



Banneker Supply Chain Solutions, Inc.

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Environmental Policy Manual
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1.0 Purpose

This Environmental Policy Manual describes Banneker Supply Chain Solutions, Inc. Environmental Management System (EMS), including its scope and key interrelationships between Banneker Supply Chain Solutions, Inc. processes. This manual also references key environmental system procedures.

2.0 Scope

This Policy Manual and the EMS describes and applies to all activities, products, and services provided by Banneker Supply Chain Solutions, Inc. (“Banneker” or “BSCS”) in the following locations of North Smithfield and North Kingstown (Rhode Island), and Madison (Alabama). Banneker’s EMS meets the requirements of ISO-14001 and applicable regulatory requirements.

3.0 Responsibilities

Banneker’s Executive Management Team and the ISO Management Representative have overall responsibility for the EMS. The ISO Management Representative is responsible for the content of this manual subject to the approval of Banneker’s President & CEO. Other Banneker Team members have responsibilities as described in this policy manual and its referenced procedures.

4.0 Context of the Organization

We at Banneker Supply Chain Solutions, Inc. will determine both Internal and External issues that are relevant to the organization and that have both a direct influence on the effectiveness of the environmental management system and an impact on global environmental and sustainability issues. In doing so, Banneker will consider the following environmental issues when developing and implementing its business strategy

- Air quality including both local and global
- Water quality and preventing contamination of controlled waters
- Land use
- Natural resources and their depletion
- Protection and Enhancement of both local ecology, biodiversity and that of the wider community

In addition to these core values, BSCS will also consider the implications and risks to our business in respect of:

- Cultural and social responsibilities
- Legal and regulatory issues and key guidance
- Financial implications
- And when practically and financially feasible, use the best available technologies

For more information, refer to our company SWOT analysis and current revision Strategic Plan.

In applying the above criteria and techniques, Banneker will actively manage and implement programs, procedures, and a business strategy in order to mitigate against pollution and harm to the environment and global impacts such as climate change. These aspects will form our core strategy when managing both its risks and opportunities for enhancing the local and global environment.

These key strategies and management programs form the core values of Banneker Supply Chain Solutions, Inc. when implementing and managing its environmental management system.

4.2 Environmental Policy

Banneker Supply Chain Solutions, Inc. recognizes and accepts its responsibility to be a good steward of the environment and to help achieve a state of sustainable development. In support of these responsibilities, we have established the following commitments:

- *Compliance to all applicable state, federal, and local legal requirements with a goal of beyond compliance wherever practical and possible*
- *Prevention of pollution in all its forms*
- *Conservation of natural resources, including energy, through source reduction, reuse and recycling wherever practical*
- *Continual environmental performance improvement through the involvement of all team members and partnership with the local community*

This policy is communicated to Banneker Team Members through the following means:

- Posting on company bulletin boards throughout company locations
- Environmental Management System Review Meetings
- Corporate Team Time Meetings
- Other Management Meetings

The Environmental Policy Statement is available to the public via <http://www.banneker.com/>

4.3 Planning

4.3.1 Environmental Aspects

Banneker Supply Chain Solutions, Inc. has established, implemented, and maintains an Identification and Control of Significant Environmental Aspects procedure:

- a. To identify the environmental aspects of its activities, products, and services that it can control, as well as, those that it can influence taking into account planned, or new developments, new or modified activities, and products and services.
- b. To determine those aspects that has or can have significant impact(s) on the environment.
 - Banneker documents this information and keeps it up to date through the Environmental Management System Planning Workbook.
 - Banneker ensures that the significant environmental aspects are taken into account in establishing, implementing, and maintaining its Environmental Management System.

4.3.2 Legal and other Requirements

Banneker identifies the pertinent environmental regulatory requirements that pertain to its activities. These regulations are documented in a Register of Regulations that identifies the regulation, the citation (Federal, State, and Local) that pertains, and the activities associated with these regulations.

