



Environmental Management System

September 23, 2011
Version 1.0

CWMC Environmental Management System

1.0 Introduction

The CWMC Environmental Management System provides for the conservation of energy and other natural resources and reduction of the impact on the environment from waste products. This policy is supported by instructions, practices and standards. Through monitoring its implementation, CWMC can effectively manage the potential environmental impact of its day-to-day operations.

1.1 About CWMC operations and the environment

CWMC is a marketing communications agency comprised of the agency principle and writers, all of whom work from home-based offices. This business model makes it impossible to separate out business from home use of energy and production of greenhouse gases for monitoring and measuring.

However, this business model does avoid the greater energy use and production of Scope 2 greenhouse gas that would result from operating out of commercial office space. Additionally, our business model avoids the direct or indirect production of Scope 1 greenhouse gas by eliminating commuting between homes and offices.

1.2 Message to subcontractors

CWMC is committed to the continual improvement regarding the potential environmental impact of day to day operations. CWMC subcontractors will operate in a manner that is protective of the environment. At a minimum, subcontractors must comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, and recycling. Subcontractors must also comply with any additional environmental requirements specific to the services being provided to CWMC as called for in design specifications, and contract documents. Subcontractors should strive to implement management systems to meet these requirements.

2.0 About CWMC operations and the environment

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However, this business model does avoid the greater energy use and production of Scope 2 greenhouse gas that would result from operating out of commercial office space. Additionally, our business model avoids the direct or indirect production of Scope 1 greenhouse gas by eliminating commuting between homes and offices.

Guidelines for waste management and recycling are part of this Environmental Management System. We will require compliance with recycling guidelines and, as is reasonable, monitor and report the reduction of the resources consumed and types of waste generated by our home-based offices.

3.0 CWMC environmental policy

CWMC environmental policy requires the conservation of energy and other natural resources and the measurement of results to the greatest extent possible with our home-based offices business model. CWMC environmental policy requires the day to day implementation of waste reduction and friendlier environmental office practices.

The CWMC environmental policy is reviewed semi-annually by the company president upon the receipt of subcontractor self-assessments.

3.1 *Energy conservation*

3.11 Energy monitoring and measurement

Because it is not practical or even possible to separate home-office energy use from each individual's overall home energy use, CWMC can only monitor and measure compliance with CWMC energy conservation policies via the self-audit and reporting requirements stated in Section 4.2 Our goal is to achieve 100% compliance with these guidelines.

3.12 Energy conservation guidelines and policies

While it will not be possible to actually measure the amount of energy conserved from business use in home-based offices (and concurrently the greenhouse gas emissions resulting from energy consumption), our energy conservation guidelines include requirements that will result in energy conservation overall.

CWMC and its subcontractors will practice energy conservation in daily use of home-based offices. These practices include, at a minimum, the following:

- Turn off lights, monitors and non-essential peripherals at the end of the work day
- Use “sleep” or “hibernation” mode on computers as practical during non-office hours
- Reset thermostats where possible at the end of the workday to reduce overnight cooling and heating
- Replace “vampire” recharging bricks or unplug rechargers when not in use
- At end of life for all office equipment, replace with Energy Star-rated devices
- Use CF or Energy Star-rated bulbs in office lighting

3.2 Scope 1 and scope 2 greenhouse gas emissions

3.21 Scope 1 and scope 2 greenhouse gas emissions monitoring and measurement

CWMC is a marketing communications agency comprised of the agency principle and writers, all of whom work from home-based offices. This business model makes it impossible to separate out business from home use of energy and the related indirect production of scope 1 or scope 2 greenhouse gases. We engage in no manufacturing or production processes that directly produce greenhouse gases.

However, this business model does avoid the greater energy use and production of Scope 2 greenhouse gas that would result from operating out of commercial office space. Additionally, our business model avoids the direct or indirect production of Scope 1 greenhouse gas by eliminating commuting between homes and offices. Very little travel (one or two face-to-face client meetings annually) is associated with our business. Therefore, the measurement of scope 1 greenhouse gases from this occasional local or air travel is negligible and would not be practical to measure or report.

CWMCE energy conservation guidelines (see Section 3.2) include requirements that will result in energy conservation overall and associated indirect production of scope 1 or scope 2 greenhouse gases. We do measure and report compliance with CWMC energy conservation policies via the self-audit and reporting requirements stated in Section 4.2 Our goal is to achieve 100% compliance with these guidelines.

3.3 Waste management and recycling

3.31 Waste management and recycling monitoring and measurement

It is not practical to measure and monitor the contribution of home office-generated trash and recycling material picked up by home garbage/recycling collection companies.

However, we can measure reduction in the use of key office consumables, in particular paper and ink/ink cartridges. To that end, CWMC is committed to reducing the amount of paper and ink consumption by at least 15% annually for the first year, and 5% for each of the following two years. This is to be accomplished by reducing the overall volume of printing as well as replacing end-of-life printers with devices capable of two-sided printing.

