WINNS SERVICES LTD

Environmental Manual

Revision 3

Issued 25th August 2021

Conforms to ISO 14001:2015

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1.0   Revision History and Approval

Rev.	Nature of changes	Approval	Date
1	Original release.	Chris Stebbing	15th January 2018
2	Updated	Chris Stebbing	10ᵗʰ October 2020
3	Updated to Google Docs	Chris Stebbing	25th August 2021

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2.0   **Welcome to Winns Services Ltd**

WINNS is a security and cleaning specialist in the delivery of manned guarding, cleaning single and integrated service solutions. With 2 regional offices and a 24-hour control Centre within the UK, WINNS are perfectly placed to service clients' requirements. Established in 1989, WINNS Services has experienced steady growth to ensure sustainability, a pride itself on its levels of customer retention. WINNS Services are able to offer security and cleaning solutions to customers whilst bringing other cost saving options and opportunities to the fore, where required.

3.0   **About Winns Environmental Manual**

This manual is prepared for the purpose of defining the company's interpretations of the ISO 14001:2015 international standard, as well as to demonstrate how the company complies with that standard.

This manual presents "Notes" which are used to define how Winns has tailored its management system to suit its purposes. These are intended to clarify implementation approaches and interpretations for concepts which are not otherwise clearly defined in ISO 14001:2015. *Notes appear in italics, with gray background.*

Where subordinate or supporting documentation is reference in this manual, these are indicated by ***bold italics***.

4.0   **Terms and Definitions**

Winns adopts the following terms and definitions within its Environmental Management System. Where no definition is provided, the company typically adopts the definitions provided in ***ISO 14001:2015: Environmental Management – Fundamentals and Vocabulary***. In some cases, specific procedures or documentation may provide a different definition to be used in the context of that document; in such cases, the definition will supersede those provided for in this Environmental Manual or ISO 14001.

General Terminology

> **Winns** – Winns Services Ltd
>
> **Document** – written information used to describe how an activity is done.
>
> **Record** – captured evidence of an activity having been done.

Risk-Based Thinking Terminology

> **Risk** – Negative effect of uncertainty
>
> **Opportunity** – Positive effect of uncertainty
>
> **Uncertainty** - A deficiency of information related to understanding or knowledge of an event, its consequence, or likelihood. (Not to be confused with measurement uncertainty.)

Nonconforming Product Terminology

> **Rework:** Efforts to bring nonconforming product into conformance through additional operations that <u>do not</u> alter the original design of the product.
>
> **Repair:** Efforts to bring nonconforming product into conformance through additional operations that alter the original design of the product; this may be through the addition of material no specified in the original design, or through altering pre-existing design features.

Scrap: The discard of nonconforming product in lieu of rework or repair.

5.0 Context of the Organisation

4.1 Understanding the Organisation and Its Context

Winns has reviewed and analysed key aspects of itself and its stakeholders to determine the strategic direction of the company. This requires understanding internal and external issues that are of concern to Winns and its interested parties (per 4.2 below); the interested parties are identified per the document *Context of the Organisation.*

Such issues are monitored and updated as appropriate, and discussed as part of management reviews.

4.2 Understanding the Needs and Expectations of Interested Parties

The issues determined per 4.1 above are identified through an analysis of risks facing Winns and its interested parties. "Interested parties" are those stakeholders who receive our products and services, or who may be impacted by them, or those parties who may otherwise have a significant interest in our company. These parties are identified per the document *Context of the Organisation.*

This information is then used by senior management to determine the company's strategic direction. This is defined in records of management review, and periodically updated as conditions and situations change.

4.3 Determining the Scope of the Environmental Management System

Based on an analysis of the above issues of concern, interests of stakeholders, and in consideration of its products and services, Winns has determined the scope of the management system as follows:

Contract Support Services for Security and Cleaning.

The environmental system applies to all processes, activities, and employees of the following locations within the company:

Elgor House, 666-686 London Road Westcliff On Sea Essex SS0 9HQ 1702719100	28 George Street Birmingham West Midlands B12 9RG 01619145145

The environmental system applies to all processes, activities and employees within the company. The facility is located at:

Elgor House, 666-686 London Road
Westcliff On Sea Essex SS0 9HQ

Phone: 1702719100
Fax:

Web: www.winnsservices.co.uk

The following table gives a list of items excluded from the scope of our EMS.