- 4.3.2.1 Access to these regulations is maintained through links to the Government websites that contain the current regulatory requirements. The ISO Management Representative maintains local ordinances and rules as applicable. Banneker maintains an awareness of changes to these

requirements through reviews of these websites, communication with local government officials (as applicable), and through ongoing environmental compliance review activities.

- 4.3.2.2 Regulatory requirements form part of the criteria for determining the significance of environmental aspects, thereby relating these requirements to both the aspects and to the activities that generate the aspects. Banneker ensures that these applicable legal requirements and other requirements to which the company subscribes are taken into account in establishing, implementing, and maintaining its Environmental Management System as documented in the Identification and Control of Significant Environmental Aspects procedure.
- 4.3.2.3 Other requirements, such as adoption of the principles of the Environmental Protection Agency are controlled through incorporation into relevant procedures and policies relating to purchasing and energy conservation (if applicable).

4.3.3 Objectives, Targets and Program(s)

Banneker Supply Chain Solutions, Inc. reviews and establishes annual environmental objectives and related targets as part of its management review process.

- 4.3.3.1 These objectives and targets are measurable, where practicable, and consistent with the Environmental Policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which Banneker subscribes, and to continual improvement.
- 4.3.3.2 Banneker takes the following into account when determining objectives and targets:
 - Legal Requirements
 - Environmental Impacts
 - Technological Options
 - Operational Requirements
 - Business Requirements
 - Customer Requirements
 - Views of Other Interested Parties

Environmental management programs are established to ensure the achievement objectives and targets once approved. These program(s) include the designation of responsibility for achieving objectives and targets at relevant functions, and the means and timeframe by which they are to be achieved.

Note: For more information on our Interested Parties, refer to the latest revision of the Interested Parties Table..

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility and Authority

Management shall ensure the availability of resources essential to establish, implement, maintain, and improve the Environmental Management System. Resources include human capital resources and specialized skills, company infrastructure, technology, and financial resources.

- 4.4.1.1 Roles, responsibilities, and authorities shall be defined, documented, and communicated in order to facilitate effective environmental management. Roles, responsibilities, and authorities may be documented in position descriptions (major duties), competency matrices (job specific

responsibilities), and within procedures and work instructions (task and functional responsibilities).

4.4.1.2 Banneker's President and CEO has appointed the ISO Management Representative with responsibilities and authority for:

4.4.1.2.1 Ensuring that an Environmental Management System is established implemented and maintained in accordance with the requirements of the ISO 14001 International Standard.

4.4.1.2.2 Reporting to top management on the performance of the Environmental Management System for review, including recommendations for improvement.

4.4.1.3 All Banneker Supply Chain Solutions, Inc. Team Members have the responsibility to safeguard the environment and their fellow workers by adhering to the policies and procedures associated with the Environmental Management System and by participating in the identification of environmental performance improvement opportunities wherever possible. All Banneker team members are tasked with supporting the Company in implementing environmental improvement projects.

4.4.2 Competence, Training and Awareness

Banneker Supply Chain Solutions, Inc. shall ensure that all Team Members and any other person performing tasks for it or on its behalf that have the potential to cause a significant environmental impact are competent based on appropriate education, training, or experience, and shall retain associated records.

4.4.2.1 Banneker has established, implemented, and maintains a process to make Team Members and other persons working for it or on its behalf aware of:

- a) The importance of conformity with the Environmental Policy and procedures and with the requirements of the Environmental Management System.
- b) The significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance.
- c) Their roles and responsibilities in achieving conformity with the requirements of the Environmental Management System.
- d) The potential consequences of departure from specified procedures.

4.4.2.2 All Banneker position descriptions include language related to the EMS: "Contribute to maintaining compliance to Quality Management System certifications and participate in projects and initiatives focused on driving Continual Improvement throughout the organization".

4.4.2.3 Training to the Environmental Policy and the requirements of the Environmental Management System is primarily communicated to Banneker Team Members through the New Hire Orientation agenda and Corporate Team Time Meetings (in addition to other mediums).

