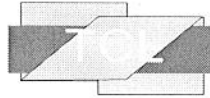


# **TRI-CONTINENTAL LIMITED**


Tricon Plaza, Braintree Road  
South Ruislip  
Middlesex, HA4 0EJ

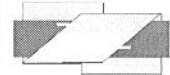


## **ENVIRONMENTAL MANAGEMENT MANUAL**

**Revision: A**

Approved for Issue  
20-Oct-11

  
PP Joseph N. Musisi  
General Manager

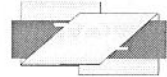


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## Introduction

### 1.1 Organisation Description

Tri-Continental Limited is a Pan Africa Distributor of Information Technology Hardware & Peripheral Equipment. We distribute our products through a network of Accredited In-Country Business Partners who install, commission and provide the full Manufacturers warranty in-country.

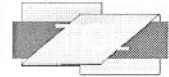
Tri-Continental Limited is a privately owned company providing its services from its head quarters in the United Kingdom.

### 1.2 Scope of Certification

Tri-Continental Limited meets the requirements of ISO 14001: 2004 at the following address: Tricon Plaza, Braintree Road, South Ruislip, Middlesex, HA4 0EJ.

### 1.3 Third Party Certification

Conformance to ISO 14001: 2004 has been verified by Sovereign Certification Limited utilising an assessment and review process. The General Manager has confirmed compliance following this process by completion of a formal written Declaration of Conformance.



## 2.0 Organisation

### 2.1 Roles & Responsibilities

The following personnel are based within or working from the company offices.

#### 2.1.1 General Manager

The General Manager is responsible for ensuring that the strategy and organisation of Tri-Continental Limited is defined and implemented to ensure effective implementation of the Environmental management System.

#### 2.1.2 EMS Services Co-ordinator

The EMS Services Co-ordinator will liaise with contractors and subcontractors to ensure that their operation has minimal impact on the environment.

#### 2.1.3 EMS Admin Manager

The EMS Admin Manager will ensure that responsible members of staff of Tri-Continental Limited (i.e. Classroom Co-ordinator, Warehouse Assistant, First Floor Co-ordinator and Ground Floor Co-ordinator) liaise with other members in their jurisdiction to ensure that the way they work has less impact on the environment and complies with the EMS policy.

#### 2.1.4 Classroom Co-ordinator

The Classroom Co-ordinator will ensure compliance to the EMS policy by the educational department.

#### 2.1.5 Warehouse Assistant

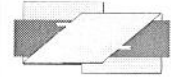
The Warehouse Assistant will ensure compliance to the EMS policy especially with waste disposal.

#### 2.1.6 First Floor Co-ordinator

The First Floor Co-ordinator will ensure compliance to the EMS policy especially with waste paper disposal and appropriate printing.

#### 2.1.7 Ground Floor Co-ordinator

The Ground Floor Co-ordinator will ensure compliance to the EMS policy especially with waste paper disposal and appropriate printing.



### **3.0 General Requirements**

#### **3.1 Description**

The environmental management system is documented within this Environmental Management Manual. The documented Environmental Management procedures are listed in Appendix E.

This manual shows the relationship between the Environmental Management System and BS EN ISO 14001. (Section 4.0 of this manual corresponds to ISO 14001: 2004 Section 4).

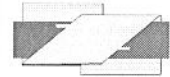
#### **3.2 Implementation and Maintenance**

It is recognised that documenting the environmental management system is only the first step towards fully implementing its requirements. For this reason the General Manager will brief all new and existing personnel on the requirements of the Environmental Management System to ensure full compliance.

The effectiveness of the implementation is measured through on-going internal audits of the environmental management system. Where implementation is deemed inadequate then steps are taken to resolve the situation in a timely manner.

The environmental management system as a whole will be reviewed during regular management review meetings where the completeness and effectiveness of the system and any steps necessary to improve it are discussed and actioned.

Whenever the environmental management system is changed the General Manager will make all relevant personnel aware of the new or revised systems and monitor them to ensure that they are implemented effectively.



## **4.0 Environmental Management System**

### **4.1 General Requirement**

Tri-Continental Limited has established this Environmental Management Manual, integrated procedures and forms to enable the implementation of an ISO 14001: 2004 compatible environmental management system.

