



# **LTES**

# **Environmental**

# **Management System**

# **(EMS)**

# **Compliance**



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## Introduction

LTES maintains sustainability through an Environmental Management System (EMS). Our EMS follows the US Environmental Protection Agency's guidelines:

- **Plan:** Planning, including identifying environmental aspects and establishing goals
- **Do:** Implementing, including training and operational controls
- **Check:** Checking, including monitoring and corrective action
- **Act:** Reviewing, including progress reviews and acting to make needed changes to the EMS.

## Compliance

The following outline demonstrates how LTES' EMS complies with key EMS requirements:

### **Requirement #1:**

*Define, deploy, and sustain a corporate responsibility and environmental management system that identifies significant aspects of the supplier's intersections with these matters, including those articulated in the Electronic Industry Citizenship Coalition Code of Conduct (EICC).*

**LTES Compliance:** The fulfilment of requirements 2-8 as described in this document satisfy the need for an environmental management system. Additionally, LTES has posted its environmental goals & results/progress on its website as noted below.

The LTES Code of Ethics for our employees is also an integral part of LTES compliance to this requirement. It can also be found on our website at <http://www.ltes-global.com/codeofethics>. Our Code of Ethics includes all applicable elements of the EICC. LTES performs annual audits on all of our subcontractors who are directly supporting LTES production to ensure they are in compliance with this requirement.

### **Requirement #2:**

*Establish programs (within the management system) to control operations that intersect with these matters and confirm compliance with applicable law, regulation and any particular contractual requirements.*

**LTES Compliance:** LTES has programs (defined by its management system) that control its operations, research, service development and services as they intersect with the environment



in support of its policy commitment to environmental leadership. These programs confirm LTES' compliance with applicable law, regulation and contractual requirements. Please see our website at: <http://www.ltes-global.com/environment>

**Requirement #3:**

*Measure performance associated with significant environmental aspects and include the following aspects:*

- *Energy conservation*
- *Scope 1 and scope 2 greenhouse gas emissions*
- *Waste management and recycling.*

**LTES Compliance:** LTES has established an accurate baseline for usage in a 12-month period in order to address seasonal trending. The baseline period is defined as January 2012 to December 2012. Results against goals (requirement #4 below) are as follows:

- Energy Consumption
  - **Electric** – 14,658 kWh consumed– 2% reduction by January 2015 – on track
  - **Gas** – 650 lt consumed– 2% reduction by January 2015 – on track
  - **Water** – 120.5 metric tons consumed– 2% reduction by January 2015 – on track
- Calculate Scope 1 greenhouse gas emissions (if applicable)
  - **Electric** – N/A
  - **Gas** – N/A
  - **Water** – N/A
- Calculate Scope 2 greenhouse gas emissions
  - **Electric** – 10.2 metric tons of CO2 generated from electricity usage – 2% reduction by January 2015 – on track
  - **Gas** – 0.126 metric tons of CO2 generated from gas usage – 2% reduction by January 2015 – on track
  - **Water** – 0.010 metric tons of CO2 generated from water usage– 2% reduction by January 2015 – on track
- Waste management and/or Recycling
  - **Recycling Volume** –Tons of recycling material picked up by recycling company: 0.5 tons– 2% reduction by January 2015 – on track
  - **Waste Volume** – Tons of trash picked up by garbage company: 0.25 tons– 2% reduction by January 2015 – on track



#### **Requirement #4:**

*Set voluntary environmental goals to achieve positive results associated with significant aspects where applicable and include one in each of the three aspects:*

- *Energy conservation*
- *Scope 1 and scope 2 greenhouse gas emissions*
- *Waste management and recycling.*

**LTES Compliance:** Working off the baseline established in requirement #3, LTES has set one goal in each category. The goal measuring period is 12 months. Goals are determined in conjunction with LTES senior management, and follow the format below:

- Energy Consumption
  - Reduce consumption of electricity 2% by January 2015
- Scope 2 greenhouse gas emissions
  - Reduce scope 2 GHG emissions 2% by January 2015.
- Waste management and recycling
  - Decrease amount of waste going to landfill 2% by y/e 2012.
  - Increase amount of recycled material 2% by January 2015.

#### **Requirement #5:**

*Publicly disclose results associated with voluntary environmental goals and other environmental aspects from the management system, including any regulatory fines or penalties that may have occurred.*

**LTES Compliance:** LTES has publicly disclosed our goals and our progress against the goals as of June 30, 2013 date. This information is publicly disclosed on our company website: <http://www.ltes-global.com/policies>. We have not received any fines or penalties of a material nature. Should we ever receive any regulatory fines or penalties of a material nature, they will be publicly disclosed on our web page.

#### **Requirement #6:**

*Train employees who are responsible for performing this work.*

**LTES Compliance:** Employees are trained on our Social Management System as they are hired. They receive training in all EICC elements of our Social Management System based on

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the content of our policy documents. There are additional classes on Health & Safety, and our EMS as required by their specific job requirements.

**Requirement #7:**

*Conduct self-assessments and audits as well as management reviews.*

**LTES Compliance:** LTES has a committee that meets on a quarterly basis. This committee reviews the progress of reduction initiatives against the EMS goals and ensures that LTES is compliant with all Social Responsibility requirements listed in requirement 1. The committee discusses any need for redirection, etc. The roster for the committee is as follows:

- Company directors
- Human resources manager
- Quality control manager
- Facilities manager
- Accounting/auditing manager
- Environmental, health, and safety representative

**Requirement #8:**

*Cascade this set of requirements to the LTES suppliers.*

**LTES Compliance:** LTES notifies all subcontractors who perform work for LTES of all 8 requirements. LTES notifies the suppliers via references added to all purchase orders listing all 8 requirements. LTES actively monitors compliance by auditing a selected number of subcontractors annually.



## References

IBM's Requirements for Suppliers on Corporate Responsibility and Environmental Management, Release Version 3.0; Release Date 24 February, 2013

ISO 14001 - Environmental management systems — Requirements with guidance for use

US Environmental Protection Agency

<http://www.epa.gov>