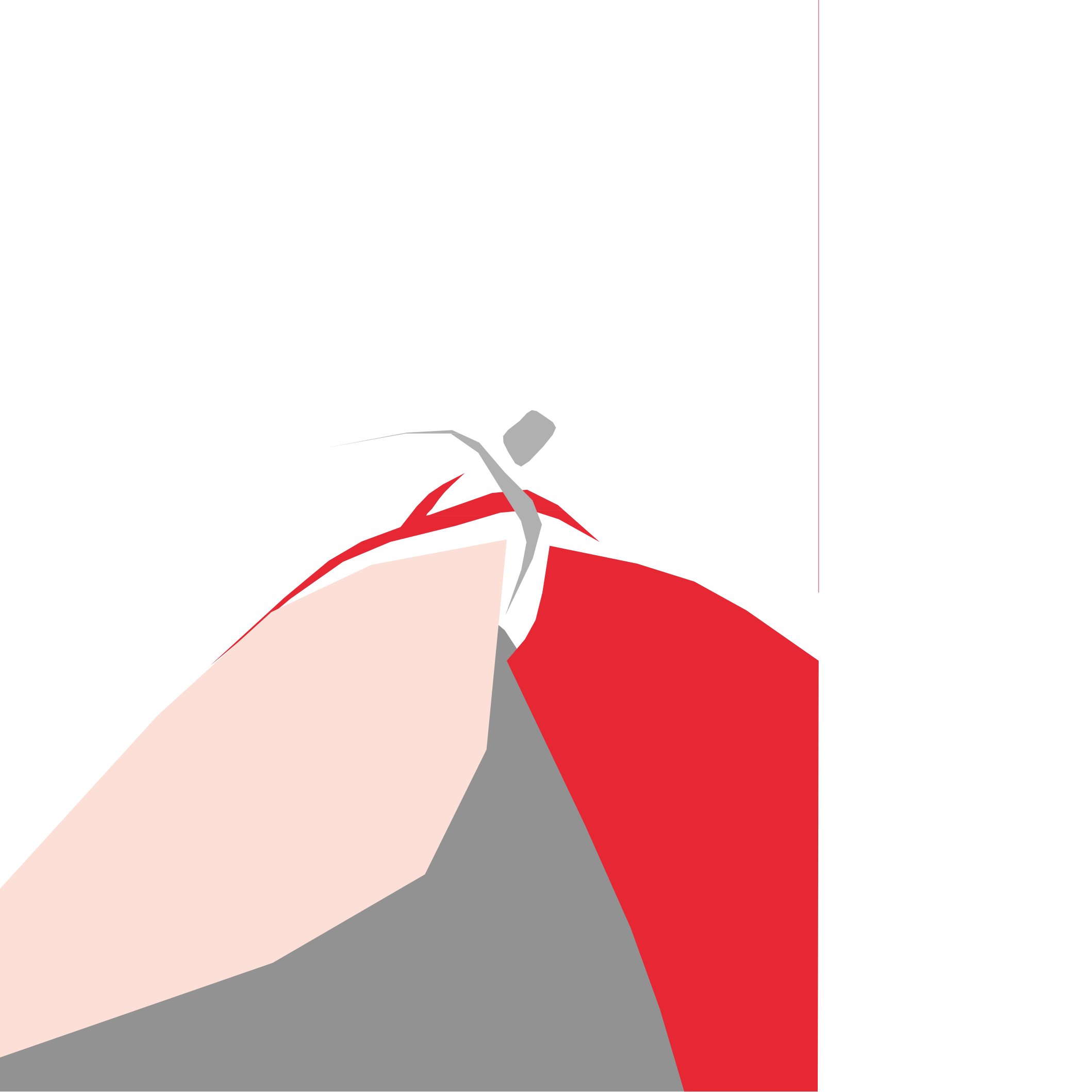




# ENVIRONMENTAL POLICY MANUAL



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## INTRODUCTION

NEXT TECHNOLOGIES LIMITED (NTL) is a systems integrator company based in Kenya and Uganda providing Information and Communications Technology solutions. NTL was established in March 2005 and has a vast experience in the architecture of ICT hardware and software solutions. Our projects span across the Greater East Africa region.