As an organisation the following steps have been taken to ensure compliance:

- a) All requirements of ISO 14001: 2004 have been specified within this document to ensure that all personnel concerned with its operation are aware of the requirements.
- b) The General Manager shall take the lead to ensure that the environmental management system is fully implemented by all personnel.
- c) Regular management review meetings will be held to review the implementation of the requirements and identify any actions that are required to maintain and improve the system.

The scope to which this environmental management system will be applied is defined as all operations which it conducts at and from the address stated in section 1.2

### **4.2 Environmental Policy**

The company's environmental policy is defined in Appendix B and is designed to reflect the environmental needs and responsibilities of the company's activities.

In particular the policy indicates the organisation's commitment to continual environmental improvement, the prevention of pollution, conformance to legislation and other requirements in relation to our environmental aspects.

The General Manager ensures that the policy is made known to all personnel and is available to the public upon request.

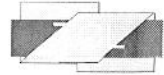
### **4.3 Planning**

#### **4.3.1 Environmental Aspects**

The company has identified the environmental aspects pertaining to its business operations and these are recorded and maintained within the management review meeting minutes to ensure that they are regularly reviewed.

The management review meeting attendees take account of the severity of the environmental aspects and the company's ability to influence them, so as they can determine which are significant.

The environmental aspects are considered when determining actions that are required to maintain the environmental management system.



#### 4.3.2 Legal and Other Requirements

The General Manager reviews all relevant environmental legislation using the NETRegs service (<http://www.environment-agency.gov.uk/netregs/>) provided online by the Environment Agency and has identified all relevant legal requirements that are relevant.

Legal requirements are reviewed on a regular basis with assistance from the automatic emails received from NETRegs whenever legislation is updated or is newly published.

The management review meeting attendees ensure that the environmental aspects identified are understood in terms of relevant legislation.

#### 4.3.3 Objectives, Targets and Programmes

Tri-Continental Limited will set out its environmental objectives and targets on a regular basis within the management review meeting minutes. Details of program dates and responsibilities will be defined. Improvements in environmental performance will be incremental and in keeping with the size of the company.

When setting objectives and targets the company will ensure that they are consistent with the environmental policy and the significant environmental aspects. In addition, technological options, financial, operational and business requirements will be considered.

In order to determine whether or not the objectives and targets are being met they will be measured, where practical, to allow progress to be monitored.

#### 4.4 Implementation and Operation

Appendix D includes a flowchart showing the sequence and interaction of the environmental management system.

##### 4.4.1 Resources, Roles, Responsibility and Authority

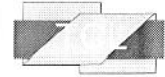
The General Manager will assign personnel to the necessary duties outlined in this manual to ensure that the environmental management system is fully implemented.

Roles and responsibilities are defined and communicated through this environmental management manual.

##### 4.4.2 Competence, Training and Awareness

The General Manager ensures that only personnel with the suitable qualification and experience are employed on work tasks which have the potential to cause a significant environmental impact. He will take action to ensure that training requirements are met and that the effectiveness of training to meet requirements is monitored. All personnel are appraised with respect to competence.

The General Manager will keep personnel fully aware of the importance of having the necessary training and experience and how they can work effectively to safeguard the environment to meet environmental objectives.



It is ensured that records of training, education, qualification and experience are maintained. Hardcopies of training certificates are held by the General Manager.

#### 4.4.3 Communication

The General Manager will ensure that all personnel are made aware of factors impacting on the environmental management systems. He will also be the person responsible for receiving, recording and responding to any environmental communications.

#### 4.4.4 Documentation

Documents that are necessary to meet the requirements of this environmental management manual shall be maintained as evidence of compliance.

#### 4.4.5 Control of Documents

Document required by 4.4.5 above shall be approved for issue and reviewed and updated as necessary. The revision status and page numbering of documents shall be implemented to ensure that incorrect documents are not inadvertently used.

Only pertinent version of documents will be made available for use and it will be ensured that they are identifiable and legible.

