ENVIRONMENTAL MANAGEMENT SYSTEM
ISO-14001:2004
POLICY MANUAL

WATERFORD CARPETS LIMITED
CONTROLLED COPY
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Revision Policy

The Environmental Policy Manual shall be revised to reflect any changes to Waterford Carpet Limited Environmental Management System (EMS).

At the discretion of the Managing Director, revisions, affected paragraphs, shall be submitted to the Environmental Management Team for their review. When a revision occurs, the Environmental Management System (EMS) Policy Manual shall be re-issued.

The Environmental Management Representative is responsible for the maintenance of the Environmental Management System (EMS) Policy Manual as described and for reviewing the manual annually.

Accepted revisions to the Environmental Management System (EMS) Policy Manual are recorded on the Revision Log per Document Control requirements.

The manual is distributed and maintained on a controlled-copy basis, with manual holders receiving copies of new or revised policies to document changes for reasons that include the following.

- The addition of new commodities or product lines to the location.
- A change of manufacturing location for existing parts.
- The introduction of significant new equipment or process changes.
- Changes relative to safety, critical, or reliability characteristics.
- Significant changes in the organizational structure.

Revisions will be submitted when the above or the appropriate conditions dictate.

Revision Log

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<td>Document</td>
<td>Initial Release</td>
<td>NC</td>
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<td>14/04/2009</td>
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Section X1 Definitions

The Management Teams

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

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<td>Managing Director</td>
<td>Noel Cunningham</td>
</tr>
<tr>
<td>Environmental Manager</td>
<td>Bart Zdrojowy</td>
</tr>
<tr>
<td>Plant Engineer</td>
<td>Bill Lyons</td>
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Continual improvement
Process of enhancing the environmental management system to achieve improvements in overall environmental performance in line with the organization's environmental policy.

Environment
Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, human's and their interrelations.

Environmental aspect
Elements of an organization's activities, products or services that can interact with the environment.

Environmental impact
Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s activities, products or services.

Environmental management system
The part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

Environmental management system audit
A systemic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organization’s environmental management system conforms to the environmental management system audit criteria set by the organization, and for the communication of the results of this process to management.

Environmental objective
Overall environmental goal, arising from the environmental policy, that an organization sets itself to achieve, and which is quantified where practicable.

Environmental performance
Measurable results of the environmental management system, related to an organization's control of its environmental aspects, based on its environmental policy, objectives and targets.

Environmental policy
Statement by the organization of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.
Environmental target
Detailed performance requirement quantified where practicable, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set in order to achieve those objectives.

Interested party
Individual or group concerned with or affected by the environmental performance of an organization.

Organization
Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

Prevention of pollution
Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution.
**Environmental Policy**

The General Management of Waterford Carpets Limited is committed to pollution prevention and environmental protection at its facility. Waterford Carpets Limited aims to achieve the highest standards of environmental performance in the interest of all our stakeholders, whether they are employees, neighbours, the general public or the natural environment.

Waterford Carpets Limited is committed to complying with all environmental legislation and regulations that may apply to the industry and we will make every effort to comply with the requirements of our Integrated Pollution Control Licence. We will adhere to the principles of responsible care and we strive for continuous improvement in its implementation.

By preparing and implementing an Environmental Management System, which will include policies, objectives and targets, we will administer a continuous programme designed to ensure that the products manufactured at Waterford Carpets Limited will not compromise or damage the environment.

Waterford Carpets Limited will review the Environmental Management System annually. We will also review our environmental aspects register and set Environmental Objectives and targets accordingly.

Waterford Carpets will examine and evaluate the environmental implications of any processes and products, and cleaner technologies will be investigated and utilised where possible. Waste avoidance and reduction plus a waste recycling initiative will be vigorously pursued and implemented.

Waterford Carpets will continuously examine, evaluate and review energy usage in its manufacturing processes and implement an energy conservation programme. We will ensure that adequate operational procedures and emergency plans are implemented and reviewed on an ongoing basis. We will ensure that our employees receive adequate training in relation to our environmental policies and procedures and will review these training needs as may be required.

