

Revision: 003
Dated: 8/31/2018

GMA/Syncom

**Environmental Management Systems
ISO-14001:2015
Policy Manual
Controlled Copy**

Document GMA-EMS 001

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This publication establishes the basic Environmental Management System functions and policies of GMA/Syncom to ensure the required high quality of all programs.

The use of this publication at GMA/Syncom is hereby authorized.

Supersede Document

N/a

Approved By:

Date

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Revision Policy

The Environmental Policy Manual shall be revised to reflect any changes to the GMA/Syncom Environmental Management System (EMS).

At the discretion of the President, revisions and affected paragraphs shall be submitted to the Environmental Management System Management Team for their review. When a revision occurs, the Environmental Management System (EMS) Policy Manual shall be re-issued.

The Environmental Management Representative is responsible for the maintenance of the Environmental Management System (EMS) Policy Manual as described and for reviewing the manual annually.

Accepted revisions to the Environmental Management System (EMS) Policy Manual are recorded on the Revision Log per Document Control requirements.

The manual is distributed and maintained on a controlled-copy basis, with manual holders receiving copies of new or revised policies to document changes for reasons that include the following.

- The addition of new commodities or product lines to the location.
- A change of manufacturing location for existing parts.
- The introduction of significant new equipment or process changes.
- Changes relative to safety, critical, or reliability characteristics.
- Significant changes in the organizational structure.

Revisions will be submitted when the above, or the appropriate conditions dictate.

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Section X1 Definitions

The Management Teams

The following “Teams” used in this manual are defined below:

Job Title	EMS Management Team	Cross Functional Team (CFT)

Continual Improvement

Process of enhancing the Environmental Management System to achieve improvements in overall environmental performance in line with the organization’s Environmental Policy.

Environment

Surroundings in which an organization operates including air, water, land, natural resources, flora, fauna, human’s and their interrelations.

Environmental Aspect

Elements of an organization’s activities, products or services that can interact with the environment.

Environmental Impact

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s activities, products or services.

Environmental Management System

The part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the Environmental Policy.

Environmental Management System Audit

A systemic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organization’s Environmental Management System conforms to the Environmental Management System audit criteria set by the organization, and for the communication of the results of this process to management.

Environmental Objective

Overall environmental goal arising from the Environmental Policy that an organization sets itself to achieve, and which is quantified where practicable.

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Environmental Performance

Measurable results of the Environmental Management System related to an organization's control of its environmental aspects based on its environmental policy, objectives and targets.

Environmental Policy

Statement by the organization of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.

Environmental Target

Detailed performance requirement quantified where practicable, applicable to the organization or parts thereof that arises from the environmental objectives and that needs to be set in order to achieve those objectives.

Interested Party

Individual or group concerned with or affected by the environmental performance of an organization.