Next Technologies provides innovative Management solutions that enable leading companies in Africa to optimize, secure, manage and support their mission-critical systems.

As an Information and Communication Technology Systems Integrator, NEXT Technologies partners with customers to deliver solutions that improve the availability, reliability and performance of their data centre, network and security infrastructure.

Using its multi-partner capabilities, NEXT Technologies combines expert consulting, integration and support services with world-class customer service to help IT organizations reduce costs, increase efficiencies and manage risk in the data centre while providing customer users with secure and mobile access.



# ABBREVIATIONS & ACRONYMS

- CEO — Chief Executive Officer
- EMCA — Environmental Management Coordination Act
- EMP — Environmental Management Program
- EMR — Environmental Management Representative
- EMS — Environmental Management System
- ISO — International Organization for Standardization
- NEMA — National Environment Management Authority
- OP — Operational Procedure
- OSHA — Occupational Safety and Health Act

# GLOSSARY

## Employees / Staff

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Shall mean employees; who are in regular employment, on contract and may extend to interns (volunteers), seconded staff from partner and or affiliated organizations. The term staff or employee may be used interchangeably to refer to the same meaning.

## Contract Staff

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These are employees who are on fixed period and renewable contracts as limited to respective project/ program life. Contractual staffs may be eligible for NEXT TECHNOLOGIES benefits as is relevant to their respective countries / regions and or levels of responsibilities as stipulated in the contractual agreement at the time of appointment.

## Interns

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NEXT TECHNOLOGIES encourages students interested in internship programs to apply through their respective institutions.

## Consultants

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A consultant engaged by NEXT TECHNOLOGIES is a specialist whose service to the organization is required.

## Supervisor

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Means one's immediate reporting officer or any other designated (delegated to) officer.

## Salary

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Means basic salary and all other payments, if any, in cash payable to an Employee for work done in respect of his/her contract of service but does not include any payment by way of commission, bonus, subsistence, allowance and other overtime payment.

## Performance Review

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Means the process wherein Employee's immediate Supervisor will review the performance of each staff on a regular basis using the Performance Review / Appraisal form.

## Director

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Means a company director, i.e. Managing Director, Finance Director, or other such position which is appointed by the company Board of Directors.

# COMPANY OVERVIEW

## Values



Committed to innovation  
and excellence.

Customer  
Centered.

Collaborative  
and flexible.

Honest and  
reliable.

### Mission

To build the trustworthy and profitable global Information Technology Company that fulfills our customers dreams of improving their business by providing high quality software and services

### Vision

To be a world class company of choice for businesses and individuals seeking to have technology as an integral part of their business ecosystem that profits in growth through Information Communication Technology.

### Philosophy

To give it 101% all the time and never give up in overcoming any limitations towards achieving our goals and going beyond what is expected.

# ABOUT THIS MANUAL

The NEXT TECHNOLOGIES Policies and Procedures manual has been designed to outline and summarize basic policies and procedures, employee benefits, responsibilities as well as general personnel practices and administrative guidelines.

All staff employees, contractors, interns and consultants of NEXT TECHNOLOGIES are responsible for reading, understanding, and complying with the provisions of this manual.

The Board and Management reserves the right to interpret or change all or any part of this document. Any and all changes will be immediately made available to staff and the document will always be easily accessible.

This manual defines the scope of the Next Technologies Limited Environmental Management System (EMS).