#### 4.4.6 Operational Control

The General Manager shall ensure that the controls and any necessary operating criteria are stipulated where activities of the company are associated with significant environmental aspects,

Where necessary documented procedures will be prepared, implemented and maintained to define the operational controls necessary to minimise the environmental impacts.

#### 4.4.7 Emergency Preparedness and Response

The company has identified the potential emergency situations and accidents pertaining to its business operations which may lead to an environmental impact. These are recorded and maintained within the management review meeting minutes to ensure that they are regularly reviewed and tested.

Where necessary documented procedures will be prepared, implemented and maintained to define the emergency response.

#### 4.5 Checking

Tri-Continental Limited monitors and measures the effectiveness of its management systems through internal audit to ensure that the systems are competently implemented. Other operational monitoring is taken to ensure that the services are undertaken to a satisfactory environmental.





#### 4.5.1 Monitoring and Measurement

Where required Tri-Continental Limited maintain registers of calibrated equipment used to monitor environmental aspects to ensure that they are not inadvertently used and that a suitable calibration certificate exists for all equipment in use.

#### 4.5.2 Evaluation of Compliance

Conformance with legislation is reviewed in accordance with section 4.3.2 and evidence of evaluation is maintained through the management review process.

#### 4.5.3 Nonconformity, Corrective Action and Preventive Action

All significant non-conformances are reported to management for completion of a Non-conformance Report (Appendix G). The following procedure outlines the process.

In order to achieve continual improvement, the causes of environmental problems that become known will be investigated and action taken to avoid recurrence.

Tri-Continental Limited understands that it is preferable and more effective to prevent environmental problems occurring. Acting in a proactive way is preferable to acting reactively. The General Manager in consultation with other parties will therefore take opportunities to reflect on situations and take preventive action wherever possible.

#### 4.5.4 Control of Records

The organisation shall maintain records as evidence that the requirements of this environmental management manual have been met. The records will be maintained so that they can be located and referred to easily.

#### 4.5.5 Internal Audit

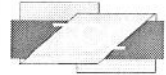
An internal audit programme is devised on an annual basis ensuring that all parts of the management systems are reviewed to ensure that they continue to meet the requirements of ISO 14001: 2004.

The internal audits are undertaken by appropriately trained and / or capable auditors and recorded on an Audit Form (Appendix H) together with any audit finding on a Non-conformance Report (Appendix G).

### 4.6 Management Review

Management review meetings are undertaken to the requirements of ISO 14001: 2004 and all pertinent aspects are reviewed and actions taken as required. The meeting is undertaken at least 6-monthly in accordance with the agenda outlined in Appendix F. The meeting is attended by the General Manager and any other interested parties.

The management review meeting is used as the pivotal means of ensuring that its systems are fully implemented and effective.

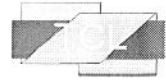


## APPENDIX A

### Definitions

"the Standard"	BS EN ISO 14001: 2004 Environmental Management Systems
"management system"	The defined methods, practices and organisation to meet the environmental requirement. The term Environmental Management System is synonymous.
"management manual"	The documented environmental system. Other documented procedures may be retained separately.
"management procedures"	The procedures documenting the environmental systems.
"environment"	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.
"environmental aspect"	Activities that can interact with the environment.
"environmental impact"	A change to the environment resulting from an environmental aspect.
"controlled copy"	The issue of a document that will be updated whenever it is revised.
"controlled issue"	The issue of a document where proof of receipt is sought from the recipient.

Note: The words "shall", "must" and "will" denote a mandatory requirement and "should" denotes a recommendation. The word "may" denotes permission and is neither a recommendation nor a requirement.



APPENDIX B

## ENVIRONMENTAL POLICY

Tri-Continental Limited is aware that operating its business has a significant impact on the environment. It is therefore essential that all parties concerned, either within or outside our organisation, combine their efforts to both recognise and reduce the impact our operations have upon it.

To this end we at Tri-Continental Limited commit to the following statements:

To operate our business in a manner that is sensitive to the needs and concerns of the people and the surrounding environment.

To use where practical the latest technology to develop sound environmentally conscious means of providing our services.

To integrate environmental issues into our decision making, whilst recognising that business concerns might affect the course of action.