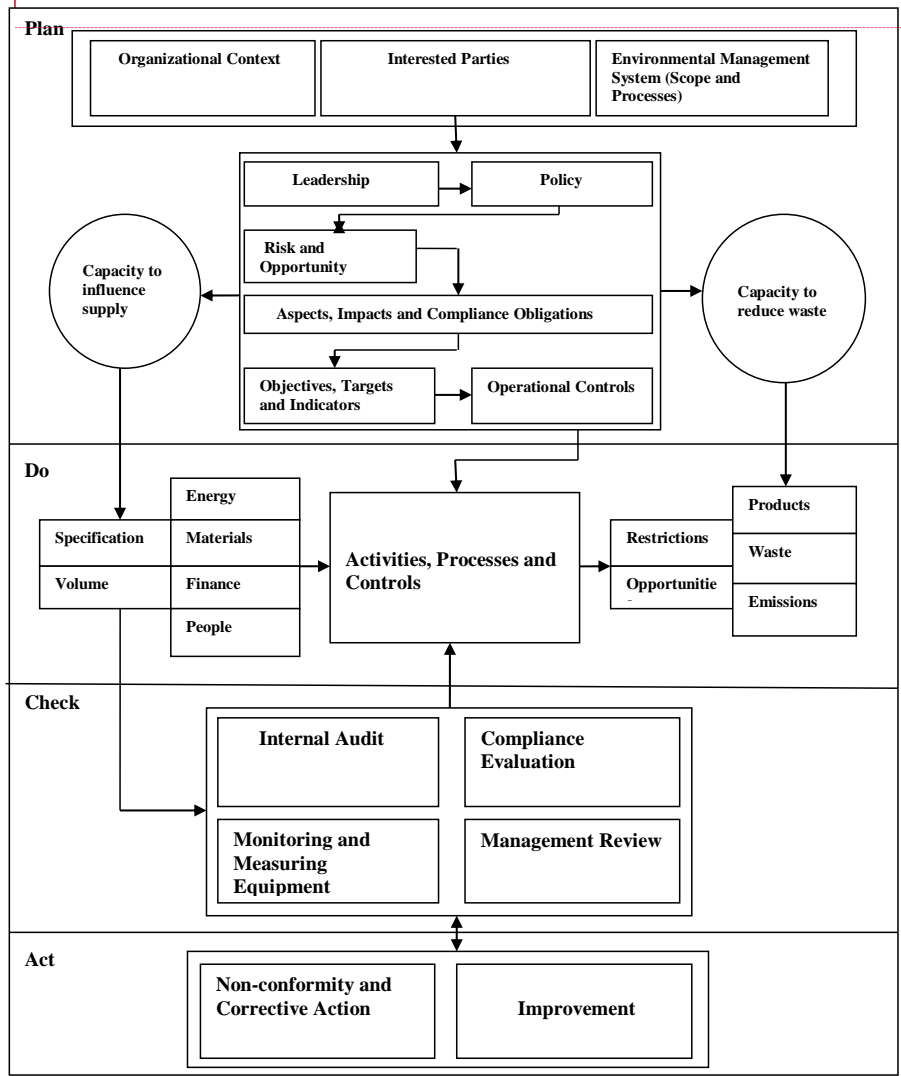
Organization

Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

Prevention of Pollution

Use of processes, practices, materials or products that avoid, reduce or control pollution which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution.

EMS Process Map



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1.0 **Scope of Environmental Management System**

The GMA/SYNCOM Specialties EMS Manual specifies the requirements of our Environmental Management System which is in compliance with the requirements of the International Standard ISO14001:2015 and consistent with our organization's environmental policy implemented as a means to;

- Enhance our environmental performance
- Fulfill our compliance obligations, and
- Achieve environmental objectives

To facilitate cross-referencing, the sections

The principal elements of the system described in this manual are:

- Environmental Policy
- Environmental Aspects
- Legal and Other Requirements
- Environmental Objectives and Targets
- Environmental Management Programs
- Organizational Structure and Responsibility
- Training, Awareness and Competence
- Communication
- Document Control
- Operational Control
- Emergency Preparedness and Response
- Monitoring and Measurement
- Nonconformance and Corrective and Preventive Action
- Records
- Environmental Management System Audit
- Management Review

2.0 **Scope**

GMA/Syncom's EMS provides a mechanism for environmental management throughout all areas and departments. The Environmental Management System is designed to cover environmental aspects which a facility can control and directly manage and those it does not control or directly manage but can be expected to influence.

3.0 **Issue and Update**

The control of this manual is in accordance with the GMA/Syncom Facility environmental procedure EMS-P-012 Environmental Document Control. All copies of

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this manual not marked “CONTROLLED DOCUMENT” are uncontrolled and should be used for reference purposes only.

Amendments to this manual will be issued by the Environmental Management Representative.

4.0 Context of the Organization

4.1 Understanding the Organization and its Context

GMA/SYNCOM Management has determined relevant external and internal issues and items that may become relevant to the company’s purpose and strategic direction and may affect our ability to achieve the intended results of the Environmental Management System. Such issues include environmental conditions being affected by or capable of affecting our organization.

GMA/SYNCOM is committed to defining our position in the marketplace and understanding how relevant factors arising from legal, political, social and technological issues influence our strategic direction and our organizational context.

GMA/SYNCOM identifies, analyses, monitors and reviews factors that may affect our ability to satisfy our customers and stakeholders, as well as factors that may adversely affect the stability of our process or our management system’s integrity.

To ensure that our EMS is aligned with our strategy, taking into account relevant internal and external factors, we analyze pertinent information in order to determine potential impact on our context and subsequent business strategy.

