

This environmental policy outlines  
Spaklean commitment to the  
environment and the respective  
responsibilities and procedures to  
make that commitment a reality

# ENVIRONMENTAL MANAGEMENT POLICY



# **Environmental Management System**

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## 0.0 Terms and Definitions

<b>Auditor</b>	Person with the competence to conduct an audit
<b>Continual improvement</b>	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organisation's environmental policy.
<b>Corrective action</b>	Action to eliminate the cause of a detected nonconformity.
<b>Document</b>	Information and its supporting media
<b>Environment</b>	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
<b>Environmental aspect (EA)</b>	Elements of an organisation's activities or products or services that can interact with the environment.
<b>Environmental impact</b>	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
<b>Environmental management system (EMS)</b>	Part of an organisation's management system used to develop and implement its environmental policy and manage its environmental aspects.
<b>Environmental objective</b>	Overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.
<b>Environmental performance</b>	Measurable results of an organisation's management of its environmental aspects.
<b>Environmental policy</b>	Overall intentions and directions of an organisation related to its environmental performance as formally expressed by top management.
<b>Environmental target</b>	Detailed performance requirement applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
<b>Interested party</b>	Person or group concerned with or affected by the environmental performance of an organisation.
<b>Internal audit</b>	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organization are fulfilled.
<b>Nonconformity</b>	Non-fulfilment of a requirement.
<b>Organisation</b>	Spaklean Limited
<b>Preventive action</b>	Action to eliminate the cause of a potential nonconformity.
<b>Prevention of pollution</b>	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutants or waste, in order to reduce adverse environmental impacts.
<b>Procedure</b>	Specified way to carry out an activity or a process.
<b>Record</b>	Document stating results achieved or providing evidence of activities performed.



## **1.0 General**

### **1.1 Company Profile**

Spaklean is an emerging company that is bringing a lot of innovation and professionalism into the Custodial Management Industry, offering Facility Maintenance, Commercial Cleaning and Project Management Services.

Spaklean is a 100% Ghanaian private investment and has over 600 employees nationwide with presence in Accra, Kumasi, Takoradi, Sunyani, Koforidua, Tamale, Techiman, Cape Coast, Bolgatanga and other towns countrywide.

Spaklean has cross industry experience with clients in Manufacturing, Food Processing, Education, Financial Services, Health care Services, Aviation and Trading companies.

The Spaklean Passion is to protect, preserve and enhance the value of all properties entrusted in our care. The Spaklean innovation perceives corporate properties as a marketing tool that complements client's effort in attracting and retaining customers so as to do business with a satisfied and healthy staff in a serene ambiance.

The corporate orientation of the company as it combines innovation and technology, hygiene and aesthetic as a marketing tool for our clientele to provide unparalleled professional service.

### **1.2 Purpose of this Manual**

This Manual defines the Environmental Management System (EMS) of Spaklean Company Limited's activities and contains:

- a) The Environmental Policy.
- b) Statements of responsibility and authority.
- c) An overview of the company's environmental procedures and controls.
- d) The identification of the resources and training allocated to management, performance of work and verification activities including internal audit.
- e) The appointment of the Environmental Management Representative (EMR); and
- f) The arrangement for periodic management reviews.

The purpose of this Manual is to demonstrate that this Environmental Management System (EMS) meets all *ISO 14001:2004 requirements* and provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

### **1.3 Scope of Environmental Management System (EMS)**

The scope of the EMS applies to the Business activities related to the Products and Services provided by Spaklean. It also covers the various locations and areas that Spaklean operates in.

## 2.0 Policy



### Environmental Policy

Spaklean Company Limited recognizes that its activities have an impact on the environment with regards to machinery, equipment, cleaning chemicals, cleaning tools, water and power use. As an ongoing concern, the company shall pursue policies that are environmentally sustainable and reduce any negative impact on the economy.

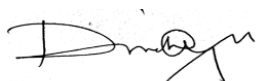
Spaklean Company Limited is therefore committed to:

- Pollution prevention
- Healthy cleaning
- Environmental improvement
- Compliance with environmental legislations
- Environmental education
- Environmental ethics

To minimize environmental impacts concerning our activities, products and services, we shall:

- Comply with applicable legal requirements and other requirements to which the Company subscribes which relate to its environmental aspects.
- Prevent pollution, reduce waste and minimise the consumption of resources.
- Educate, train and motivate employees to carry out tasks in an environmentally responsible manner.
- Encourage environmental protection among suppliers and subcontractors.