It describes the organization-wide implementation of the main elements of the EMS and ensures activities are conducted in a manner, which minimizes adverse environmental impacts and enhances it's role in environmental stewardship. The manual 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
- Legal and Other Requirements
- Environmental Management Programs
- Competence, Training and Awareness
- Non-conformity, Corrective action and Preventive Action
- Control of Records
- Internal Environmental Management System Audit
- Management Review
- Environmental Aspects
- Environmental Objectives and Targets
- Organizational Structure and Responsibility for implementation
- Communication
- Document Control
- Operational Control
- Emergency Preparedness and Response
- Monitoring and Measurement

It is intended that the manual can also be used to give interested parties a clear view of how Next Technologies is organized to achieve and control its environmental performance.

Through periodic review and evaluation of the EMS, the company will identify opportunities for continuous improvement.



# LEGAL AND OTHER REQUIREMENTS

The company shall establish a procedure for identifying, accessing and communicating legal and other requirements that are applicable to its activities.

The relevant requirements are identified, accessed and communicated to all personnel as necessary.

The applicable environmental regulations include;

- EMCA 1999
- OSHA 2007
- EMCA (Waste management) Regulations, 2006
- EMCA (Water quality) Regulations 2006
- The Environmental (Impact Assessment and Audit) Regulations, 2003
- Physical Planning Act, 1996
- Water Act Cap 372, 2002

On annual basis, the EMS team shall re-evaluate this list to keep track of the current national legal and other requirements as applicable to KEFRI.

## Objectives, Targets and Program

The EMS team has developed and maintains documented environmental objectives and targets for each significant environmental aspect. The objectives and targets are to be measurable and consistent with the environmental policy as approved by top management. They define:

- The performance objectives for each significant environmental aspect
- The specific, quantified targets which define those performance objectives
- The planned deadlines for the achievement of those targets

# INTRODUCTION

All businesses have some impact on the environment. Even the simple act of switching on a light has some environmental impact. As a business owner or manager, it is your responsibility to ensure that whatever level of impact, that impact is managed appropriately and minimized where possible.

Our company plans to manage the environmental impacts using an Environmental Management System. These steps are based on the international environmental standard ISO: 14001. An Environmental Management System provides structured way of planning and implementing environment protection measures. Experience has shown businesses using an Environmental Management System gain many benefits including:

- Improved operational efficiencies
- Cost savings
- Increase in customer satisfaction
- New markets and customers
- Competitive advantage
- Improved business image

To be sustainable, need to take responsibility for not only economic performance, but also environmental and social performance.

Not only will an Environmental Management System help to improve environmental performance, but also benefit staff, especially as many environmental hazards can cause health and safety risks to people.

There are also legal responsibilities for business owners and managers to manage their environmental impacts.

EMCA Stipulates that everyone has a General Environmental Duty to not undertake an activity that pollutes, or might pollute, the environment unless the person takes all reasonable and practicable measures to prevent or minimize any resulting environmental harm.

In taking all reasonable care to avoid Our business causing environmental harm, we will be able to use this reasonable care, or due diligence, as a defense should the company unwittingly cause an environmental offence.

An Environmental Management System in place enables us to identify and control any risks to the environment **before** they result in harm.

It is equally important that our staff are aware and capable of identifying environmental impacts and risk situations in day to day operations.

# ENVIRONMENTAL COMMITMENT & POLICY

Next Technologies is committed to managing all aspects of our operations in an environmentally responsible manner at all times. We care about the environment, and we ask our customers to do the same.

To ensure environmentally responsible behavior is accepted as an integral part of our operations, we specifically undertake to:

- ☐ Establish an Environmental Management System in order to help systematically reduce our impacts on the environment
- ☐ Prevent pollution occurring from our activities and operations
- ☐ Conduct operations in compliance with relevant local environmental regulations, licenses and legislation
- ☐ Communicate this policy to our employees, business associates and the wider community
- ☐ Educate our employees and contractors on their environmental responsibilities and ensure this is integrated into their work practices, training and decision making
- ☐ Continuously improve the environmental performance of our company



Signed: .....

Position:..DIRECTOR.....

Date:..25-5-2018.....