GMA/SYNCOM monitors and reviews this information during our Management Review meetings to ensure that a continual understanding of each group’s requirements is derived and maintained. To facilitate the understanding of our context, we consider issues that influence our context during management review meetings and are conveyed via minutes and business planning documents. The output from this activity is evident as an input to the consideration of risks and opportunities and the actions that we take to address them (Ref. Section 6.1 for more information about the risk and opportunity management framework.

Internal Issues

- Market share
- Performance
- Employees
- Capacity, Values and Culture
- Innovation and Knowledge

External Issues

- Customer and Suppliers
- Markets and Compensation
- Regulatory and Statutory
- Economic backdrop
- Technological
- Cultural and Social

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The following information is evaluated by management for strategic direction to our organizational context;

1. Analysis of business plans, strategies and statutory and regulatory commitments
2. Analysis of technology and competitors
3. Economic reports or periodicals from relevant business sectors
4. Technical reports
5. Minutes of meetings, process maps, reports, etc.

Refer Procedure EMS-P-002 Environmental Aspects, Objectives, Targets and Management Programs

4.2 Understanding the Needs and Expectations of Interested Parties

The effect or potential effect on our organization’s ability to consistently provide products and services that meet our customer and applicable and regulatory requirements, GMA/SYNCOM has determined the following;

1. The interested parties relevant to the QMS
2. The requirements of the identified interested parties relevant to the QMS
3. Which of those needs and expectations became our compliance obligations.

GMA/SYNCOM is committed to continually monitoring, reviewing and analyzing information and relevant requirements of the interested parties to assure their requirements are effectively managed in the EMS.

GMA/SYNCOM recognizes that we have a unique set of interested parties whose needs and expectations change and develop over time, and furthermore, that only a limited set of their respective needs and expectations are applicable to our operations or to our quality management system. Such needs and expectations include those shown in the table below;

Interested Parties	Needs and Expectations	EMS Processes
Customers	Price, reliability & value	All processes of our EMS
Owners/Shareholders	Profitability & Growth	
Employees	Shared values and security	Human Resources, Accounting, Training,
Suppliers	Beneficial relationships	
Regulatory & Statutory	Compliance and reporting	Purchasing, Contracts, Incoming Inspection

To ensure that our products and processes continue to meet all relevant requirements, we identify and assess the potential impact of any relevant needs and expectations that may be elicited from the interested parties.

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Where appropriate, to ensure our products and processes are aligned to deliver the requirements of our interested parties, we convert relevant needs and expectations into requirements which become inputs to our QMS and to our products.

Refer Procedures EMS-P-009 Agency Approvals and EMS-P-011 Contractor Control

4.3 Determining the Scope of the EMS

Our organization has determined the boundaries and applicability (see 1.2) of our Environmental Management System and its scope.

When determining the scope, our organization considered

- a) The internal and external issues referred to in 4.1
- b) The compliance obligations referred to in 4.2
- c) Our organizational unit functions and physical boundaries
- d) Our activities, products and services
- e) Our authority and ability to exercise control and influence

Once the scope was defined, all activities, products and services of our organization within the scope were included in the EMS.

The scope of our Environmental Management System is documented in the MES Manual (see Section 1)

4.4 Environmental Management System (EMS)

To achieve the intended outcome including enhancing environmental performance, our organization established, implemented, maintains and continually improves our Environmental Management System including processes needed and their interactions, in accordance with the requirements of ISO14001:2015

Our organization considered the knowledge gained in 4.1 and 4.2 when establishing our Environmental Management System and that knowledge is also considered when maintaining our system

5.0 Leadership

5.1 Leadership and commitment

Our top management demonstrates leadership and commitment with respect to our environmental management system by;

- a). taking accountability for the effectiveness of our environmental management system
- b). ensuring our environmental policy and environmental objectives are established and compatible with the strategic direction and context of our organization

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- c). ensuring the integration of our environmental management system requirements into our organization's business process
- d). ensuring the resources needed for our environmental system are available
- e). communicating the importance of effective environmental management and of conforming to our environmental management system requirements
- f). ensuring our environmental management system achieves its intended outcomes
- g). directing and supporting employees to contribute to the effectiveness of our environmental management system.
- h). promoting continual improvement.
- i). supporting other relevant management roles to demonstrate that leadership as it applies to their areas of responsibility.