Consequently, Spaklean is committed to continual improvement of its environmental performance. This Policy will be communicated to all staff, contractors and suppliers, and be available for the general public.



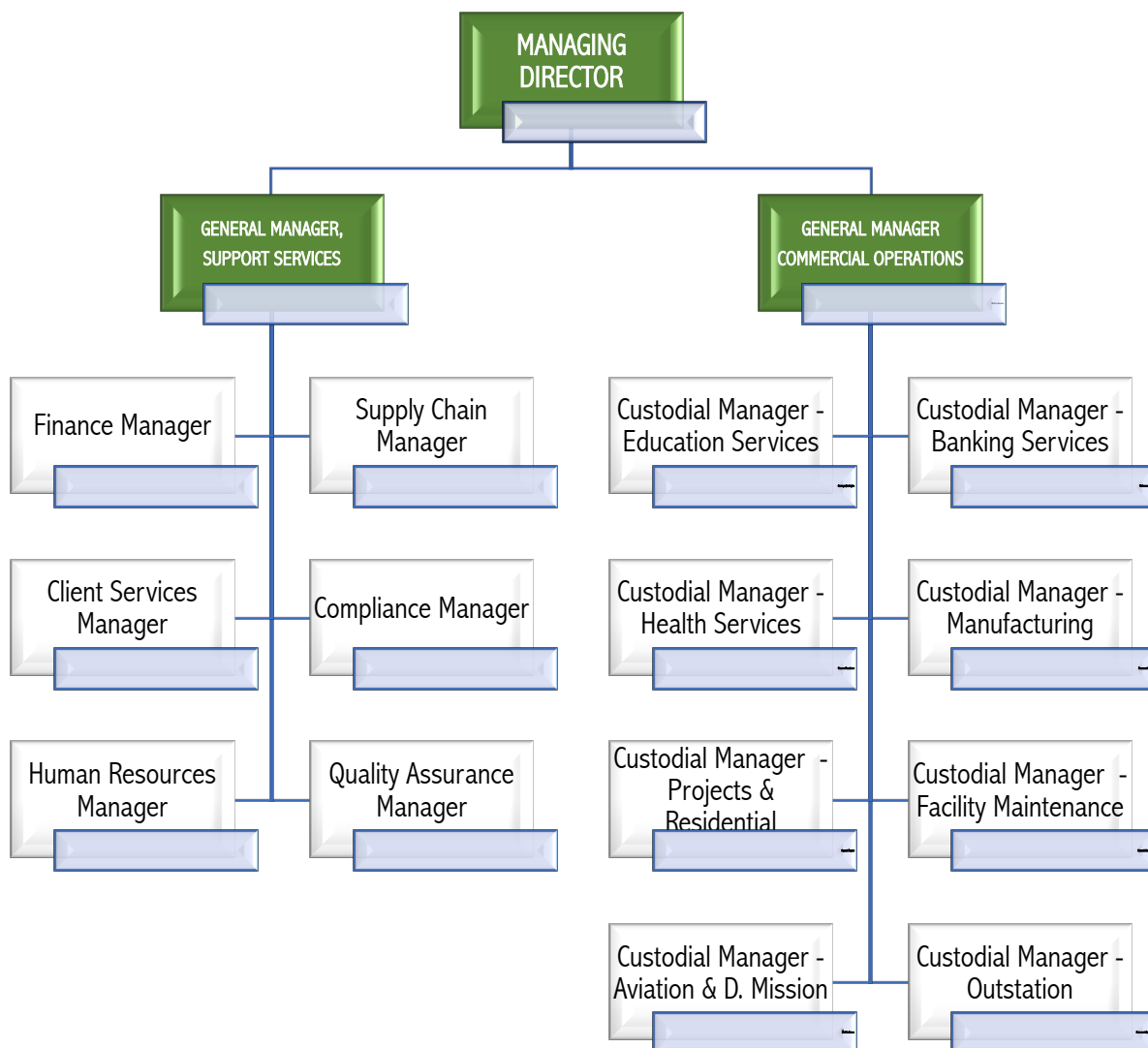
Dinah Owusu-Kissi

Managing Director

Date: 15 MAY 2018

## Organisation

### 2.1 Organisation Chart



## 2.2 Responsibility

### 2.2.1 Top Management

*Top Management* is responsible for:

- endorsing the environmental policy.
- ensuring appropriate resource allocation to enable the effective operation and continual improvement of the EMS.