Where practical to reduce or eliminate pollution

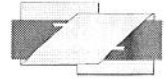
To continually look for ways to improve our business and reduce our environmental impact.

To educate and train our employees in the use of environmentally conscious practices, recognising that no matter what their roles are, they are also responsible for protecting the environment.

To ensure compliance with relevant environmental legislation and other requirements related to our operations.

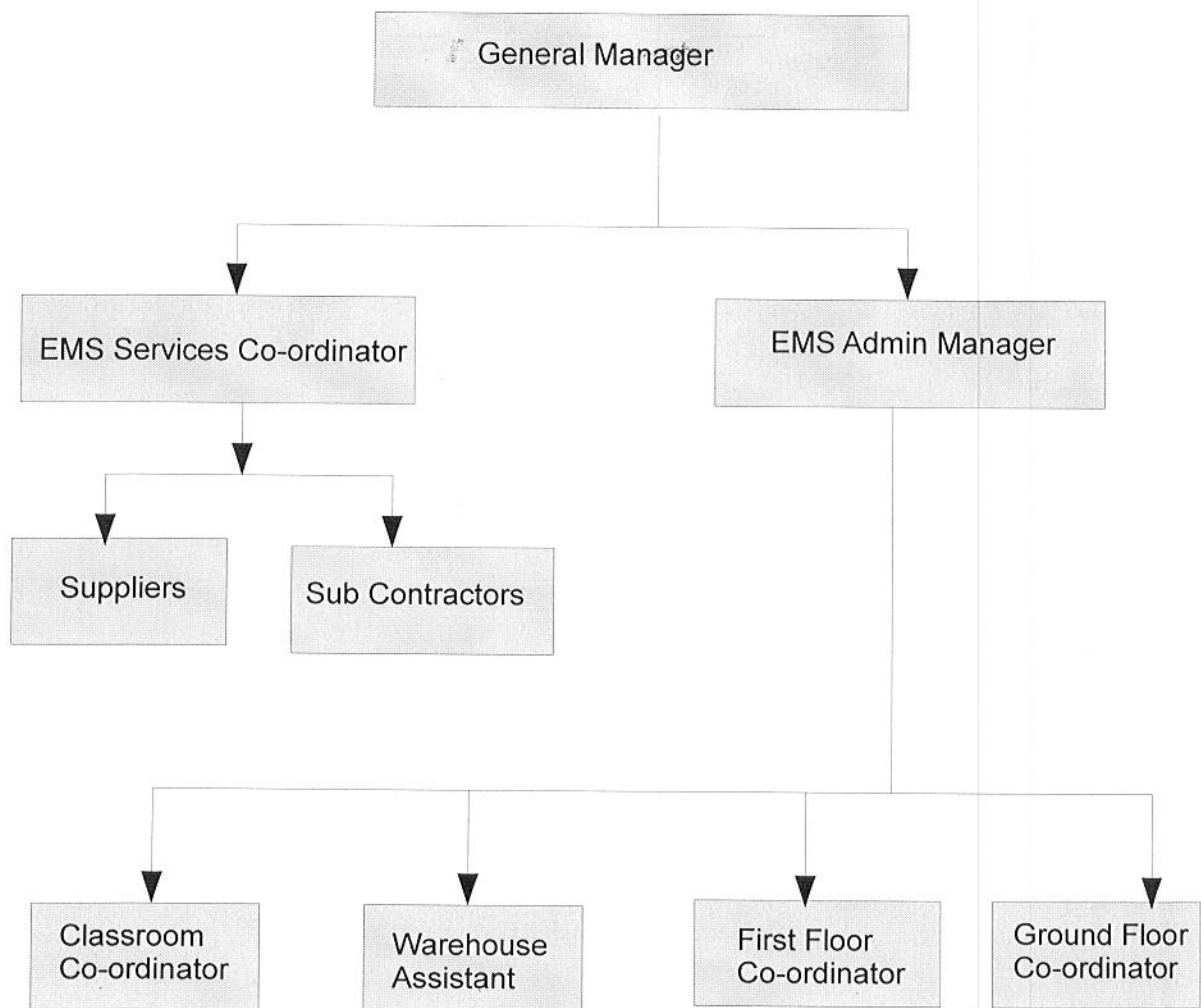
To set and achieve our environmental objectives and targets.