Exclusions	Reason for Exclusion
Sub-contracted manufacturing and repair and maintenance jobs (excluding on-site jobs at client's premises), etc. that take place outside of our premises.	We do not own or control these operations. However, we do encourage those suppliers and sub-contractors to improve their environmental performance wherever possible.

The following sites are excluded from the company environmental system at this time; in the future, these may be incorporated into the company QMS, and this manual will be updated accordingly.

28 George Street Birmingham West Midlands B12 9RG 01619145145	

4.4 Environmental Management System and Its Processes

4.4.1 Process Identification

Winns has adopted a process approach for its management system. By identifying the top-level processes within the company, and then managing each of these discretely, this reduces the potential for nonconforming products and services discovered during final processes or after delivery. Instead, nonconformities and risks are identified in real time, by actions taken within each of the top-level processes.

Note: not all activities are considered "processes" – the term "process" in this context indicates the activity has been elevated to a higher level of control and management oversight. The controls indicated herein are applicable only to the top-level processes identified.

The following top-level processes have been identified for Winns:

- Investigate the possible reduction of chemicals for cleaning
- Reduce, reuse and recycle waste and packaging
- Improve the efficiency of energy waste

Each process may be supported by other activities, such as tasks or sub-processes. Monitoring and control of top level processes ensures effective implementation and control of all subordinate tasks or sub-processes.

Each top-level process has a **Process Definition** document which defines:

- applicable inputs and outputs
- process owner(s)
- applicable responsibilities and authorities
- applicable risks and opportunities
- critical and supporting resources
- criteria and methods employed to ensure the effectiveness of the process
- Environmental objectives related to that process

The sequence of interaction of these processes is illustrated in Appendix A.

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Note: Appendix A represents the <u>typical</u> sequence of processes, and may be altered depending on customer or regulatory requirements at the job or contract level, as needed.

4.4.2   Process Controls & Objectives

Each process has at least one objective established for it; this is a statement of the intent of the process. Each objective is then supported by at least one key performance indicator (KPI) which is then measured to determine the process' ability to meet the Environmental objective.

Note: some processes have multiple objectives. This is determined by the nature of the process, it's impact on products and services, and associated risks.

Note: Whereas ISO 14001 discusses process measurements and "Environmental objectives" as separate concepts, Winns combines them; i.e., Environmental objectives are used to control the processes. Additional objectives for products and services may be assigned, but these will also be used to measure process effectiveness.

Throughout the year, metrics data is measured and gathered by process owners or other assigned managers, in order to present the data to Senior Management Team. The data is then analyzed by Senior Management Team in order that Senior Management Team may set goals and make adjustments for the purposes of long-term continual improvement.

The specific Environmental objectives for each process are defined in the applicable **Process Definition**.

Metrics, along with current standings and goals for each objective, are recorded in records of management review.

When a process does not meet a goal, or an unexpected problem is encountered with a process, the corrective and preventive action process is implemented to research and resolve the issue. In addition, opportunities for improvement are sought and implemented, for the identified processes.

4.4.3   Outsourced Processes

Any process performed by a third party is considered an "outsourced process" and must be controlled, as well. The company's outsourced processes, and the control methods implemented for each, are defined in **Outsourced Processes**.

The type and extent of control to be applied to the outsourced process take into consideration:

a) the potential impact of the outsourced process on the company's capability to provide product that conforms to requirements,

b) the degree to which the control for the process is shared,

c) the capability of achieving the necessary control through the purchasing contract requirements.

6.0   **Leadership**

5.1   **Leadership & Commitment**

5.1.1   **General**

Senior Management Team of Winns provides evidence of its leadership and commitment to the development and implementation of the Environmental management system and continually improving its effectiveness by:

a) taking accountability of the effectiveness of the Environmental management system;

b) ensuring that the **Environmental Policy** and Environmental objectives are established for

the management system and are compatible with the strategic direction and the context of the organisation;

   c) ensuring the integration of the management system requirements into the organisation's other business processes, as deemed appropriate (see note);

   d) promoting awareness of the process approach;

   e) ensuring that the resources needed for the management system are available;

   f) communicating the importance of effective Environmental Management and of conforming to the management system requirements;

   g) ensuring that the Environmental management system achieves its intended results;

   h) engaging, directing and supporting persons to contribute to the effectiveness of the Environmental management system;

   i) promoting continual improvement;

   j) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

Note: "business processes" such as accounting, employee benefits management and legal activities are out of scope of the EMS.