### 2.2.2 Environmental Management Representative (EMR)

The *Technical Director* is the appointed EMR and has the responsibility and authority for:

- ensuring that EMS requirements are established, implemented and maintained in accordance with the ISO 14001 standard.
- ensuring that sufficient resources are allocated for the proper implementation of



the environmental policy and the EMS.

- c) regularly reviewing the policy and the effectiveness of the EMS and ensuring that the necessary changes are made.

EMR also has the responsibility and authority for:

- a) leading Management to establish and implement the EMS according to ISO 14001 standard and monitoring the performance of the EMS.
- b) coordinating internal EMS audits to ensure the EMS has been properly implemented and maintained.
- c) handling and investigating nonconformity and ensuring corrective and preventive action has been taken to mitigate any impacts caused.
- d) reporting on the performance of the EMS to the top management for review and as a basis for improvement of the EMS.

Spaklean top Management shall undertake the EMS management review *annually* to ensure top management commitment and integration of the EMS with business strategies for its implementation and continual improvement.

### **2.2.3 Deputy Environmental Management Representative (DEMR)**

The *Managing Director* is the appointed DEMR and has the responsibility and authority for:

- a) assisting the EMR to ensure the EMS is effectively implemented and maintained in accordance with ISO 14001 standard.
- b) assuming the responsibility and action of the EMR when the EMR is unavailable.

### **2.2.4 Quality, Safety, Health and Environmental Management Committee (QSHE Committee)**

This committee is responsible for:

- a) the establishment and implementation of the EMS.
- b) the establishment and review of objectives, targets, and programmes.
- c) ensuring the effective implementation of environmentally related operational controls and programmes;
- d) the internal communication of environmental matters between management and employees; and promoting environmental awareness among company staff.
- e) the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary.
- f) providing leadership in the pursuit of environmental issues;
- g) any other EMS activities that are assigned by the EMR.
- h) holding regular meeting (at approximately *three-month* intervals).

### **2.2.5 Management Review Committee**

The Committee systematically examines the EMS to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of the Top Management, EMR, DEMR, and designated Custodial Managers, Facility Executives, Supervisors and Janitors.

### 2.2.6 Custodial Manager

The Custodial Managers are responsible for:

- a) establishing controls for the identified significant environmental aspects for his/her function team / department according to procedures and instructions.
- b) ensuring that the EMS is properly implemented and that environmental matters are properly handled at all stages.

### 2.2.7 All Employees

All employees are responsible for:

- a) working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions; and
- b) reporting problems or deviations associated with environmental issues and the EMS to the SHEQ Committee.

## 3.0 Environmental Management System Requirements

The EMS of Spaklean is developed to manage significant environmental aspects so as to limit their impacts on the environment. The EMS is established in accordance with ISO 14001:2004 *and* is described in this section.

Environmental Management System Documents

The purposes of these EMS documents are as follows:

<b>Environmental Policy</b>	Describes the intention and principles to be adopted in relation to environmental performance, including but not limited to legal compliance, continual improvements and pollution prevention.
<b>Environmental Management System Manual (EMS Manual)</b>	Describes the environmental management system and outlines how the requirements of the International Standard (ISO 14001) are achieved.
<b>Objective(s)</b>	The overall environmental goals that Spaklean sets to achieve.
<b>Target(s)</b>	The set of measurable performance requirements that the company establishes to achieve the objectives.
<b>Programme(s)</b>	The programme and schedule which the company implements to achieve the objectives and targets.
<b>Environmental Procedures (EPs)</b>	Define the roles, responsibilities, and actions to be taken to ensure that activities are performed, and the EMS implemented in accordance with the environmental policy and the requirements of ISO 14001.
<b>Register of Environmental Aspects</b>	Compiles the environmental aspects that are derived from the activities and services of Spaklean. The register also denotes the significance of the environmental aspects and the respective operational controls for significant environmental aspects.

<b>Register of Legal and Other Requirements</b>	Compiles the legal and other requirements, which include legislation, codes of practice, regulatory and non-regulatory guidelines that are applicable to Spaklean.
<b>Environmental Instructions (EIs)</b>	Describe which and how activities should be performed to manage significant environmental aspects and to achieve the EMS ISO 14001 requirements.
<b>Environmental Forms/Records</b>	Record information for the audit trail and the assessment of environmental conditions and performance.