5.2 Environmental Policy

The following Environmental Policy is established by the President/CEO of GMA/SYNCOM considering the purpose and context of our organization.

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EMS POLICY

Our Environmental Policy is to be a responsible corporate citizen in protecting the environment. We are committed to complying with accepted environmental practices and obligations, including the commitment to meet or exceed applicable legal and other requirements, to strive for continual improvement in our Environmental Management System, and to minimize the creation of wastes and pollution. We will therefore manage our processes, our materials, and our people in order to reduce the environmental impacts associated with our work.

Our Environmental Policy provides the framework for setting and reviewing environmental objectives and targets. Our Environmental Policy is documented, implemented and maintained and communicated to all employees.

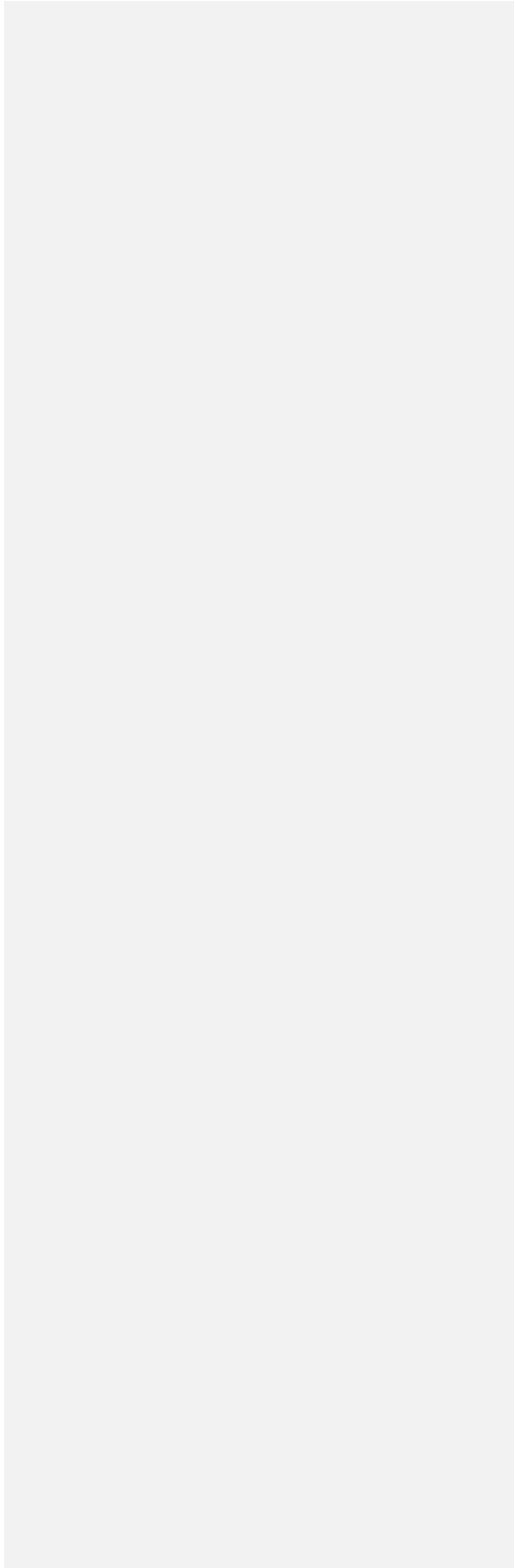
GMA/Syncom pledges to implement and operate the ISO-14001 Environmental Management System to further enhance environmental performance. Our main objectives and commitments are to:

- **Investigate the reduction of hazardous and toxic chemicals**
 - **Reduce, reuse and recycle waste and packaging**
 - **Improve the efficiency of energy waste**

This policy will be communicated to all parties interested in the performance of our environmental management system, including the public.

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5.3 Organizational Roles, Responsibilities and Authorities

Our top management ensures that the responsibilities and authorities are relevant roles assigned and communicated within our organization.