Top management has defined environmental policy in a procedure and has ensured that it:

- ☐ Is appropriate to the nature, scale and environmental impacts of its activities, products and services;
- ☐ Includes a commitment to continual improvement and prevention of pollution;
- ☐ Includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which it subscribes;
- ☐ Provides the framework for setting and reviewing environmental objectives and targets;
- ☐ Is documented, implemented, maintained and communicated to all employees;
- ☐ Is available to the public.

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# IDENTIFICATION OF ENVIRONMENTAL ASPECTS AND IMPACTS

## Environmental impacts

are the effects of these aspects on the environment, including air, noise, water (storm water, groundwater and waste water), soil, flora, fauna and people.

**We do this by:**

- Listing all business activities
- Listing all the impacts these can have on the environment (positive and negative)
- Talking to staff inspecting the workplace
- Reviewing records
- Incident reports

NOTE: Impacts are not limited to those of our company but also to those of your suppliers and the impacts of our goods or services once they leave our site.

After identifying the impacts we begin prioritizing based on risk. We have a tool box which has Risk Assessment Tool. This will help to determine the likelihood of the impact on the environment occurring, and the consequence of that impact. This in turn helps determine a priority rating for the impact.

## Environmental aspects

Are all areas of a business that can have an impact on the environment e.g. goods, services and processes.

# Roles and Responsibilities

Individual/Group	Responsibilities
Director / Chief Executive Officer	<ul style="list-style-type: none"><li>▪ Gives the general direction in implementation of the EMS and ensures that allocated resources are effectively utilized</li><li>▪ Appoints EMR and EMS team members</li><li>▪ Approves EMS documents</li><li>▪ Chairs management review meetings at institutional level</li></ul>
Top Management	<ul style="list-style-type: none"><li>▪ Ensures availability of resources essential to establish, implement, maintain and improve the EMS</li><li>▪ Receives audit findings as the basis for corrective action and continuous improvement of environmental performance</li><li>▪ Reviews the EMS at appropriate intervals to assess its continuing suitability, adequacy and effectiveness</li></ul>
EMR	<ul style="list-style-type: none"><li>▪ Ensures that environmental management system requirements are established, implemented and maintained in accordance with ISO 14001</li><li>▪ Reports to top management on the performance of the environmental management system for review, including recommendations for improvement</li></ul>
EMS Team	<ul style="list-style-type: none"><li>▪ Carries out environmental reviews</li><li>▪ Documents, implements and maintains the EMS</li><li>▪ Carries out EMS awareness training</li><li>▪ Conducts internal environmental audits in line with ISO 19011 requirements to determine conformance to ISO 14001</li></ul>
Staff	<ul style="list-style-type: none"><li>▪ Are required to be aware of the Institute’s environmental policy and EMS implementation process, each taking responsibility for impact that comes from individual activity</li><li>▪ Participate fully during the implementation of the EMS</li></ul>

# COMMUNICATION, PARTICIPATION AND CONSULTATION



## COMMUNICATION

With regard to its environmental aspects and environmental management system, NEXT TECHNOLOGIES has established, implements and maintains procedures for:

- ❖ Internal communication among its various levels and functions
- ❖ Receiving, documenting and responding to relevant communication from external interested parties



## CONTROL OF DOCUMENTS

Next Technologies has established a procedure for controlling all documents related to the EMS.

- ❖ This procedure describes where documents are located, how and when they are reviewed.
- ❖ The procedure ensures that current document versions are available at point of use and that obsolete versions are removed from use or are suitably identified.



## DOCUMENTATION

- ❖ Documents, including records required by ISO 14001:2004.
- ❖ Documents to ensure the effective planning, operation and control of processes that relate to its significant environmental aspects.
- ❖ The Company has established and maintains information to describe the core elements of the EMS as described in this manual.
- ❖ The EMS documentation includes the policy, manual, procedures, work instructions and EMS records. This manual identifies all documents relevant to the EMS.