### 3.1 Environmental Policy

(ISO 14001 Standard Clause 4.2)

The environmental policy of Spaklean is included in Section 2 of this document. It outlines the environmental commitments of the company with respect to its operations, activities, and overall environmental performance. During the development of this policy, the appropriateness to the nature, scale and environmental impacts of the company's activities, products and services have been considered. The policy is endorsed by the *Top Management* and the policy shall be reviewed during the management review meeting.

The policy shall stipulate the commitments of Spaklean to continually improve its environmental management and prevention of pollution. Spaklean is also committed to comply with applicable legal requirements and other requirements to which the company subscribes which relate to its environmental aspects. The environmental policy shall provide a framework for setting and reviewing objectives and targets, and must be maintained, implemented and communicated to all employees of Spaklean and its contractors.

This policy shall be available to the public.

### 3.2 Planning

Spaklean shall follow a "plan-do-check-act" (PDCA) process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of Spaklean's Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with Spaklean's environmental policy, the company's objectives and targets are established, and appropriate programmes are formulated to achieve the objectives and targets.

#### 3.2.1 Environmental Aspects

(ISO 14001 Standard Clause 4.3.1)

The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, Spaklean shall establish, implement and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects".

Spaklean shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.

Spaklean shall keep this information up to date.

### 3.2.2 Legal and Other Requirements

(ISO 14001 Standard Clause 4.3.2)

Spaklean shall establish, implement and maintain a procedure to identify and maintain access to legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company's environmental aspects

The company shall identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Other Requirements.

Spaklean shall keep this information up to date.

### 3.2.3 Objectives, Targets and Programme(s)

(ISO 14001 Standard Clause 4.3.3)

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within the company. Programmes are established, implemented and maintained for achieving its objectives and targets.

When establishing and reviewing its objectives, Spaklean shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

The *Top Management* shall approve the objectives, targets and programmes proposed by the QSHE Committee before implementation. The EMR shall ensure that the objectives and targets are measurable if possible, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by the QSHE Committee *every 24 months*. The EMR shall lead the QSHE Committee in revising the objectives, targets and programmes as necessary.

Spaklean shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the EMR shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.

The EMR shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

## 3.3 Implementation and Operation

The implementation of the EMS requires Spaklean to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

### 3.3.1 Resources, Roles, Responsibility and Authority

(ISO 14001 Standard Clause 4.4.1)

Top management of Spaklean shall commit to provide resources (including human resources and specialized skills, organizational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

Spaklean has appointed the *Technical Director* as the Environmental Management Representative (EMR), and the *Managing Director* as the Deputy Environmental Management Representative (DEMR) for the implementation and maintenance of the EMS. Their EMS responsibilities are described in section 3 of this manual.

### 3.3.2 Competence, Training and Awareness

(ISO 14001 Standard Clause 4.4.2)

Spaklean shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.

Spaklean will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

Spaklean shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the environmental management system.
- the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS.
- the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance.
- the potential consequences of departure from specified operating procedures.

### 3.3.3 Communication

(ISO 14001 Standard Clause 4.4.3)

For internal communication, the EMR shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees on notice boards, or is published on the Spaklean website, [www.spaklean.com](http://www.spaklean.com).

Employees with enquiries / complaints regarding to the EMS and/or environmental issues of Spaklean shall inform their Facility Executive/Supervisor / Custodial Manager. The designated member of QSHE Committee representing each Region shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the EMR shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication, the environmental policy is available at the office and

company web page. All internal and external enquiries / complaints / communications shall be discussed and reviewed during the QSHE Committee meeting, and the decision shall be recorded on meeting minutes.

The QSHE Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement a method(s) for this external communication, e.g., publish environmental report.

### 3.3.4 Documentation

(ISO 14001 Standard Clause 4.4.4)

The Environmental Management System documentation encompasses four levels as described below:

The first level is the *Environmental Management System Manual* (this document) which includes Spaklean's environmental policy (specifying the principal objectives and environmental commitments of Spaklean), and a broad description of how Spaklean addresses the ISO 14001 requirements. The EMS Manual serves as an interface to interpret the relationship between Spaklean's EMS and the ISO 14001 Standard. An individual document of *Objectives, Targets and Programmes* is developed based on the company's environmental policy. It demonstrates the company's environmental commitment on continual improvement in environmental performance.