5.1.2 Customer focus

Senior Management Team of Winns adopts a customer-first approach which ensures that customer needs and expectations are determined, converted into requirements and are met with the aim of enhancing customer Environmental satisfaction.

This is accomplished by assuring:

   a) customer and applicable statutory and regulatory requirements are determined, understood and consistently met;

   b) the risks and opportunities that can affect conformity of Environmental services and the ability to enhance customer satisfaction are determined and addressed;

   c) the focus on enhancing customer satisfaction is maintained.

5.2 Policy

Senior Management Team has developed the Environmental Policy, defined in section 3.0 above, that governs day-to-day operations to ensure Environmental.

The Environmental Policy is released as a standalone document as well, and is communicated and implemented throughout the organisation.

The Environmental Policy of Winns is as follows:

__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,

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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.

WINNS SERVICES LTD. 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 possible reduction of chemicals for cleaning**
- **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.

5.3   Organisational Roles Responsibilities and Authorities

Our Senior Management Team has assigned responsibilities and authorities for all roles relevant to the full and proper implementation, operation and maintenance of this environmental management system. These are communicated through the combination of our Organisation Chart and internal Job Titles.

The Senior Management Team has assigned responsibility and authority for:

- ensuring that the EMS conforms to applicable standards

- ensuring that EMS processes are delivering their intended outputs

- reporting on the performance of the EMS

- ensuring the promotion of a focus on environmental matters throughout the organisation

- ensuring that the integrity of the EMS is maintained when changes are planned and implemented

All managers are expected to demonstrate their commitment to the implementation and improvement of the EMS through:

- the provision of necessary resources

- their involvement in the internal audit process

- their proactive involvement in continual improvement activities

- focusing on the improvement of key system processes

All managers are responsible for the implementation of the policies, processes and systems described in this manual and for planning, controlling and suitably resourcing the EMS processes within their area of responsibility.

All staff are responsible for the implementation of the environmental policies and procedures applicable to processes they perform and are encouraged to identify and report any known or potential problems and to recommend related solutions.

All staff responsible for environmental outcomes have the authority to stop activities to address environmental problems.

In addition, the following overall EMS responsibilities and authorities are assigned as follows:

Responsibility	Assigned To
Ensuring that the environmental management system conforms to applicable standards	Senior Management Team
Ensuring that the processes are delivering their intended outputs	Applicable process owner
Reporting on the performance of the environmental management system and providing opportunities for improvement for the management system	General Manager
Ensuring the promotion of customer focus throughout the organisation	Senior Management Team
Ensuring that the integrity of the environment management system is maintained when changes are planned and implemented	Senior Management Team

The General Manager has been assigned the role of Environmental Manager when having a single point of contact to represent the Winns environmental system is useful or required by customer or regulations. Other duties of the Environmental Manager may be defined herein or within other documented procedures.

7.0   Planning

6.1   Actions to Address Risks and Opportunities

Note: Winns deviates slightly from the approach towards risk and opportunity presented in ISO 14001. Instead, Winns views "uncertainty" as neutral, but defines "risk" as a negative effect of uncertainty, and "opportunity" as a positive effect of uncertainty. Winns has elected to manage risks and opportunities separately, except where they may overlap. Formal risk management may not be utilised in all instances; instead, the level of risk assessment, analysis, treatment and recordkeeping will be performed to the level deemed appropriate for each circumstance or application.

6.1.1 General

In creating our EMS, we have identified the risks and opportunities that need to be addressed, based particularly on: *4.1 Understanding our business, 4.2 Understanding the needs and expectations of interested parties* and *6.1.3 Compliance Obligations* but also including all other aspects of the EMS. Those risks and opportunities have been addressed to:

- ensure that the EMS can achieve its intended outcomes
- enhance desirable effects
- prevent, or reduce, undesirable effects, including the potential for external environmental conditions to affect us
- achieve continual improvement

When managing risks and opportunities:

- we consider risks and opportunities when taking actions within the EMS, as well as when implementing or improving the EMS

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- formal risk management may not be utilised in all circumstances and the level of risk assessment, analysis, actions and recording will be to a level appropriate to each circumstance
- the actions we take to address environmental risks and opportunities are proportionate to their potential impact

We operate and maintain arrangements for determining our environmental risks and opportunities as set out in our EMS Identification of Environmental Aspects and Significant Impacts Procedure.

We operate and maintain arrangements for determining potential emergencies as set out in our EMS Environmental Emergency Preparedness and Response Procedure.