We are committed to continuous improvement of our Environmental Management System and we will ensure that it shall be integrated at all levels within our organisation. We will strive for ever-improving environmental performance and we will strive to protect the environment for our employees, neighbours and all our other stakeholders.

________________
Noel Cunningham
Managing Director
1.0 Purpose

This manual defines the scope of the Waterford Carpet Ltd. Environmental Management System (EMS) and provides a linkage of system documents to the various elements of the ISO 14001:2004 standard.

The principal elements of the system described in this manual are:

- Environmental Policy
- Environmental Aspects
- Legal and Other Requirements
- Environmental Objectives and Targets
- Environmental Management Programs
- Organizational Structure and Responsibility
- Training, Awareness and Competence
- Communication
- Document Control
- Operational Control
- Emergency Preparedness and Response
- Monitoring and Measurement
- Nonconformance and Corrective and Preventive Action
- Records
- Environmental Management System Audit
- Management Review

2.0 Scope

The Waterford Carpets Ltd. EMS provides a mechanism for environmental management thoughtout all areas and departments. The environmental management system is designed to cover environmental aspects, which Waterford Carpets Ltd. can control and directly manage, and those it does not control or directly manage but can be expected to influence.

3.0 Issue and Update

The control of this manual is in accordance with the Waterford Carpets Ltd. environmental procedure EMS-P-012 Environmental Document Control. All copies of this manual not marked “CONTROLLED DOCUMENT” are uncontrolled and should be used for reference purposes only.

Amendments to this manual will be issued by the Environmental Management Representative or designee, following approval by the managing director.

4.0 Environmental Policy

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

**Reference: Material:**
ISO-14001 Standard (4.2)

**Applicable Procedures:**
EMS-P-010 Environmental Communications

### 5.0 Environmental Aspects

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

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

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

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

**Reference Materials**
ISO-14001 Standard (4.3.1)

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

### 6.0 Legal and Other Requirements

Waterford Carpets Ltd. has established an environmental procedure for the purpose of identifying, accessing, determining how they apply to its environmental aspects and communicating legal and other requirements that are applicable to the site.

Additional information is also available through legal publications. Local regulations are identified, accessed and communicated by the Environmental Management Representative. At least annually the Environmental Management Representative will review the most current national, regional, provincial, European and local legal and other requirements as applicable to Waterford Carpets Ltd.

**Reference Materials**
ISO 14001 Standard (4.3.2)

**Applicable Procedures**
EMS-P-007 Environmental Regulations and Other Requirements

**7.0 Environmental Objectives and Targets**

The Environmental Management Team (EMT) has developed objectives and targets for each significant environmental aspect. These objectives and targets define:

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

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

**Reference Material**
ISO 14001 Standard (4.3.3)

**Applicable Procedures**
EMS-P-002 Environmental Aspects, Objectives and Targets, and Management programmes
EMS-P-008 Environmental Review of Programmes

**8.0 Environmental Management Programme**

The Environmental Management Team (EMT) establishes environmental management programmes and assigns responsibility for (EMPs) at relevant functions and levels throughout our organization as a means for achieving objectives and targets. These programmes define the principle actions to be taken, those responsible for undertaking those actions and the scheduled times for their implementation. The EMPs are developed by the EMT and approved by the Managing Director. (Refer to Section 5.0 Environmental Aspects).

**Reference Materials**
ISO 14001 Standard (4.3.4)

**Applicable Procedures**
EMS-P-002 Environmental Aspects, Objectives and Targets, and Management programmes.
EMS-P-008 Environmental Review of Projects.
9.0 **Resources, Roles, Responsibility and Authority**

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

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

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

- Ensuring the environmental management system requirements are established, implemented and maintained in accordance with this international standard;
- Reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the environmental management system.

The Environmental Management Team (EMT) provides routine EMS support, and reports directly to the Managing Director. Documentation, which describes various positions, is included in our organizational chart – Structure & Responsibilities.

**Reference Material**
ISO-14001 (4.4.1)

**Applicable Documents**
Organizational Chart (p.17)

10. **Competence, Training and Awareness**

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

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

The personnel manager is responsible for maintaining employee-training records. Appropriate records are monitored and reviewed on a scheduled basis.