4.4.2.4 Operational Controls and application of training to the Environmental Policy and requirements of the Environmental Management System are flowed-down (as applicable) through Banneker Supply Chain Solutions, Inc. Standard Operating Procedures, Work Instructions, and associated documentation (i.e. forms).

4.4.3 Communication

With regard to its Environmental Aspects and Environmental Management System, Banneker has established, implemented, and maintains a process for:

- a) Internal communication between the various locations and functions of the company. The Company has an environmental communication board and posts environmental performance information and Environmental Bulletins. Opportunities, ideas, and concerns from Team Members are solicited through the use of the Continual Improvement Program and through representation of cross-functional departments on the Banneker Environmental Sustainability Team (B.E.S.T.).
- b) Receiving, documenting, and responding to relevant communication from external interested parties. All outside inquiries relating to information about Banneker Supply Chain Solutions, Inc. Environmental Management System are routed to the Banneker Environmental Sustainability Team (typically via email) who maintains a Communication Log that captures the information from the inquiry and assigns the appropriate Banneker personnel to respond. B.E.S.T. also follows up to ensure a response was provided to the requestor and records this in the Communication Log.

The Banneker Environmental Sustainability Team is responsible for analyzing all internal and external communications for the past year as part of their preparation for management review meetings, which are held two times per year. This information will be used to summarize the feedback from interested parties during the setting of environmental objectives and targets.

Banneker has decided that it will not routinely communicate externally information about its Significant Environmental Aspects, except as required by government regulations or to support local emergency response.

Exceptions can be made as needed and requested by Company management personnel.

4.4.4 Documentation

The Environmental Management System documentation includes:

- 4.4.4.1 The Environmental Policy, objectives, and targets.
- 4.4.4.2 This Environmental Policy Manual, which includes a description of the scope of the Environmental Management System, a description of the main elements of the Environmental Management System and their interaction, and reference to related documents.
- 4.4.4.3 Procedures and records required by the ISO 14001 Standard.
- 4.4.4.4 Procedures, instructions, guidelines and records, determined by Banneker to be necessary to ensure the effective planning, operation, and control of processes that relate to its significant environmental aspects. The core EMS procedures are defined within the EMS policy manual.

4.4.5 Control of Documents

The documents required by the Environmental Management System and by the ISO 14001 Standard shall be controlled. Records are a special type of document and shall be controlled in accordance with the requirements.

The Control of Documents & Records process provides instructions on how Banneker will:

- 4.4.5.1 Approve documents for adequacy prior to issue.
- 4.4.5.2 Review and update as necessary and re-approve documents.
- 4.4.5.3 Ensure that changes and the current revision status of documents are identified.
- 4.4.5.4 Ensure that relevant versions of applicable documents are available at points of use.
- 4.4.5.5 Ensure that documents remain legible and readily identifiable.
- 4.4.5.6 Ensure that documents of external origin determined by the company to be necessary for the planning and operation of the environmental management system are identified and their distribution controlled.
- 4.4.5.7 Prevent the unintended use of obsolete documents and to apply suitable identification to them if retained for any purpose.

4.4.6 Operational Control

Banneker Supply Chain Solutions, Inc., through the efforts of the cross functional team and the Identification and Control of Significant Environmental Aspects procedure, identifies and plans those operations that have significant environmental aspects consistent with its Environmental Policy, objectives, and targets. This process ensures that these activities are carried out under specified conditions, by:

- 4.4.6.1 Establishing, implementing, and maintaining documented procedures to control situations where their absence could lead to deviation from the Environmental Policy, objectives and targets.
- 4.4.6.2 Stipulating the operating criteria in these procedures.
- 4.4.6.3 Establishing, implementing, and maintaining procedures related to the identified significant environmental aspects of goods and services used and communicating applicable procedures and requirements to vendors, including contractors. Vendors are required to provide appropriate environmental, health & safety information about their products (i.e. MSDS sheets) as part of the order. These are maintained in MSDS binders available to all team members. Significant aspects associated with new materials are identified as described in the Identification and Control of Significant Environmental Aspects procedure and appropriate operational controls established.
 - 4.4.6.3.1 Subcontractors involved in work that could have a significant environmental impact (i.e. construction, demolition, etc.) are requested to describe their processes, materials, and wastes. If potential impact to Banneker Environmental Aspects and Operational Controls is deemed to exist, the work being performed will be monitored and any impacts noted within the aspect data.

