### ENVIRONMENTAL MANAGEMENT SYSTEM

#### POLICY MANUAL

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EMS-P-005 Environmental Management System Management Review
This publication establishes the basic Environmental Management System functions and policies of GAUCHEAIR Air-conditioning Services to ensure the required high quality of all programs.

The use of this publication at GAUCHEAIR Air-conditioning Services is hereby authorized.

Supersede Document

N/A

Approved By: GRAHAM GAUCHE (16.1)

Date: 01/01/2021
Revision Policy

The Environmental Policy Manual shall be revised to reflect any changes to GAUCHEAIR Air-conditioning Services Environmental Management System (EMS).

At the discretion of the CEO, revisions, 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.
Record of Manual Holders

The following persons have copies of the GaucheAir Air-conditioning Services Environmental Management System (EMS) Policy Manual and must be issued revised copies when made:

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Section X 1 Definition

The Management Teams

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

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<thead>
<tr>
<th>Job Title</th>
<th>EMS Management Team</th>
<th>Cross Functional Team (CTF)</th>
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<tr>
<td>CEO</td>
<td>GRAHAM GAUCHE</td>
<td>GRAHAM GAUCHE</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>BRAD GAUCHE</td>
<td>BRAD GAUCHE</td>
</tr>
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<td>SALES MANAGER</td>
<td>STEVE GAUCHE</td>
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<td>ENGINEERING MANAGER</td>
<td>MARNE GELDENHUYS</td>
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<tr>
<td>HEALTH &amp; SAFETY OFFICER</td>
<td>SANDILE NDLOVU</td>
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Continual improvement

The 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.
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
A Statement by GaucheAir 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 POLICY

Our Environmental Policy is to be a responsible corporate citizen in protecting the environment. We are committed to complying with accepted environmental practices, 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.

GaucheAir Air-conditioning Services 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.

Date: 01/01/2021
1.0 Purpose

This manual defines the scope of GaucheAir Air-conditioning Services Environmental Management System (EMS) and provides a linkage of system documents to the various elements of the ISO 14001:2004 standard.

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
- Non-conformance and Corrective and Preventive Action
- Records
- Environmental Management System Audit
- Management Review

2.0 Scope

GaucheAir Air-conditioning Services EMS provides a mechanism for environmental management thought out 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 GaucheAir Air-conditioning Services environmental procedure EMS-P-012 Environmental Document Control. All copies of 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 Environmental Policy

GaucheAir Air-conditioning Services Environmental Policy (Policy EMP-1) is endorsed by the CEO. The policy covers all aspects of the facility. The policy includes a commitment to continual improvement and prevention of pollution, as well as a commitment to meet or exceed relevant environmental legislation, regulations and other requirements. The policy will be reviewed annually by the top management, communicated to all persons working on behalf of the organization and made available to the public in accordance with the Environmental Communication procedure.

Reference: Material:
ISO-14001 Standard (4.2)

Applicable Procedures:
EMS-P-010 Environmental Communications
5.0 Environmental Aspects

The Cross Functional Team (CFT) identifies the environmental aspects of its activities, products and services within the defined scope of the EMS which the facility can control and it can influence taking into account planned or new development, or new or modified activities, products and services and over which it may be expected to have an influence, and determines which of those aspects are considered significant.

We ensure that significant environmental aspects are taken into account in establishing, implementing and maintaining this environmental management system.

Discussions regarding significance are recorded in CFT meeting minutes. These aspects are reviewed at least semi-annually by the CFT or when there is a new or changed process or activity in the facility.

The Environmental Management Representative maintains CFT minutes and other records. A list of the aspects by area and department is addressed in EMS-P-002-Aspects, Objectives & Targets.

Reference Materials

ISO-14001 Standard (4.3.1)

Applicable Procedures

EMS-P-002 Environmental Aspects, Objectives and Targets and Management Programs
EMS-P-008 Environmental Review of Projects
6.0 **Legal and Other Requirements**

GaucheAir Air-conditioning Services has established an environmental procedure for the purpose of identifying, accessing, determining how they apply to its environmental aspects and communicating legal and other requirements that are applicable to the facility.

Additional information is also available through legal publications. Local regulations are identified, accessed and communicated by the Environmental Management Representative. At least annually the Environmental Management Representative will review the most current national, regional, provincial, state and local legal and other requirements as applicable to GaucheAir Air-conditioning Services.

**Reference Materials**

ISO-14001 Standard (4.3.2)

**Applicable Procedures**

EMS-P-007 Environmental Regulations and Other Requirements

7.0 **Environmental Objectives and Targets**

The Cross Functional Team (CFT) has developed objectives and targets for each significant environmental aspect. These objectives and targets define:

1. the performance objectives (Investigate/Study, Control/Maintain, or Improve) for each significant environmental aspect;
2. the specific, quantified targets which define those performance objectives and
3. The planned deadlines for the achievement of those targets.
4. Assigning responsibilities for achieving objectives and targets at relevant functions throughout the organization.

