



ECLARO

SUSTAINABILITY

Environmental Management System (EMS)

Mission Statement

- To develop and enforce an Environmental Management System (EMS) with guidelines and policies to promote sustainable practices as it relates to environmental sustainability and corporate global citizenship.
- To Utilize this EMS as a strategic tool to grow our business via sustainable practices.

Why Now?

- Not only does **ECLARO**'s Management Team know that this is the right thing to do (reducing our global impact) but they believe it will also provide a competitive advantage by enabling the company to secure and win new business. **ECLARO** believes we are all responsible for conducting safe and environmentally sound operations.
- **ECLARO** recognizes its responsibility as a global citizen to assess and minimize the impact of its business activities to reduce environmental impact and protect the eco-systems upon which all life depends, while advancing economic development. We believe there is a direct impact on the environment through our daily consumption needs of natural resources via energy, water & other inputs in our process
- The establishment of an EMS is also a flow down requirement of one of our clients and we believe several more of our large clients will impose the same requirements shortly.

Goals

- To continue to conduct business that achieves a balance of integrating economic, environmental and social imperatives while meeting stakeholder needs
- **ECLARO** will be focusing on reducing Scope 1 and 2 Green House Gas Emissions in our Global operations 10% by 2023.
- **ECLARO** will reduce paper usage 50% by 2022.

What are ECLARO's Greenhouse Gas Emissions?

- Scope 1 - “Direct Emissions” – recycling, purchasing recycled products, reducing paper usage, reduce Co2 emissions by encouraging the use of public transportation via transit check programs, car pooling, effective employee alignment with work locations, etc.
- Scope 2 – “Indirect Emissions” – reducing electricity and water usage through turning off electronics when not in use, meeting and training via video conferencing versus travel

Commitments

- ECLARO takes appropriate measures to provide employees with a safe and healthy working environment by considering industry practices and societal standards of care.
- Employees – ECLARO will continue to encourage environmental awareness among our employees and provide appropriate training and information regarding ECLARO's programs. ECLARO will develop programs and offer opportunities to harness employee enthusiasm and collaboration with our efforts to improve environmental performance
- Clients – ECLARO will work with our clients to consider the environmental impact of our work and support their own environmental impacts.
- Suppliers – ECLARO will consider environmental factors when procuring goods and services. ECLARO encourages a localized procurement process to source goods and services within a 500 mile radius, when possible. Our policies help to identify vendors who reduce consumption of natural resources, promote diversity and adopt ethical work practices. ECLARO will assess the environmental performance of our key suppliers to improve their environmental performance as well as ours.

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- Energy and emissions – **ECLARO** will track carbon dioxide emissions resulting from their energy usage and optimize energy usage in our office locations through efficient choices while considering renewable energy sources where feasible. **ECLARO** will control thermostats using preset temperatures in air conditioners. EI will impose a "lights-out" policy in our leased facilities by doing a nightly walk through to turn off all lights and energy sources.
- Waste and water – **ECLARO** will promote Reducing, Reusing, and Recycling by seeking to recycle or recondition our PCs and mobile devices. **ECLARO** will act to minimize the waste we send to landfill from our operations.
- Conservation of paper – **ECLARO** will act to reduce paper consumption by adopting e-verification and e-Signatures for all paperwork in order to minimize any paper utilization. When possible and where accepted, paper will be scanned and e-mailed.

How will we meet this goal

- **ECLARO** will establish and require adherence to recycling programs at all corporate facilities.
- **ECLARO** will comply with all applicable environmental and related laws, regulations, and contractual requirements.
- **ECLARO** will purchase recycled materials whenever practical.
- **ECLARO** will encourage energy efficiency in all equipment purchases.
- **ECLARO** will use virtualization to reduce hardware energy consumption.
- **ECLARO** will reduce commuting impacts by encouraging the use of public transportation via the transit check program, car pooling, effective resource work location alignment, etc.
- **ECLARO** will reduce business travel frequency through the use of collaboration software, video conferencing, video training.
- **ECLARO** will use power stabilizers to improve and supply consistent voltage.

Employees will be required to:

- Adhere to recycling policies at all corporate facilities
- Conserve energy by shutting down computers, electronics and lights when not in use
- Print only when absolutely necessary, print double sided when available, to conserve resources, and recycle all office paper
- Utilize reusable materials rather than disposable whenever possible
- Purchase paper products which contain a minimum of 30% recycled material whenever available

Measurement and Reporting

ECLARO will identify, assess and manage the environmental impacts of our existing and planned operations by:

- Self assessment
- Monthly Management review
- Quarterly reporting (internal and external)

ECLARO will record and internally publish any such reviews and decisions

Management Review

ECLARO will establish a management committee to review the policies and plans for program and process improvements, training, remedy for any nonconformance, introduction of new tools, technologies, and new processes or required adjustments.

Management will review the following:

- Progress on objectives and targets
- Analysis of internal and external feedback/complaints/suggestions
- Assess the status of the Environmental Management System and conservation efforts
- Review summary of data gathered
- Review and assess legal and contractual changes and make program recommendations accordingly
- Evaluate real estate agreements taking into account their support of EMS goals
- Drive Global Expansion of the EMS program
- A global training and audit program is being planned to ensure compliance with EMS policies.
- Require internal environmental audits of all global facilities are conducted to monitor whether the environmental activities and related results comply with the Program.