4.4.6.3.2 Only certified and/or licensed environmental subcontractors are used for specific environmental services (as necessary).

4.4.7 *Emergency Preparedness and Response*

Banneker has established, implemented, and maintains emergency plans and procedures to identify potential emergencies and accidents that may have an impact on the environment and how Banneker will respond to them and prevent or mitigate adverse environmental impacts. These plans and procedures include, but are not limited to Fire, General Emergency, and Evacuation Plans. The plans are periodically reviewed and revised (as needed) and a debrief meeting is held after any such occurrence.

A formal incident appraisal is held within 24 hours of each actual incident or emergency in order to fully investigate what happened, the Company's response, and any future actions necessary to prevent recurrence. An authorized Banneker representative will facilitate the appraisal. All such appraisals shall be documented. Any actions taken to prevent recurrence and any necessary post-incident notifications made to local, state, or government agencies in accordance with regulatory requirements will also be documented.

4.5 *Checking*

4.5.1 *Monitoring and Measurement*

Banneker has established, implemented, and maintains processes to regularly monitor and measure the key characteristics of its operations that can have a significant environmental impact. Operational metrics are determined in accordance with the Identification and Control of Significant Environmental Aspects procedure and are recorded in the Environmental Planning Workbook. Data and information needed to monitor performance, applicable operational controls, and conformity with the company's environmental objectives and targets is collected and reported as called out in the Environmental Planning Workbook and is used during Banneker Environmental Sustainability Team meetings and management reviews.

Banneker ensures that all environmental monitoring devices, measurement devices, sensors, and other relevant equipment are calibrated/verified as required and the associated records maintained. All environmental monitoring and measurement devices requiring calibration are listed in the Company's calibration database and controlled in accordance with the QMS.

4.5.2 *Evaluation of Compliance*

Consistent with its commitment to regulatory compliance, Banneker has established, implemented, and maintains a process for periodically evaluating compliance with applicable legal requirements.

Compliance reviews are performed annually as part of the Banneker Environmental Sustainability Teams' activities. Records of the results of these periodic reviews are maintained and are reviewed with Management. Any deficiencies noted during the review are recorded and appropriate actions taken to correct any regulatory violations, including notifications to government agencies as required by applicable environmental regulations.

4.5.3 *Nonconformity, Corrective Action and Preventive Action*

Banneker has established, implemented, and maintains nonconformity, corrective and preventive action for dealing with actual and potential nonconformities. This procedure defines the

requirements for:

- (1) Identifying and correcting nonconformities and taking actions to mitigate their environmental impacts.
- (2) Investigating nonconformities, determining their causes, and taking action in order to avoid their recurrence.
- (3) Evaluating the need for action to prevent nonconformities and implementing appropriate actions designed to avoid their recurrence.
- (4) Recording the results of corrective actions and preventive actions taken.
- (5) Reviewing the effectiveness of actions taken.

Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered. The ISO Management Representative ensures that any necessary changes are made to Environmental Management System documentation

4.5.4 Control of Records

Banneker has established, implemented and maintains a Control of Documents and Records Procedure to ensure that all records required by law, by the ISO 14001 Standard, or necessary to demonstrate conformity to the requirements of its environmental management system are retained. This procedure provides for the identification, storage, protection, retrieval, retention and disposal of records. Records shall remain legible, identifiable, and traceable.

4.5.5 Internal Audit

Banneker has established, implemented, and maintains an Internal Audits Procedure to ensure that internal audits of the EMS are conducted at planned intervals and to determine whether the EMS conforms to planned arrangements for environmental management have been properly implemented (including the requirements of the ISO 14001 Standard).

