary that every reasonably practicable means be used to: -

- Comply with applicable legal requirements and with other requirements to which Brennan Group subscribes which relate to its environmental aspects.
- We are committed to the achievement of continual improvement and the prevention of pollution.
- Measure the business operations to provide the framework for setting and reviewing of environmental objectives and targets.
- Make economic use of energy, water and other materials to minimise waste in all aspects of the business function.
- Review regularly the environmental impact resulting from business operations and to remain fully informed of changes to legal and other requirements and recognised best practices.
- Communicate this policy to all interested parties including company customers, suppliers and employees and encourage their active involvement in environmental issues.

The Managing Director has the overall and final responsibility for the Environmental Policy with the Office Coordinator responsible for the co-ordination, implementation and monitoring of the policy throughout the organisation and ensuring that the policy is reviewed annually.

Management throughout the organisation are responsible for the communication of the policy and promoting active participation at all levels, whilst ensuring that activities under their control conform to the legal requirements and that good environmental standards are achieved and maintained.

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Employees have the responsibility to actively support the company to ensure the effective implementation and maintenance of the policy.

4.3 Planning

4.3.1 Environmental Aspects – The Management Representative supported by the Management & Staff is responsible for identifying aspects and determining the significance of their impacts. Information is received via trade association updates, Government agencies and independent specialist websites. This information is recorded and scored on an Aspects and Impact Matrix with significant impacts identified in Appendix B of this document. This subject will be regularly reviewed at the Management Meetings.

4.3.2 Legal and other requirements - The Management Representative supported by the Management Team is responsible for identifying and have access to legal and other requirements to which is applicable to the environmental aspects of activities, and services. Information is received via trade association updates, Government agencies and independent specialist websites. A List of applicable laws and regulations is documented as Appendix C to this document and is regularly reviewed at the Management Meetings

4.3.3 Objectives, targets and programmes – The Management Representative supported by the Management & Staff will make recommendations to the Managing Director regarding environmental objectives and targets as well as continuous improvement programmes based on results of the assessment of the company's aspects and impact. Once agreed, Project action plans are produced identifying actions, responsibilities and timescales; these are communicated both internally and externally and are monitored at the Management Meetings.

4.4 Implementation and operation

4.4.1 Resources, roles, responsibilities and authority - The Managing Director is responsible for the provision of sufficient resources essential to the implementation and control of the EMS at all levels of the organisation. Resources include human resources and specialised skills, technology, and financial resources. All roles, responsibilities and authorities will be defined throughout the procedures. An Organisational Chart and General Responsibility Matrix are included as Appendix D & E of this document.

4.4.2 Competence, training and awareness - Measures have been established and provisions documented and maintained to identify the training needs of all staff whose work may create a significant impact upon the environment. These provisions are documented in procedure MP-07 Competence, Awareness & Training.

4.4.3 Communication – The Management Representative supported by the Management & Staff is responsible for the effective communication of environmental activities. Internal communications includes the display of the Environmental Policy, objectives and targets on company notice boards and notes from the Management Meeting will be briefed to the staff via the Departmental Managers. External communication to interested parties will include a specific page on the company Website and through the tender and purchasing processes. All environmentally based communications received by the company are referred to the

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Management Representative, who will ensure that the appropriate actions are taken and recorded at the Environmental Team Meetings.

4.4.4 Documentation – In addition to the Environmental Policy, the following system procedures have been established.

EMD-01 Environmental Management Document

MP-01 Document, Data & Record Control

MP-02 Continuous Business Improvement

MP-03 Internal Audits

MP-04 Management Review

MP-05 Purchasing

MP-06 Account Management

MP-07 Competence, Awareness & Training

MP-08 Warehouse

A comparison matrix of ISO14001 elements to company procedures can be found as Appendix F of this document.

4.4.5 Control of documents - Provisions for document control are in procedure MP-01 Documents, Data & Record Control.

4.4.6 Operational Control - Measures have been established and provisions are documented and maintained to identify those operations and activities that are associated with the identified significant environmental aspects in line with the environmental policy, objectives and targets. Provisions are documented in procedure MP-06 Account Management and Purchasing MP-05 & Measurement and waste streams are listed in Appendix G of this document.