6.1.2 Environmental aspects

We operate and maintain arrangements to document, review and communicate our environmental aspects and significant impacts as set out in the EMS Identification of Environmental Aspects and Significant Impacts Procedure.

By means of this procedure we:

- determine those environmental aspects and significant impacts arising from our activities, products and services that fall within the scope of our EMS
- identify their environmental impacts and the degree to which we can control, and influence them in the context of a life-cycle perspective

6.1.3 Compliance obligations

We operate and maintain arrangements to identify, review, document and communicate our environmental compliance obligations as set out in our EMS Fulfilment of Environmental Compliance Obligations Procedure.

By means of this procedure we determine, and provide access to, the compliance obligations related to our environmental aspects, and:

- determine how these compliance obligations apply to us
- take these compliance obligations into account when establishing, implementing, maintaining and continually improving our EMS

6.1.4 Planning action

We have implement our EMS to address our significant environmental aspects, our compliance obligations and the risks and opportunities we identify.

Through planning, measurement and review, in accordance with our EMS, and taking into account both our technological options and our financial, business and operational requirements, we act to ensure continual improvement in our environmental performance.

We operate and maintain arrangements for the periodic review of these plans as set out in our EMS Control of Management Reviews Procedure.

Winns considers risks and opportunities when taking actions within the environmental management system, as well as when implementing or improving the environmental management system; likewise, these are considered relative to products and services. Risks and opportunities are identified as part of the "Context of the Organisation Exercise" defined in Context of the Organisation, as well as throughout all other activities of the EMS.

Risks and opportunities are managed in accordance with the document *Risk and Opportunity Management*. This procedure defines how risks are managed in order to minimise their likelihood and impact, and how opportunities are managed to improve their likelihood and benefit.

6.2   Environmental Objectives and Planning to Achieve Them

As part of the adoption of the process approach, Winns utilises its process objectives, as discussed in 4.4 above, as the main Environmental objectives for the EMS. These include overall product-related

6.2.1 Environmental objectives; additional product-related Environmental objectives may be defined in work instructions or customer requirements.

The process objectives have been developed in consideration that they:

a) reduce wastage of energy and natural resources

b) reduce emissions and releases to the environment

c) reduce the number of environmental accidents and incidents by 10% or remain at 0 by 31-Mar-2019

d) reduce organisation's carbon footprint per kVA of final product by 10% by 31-Mar-2025

e) enhance environmental awareness among employees, contractors and customers.

f) be consistent with the Environmental policy;

g) be measurable;

h) take into account applicable requirements;

i) be monitored;

j) be communicated;

k) be updated as appropriate.

Process Environmental objectives are defined in the minutes of management review per section 9.3 below.

The planning of process Environmental objectives is defined in section 4.4. above.

6.2.2 Planning actions to achieve our Environmental Objectives

When planning how to achieve Environmental Objectives, we determine:

● what will be done

● what resources will be required

● who will be responsible

● when it will be completed

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- how the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable Environmental Objectives.

Wherever practicable, we seek to integrate actions to achieve our Environmental Objectives into our business processes.

The head of each business function periodically, or whenever Environmental Objectives are changed, prepares an <u>Environmental Objectives Realisation Plan</u> for their area of responsibility which is submitted to the <Senior Management Team> for approval and monitoring.

6.3   Planning of Changes

Changes to the Environmental Management system and its processes are carried out in a planned manner per the procedure ***Change Management.***

8.0   **Support**

7.1   **Resources**

7.1.1   **General**

Winns determines and provides the resources needed:

    a) to implement and maintain the environmental management system and continually improve its effectiveness

Resource allocation is done with consideration of the capability and constraints on existing internal resources, as well as needs related to supplier expectations.

Resources and resource allocation are assessed during management reviews.

7.1.2   **People**

Senior management ensures that it provides sufficient staffing for the effective operation of the environmental management system, as well its identified processes.

7.1.3   **Infrastructure**

Winns determines, provides and maintains the infrastructure needed to achieve conformity to product requirements. Infrastructure includes, as applicable:

    a) buildings, workspace and associated facilities;

    b) process equipment, hardware and software;

    c) supporting services such as transport;

    d) Information and communication technology.