4.6 Management Review

Banneker reviews the EMS to ensure its continuing suitability, adequacy, and effectiveness. Reviews include assessing opportunities for improvement, the need for changes to the EMS, including the Environmental Policy, and environmental objectives and targets during regularly scheduled management review meetings. Records of the management reviews are retained.

Input to Management Reviews shall include:

- a. Results of internal audit evaluations of compliance with legal requirements, and with other requirements to which the company subscribes.
- b. Communication(s) from external interested parties, including complaints.
- c. The environmental performance of the Company.
- d. The extent to which objectives and targets have been met.
- e. Status of corrective and preventive actions.
- f. Follow-up actions from previous management reviews.
- g. Changing circumstances, including developments in legal, statutory, regulatory, and other requirements related to its environment aspects.
- h. Recommendations for improvement.

Amendment Record		
Revision	Date	Description
One	02/04/2013	Initial release
Two	8/30/2013	Added locations to scope. Added Appendix A Cross Reference Matrix. Added Executive Management Representative-signature block.
Three	9/30/2013	Minor Wordsmithing Added Appendix A Process Interaction Systems Cross Reference Matrix, Appendix B Environmental Management System Organization Chart
Four	07/08/2014	Removed References To Seekonk MA Location Replaced "Team CURRB" With "The Banneker Environmental Sustainability Team" Revision To Responsibility For Maintaining Of Communication Log Revision To Evaluation Of Compliance Responsibility & Process Changed to new header format and included updated Environmental Management System Organization Chart as Appendix B
Five	09/17/2015	Revision To Appendix B – Specific Naming of Aspect Champions Removed Approvals Heading Box Amended Responsibility For EPM Approvals To Banneker President & CEO from Section 3.0 Replaced "2000" with "QPM" in Appendix A – Systems Cross Reference Matrix Revised periodicity of emergency plan review in Section 4.3.7.1
Six	08/29/2016	General document re-formatting Alignment of section numbering (post Section 3.0) with section numbering from ANSI/ISO/ASQ E14001-2004 Standard Amendment of Waste Management and Facility Energy Champions in Appendix B
Seven	10/4/2017	General document re-formatting and wordsmithing Added section 4 – Context of the organization Updated Appendix A for compliance with ISO9001:2015 and ISO14001:2015
Eight	5/02/2019	Updated Business name and aligned #'s General document re-formatting and wordsmithing Amendment of Appendix B, Environmental Management System Organizational Chart

Appendix A

ISO9001:2015 and ISO 14001:2015 Process Interaction Systems Cross Reference Matrix				
BANNEKER QMS/EMS - SUPPORTING STANDARD OPERATING PROCEDURES				
ENVIRONMENTAL HEALTH AND SAFETY PROGRAM			SOP EHS-001	
SECURITY PROGRAM			SOP ERM-002	
INSIDER THREAT PROGRAM			SOP ERM-003	
BUSINESS CONTINUITY/DISASTER RECOVER			SOP ERM-0001	
ISO 9001:2015		Banneker IBQMS		ISO 14001:2015
Context of the Organization	4	EPM	4	Context of the Organization
Understanding the organization and its context	4.1	EPM	4.1	Understanding the organization and its context
Understanding the needs and expectations of interested parties	4.2	EPM	4.2	Understanding the needs and expectations of interested parties
Determining the scope of the quality management system	4.3	EPM	4.3	Determining the scope of the environmental management system
Quality management system and its processes	4.4	EPM	4.4	Environmental management system and its processes
Leadership	5		5	Leadership
Leadership and commitment	5.1	EPM	5.1	Leadership and commitment
General	5.1.1	EPM	5.1.1	-
Customer focus	5.1.2	EPM	5.1.2	-
Policy	5.2	EPM	5.2	Environmental policy
Establishing the quality policy	5.2.1	EPM	5.2.1	-
Communication quality policy	5.2.2	EPM	5.2.2	-
Organizational roles, responsibilities and authorities	5.3	EPM	5.3	Organizational roles, responsibilities and authorities
Planning	6		6	Planning