4.4.7 Emergency preparedness and response - Measures have been established and provisions are documented and maintained to identify the potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. Provisions are documented in the procedure for Fire and Evacuation Instructions KIL-F&E-2006.

4.5 Checking

4.5.1 Monitoring and Measurement - Measures have been established and provisions are documented and maintained to monitor and measure, on a regular basis, the key characteristics of the operations and activities that can have a significant impact on the environment. Provisions are documented in procedure MP-02 Continuous Business Improvement.

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4.5.2 Evaluation of compliance- The Management Representative supported by the Management & Staff is responsible for continually monitoring all environmental activities and where specific Licenses, permits or schemes are applicable, a nominated member of the management team will monitor compliance and report back to the Management Meetings which is noted as an agenda item. The Environmental Management System is formally reviewed and evaluated to ensure continued compliance against legislation, regulations and the company's own environmental objectives annually prior to the management Review.

4.5.3 Nonconformance and corrective and preventive action - Provisions for non-conformance, corrective and preventive action are fully documented in procedure MP-02 Continuous Business Improvement.

4.5.4 Control of records - Provisions for record control are in procedure MP-01 Documents, Data & Record Control.

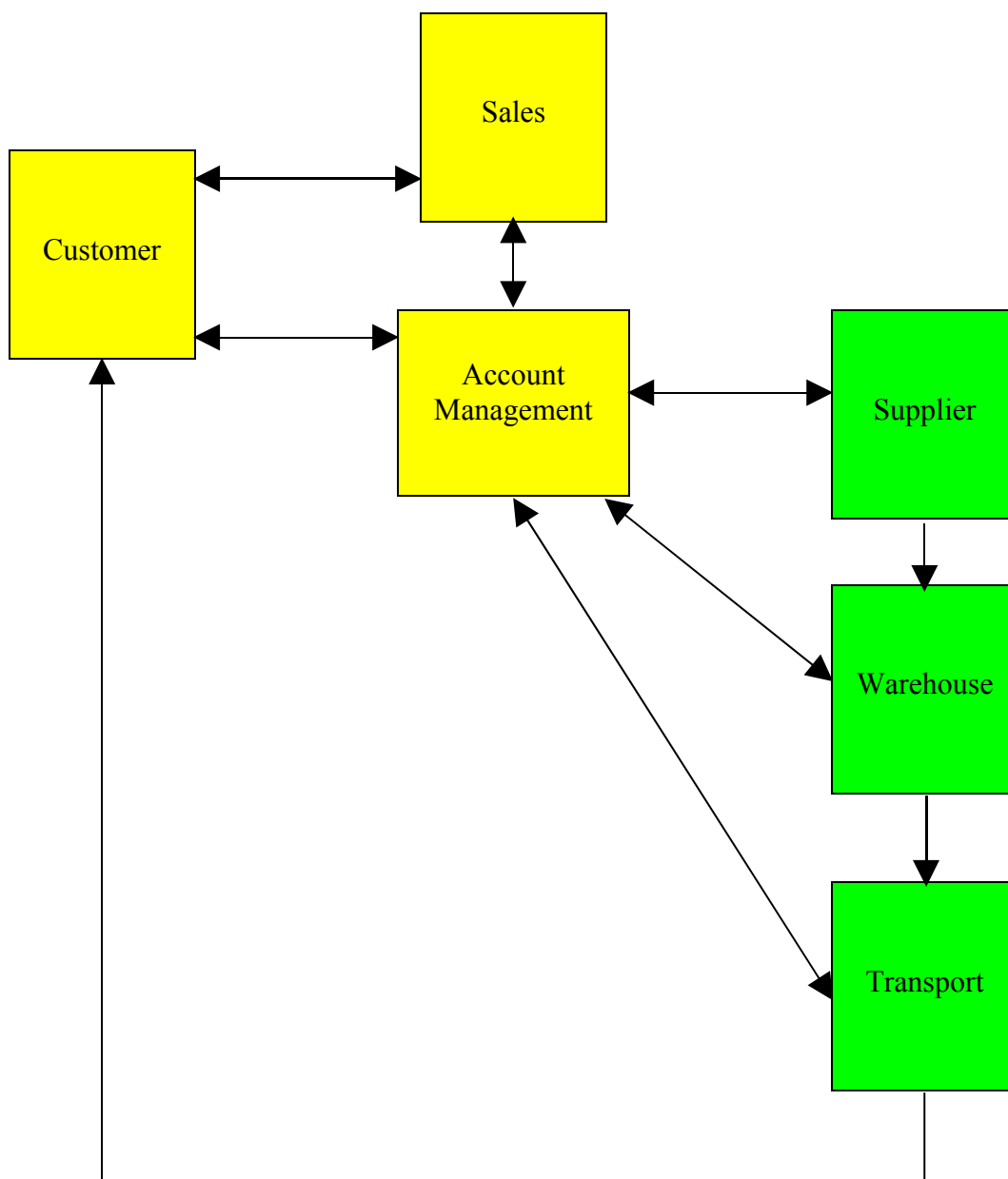
4.5.5 Internal Audit - Provisions for periodic EMS audits are documented in procedure MP-03 Internal Audits. Progress of all audit actions, are monitored via the Environmental Management Meetings as an agenda item.