The second level is the *Environmental Procedures (EPs)*, which include all procedures that Spaklean shall follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when. Register of Environmental Aspects and Register of Legal and Other Requirements are derived from the procedures and act as the foundation of the EMS which the company subscribed to.

The third level is the *Environmental Instructions (EIs)*, which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with Spaklean's operations and activities.

The fourth level is *Environmental Records*, which arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc, as defined in each Environmental Procedure and Environmental Instruction.

### 3.3.5 Control of Documents

(ISO 14001 Standard Clause 4.4.5)

The essences of EMS documentation controls are:

- they shall be reviewed, revised as necessary and approved for adequacy by authorized personnel;
- that current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed;
- that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution



controlled.

- obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- any obsolete documents retained for legal and / or knowledge preservation purposes shall be suitably identified.

Spaklean shall ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. Spaklean shall establish, implement and maintain a procedure for the creation and modification of the various types of documents and the respective responsibilities for such creation and modifications.

### **3.3.6 Operational Control**

(ISO 14001 Standard Clause 4.4.6)

Spaklean shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

Spaklean shall ensure that all operations and activities, carried out by Spaklean's employees or contractors, that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. Spaklean shall influence its staff and contractors by communicating its environmental policy and other relevant EPs and/or EIs to them.

### **3.3.7 Emergency Preparedness and Response**

(ISO 14001 Standard Clause 4.4.7)

Spaklean shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

Spaklean shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

Spaklean shall also periodically test the procedure and the preparedness where practicable.

## **3.4 Checking**

While implementing the EMS, Spaklean shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

### **3.4.1 Monitoring and Measurement**

(ISO 14001 Standard Clause 4.5.1)

Spaklean shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's

objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

### **3.4.2 Evaluation of Compliance**

(ISO 14001 Standard Clause 4.5.2)

To meet the company's commitment to compliance, Spaklean shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements (section 4.5.2.1) and other requirements (section 4.5.2.2) that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

### **3.4.3 Nonconformity, Corrective Action and Preventive Action**

(ISO 14001 Standard Clause 4.5.3)

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, Spaklean shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- handle and investigate nonconformity;
- take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- record the results of corrective and prevention actions taken;
- review the effectiveness of corrective action and preventive action taken;
- implement and record any changes in the documented procedures resulting from corrective and preventive action; and

Spaklean shall also ensure that any necessary changes are made to environmental management documentation.

### **3.4.4 Control of Records**

(ISO 14001 Standard Clause 4.5.4)

Records shall be maintained to keep track of Spaklean's environmental performance, to demonstrate conformity to the requirements of the EMS, legal compliance, and to maintain audit trails in accordance with the requirements of ISO 14001 Standard, and the results achieved.

Spaklean shall establish, implement and maintain a procedure to denote the identification, storage, protection, retrieval, retention and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.



### **3.4.5 Internal Audit**

(ISO 14001 Standard Clause 4.5.5)

Spaklean shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to:

- a) determine whether or not the environmental management system:
  - conforms to planned arrangements for environmental management including the requirements of ISO 14001; and
  - has been properly implemented and maintained;
- b) provide audit results and information for management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

Spaklean shall conduct EMS audits on a regular basis. Timely site environmental audits are required to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis.

### **3.5 Management Review**

(ISO 14001 Standard Clause 4.6)

The “plan-do-check-act” cycle shall require the top management of Spaklean to act and review the environmental management system periodically to ensure its suitability, adequacy and effectiveness.

Before the Review, the EMR shall schedule for the management review and inform all the participants and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The Top Management, EMR and DEMR together with the QSHE Committee shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, Business activities, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- review of the environmental policy, objectives, targets, and programmes.
- review of legal compliance and compliance with other requirements (including contractor compliance on Spaklean’s activities);
- environmental aspects of activities and their disclosure to public.
- findings of the internal audits.
- review of nonconformities and the status of corrective/preventive actions.
- communications from external interested parties, including complaints.
- areas for improvement with respect to environmental performance.
- adequacy of emergency preparedness and response.
- changing circumstances, including developments in legal and other requirements

related to its environmental aspects,

- identify the need for modification of the existing EMS in light of the above items, and
- follow-up action from previous management reviews.

The review shall initiate a new “plan-do-check-act” cycle with improvements in Spaklean’s environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and the EMR shall retain it as an EMS record.