5. Legal and other requirements are considered

Objectives and targets are developed considering significant environmental aspects, technology options and financial, operational and business plans, and the views of interested parties, with the goal of continual improvement.

Reference Material

ISO-14001 Standard (4.3.3)

Applicable Procedures

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

EMS-P-008 Environmental Review of Programs

8.0 Environmental Management Program

The Cross Functional Team (CFT) establishes environmental management programs and assigns responsibility for (EMPs) at relevant functions and levels throughout our organization as a means for achieving objectives and targets. These programs define the principle actions to be taken, those responsible for undertaking those actions and the scheduled times for their implementation. The EMPs are developed by the CFT and approved by (insert job title). (Refer to Section 5.0 Environmental Aspects).
Reverence Materials

ISO-14001 Standard (4.3.4)

Applicable Procedures

EMS-P-002 Environmental Aspects, Objectives and Targets, and Management Programs.
EMS-P-008 Environmental Review of Projects.

9.0 Resources, Roles, Responsibility and Authority

Environmental management systems roles, responsibilities, authorities and authority are defined at relevant functions and levels within the organization. The EMS team assures that the resources essential to the implementation and control of the environmental management system are available, including:

- Training
- Human Resources
- Specialty Services
- Financial Resources
- Technical Services
- And Informational Services

The organization’s top management has appointed specific management representative(s) who, irrespective of other responsibilities, has have defined roles, responsibilities and authority for:

- Ensuring the environmental management system requirements are established, implemented and maintained in accordance with this international standard;
- Reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the environmental management system.
A Cross Functional Team (CFT) provides routine EMS support, and reports directly to the Environmental Management Representative. Documentation, which describes various positions, is included in our organizational chart – Structure & Responsibilities.

**Reference Material**

ISO-14001 (4.4.1)

**Applicable Document**

Organisational Chart

**10. Competence, Training and Awareness**

GaucheAir Air-conditioning Services ensures that all persons performing tasks on its behalf that have the potential to cause a significant environmental impact(s) are identified by the Cross Functional Team (CFT) are competent on the basis of appropriate education, training and experience. Competency is determined by the employee’s supervisor as specified in EMS-P-014. An environmental training plan is in Appendix F – Training Matrix.

The cross functional team (CFT) has an environmental procedure to train employees at each relevant function and level so they are aware of the environmental policy, significant environmental aspects, their role and responsibilities in achieving conformance with the policy and procedures, and with the requirements of the Environmental Management System.

The training coordinator is responsible for maintaining employee-training records. Appropriate records are monitored and reviewed on a scheduled basis.
Reference Material
ISO-14001 Standard (4.4.1)

Applicable Procedures
EMS-P-014 Environmental Training and Awareness

11.0 Communication

GaucheAir Air-conditioning Services has established and will maintain a procedure for internal communications regarding environmental aspects and the Environmental Management System and receiving, documenting and responding to relevant communication from external interested parties.

We also have established a procedure to determine and document whether we will communicate externally about our significant environmental aspects using EMS-P-010 Environmental Communications, this procedure also covers the method we will use if the decision is to communicate.

Reference Material
ISO14001 Standard (4.4.3)

Applicable Procedures
EMS-P-010 Environmental Communications

12.0 Documentation

This manual identifies all documents relevant to the Environmental Management System. A copy of Environmental Management System documents, other than visual aids and records, can be obtained from the Environmental Management Representative or designee. System procedures and forms are provided in Appendix I – List of documents
Environmental management system documentation includes:

- Environmental policy (this manual)
- Objectives and targets (EMS-P-002)
- Description of scope of environmental management system (this manual)
- Main elements of EMS and associated documents (this manual)
- All Documents, including records, required by ISO 14001:2004 and the EMS (Appendix I – List of documents)

**Reference Material:**
ISO14001 Standard (4.4.4)

### 13.0 Document Control

GaucheAir Air-conditioning Services has established an environmental procedure for controlling all documents related to the environmental system. This procedure describes where documents can be located and how and when they are reviewed.

The procedure provides for the approval for adequacy prior to release, review and updating as required and re-approval, that changes recorded and ensures that current versions are available and that obsolete documents are promptly removed from use or are suitably identified, they are available at point of use and they remain legible and readily identifiable. Ensure that documents from external origin that are determined by the organization to be required for the planning and operation of the EMS are identified and there distribution controlled. Prevents the unintended use of obsolete document and have suitable identification to them if they are retained for any purpose.

Controlled documents are obtainable from the Environmental Management Representative or designee.