Environmental management is the responsibility of all levels of management and is led by top management. Our Environmental Management Team is the management group operating under the direction of the President/CEO with overall responsibility for decisions concerning the establishment, implementation, maintenance and continual improvement of our Environmental Management System. In addition to the President/CEO, the Management group consists of the Plant Manager, Office Manager, Maintenance Manager, QM/Business Manager, EMS Representative and other relevant Management Personnel.

The President/CEO establishes the Company Environmental Policy and is responsible for providing the resources (human, infrastructure, technological, and financial) for the establishment, implementation, maintenance and continual improvement of our Environmental Management System.

The Environmental Management Representative (EMR) has the assigned responsibility and authority for;

- a) Determining and ensuring that the resources needed for the establishment, implementation, maintenance and continual improvement of the Environmental Management System are provided for;
- b) Ensuring that our Environmental Management System is established;
- c) Addressing the risks and opportunities related to our environmental aspects, compliance obligations and other issues and requirements identified;
- d) Ensuring that performance evaluations (monitoring, measurement analysis and evaluation, internal audits, management reviews) are conducted at planned intervals;
- e) Preparing and submitting information (application and efforts) necessary to comply with the legal requirements of federal, state, county and local regulatory agencies;
- f) Ensuring that corrective actions are appropriate to the significance of the effects of any nonconformities encountered including the environmental impacts;
- g) Ensuring our Environmental Management System conforms to the requirements of ISO14001:2015;
- h) Reporting of the performance of our Environmental Management System including environmental performance to our Environmental Management Team.

The environmentally related responsibilities of management and supervisory personnel and other relevant roles are further defined in applicable EMS documents including environmental procedures, environmental work instructions and environmental instructions.

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6.0 Planning

6.1 Actions to Address Risk and Opportunities

6.1.1 General

Our planning for our EMS takes into consideration understanding our organization and its context (see Section 4.1) and the needs and expectations of our interested parties (See Section 4.2) as well as determines risk and opportunities. We assess risk and opportunities using various processes as well as inherently in everything we do. The following summarize our approach to risk and opportunities:

- a). We determine that our EMS can achieve its intended results through our Environmental Objectives, Management Reviews, internal audits, and within all of our processes. Key processes that address the risks associated with within each process are Customer Contracts, Customer-Related Processes, Contract Review, Purchasing and Production and Service Provision. Additionally, all other processes identify the impact/risk on our business and customers both internally and externally.
- b). That the output of all our processes is intended to achieve our planned results
- c). By assessing risk as identified above, we expect to eliminate or reduce unintended results
- d). Through defining the aforementioned, we strive to achieve continuous improvement.

GMA/SYNCOM has planned actions to address the above risks and opportunities and has initiated appropriate procedures to integrate and implement appropriate actions into our EMS including the evaluation of the effectiveness of the EMS processes.

6.1.2 (ISO)

Any actions taken to address tasks and opportunities shall be proportionate to the potential impact on the conformity of products and services.

The overall aim of risk and opportunity management with GMA/SYNCOM is to ensure that organizational capabilities and resources are employed in an efficient and effective manner to take advantage of the opportunities to mitigate risks.

Whether it's a FMEA or simply not accepting a purchase order, these are activities which determine risks and opportunities. In some circumstances, a business decision may be to accept the risk.

We have integrated our risk assessment (risk-based thinking) into our processes and generically define how we will address any associated risk and opportunities throughout our processes. The following are some areas within our EMS that affect risk:

- a). Context of the Organization
- b). Expectation of Interested Parties

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- c). Corrective Action
- d). Analysis of Data
- e). Management Review
- f). Leadership
- g). Customer Focus and Expectations
- h). All of our Processes

By integrating our risk assessment into our processes, this enables us to assess the effectiveness associated with the specific process. Our process maps assist us in assessing the process characteristics such as inputs (expectations), criteria (metrics) and other high-level information to assist in the effective execution and improvement of our processes.

Our organization establishes, implements and maintains processes needed to meet the requirements in 6.1

When playing for our Environmental Management System, our organization considers

- a) The issues referred in 4.1
- b) The requirements referred to in 4.2
- c) The scope of our Environmental Management System

And determines the risks and opportunities related to our environmental aspects (see 6.1.2), compliance obligations and other issues and requirements identified in 4.1 and 4.2 (that need to be addressed to;

- Give assurance that our Environmental Management System can achieve its intended outcomes
- Prevent or reduce undesired effects including the potential the external environmental conditions to affect the organization
- Achieve continual improvement

Within the scope of our Environmental Management System our organization determines potential emergency situations including those that have an environmental impact.