4.6 Management Review

It is the responsibility of the Managing Director to ensure that periodic Management Reviews are conducted as described in procedure MP-04 Management Review.

Appendix A

Core Process



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Appendix B

Significant Aspects & Impacts (Score of 100 or above)

Activity	Environmental Aspect	Potential Environmental Impact	Actions /controls to reduce impact
Premises Operation	Use of energy and resources i.e. electricity, gas and water	Consumption and wastage of resources	External energy survey Project set up to implement recommended actions and to continue to monitor and reduce energy and resource usage. Risk assessments Planned maintenance.
Import & Export of electrical products	Levels of hazardous substances in IT & communications equipment from outside the EU	Soil and groundwater contamination	Declarations of compliance from suppliers Standard letter sent to all new suppliers requesting declaration.
Air Conditioning Units	Use of electricity & gases	Greenhouse gases Consumption & wastage of resources	Planned maintenance
Sub-contracted Transport & Distribution	Emissions to air Use of solvents / oils Disposal of waste products	Greenhouse gases Noise pollution Damage to flora & fauna	Regular servicing Route planning Supplier survey & grading Transport & Distribution Project
Disposal of waste materials	Waste steams recycled or land filled	Consumption and wastage of resources	Waste steam separated and recycled. Recycle project in operation.

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Appendix C

Legal Requirements

Legislation	Company Activities
Information Security Data Protection Act 1998 Human Rights Act 1998 Computer Misuse Act 1990 Telecommunications (Lawful Business Practice) Regulations 2000 Employment Practices Data Protection Code 2005 Regulation of Investigatory Powers Act 2000 (RIPA)	The receipt and processing of customer personal and financial data The operation of CCTV on premises The recoding and storage of Employee personal and financial data
Waste Environment Act 1995 Environmental Protection Act 1990 Hazardous Waste (England & Wales) Regulations 2005 Environmental Permitting (England & Wales) Regulations 2007 Landfill (England) Regulations 2005 Waste Electrical & Electronic Equipment (WEEE) Regulations 2007 The Batteries & Accumulator Regulations 2008	Waste handling, storage and transfer Use of waste contractors Waste disposal to landfill Disposal of electrical equipment Removal of Clinical waste
Air Pollution Environmental Protection (Controls on ozone-depleting substances) Regulations 2002.	Use of Air-conditioning Units
Water Pollution Water Industry Act 2003 Water Resource Act 1991 Environmental Protection Act 1990 Groundwater Regulations 1998.	Normal use of water resources
Statutory Nuisance Environmental Protection Act 1995 Noise and Statutory Nuisance Act 1993	Paper waste and litter
Contaminated Land Environmental Act 1995 Environmental Protection Act 1990 The Restriction of the use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations (RoHS) 2005	Waste disposal to landfill Waste handling, storage and transfer Import and Export of electrical products
Health, Safety & Welfare Health and Safety at Work Act 1974 Management of Health and Safety at Work 1999	Health & Safety Programme Emergency evacuation
Other ISO 14001:2004 Environmental Management Systems – Requirements with guidance for use	