A list of controlled documents is provided in Appendix I – List of documents
Reference Material

ISO-14001 Standard (4.4.5)

Applicable Procedures

EMS-P-001 Formatting Environmental Procedures, Work Instructions and Forms
EMS-P-012 Environmental Document Control

14. Operation Control

The Cross Functional Team (CFT) is responsible for identifying operations and activities associated with significant environmental aspects consistent with our Environmental Policy, objectives and targets that require operational control in procedures, work practices or environmental management programs.

These documents define the mechanisms for the establishment, implementation and maintenance of the Environmental Management System and ensure that the system is maintained in accordance with the environmental policy and objectives and targets and is communicated to employees, suppliers and contractors.

- System procedures: Cover the management and control of both the Environmental Management System and the principle environmental aspects, which the system manages. These procedures are facility-wide in their application.

- Work Practices: Cover the environmental control of specific operational activities and they are usually activity specific in their application.

Reference Material

ISO-14001 Standard (4.4.6)
Applicable Procedures
EMS-P-016 Operational Control

15. Emergency Preparedness and Response

GaucheAir Air-conditioning Services has an environmental procedure to identify the potential for and how to respond to accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them.

Emergency methods are reviewed by the Cross Functional team (CFT) on an annual basis and after the occurrence of accidents or emergency situations.

Reference Material
ISO-14001 Standard (4.7)

Applicable Procedures
EMS-P-006 Emergency Preparedness and Response

16. Monitoring and Measurement

GaucheAir Air-conditioning Services has established an environmental procedure to monitor and measure the key characteristics of its operation and activities that can have a significant impact on the environment. Including the documenting of information to monitor performance, applicable operational controls and conformity with the organizations objectives and targets.

This procedure includes calibration and maintenance requirements and ensures that records will be retained.
GaucheAir Air-conditioning Services has established an Environmental Regulatory Compliance program. Procedure EMS-P-003 outlines the requirements of the program to periodically review regulatory compliance and report results to management on a yearly basis.

**Reference Material**

ISO-14001 Standard (4.5.1)

**Applicable Procedures**

EMS-P-003 Environmental Management System and Regulatory Compliance Audits
EMS-P-015 Monitoring and Measurement
EMS-P-016 Operational Control

17.0 **Evaluation of Compliance**

GaucheAir Air-conditioning Services has an environmental procedure for periodically evaluating compliance with applicable legal requirements and other requirements to which it subscribes.

Records shall be maintained.

**Reference Material**

ISO-14001 Standard (4.5.2)
Applicable Procedures
EMS-P-007 Legal and Other Requirements

18.0 Non-conformance and Corrective and Preventive Actions

GaucheAir Air-conditioning Services has an environmental procedure for defining responsibility and authority for handling and investigating non-conformance, for taking actions to mitigate impacts, and for initiating and completing corrective and preventive action.

Any changes in procedures resulting from corrective and preventive actions are implemented and recorded. The Cross Functional Team leader maintains these records.

Reference Material
ISO-14001 Standard (4.5.3)

Applicable Procedures
EMS-P-004 Non-conformance and Corrective and Preventive Actions

19.0 Records

GaucheAir Air-conditioning Services shall establish and maintain records as necessary to demonstrate conformity to the requirements of our environmental management system and ISO-14001 and the results achieved.
We have an environmental procedure for the identification, storage, protection, retention and disposal of environmental records. Some of these records include:

- Environmental aspects, significant aspects
- Targets, objectives and programme(s)
- Training Records
- Results of Internal Audits
- Results of Management Reviews

They are readily retrievable and protected against damage, deterioration and loss. The areas and departments maintain their own environmental records. Records and documents retention is also specified in the procedure. A list of relevant records is provided in Appendix I – List of Documents

**Reference Material**

ISO-14001 Standard (4.5.3)

**Applicable Procedures**

EMS-P-013 Records

EMS-F-04.05.001 Index of Environmental Records

**20.0 Environmental Management System Audit**

Periodic system audits are conducted to ensure that the environmental management system has been properly implemented and maintained. Procedures cover: assigning responsibilities and requirements for planning and conducting audits, reporting the results of audits and retaining records, determination of audit criteria, scope and frequency and methods.

Audits shall determine:

- Conformance to the arrangements for environmental management including the requirement of ISO-14001
- The EMS has been properly implemented and maintained
The results of these audits are provided to management. Audits are performed according to a schedule, which is based in the environmental importance of the activity, the results of the last audit and the audit schedule.

The selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process and auditors are trained and records are kept with the Audit Program Leader.

**Reference Material**

ISO-14001 Standard (4.5.4)

**Applicable Procedures**

EMS-P-003 Environmental Management System and Regulatory Compliance Audits

### 21.0 Management Review

GaucheAir Air-conditioning Services Environmental Management Team reviews all elements of the Environmental Management System annually to ensure its continuing suitability, adequacy and effectiveness. Meeting minutes record these reviews and are kept by the EMR or designee.

**Reference Material**

ISO-14001 Standard (4.6)

**Applicable Procedures**

EMS-P-005 Environmental Management System Management Review