Our organization maintains documented information of

- Processes needed in 6.1.1 – 6.1.4 to the extent necessary to ensure they are carried out as planned

Refer Procedures EMS-P-007 Legal and Other Requirements

6.1.2 Environmental Aspects

Within the defined scope of our Environmental Management System, our organization determines the environmental aspects of our activities, products and services that we can control

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and those that we can influence and their associated environmental impacts, considering life cycle perspective.

When determining environmental aspects, the organization takes into account;

- a) Change, including planned and new or modified activities, products and services
- b) Abnormal conditions and reasonably foreseeable emergency situations

Our organization determines these aspects that have or can have a significant environmental impact (significant environmental aspects) by using established criteria.

Our organization communicates our significant environmental aspects among the various levels and functions of our organization as appropriate.

Our organization maintains documented information of our

- Environmental aspects and associated environmental impacts
- Criteria used to determine significant environmental aspects
- Significant environmental aspects

Refer Procedure EMS-P-002 Environmental Aspects

6.1.3 Compliance Obligations

Our organization

- a) Determines and has access to compliance obligations related to our environmental aspects
- b) Determines how those compliance obligations apply to our organization
- c) Takes those compliance obligations into account when establishing, implementing and continually improving our Environmental Management System.

Our organization maintains documented information of our compliance obligations.

6.1.4 Planning Action

Our organization plans

- a) To take action to address our:
 - 1) Significant environmental aspects
 - 2) Compliance obligation
 - 3) Risks and opportunities identified in 6.1.1
- b) How to:
 - 1) Integrate and implement those actions into our Environmental Management System processes or other business processes.
 - 2) Evaluate the effectiveness of those actions

When planning these actions, our organization considers technological and financial options.

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6.2 Environmental Objectives and Planning to Achieve Them

6.2.1 Environmental Objectives

Our organization establishes environmental objectives at relevant functions and levels, taking into account our organization's significant environmental aspects and associated compliance obligations, and gives consideration to our risks and opportunities.

Our Environmental Objectives are

- a) Consistent with our Environmental Policy
- b) Measurable (where practical)
- c) Updated or appropriate

Our organization maintains documented information on our environmental objectives.

6.2.2 Planning actions to Achieve Environmental Objectives

When planning to achieve environmental objectives, our organization determines;

- a) What will be done
- b) What resources will be requested
- c) When it will be completed
- d) How the results will be evaluated including indicators for monitoring process toward achievement of our measurable environmental objectives.

Our organization considers how actions to achieve our environmental objectives can be integrated into our organization's business processes.

7.0 Support

7.1 Resources

Our organization determines and provides the resources needed for the establishment, implementation, maintenance and continual improvement of the Environmental Management System.

7.2 Competence

Our organization

- a) Determines the necessary competence of persons doing work under our control that affects our environmental performance and our ability to fulfill our competitive obligations
- b) Ensures these persons are competent on the basis of appropriate education, training and/or experience
- c) Determines the training needs associated with our Environmental Management System
- d) Takes appropriate action to acquire the necessary competence and evaluate the effectiveness of the actions taken where applicable

Refer Procedure EMS-014 Environmental Training and Awareness

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7.3 Awareness

Our organization ensures that persons doing work under our control are aware of

- a) Our Environmental Policy
- b) The significant environmental and related actual or potential environmental impacts associated with their work
- c) Their contribution to the effectiveness of our Environmental Management System including the benefits of enhanced environmental performance
- d) The implications of not conforming with our Environmental Management System requirements including not fulfilling our organization's compliance obligations.