**Reference Material**
ISO-14001 Standard (4.4.1)

**Applicable Procedures**
EMS-P-014 Environmental Training and Awareness

### 11.0 Communication

Waterford Carpets Ltd. has established and will maintain a procedure for internal communications regarding environmental aspects and the Environmental Management System and receiving, documenting and responding to relevant communication from external interested parties.

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

**Reference Material**
ISO14001 Standard (4.4.3)

**Applicable Procedures**
EMS-P-010 Environmental Communications

### 12.0 Documentation

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

Environmental management system documentation includes:

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

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

### 13.0 Document Control

Waterford Carpets Ltd. has established an environmental procedure for controlling all documents related to the environmental system. This procedure describes where documents can be located and how and when they are reviewed.

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

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

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

**Reference Material**
ISO-14001 Standard (4.4.5)

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

### 14. Operation Control

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

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

- **System procedures**: Cover the management and control of both the Environmental Management System and the principle environmental aspects, which the system manages. These procedures are site-wide in their application.
- **Work Practices**: Cover the environmental control of specific operational activities and they are usually activity specific in their application.

**Reference Material**
ISO-14001 Standard (4.4.6)

**Applicable Procedures**
EMS-P-016 Operational Control

### 15. Emergency Preparedness and Response

Waterford Carpets Ltd. has an environmental procedure to identify the potential for and how to respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them.
Emergency methods are reviewed by the Environmental Management team (EMT) on an annual basis and after the occurrence of accidents or emergency situations.

Reference Material
ISO-14001 Standard (4.7)

Applicable Procedures
EMS-P-006 Emergency Preparedness and Response

16.0 Monitoring and Measurement

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

This procedure includes calibration and maintenance requirements and ensures that records will be retained.

Waterford Carpets Ltd. has established an Environmental Regulatory Compliance programme. Procedure EMS-P-003 outlines the requirements of the programme to periodically review regulatory compliance and report results to management on a yearly basis.

Reference Material
ISO-14001 Standard (4.5.1)

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

17.0 Evaluation of Compliance

Waterford Carpets Ltd. has an environmental procedure for periodically evaluating compliance with applicable legal requirements and other requirements to which it subscribes.

Records shall maintained.

Reference Material
ISO-14001 Standard (4.5.2)

Applicable Procedures
EMS-P-007 Legal and Other Requirements

18.0 Nonconformance and Corrective and Preventive Actions
Waterford Carpets Ltd. has an environmental procedure for defining responsibility and authority for handling and investigating nonconformance, for taking actions to mitigate impacts, and for initiating and completing corrective and preventive action. Any changes in procedures resulting from corrective and preventive actions are implemented and recorded. The Managing Director maintains these records.

**Reference Material**
ISO-14001 Standard (4.5.3)

**Applicable Procedures**
EMS-P-004 Nonconformance and Corrective and Preventive Actions

### 19.0 Records

Waterford Carpets Ltd. shall establish and maintain records as necessary to demonstrate conformity to the requirements of our environmental management system and ISO-14001 and the results achieved.

We have an environmental procedure for the identification, storage, protection, retention and disposal of environmental records. Some of these records include:

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

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

**Reference Material**
ISO-14001 Standard (4.5.3)

**Applicable Procedures**
EMS-P-013 Records
EMS-F-04.05.001 Index of Environmental Records

### 20.0 Environmental Management System Audit

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

Audits shall determine:

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

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

**Reference Material**  
ISO-14001 Standard (4.5.4)

**Applicable Procedures**  
EMS-P-003 Environmental Management System and Regulatory Compliance Audits

### 21.0 Management Review

The Management of Waterford Carpets and the EMT reviews all elements of the Environmental Management System annually to ensure its continuing suitability, adequacy and effectiveness. Meeting minutes record these reviews and are kept by the Managing Director.

**Reference Material**  
ISO-14001 Standard (4.6)

**Applicable Procedures**  
EMS-P-005 Environmental Management System Management Review