Equipment is validated per the procedure ***Validation of Equipment*** and maintained per the procedure ***Preventive Maintenance.***

7.1.4   **Environment for the Operation of Processes**

Winns provides a clean, safe and well-lit working environment. The Senior Management Team of Winns manages the work environment needed to achieve conformity to product requirements. Specific environmental requirements for products are determined during Environmental planning and are documented in subordinate procedures, work instructions, or job documentation. Where special work environments have been implemented, these shall also be maintained per 6.3 above.

Human factors are considered to the extent that they directly impact on the Environment

Note: Social, psychological and safety aspects of the work environment are managed through activities outside of the scope of the management system. Only work environment aspects which can directly affect process efficiency or product and service Environmental are managed through the management system.

7.1.5   Monitoring and Measuring Resources

Where equipment is used for critical measurement activities, such as inspection and testing, these shall be subject to control and either calibration or verification; see the procedure **Calibration of Equipment.**

Note: Calibration and measurement traceability is not employed for all measurement devices. Instead, Winns determines which devices will be subject to calibration based on its processes, products and services, or in order to comply with specifications or requirements. These decisions are also based on the importance of a measurement, and considerations of risk.

7.1.6   Organisational Knowledge

Winns also determines the knowledge necessary for the EMS. This may include knowledge and information obtained from:

a) internal sources, such as lessons learned, feedback from subject matter experts

b) external sources such as standards, academia, conferences, and/or information gathered from customers or suppliers.

This knowledge shall be maintained, and made available to the extent necessary.

When addressing changing needs and trends, Winns shall consider its current knowledge and determine how to acquire or access the necessary additional knowledge.

7.2   Competence

Staff members performing work affecting EMS are competent on the basis of appropriate education, training, skills and experience. The documented procedure **Hiring and Training** defines these activities in detail.

Note: the management system does not include other aspects of Human Resources management, such as payroll, benefits, insurance, labour relations or disciplinary actions.

7.3   Awareness

Training and subsequent communication ensure that staff are aware of:

a) the Environmental policy;

b) relevant Environmental objectives;

c) their contribution to the effectiveness of the environmental management system, including the benefits of improved performance;

d) the implications of not conforming with the environmental management system requirements.

7.4   Communication

Senior Management Team of Winns ensures internal communication takes place regarding the effectiveness of the environmental management system. Internal communication methods include:

a) all staff are competent to undertake their tasks

b) all staff are aware of:

c) our management system(s) and their related policies and objectives

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d)   their roles and responsibilities

e)   their contribution to the effectiveness of our management system(s)

f)   the benefits of improved personal performance

g)   the importance of complying with our management systems, policies and procedures

h)   the consequences of any departure from our management systems, policies and procedures

i)   emergency preparedness and response requirements

j)   any management system changes

k)   the results of the Senior Management Team's annual review of management system(s) compared to their objectives

l)   training needs are identified

m) appropriate training plans are developed and implemented use of corrective and preventive action processes to report nonconformities or suggestions for improvement

n)   use of the results of analysis of data

o)   meetings (periodic, scheduled and/or unscheduled) to discuss aspects of the EMS

p)   use of the results of the internal audit process

q)   regular company meetings including employees

r)   Winns' "open door" policy which allows any employee access to Senior Management Team for discussions on improving the environmental system

7.5   Documented Information

The environmental management system documentation includes both documents and records.

Note: the ISO 14001:2015 standard uses the term "documented information"; Winns does not use this term, but instead relies on the terms "document" and "record" to avoid confusion. In this context the terms are defined by Winns as provided for in section 3.0 above. Documents and records undergo different controls as defined herein.

The extent of the management system documentation has been developed based on the following:

a) The size of Winns

b) Complexity and interaction of the processes

c) Risks and opportunities

d) Competence of personnel

Documents required for the environmental management system are controlled in accordance with procedure **Control of Documents.** The purpose of document control is to ensure that staff have access to the latest, approved information, and to restrict the use of obsolete information. All documented procedures are established, documented, implemented and maintained.

A documented procedure **Control of Records** has been established to define the controls needed for the identification, storage, retrieval, protection, retention time, and disposition of Environmental records. This procedure also defines the methods for controlling records that are created by and/or retained by suppliers.

These controls are applicable to those records which provide evidence of conformance to requirements; this may be evidence of product and service requirements, contractual requirements,

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procedural requirements, or statutory/regulatory compliance. In addition, Environmental records include any records which provide evidence of the effective operation of the management system.

9.0 **Operation**

8.1 **Operational Planning and Control**

Winns plans and develops the processes needed for realisation of its products and services. Planning of product and service realisation is consistent with the requirements of the other processes of the environmental management system. Such planning considers the information related to the context of the organisation (see section 2.0 above), current resources and capabilities, as well as product and service requirements.