CWMC and CWMC subcontractors will establish a baseline by recording paper and ink consumption from December 1 through June 1 and provide the baseline measurement in the first audit report. Thereafter, consumption will be measured against the baseline in semi-annual reports.

Additionally, CWMC will monitor and measure compliance with CWMC waste management and recycling policies via the self-audit and reporting requirements stated in Section 3.2 Our goal is to achieve 100% compliance with these guidelines.

3.32 Waste management guidelines and policies

CWMC and its subcontractors will practice energy conservation in daily use of home-based offices. These practices include, at a minimum, the following:

- Recycle all paper, plastic bottles, cans, ink cartridges, fluorescent light bulbs and other applicable office-use products.
- Recycle electronic equipment, including computers, monitors, printers, other peripherals and cell phones, or dispose of such equipment in compliance with all local, regional and federal requirements. When applicable, donate computers, monitors and printers to be refurbished.

- Reduce consumption of products harmful to the environment to the greatest extent possible. For example, use:
 - Rechargeable instead of single-use batteries
 - Non-toxic cleaning products
 - Office supplies such as paper and file folders made from recycled materials.
- Meet or exceed CWMC targets for reducing paper and ink documented in Section 3.21. These targets can be achieved by:
 - Going “paperless” and eliminating all but essential printing
 - At end of life, replacing single-page printers with printers capable of double-sided printing and selecting printers with low ink consumption ratings
 - Setting double-sided printing as the default for capable devices
 - Setting “draft quality” or the equivalent as the default for printers

4.0 Subcontractor Requirements

CWMC’s goal is to achieve 100% compliance with the CWMC Environmental Management System. This section describes how subcontractors will comply with the CWMC environmental policy and report that compliance. Documentation of subcontractor participation and compliance is a key performance measurement in the CWMC Environmental Management System.

4.1 Compliance

Current CWMC subcontractors will receive energy conservation and recycling guidelines by 10/30/11. Subcontractors will be given until 11/30/2011 to sign an intent to comply with CWMC recycling policy. Thereafter, new subcontractors will receive and sign an intent to comply with the Environmental Management System at contract signing.

Each subcontractor will be required to periodically read and certify their compliance with CWMC’s Environmental Management System. Each subcontractor will be responsible to be aware of the policy and compliance with CWMC policy and other environmental requirements as a condition of maintaining their relationship with CWMC.

4.2 Self-Assessment and Reporting

Each subcontractor is required to perform a self-assessment on compliance with company guidelines semi-annually, reporting results directly to the company president. Any adjustments made to the policy by the president will be communicated to all subcontractors on January 5th and July 5th of each year.

The self-assessments required by each subcontractor will include documenting compliance with any local and/or regional applicable laws, regulations, and requirements.

Every subcontractor is expected to follow policy and report any environmental, health, or safety concern to company president.

4.3 Risk Assessment and Risk Management

Subcontractors are responsible for identifying health and safety labor practices including but not limited to achieving conformance with local/regional environmental laws and guidelines and the CWMC environmental policy.

5.0 Improvement Objectives

CWMC requires 100% compliance with regards to recycling guidelines. CWMC is committed to reducing the amount of paper and ink consumption by 15% annually for the first year, and 5% for the following two years. This is to be accomplished by reducing the volume of printing as well as replacing end-of-life printers with devices capable of two-sided printing. CWMC and CWMC subcontractors will establish a baseline by recording paper and ink consumption from December 1 through June 1 and provide the baseline measurement in the first audit report. Thereafter, consumption will be measured against the baseline in semi-annual reports.

6.0 Training

Each existing subcontractor as well as new subcontractors will be required to undergo one-hour training in the new Environmental Management System. Existing contractors will be required to complete training by 10/30/2011.

Additional information and documentation will be distributed via email, conducting training via webcasts, and requiring subcontractors to comply with all requirements including but not limited to performing and reporting the results of semi-annual self-assessments.

7.0 Communication

CWMC will begin posting results of subcontractor compliance agreements and self-audit results on 11/30/2011 and update semi-annually. CWMC will publically disclose an executive summary of the Management System itself as well as any regulatory fines or penalties incurred. Public disclosure will be via our web site www.cwmarcom.com.

7.1 Feedback and Participation

Feedback will be an ongoing process to assess the subcontractor's understanding and compliance with the Management System. CWMC will strive for continuous improvement and update the Management System as needed to insure that program goals are being reached at their maximum potential and to incorporate technology advances that may become available to help meet our goals. Educating and disseminating vital information to subcontractors will be ongoing. Additionally, CWMC will actively seek subcontractor contribution to the continuous improvement of the CWMC environmental policies.