## OPERATIONAL CONTROL

Operational control procedures shall be put in place for those activities associated with each identified significant environmental aspect. Some of the operational control procedures are listed below:

- ❖ Handling and disposal of non-hazardous solid waste
- ❖ Handling and disposal of effluent
- ❖ Handling and disposal of hazardous materials
- ❖ Detection and control of radiation emissions

# CHECKING

Measuring, monitoring and evaluating are key activities of an EMS, which ensure that Next Technologies is performing in accordance with the stated Environmental Management Program.

## MONITORING AND MEASUREMENT



Next Technologies shall establish and maintain a documented procedure to monitor and measure the key characteristics of its activities that can have a significant impact on the environment.

This procedure shall outline requirements for recording information needed to track performance, relevant operational controls and conformity with the organization’s environmental objectives and targets.

NEXT TECHNOLOGIES shall ensure that monitoring and measuring equipment are calibrated or verified before use. Records of calibration shall be maintained.

## EVALUATION OF COMPLIANCE



Next Technologies shall establish and maintain a documented procedure for periodically evaluating compliance with relevant environmental legislation and other requirements to which it subscribes.

## NONCONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION



Next Technologies shall establish and maintain an environmental procedure for handling and investigating non-conformities.

It shall define responsibility and authority for taking action to mitigate impacts caused and initiating and completing corrective and preventive action.

Any changes in procedures resulting from implementing corrective and preventive actions are recorded.

Measuring, monitoring and evaluating are key activities of an EMS, which ensure that Next Technologies is performing in accordance with the stated Environmental Management Program.

## CONTROL OF RECORDS

Next Technologies shall establish an environmental procedure for the identification, storage, protection, retrieval, and disposal of environmental records.

Records shall be legible, identifiable and traceable to the activity, product and service involved.

They shall be stored in such a way as to make them retrievable, protecting them against deterioration, damage or loss. Retention times shall be established and recorded.

## INTERNAL ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT

Next Technologies shall periodically conduct internal audits to determine whether its EMS conforms to planned arrangements for environmental management, including requirements of ISO 14001.

Internal audits will also be conducted to determine whether the EMS has been properly implemented and maintained.

An audit procedure shall been established and comprehensively cover the audit scope, frequency, methodologies applied and the responsibilities and requirements for conducting audits and reporting results.

All auditors are trained and their conduct should ensure objectivity.

Audit records shall be analyzed by the EMR for use in the management review process.