Such planning is accomplished through:

a) determining the requirements for the environmental system;

b) determining the resources needed to achieve conformity to the product and service requirements;

c) implementing control of the processes in accordance with the criteria;

d) determining, maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate the conformity of the environmental management system to their requirements.

Changes to operational processes are done in accordance with the document *Change Management*.

Outsourced processes and the means by which Winns controls them are defined in the documented procedure *Outsourced Processes.*

8.2 **Emergency preparedness and response**

Winns operate and maintain arrangements for environmental emergency preparedness as set out in our EMS Environmental Emergency Preparedness and Response Procedure.

Our preparations include:

a) planning actions to prevent or mitigate adverse environmental impacts from emergency situations

b) readiness to respond to actual emergency situations

c) taking action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact

d) periodically, where practicable, testing the planned response actions

e) periodically reviewing and updating the processes and planned response actions, in particular after the occurrence of emergency situations or tests

f) providing relevant information and training related to emergency preparedness and response, as appropriate, to all those working under our control and relevant interested parties.

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10.0 Performance Evaluation

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

Winns has determined which aspects of its Environmental Management System must be monitored and measured, as well as the methods to utilize and records to maintain, within this Environmental Manual and subordinate documentation.

Monitoring and measurement of the processes, as defined in 4.4 above, ensure that the Senior Management Team evaluates the performance and effectiveness of the Environmental Management System itself.

9.1.2 Evaluation of compliance

We operate and maintain arrangements for evaluation of compliance as set out in our EMS Fulfilment of Environmental Compliance Obligations Procedure.

By means of this procedure we:

•   determine the frequency of compliance evaluation

•   evaluate compliance and take action as necessary

•   maintain knowledge and understanding of our compliance status

The corrective and preventive action system shall be used to develop and implement plans for environmental satisfaction improvement that address deficiencies identified by these evaluations, and assess the effectiveness of the results.

9.1.3 Analysis and Evaluation

Winns have identified the key characteristics of processes and activities that should be measured and included them in our Environmental Monitoring Plan which clearly identifies what will be measured, where and when it should be measured, and what methods should be used.

The General Manager periodically analyses the results of measurement and monitoring and:

•   communicates relevant environmental performance information both internally to the Senior Management Team and all appropriate managers and supervisors

•   reports results to the environmental management review meeting, which evaluates and uses these results, to identify both successes and areas requiring correction or improvement

Statistical techniques used may be defined in appropriate documented procedures; in all cases, the methods are based on established standards or are otherwise determined to be statistically valid.

9.2 Internal Audit

Winns conducts internal audits at planned intervals to determine whether the environmental management system conforms to contractual and regulatory requirements, to the requirements of ISO 14001, and to management system requirements. Audits also seek to ensure that the environmental management system has been effectively implemented and is maintained.

These activities are defined in the document *Internal Audits.*

9.3   Management Review

The Senior Management Team reviews the environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. The review includes assessing opportunities for improvement, and the need for changes to the environmental management system, including the ***Environmental Policy*** and Environmental objectives.

Management review frequency, agenda (inputs), outputs, required members, actions taken and other review requirements are defined in the documented procedure ***Management Review.***

Records from management reviews are maintained.

11.0   Improvement

10.1   General

Winns uses the environmental management system to improve our environmental outcomes.

Improvement shall be driven by an analysis of data related to:

The improvement opportunities we seek include:

   a) addressing evolving and future needs and expectations

   b) correcting, preventing and reducing undesired effects

   c) improving the performance and effectiveness of our EMS

   d) the effectiveness of actions taken to address risks and opportunities;

   e) the performance of external providers;

   f) other improvements to the environmental management system.

10.2   Nonconformity and Corrective Action

Winns takes corrective action to eliminate the cause of nonconformity in order to prevent recurrence. Likewise, the company takes preventive action to eliminate the causes of potential nonconformities in order to prevent their occurrence.

These activities are done through the use of the formal Corrective Action (***CAR***) system, and are defined in the document ***Corrective and Preventive Action.***

10.3   Continual Improvement

Through the process effectiveness reviews, done as part of Management Review, Winns works to continually improve the suitability, adequacy and effectiveness of the Environmental Management system. This includes seeking opportunities for improvement.

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Appendix A: Overall Process Sequence & Interaction