Refer Procedure EMS-P-014 Environmental Training and Awareness

7.4 Communication

7.4.1 General

Our organization establishes, implements, and maintains the processes needed for internal and external communications relevant to our Environmental Management System including;

- a) What to communicate
- b) When to communicate
- c) With whom to communicate
- d) How to communicate

Refer Procedure EMS-P-010 Environmental Communication

7.5.2 Creating and Updating

When creating and updating documented information, our organization ensures appropriate

- a) Identification and description (title, date author, number)
- b) Format (eg. language, software version, Graphics and media, paper and electronic)
- c) Review and approval for suitability and accuracy

Refer Procedure EMS-P-012 Control of Documents

7.5.3 Control of Documented Information

Documented information required by our Environmental Management System and by ISO14001;2015 is controlled to ensure that it is;

- a) Available and suitable for use when and where it is needed
- b) Adequately protected (eg. from loss of confidentiality, improper use or loss of integrity).

For the control of documented information, our organization addresses the following activities as applicable

- Distribution access, retrieval and use
- Storage and preservation including preservation of legibility
- Control of changes (eg. Revision control)
- Retention and disposition

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Documented information of external origin determined by our organization to be necessary for the planning and operation of our Environmental Management System is identified as appropriate and controlled.

**Refer Procedure EMS-P-012 Control of Documents
and Procedure EMS-P-013 Environmental Records**

Section 8 Operation

8.1 Operational Training and Control

Our organization establishes, implements, controls, and maintains the processes needed to meet our Environmental Management System requirements and to implement the actions identified in 6.1 and 6.2 by;

- a) Establishing operating criteria for these processes
- b) Implementing control of those processes in accordance with the operating criteria

Our organization controls planned changes and reviews the consequences of unintended changes, taking actions to mitigate and adverse reactions as necessary.

Our organization ensures outsourced processes are controlled or influenced. The type and extent of control or influence applied to those processes is defined within our Environmental Management System.

Consistent with a life cycle perspective, our organization

- a) Establishes controls as appropriate to ensure environmental requirements are addressed in the design and development process for products considering each life cycle stage
- b) Determines environmental requirements for procurement of products or services as appropriate
- c) Communicates relevant environmental requirements for external providers
- d) Considers the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use end of life treatment and final disposal of products.

Our organization maintains documented information to the extent necessary to have confidence that processes have been carried out as planned.

**Refer Procedures EMS-P-014 Environmental Training and Awareness
and Procedure EMS-P-016 Operational Control**

8.2 Emergency Preparedness and Response

Our organization implements and maintains the processes needed to prepare for and respond to the potential emergency situations identified in 6.1.1

Our organization;

- a) Prepares to respond by planning actions to prevent or mitigate adverse environmental impacts resulting from emergency situations
- b) Responds to actual emergency situations

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- c) Takes action to prevent or mitigate the consequences of emergency situations appropriate to the magnitude of the emergency and the potential environmental impact
- d) Periodically tests planned response actions where practical
- e) Periodically reviews and revises our processes and planned response actions, in particular after the occurrence of emergency situations or tests
- f) Provides relevant information and response, as appropriate to relevant interested parties, including persons working our control

Our organization maintains documented information to the extent necessary to have confidence that our processes are carried out as planned.

Refer Procedure EMS-P-006 Emergency Preparedness and Response

Section 9 Performance and Evaluation

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

Our organization monitors, measures, analyzes, and evaluates our environmental performance. Our organization determines

- a) What needs to be monitored and measured
- b) The methods for monitoring, measurement analysis and evaluation as applicable to ensure valid results
- c) The criteria against which our organization will evaluate our environmental performance, and appropriate indicators.
- d) When the monitoring and measuring shall be performed
- e) When the results from monitoring and measurement equipment is used and maintained as appropriate.

Our organization ensures that calibrated or verified monitoring and measurement equipment is used and maintained as appropriate

Our organization evaluates environmental performance and the effectiveness of our Environmental Management System

Our organization communicates relevant environmental performance information both internally and externally, as identified in our communication processes and as required by our compliance obligations.

Our organization retains appropriate documented information as evidence of the monitoring measurement analysis and environmental results

Refer Procedure EMS-P-015 Monitoring and Measurement

9.1.2 Evaluation of Compliance

Our organization establishes, implements and maintains the processes needed to evaluate fulfillment of our compliance obligations.