# ENVIRONMENTAL ACTION PLAN

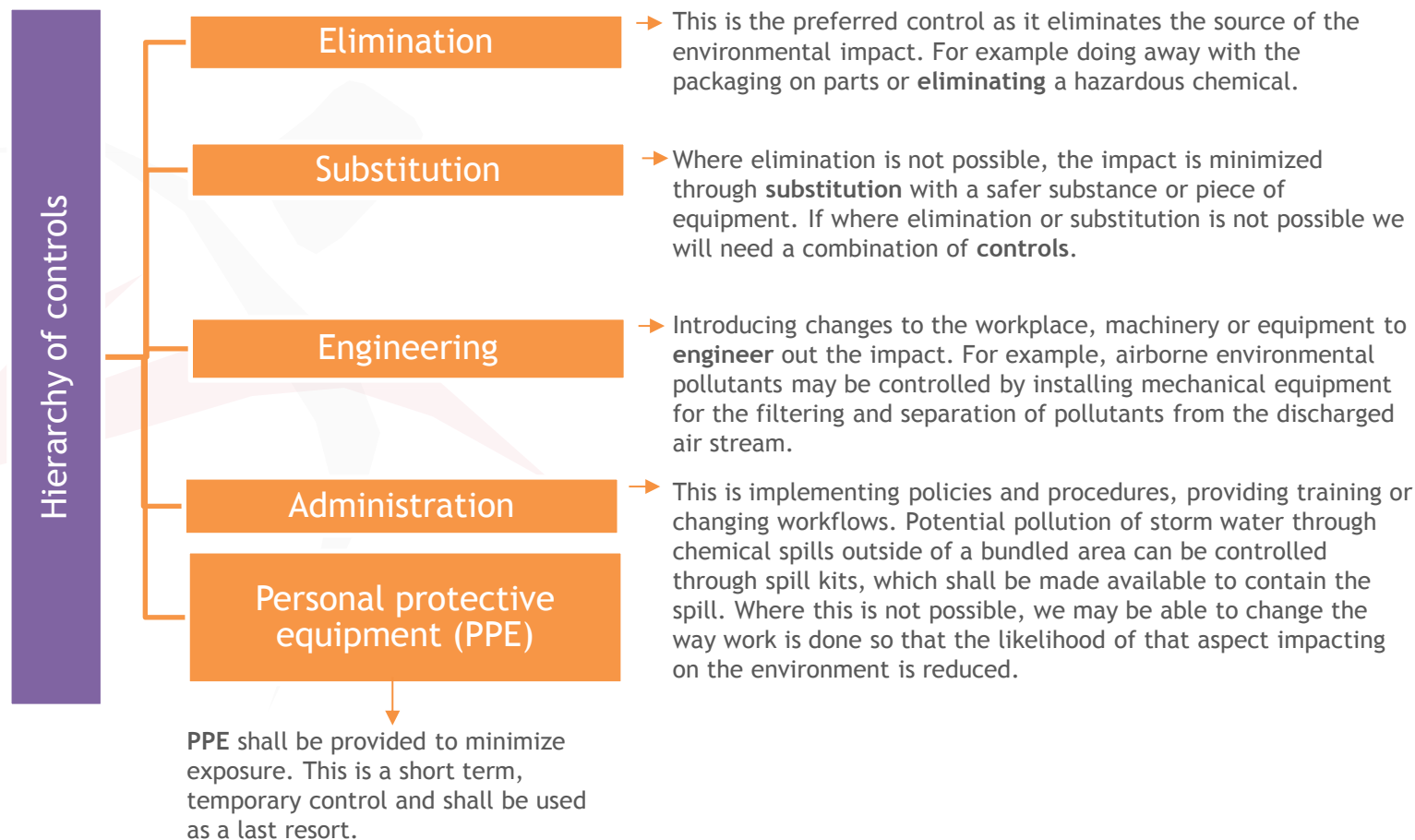
Planning the action needed to remove or control the impact on the environment identified shall be undertaken through an environmental action plan to be formulated.

We focus on the high level priorities in the action plan i.e. Urgent and high risks must be addressed immediately. This doesn't mean we ignore those with medium or low priority, but it makes it a little more manageable.

We try to make the environmental actions specific, measurable and inclusive of an objective or target. When we are allocating actions to mitigate the impact,

When deciding how to address the environmental impacts of the business the first response is usually to remove the impact. If this is not possible, then we follow the hierarchy of controls.

## IMPLEMENTATION & OPERATION



# ENVIRONMENTAL ACTION PLAN

## IMPLEMENTATION & OPERATION

### Emergency response

Implementing spill controls and emergency response procedures into the workplace helps to prevent any possible pollution.

We shall need to identify potential environmental emergencies and prepare an emergency response procedure. The procedure shall be reviewed and tested regularly.

#### Content of the emergency response procedure

As a minimum, the procedure shall contain:

- ☐ Preventative measures for all activities, risks, wastes and discharges that have the potential to leak or spill and cause harm to the environment.
- ☐ A written procedure should be prepared for each area to ensure that all staff know what to do and who to contact in case of a spill. This should be actively and regularly reviewed
- ☐ Ensure appropriate clean-up materials are provided at all identified areas to deal with potentially polluting materials

In case of a spill;

- ☐ Check the Material Safety Data Sheet (MSDS) to determine the type of material spilled and any risks to human or environmental health. MSDS.s also contain particular information regarding the cleanup of that material.
- ☐ Quickly and safely stop the spill and isolate and contain the spilt material from the storm water system (booms, drain seals, absorbent materials can be used for this).
- ☐ If a spill is large or is a hazardous material, contact the specialists
- ☐ If the Fire Service is not required, you must notify NEMA
- ☐ For smaller or non-hazardous spills, clean up the spill adequately using the appropriate spill materials for that type of substance.