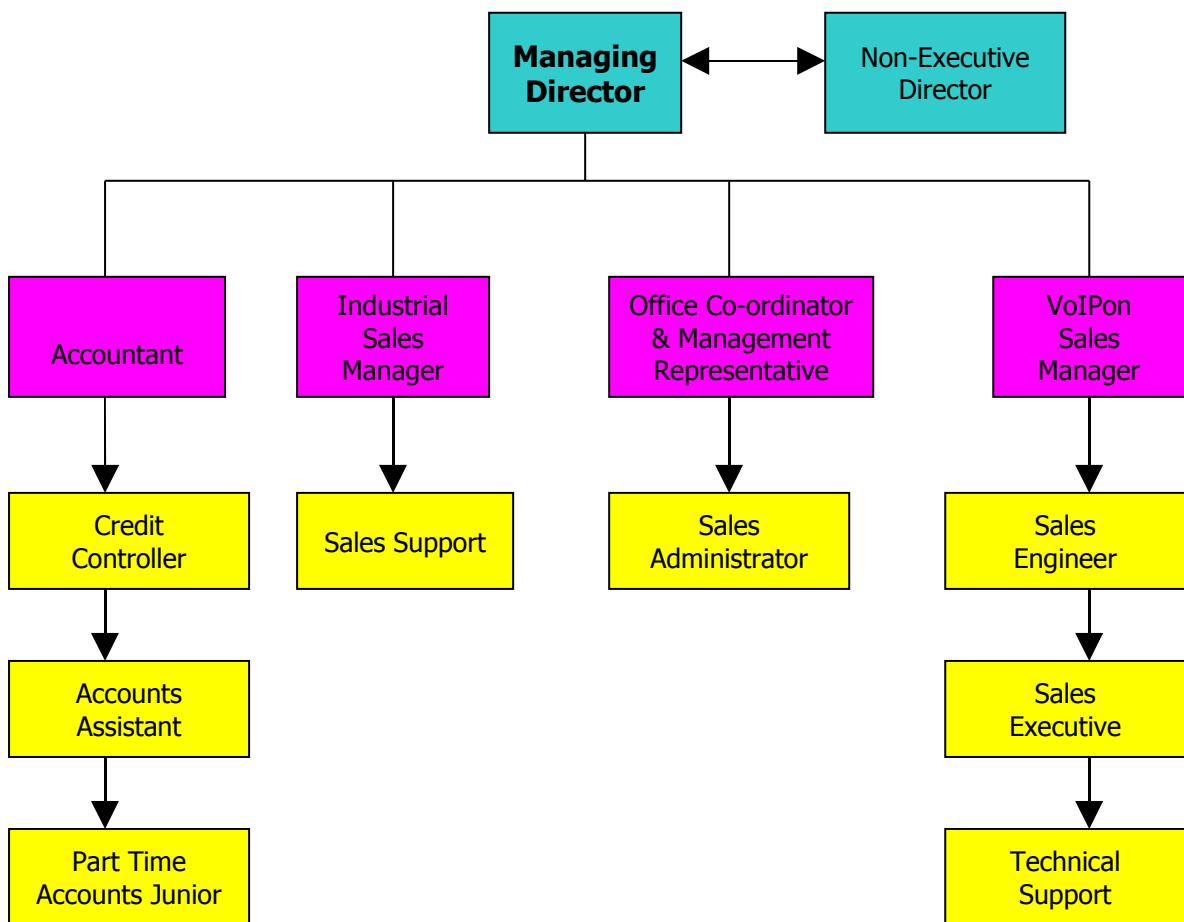
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ISO 9001:2000 Quality Management Systems – Requirements

Appendix D

Company Organisation Chart - Management Structure



Faye Hawkins is appointed The Management Representative. The Managing Director will deputise when MR is absent.

The duties of the MR shall include:

- ensuring that EMS requirements are established, implemented and maintained in accordance with ISO 14001, latest revision; and,
- reporting on the performance of the EMS to Executive Management for review and as the basis for the continual improvement of the system.