Actions to address risks and opportunities	6.1	Vision 2020 SWOT	6.1	Actions to address risks and opportunities
-	-		6.1.1	General
-	-	1002.3	6.1.2	Environmental aspects
-	-		6.1.3	Compliance obligations
-			6.1.4	Planning action
Quality objectives and planning to achieve them	6.2	1002.3	6.2	Environmental objectives and planning to achieve them
-			6.2.1	Environmental objectives
-			6.2.2	Planning actions to achieve environmental objectives
Planning of changes	6.3	1002.3	-	-
Support	7		7	Support
Resources	7.1	QPM /EPM	7.1	Resources
General	7.1.1	QPM /EPM	-	
People	7.1.2	QPM /EPM	-	
Infrastructure	7.1.3	QPM /EPM	-	
Environment of the operation of	7.1.4	QPM /EPM	-	
Monitoring and measuring	7.1.5	QPM /EPM	-	
Organizational knowledge	7.1.6	QPM /EPM	-	
Competence	7.2	1000	7.2	Competence
Awareness	7.3	1000	7.3	Awareness
Communication	7.4	QPM /EPM	7.4	Communication
-	-	QPM /EPM	7.4.1	General
-	-	QPM /EPM	7.4.2	Internal communication
-	-	QPM /EPM	7.4.3	External communication
Documentation information	7.5	2003	7.5	Documentation information
General	7.5.1	2003	7.5.1	General
Creating and updating	7.5.2	2003	7.5.2	Creating and updating
Control of documented information	7.5.3	2003	7.5.3	Control of documented information
Operation	8		8	Operation
Operational planning and control	8.1	1002.3	8.1	Operational planning and control

Requirements for products and services	8.2	1002.3	8.2	Emergency preparedness and response
Customer communication	8.2.1	1002.3	-	
Determining of requirements for products and services	8.2.2	1002.3	-	
Review of requirements for products and services	8.2.3	1002.3	-	
Changes to the requirements for products and services	8.2.4	1002.3	-	
Design and development of products and services	8.3	N/A	-	
General	8.3.1	N/A	-	
Design and development planning	8.3.2	N/A	-	
Design and development inputs	8.3.3	N/A	-	
Design and development controls	8.3.4	N/A	-	
Design and development outputs	8.3.5	N/A	-	
Design and development changes	8.3.6	N/A	-	
Control of externally provided processes, products and services	8.4	2003 BIVCA	-	
General	8.4.1	2003 BIVCA	-	
Type and extent of control	8.4.2	2003 BIVCA	-	
Information for external providers	8.4.3	2003 BIVCA	-	
Production and service provision	8.5	1002.3	-	
Control of production and service provision	8.5.1	1002.3	-	
Identification and traceability	8.5.2	1008	-	
Property belonging to external customers or providers	8.5.3	1008	-	
Preservation	8.5.4	1008 1002.3	-	
Post-delivery activities	8.5.5	-	-	
Control of changes	8.5.6	-	-	

Release of products and services	8.6	-	-	
Control of nonconforming outputs	8.7		-	
Performance evaluation	9		9	Performance evaluation
Monitoring, measurement, analysis and evaluation	9.1	1002.4	9.1	Monitoring, measurement, analysis and evaluation
General	9.1.1	1002.5	9.1.1	General
Customer satisfaction	9.1.2	1002.4	9.1.2	Evaluation of compliance
Analysis and evaluation	9.1.3	1002.5	-	
Internal audit	9.2	1002.4	9.2	Internal audit
		QPM EPM	9.2.1	General
		QPM EPM	9.2.2	Internal audit program
Management review	9.3	QPM EPM	9.3	Management review
General	9.3.1	QPM EPM	-	
Management review inputs	9.3.2	QPM EPM	-	
Management review outputs	9.3.3	QPM EPM	-	
Improvement	10		10	Improvement
General	10.1	2001	10.1	General
Nonconformity and corrective action	10.2	2001	10.2	Nonconformity and corrective action
Continual improvement	10.3	2001	10.3	Continual improvement

Appendix B
Banneker Supply Chain Solutions, Inc.
Environmental Management System Organizational Chart