Ensure that the material is disposed of adequately and not necessarily placed into the rubbish bin. Ensure you know the appropriate disposal method for that material.

# ENVIRONMENTAL ACTION PLAN

## Maintaining environmental management system

With a list of all the environmental aspects and impacts that are rated based on their risk, and an Environmental Action Plan showing how to address these we require a way of maintaining this System.

This may be through an ongoing checklist that may be completed at the end of each day, week or month, depending on the risk the impact has. Checklists will be used to provide feedback to employees on how the business is

Audit of this system shall be undertaken on a regular basis to ensure we are actually managing the environmental impacts. This may be assisted by feedback from staff, or an external person to conduct this audit.



Resource use (electricity, raw materials, Chemicals)



Maintenance of machinery



Staff training

### Things that may need to be regularly monitored include:

Including environmental management into existing procedures, for example Standard Operating Procedures, induction and training, will provide a useful way of monitoring the system.

Finally, we shall set up a procedure to ensure the business is kept informed about and documents legislative changes.

Attending training, accessing the Internet and contacting NEMA shall help be up to date with environmental information.

## Reporting non-conformance

Another way of maintaining and improving the Environmental Management System shall be to develop a procedure to document and address non-conformance.

This may be through a simple Corrective Action Report depending on the needs of company.

To ensure that any Corrective Action Report forms such as these are used to their best potential, it shall focus on any faults in the Environmental Management System and how they can be improved, and not on human error.

# ENVIRONMENTAL ACTION PLAN

## Corrective action report form- key components

The corrective action report form shall contain:

- a. Details of the non-conformance (date, time, location)
- b. Environmental information and impact or potential impacts
- c. A description of the non-conformance
- d. A brief analysis of the non-conformance
- e. Actions undertaken to control the non-conformance or prevent recurrence
- f. Details of the investigator of the non-conformance
- g. Whether notification of a third party is necessary

# REVIEW AND CONTINUOUS IMPROVEMENT

## SYSTEM REVIEW:

Regular review of Environmental Management System shall be undertaken to ensure that all the hard work of establishing, implementing and maintaining the system continues to bring benefits to the company.

The regularity will depend on how much has changed, but at a minimum should be every 12 months.

The purpose of a review differs from an audit; an audit is about verifying that the System is doing what it is supposed to, whereas a review shall take into account ;

- Any non-conformance
- Evaluate any further training needed
- Evaluate the Systems suitability and effectiveness (i.e. are the procedures ensuring the actions & the Environmental Action Plan are being carried out)
- Update the Environmental Action Plan
- Consult with staff on effectiveness

The system will also need to be reviewed if a new aspect (good, service or process) commences in the company.

The scope of the review, chaired by the Director/CEO shall include:

- Environmental policy, objectives, targets and performance
- Findings of internal and external audits
- Follow-up actions from the previous management reviews
- Status of corrective and preventive actions
- Evaluation of compliance with the statutory legislations
- Evaluation of legislative requirements new or forthcoming, advances in technology, lessons from environmental incidents, expectations and requirements from interested parties, including the public and regulatory authorities
- Resource needs (mobilization and allocation)
- Recommendations for improvement

# REVIEW AND CONTINUOUS IMPROVEMENT

## CONTINUOUS IMPROVEMENT

Part of reviewing the company's Environmental Management System is to ensure that the environmental performance of our business is continuously improving.

The procedures set place to achieve the management of impacts shall be constantly examined to see if they can be improved or if more effective procedures can be introduced.

Staff should always be consulted on improvements as they are often the ones with hands-on involvement, and may know of areas for improvement.

We may want at some time to produce a public report to publicize what our company has achieved.