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Appendix E

GENERAL RESPONSIBILITY MATRIX

[LEGEND: L = Lead Role; S = Support Role]	MD.	MR	DM	Staff
Overall accountability for EMS	L	S		
Ensure establishment and reporting of EMS	L	S		
Communicate importance of environmental management	L	S	S	
Identify environmental aspect of activities, products and services	S	L	S	S
Establish environmental objectives and targets	L	S	S	
Comply with applicable legislative and regulatory requirements	L	S	S	S
Conform with EMS requirements	L	S	S	S
Track/analyse new regulations and maintain master list	S	L		
Obtain permits and develop compliance plans	S	L		
Prepare reports required by regulations	S	L		
Co-ordinate communications with interested parties	L	S		
Train employees	S	L	S	
Co-ordinate emergency response	L	S		
Co-ordinate EMS audits	S	L	S	
Communicate EMS expectations with suppliers and contractors	L	S	S	
Monitor key processes	S	L	S	
Maintain EMS records	S	L	S	
Co-ordinate EMS document control	S	L		
Maintain monitoring equipment	L	S		
Integrate EMS into recruiting	L	S		
Provide resources for EMS	L			

Appendix F

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COMPARISON MATRIX OF ISO 14001 ELEMENTS TO PROCEDURES

ISO 14001 Clause No.	Environmental Management System Procedure	
	GNP Reference	ISO 14001 Standard headings
4.2	EP - 00I/2008	Environmental Policy
4.3.1	EMD-01	Environmental Aspects
4.3.2	EMD-01	Legal and Other Requirements
4.3.3	KIL/O&T/2008	Objectives, Targets & Programmes
4.4.1	EMD-01	Resources, roles, responsibility and authority
4.4.2	MP-07	Competence, Training and Awareness
4.4.3	EMD-01	Communication
4.4.4	EMD-01	Documentation
4.4.5	MP-01	Control of Documents
4.4.6	MP-05 & MP-06	Operational Control
4.4.7	KIL/F&E/2006	Fire & Evacuation Instructions
4.5.1	MP-02	Monitoring and Measurement
4.5.2	EMD-01	Evaluation of Compliance
4.5.3	MP-02	Nonconformance Corrective and Preventive Action
4.5.4	MP-01	Control of Records
4.5.5	MP-03	Internal Audit
4.6	MP-04	Management Review

Appendix G

Waste Streams

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Waste Stream	Classification	EWC Code	Contractor	Disposal Method
Paper – for recycling	Non Hazardous	EWC 20.01.01	Chelmsford Borough Council	Recycle
Cardboard – for recycling	Non Hazardous	EWC 20.01.01	Chelmsford Borough Council	Recycle
Plastic – for recycling	Non Hazardous	EWC 20.01.04	Chelmsford Borough Council	Recycle
Cans – for recycling	Non Hazardous	EWC 15.01.04	Chelmsford Borough Council	Recycle
Glass – for recycling	Non Hazardous	EWC 15.01.07	Chelmsford Borough Council	Recycle
General Waste to landfill	Non Hazardous	EWC 20.03.01	Chelmsford Borough Council	Landfill
Ink Jet Cartridges	Non Hazardous	EWC 08.03.17* EWC 08.03.08	Hewlett Packard	Recycle envelopes provided by HP
Toner Cartridges	Non Hazardous	EWC 08.03.17* EWC 08.03.08	Xerox Panasonic	Recycle envelopes provided by Xerox
Kitchen Waste	Non Hazardous	EWC 20.02.01 EWC 20.01.08	Keison International	Composting on Site
Batteries	Hazardous / Non Hazardous	EWC 20.01.33* EWC 20.01.34	TBA	Waste Transfer Note and copy of carriers certificate When required
Clinical waste	Hazardous (Low level Bio hazard)	EWC 18.01.04	PHS Group Plc	Waste Transfer Note and copy of carriers certificate available
Electrical Waste Fluorescent tubes Monitors	Hazardous	EWC 20.01.35* EWC 20.01.21* EWC.16.02.13*	TBA	Waste Transfer Note and copy of carriers certificate When required

All waste streams are collected in designated bins / bags and stored within the Kitchen and external yard area prior to disposal. Kitchen waste which is bio degradable is stored in a green bin in the Kitchen and composted with the grass cuttings from the lawn in the grounds of the premise. * denotes Hazardous waste