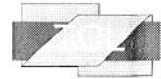
20 October 2011  
Joseph N. Musisi  
General Manager



APPENDIX C

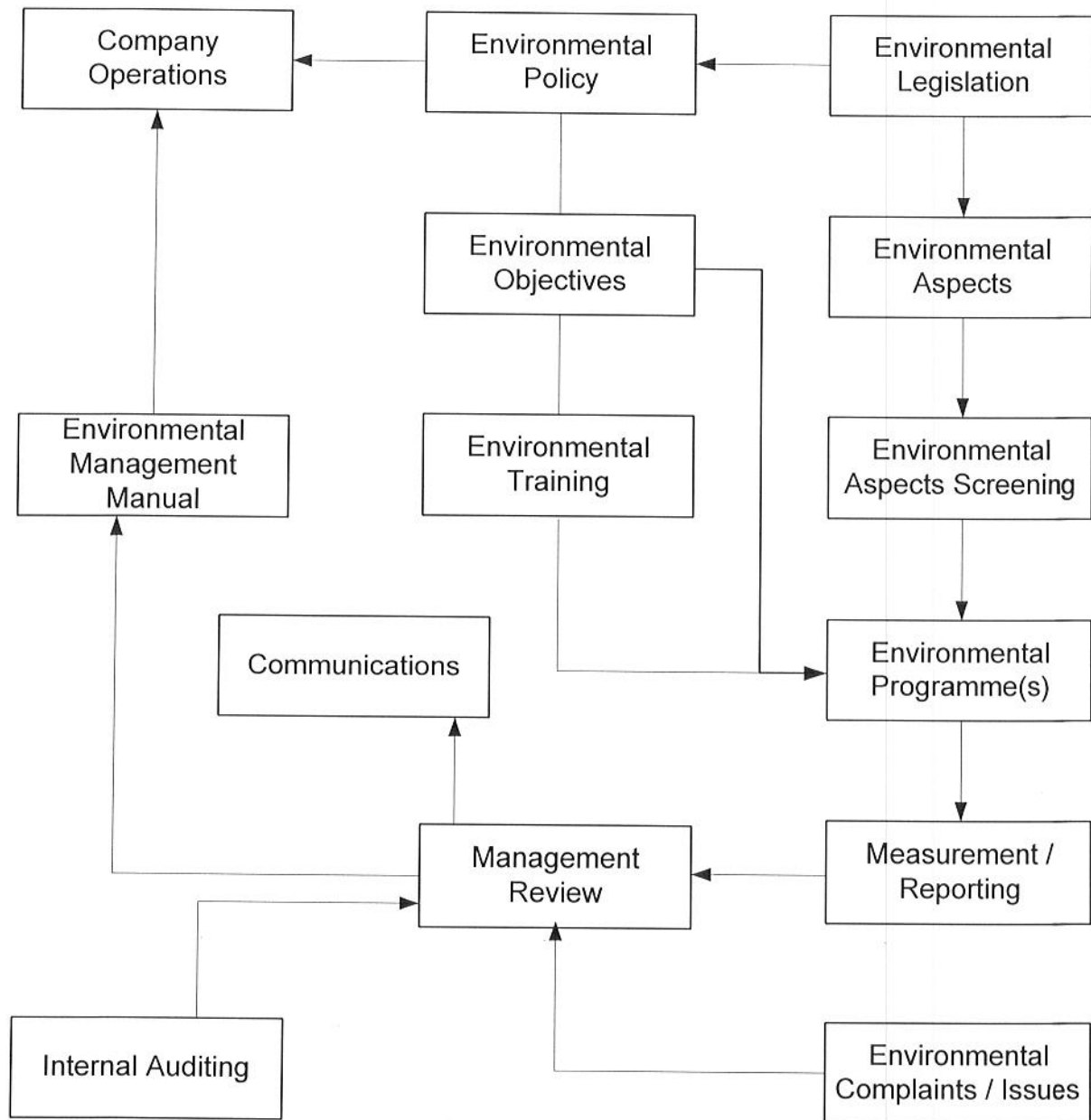
**TCL Environment Management System Organisation Chart**