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Our organization

- a) Determines the frequency that compliance will be evaluated
- b) Evaluate compliance and take action if needed
- c) Maintains knowledge and understanding of compliance evaluation status

9.2 Internal Audit

9.2.1 General

Our organization conducts internal audits at planned intervals to provide information on whether our Environmental Management System

- a) Conforms to
 - 1) Our organization's own requirements for our Environmental Management System
 - 2) The requirements of ISO14001:2015
- b) Is effectively implemented and maintained

9.2.2 Internal Audit Program

Our organization establishes, implements, and maintains an Internal Audit Program including the frequency, methods, responsibilities, planning requirements and reporting of internal audits.

When establishing our internal audit program, our organization takes into account the environmental importance of the processes concerned, changes affecting our organization and results of previous audits.

Our organization retains documented information as evidence of the implementation of our audit program and the audit results.

Refer Procedure EMS-P-003 Environmental Management Systems and Regulatory Compliance Audits

9.3 Management Review

Our Management team reviews our organization's Environmental Management System at least once a year to ensure its continuing suitability and effectiveness.

Our Management Reviews include consideration of;

- a) The status of actions from previous Management Reviews
- b) Changes in
 - 1) External and internal issues that are relevant to our Environmental Management System
 - 2) The needs and expectations of interested parties including compliance obligations
 - 3) Our significant environmental aspects
 - 4) Risks and opportunities
- c) The extent to which environmental objectives have been achieved
- d) Information on our organization's environmental performance including trends in;
 - 1) Nonconformities and corrective actions

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- 2) Monitoring and measurement results
- 3) Fulfillment of compliance objectives
- 4) Audit results
- e) Adequacy of resources
- f) Relevant communication from interested parties including complaints
- g) Opportunities for continual improvement

The outputs of Management Review include;

- Conclusions on the continuing suitability, adequacy and effectiveness of our Environmental Management System
- Decisions related to continual improvement opportunities
- Decisions related to any needed Environmental Management System changes including resources
- Actions, if needed when environmental objectives have not been achieved
- Opportunities to improve the integration of our Environmental Management System with other business processes if needed.
- Any implications for the strategic direction of our organization

Refer Procedure EMS-P-005 Management Review

Section 10 Improvement

10.1 General

Our organization determines opportunities for improving our Environmental Management System implementing actions necessary to achieve our intended outcomes. When determining improvements, we consider the results from the analysis and evaluation of environmental performance, evaluation of compliance, internal audit results and management review outcomes. These include:

- Improvements to our products, services and processes to meet our environmental requirements as well as to address future needs and expectations.
- Correction, prevention, or reduction of undesired effects on the environment
- Continual improvement to the to the performance and effectiveness of the Environmental

10.2 Nonconformity and Corrective Action

If any nonconformity is identified, including any arising as a complaint, our organization will act as follows;

- Based on the significance, the nonconformity will be documented on a corrective action report (C.A.R) and will be investigated
- Take actions to control (contain) the nonconformity and correct it.
- Evaluates the need for action to eliminate the cause(s) of the nonconformity by;
 - Performing a root cause analysis
 - Determining the root cause of the nonconformity
 - Checking to see if similar nonconformances exist or could potentially occur in other areas

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- Determine and implement corrective and preventive actions appropriate to the significance of the effect of the nonconformity encountered, including the environmental impacts;
- Review the effectiveness of any actions taken;
- If necessary, update risks and opportunities determined during planning;
- Make changes to the environmental management system, if necessary

The Environmental Management Representative (EMR) takes specific actions escalating the issue when timely and effective corrective actions are not achieved.

Documented information on nonconformities is retained as evidence of the nature of the nonconformities, any subsequent actions taken and the results of any corrective action.

Refer Procedure EMS-P-004 Corrective and Preventive Action

10.3 Continual Improvement

GMA/SYNCOM continually improves the suitability, adequacy, and effectiveness of the Environmental Management System. We use results of analysis and evaluation, and the outputs from management review meetings, to determine if there are any needs or opportunities which can be addressed as part of continual improvement process.

Determination of improvement activities based on internal drivers such as achievement of environmental objectives, environmental performance etc., and external drivers such as changes to interested parties and their expectations, compliance obligations, environmental impacts etc. Implemented improvement activities are monitored and effectiveness of the results is evaluated.

Refer Procedure EMS-P-004 Corrective and Preventive Action