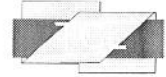




## APPENDIX D

### Environmental Management Processes

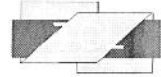




## APPENDIX E

## Index of Management Procedures

Title	Reference
<u>ISO 14001: 2004 Procedures</u>	
Environmental Aspects	Section 4.3.1
Legal & Other Requirements	Section 4.3.2
Competence, Training & Awareness	Section 4.4.2
Communication	Section 4.4.3
Control of Documents	Section 4.4.5
Operational Control	Section 4.4.6
Emergency Preparedness & Response	Section 4.4.7
Monitoring & Measurement	Section 4.5.1
Evaluation of Compliance	Section 4.5.2
Non-conformity, Corrective Action & Preventive Action	Section 4.5.3
Control of Records	Section 4.5.4
Internal Audit	Section 4.5.5
<u>Operational Procedures</u>	
List any other operational procedures that are needed to ensure proper environmental compliance.	



## APPENDIX F

## Management Review Meeting

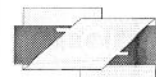
Attendance:		Date:
Item	Agenda Item	Action by
<b>1</b>	<b>Actions from previous meeting</b>	
1.1	"Discuss and detail progress and closure of actions from the previous meeting"	
<b>2</b>	<b>Internal audit results</b>	
2.1	"Discuss the results for the internal audits that you have undertaken during the previous period. Show analysis of results where possible"	
<b>3</b>	<b>Environmental Communications / Complaints</b>	
3.1	"Discuss customer complaints and actions taken and to be taken. Show analysis where possible."	
<b>4</b>	<b>Environmental Performance</b>	
4.1	"Discuss the overall environmental performance. Show analysis where possible."	
<b>5</b>	<b>Objective &amp; Targets / Continual Improvement</b>	
5.1	"Discuss the Environmental Programme (below) adding / updating table."	
<b>6</b>	<b>Corrective &amp; Preventive Actions</b>	
6.1	Discuss corrective & preventive actions	
<b>7</b>	<b>Environmental Aspects</b>	
7.1	Discuss what may be forthcoming / changing to affect the environmental aspects and update table below.	
<b>8</b>	<b>Preventive Actions / Suggestions</b>	
8.1	"Discuss and record what steps have been and will be taken to avoid the occurrence of any problems that are likely to rise."	
<b>9</b>	<b>Resources</b>	
9.1	"Discuss resources and decide whether any changes need to be made to the resource levels currently in place."	
<b>10</b>	<b>Next Meeting</b>	DD/MM/YY
Record and retain the Management Review Minutes.		

## 11 - Minutes of Meeting – Environmental Programme

Overall Objective What is aimed for	Specific Action What will be done	Target Date / Measure of completion	Action by

## 12 - Minutes of Meeting - Environmental Aspects

Aspects Aspects that have environmental impacts	Legal Requirement (NetRegs)	Management & Monitoring How the organisation is managing & monitoring this aspect

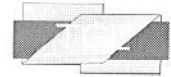


## APPENDIX G

## Non-conformance Report

NCR No. :	Date:	Audit No. : (where relevant)
<b>Description of Non-conformance</b> Raised due to : (delete not applicable) Internal Audit / Customer Complaint / Normal Working          Reported by :		
<b>Remedial Action (fix immediate problem)</b>          		
Action by :	To be completed by :	(date)
<b>Action to Prevent Recurrence (the corrective action)</b>          		
Action by :	To be completed by :	(date)
<b>Corrective Action Completed</b>          		
General Manager	(signed)	(date)





## APPENDIX H

## Audit Report

Audit No. :	Date :	No. of Non-conformances raised :
Scope of Audit (what was audited):		
Auditor (who did the audit) :		
Auditees (who was audited):		
<u>Summary of Audit Findings</u> (what was discovered during the audit)		
<u>Observations / Recommendations</u> (is there anything that should be considered that was not included on a non-conformance report?)		
<u>Audit Completion</u>		
Auditor	(signed)	(date)