

_codelab

ENVIRONMENTAL SAFETY POLICY

**WE KNOW,
WE CARE,
WE DO**



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PURPOSE

The Company is committed to reducing the environmental impacts of its business activities as well as to improving the environment through our business activities, based on the **ISO 14001** Environment Management System. The Company's objectives are to reduce the environmental impact, increase environmental awareness of the employees, influence its suppliers to optimize their processes and conduct Company business operations in a responsible and sustainable way.

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CONTEXT OF ORGANIZATION

Significant external and internal factors that affect the organization's ability to achieve the intended objectives and goals of the Environmental Management System were identified during the workshops and documented in Organizational Context. Important needs and expectations of both the customers and the employees were considered. Organizational context is updated every year according to Annual Wheel.

3

INTERESTED PARTIES

Organizational culture, structure and the external environment including legal, technological, financial and market competition were analysed during workshop which led to the identification of relevant Interested parties, that can be affected, be or perceive to be affected by the Company Environmental Management System. The complete list of interested parties is available in Organizational Context.

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UNDERSTANDING THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

Due to their effect or potential effect on the organization's ability to consistently provide services that meet customer and applicable statutory and regulatory requirements, the Company determined:

- the Interested parties that are relevant to the quality management system
- the requirements of these Interested parties that are relevant to the quality management system.
- The Company monitors and reviews information about these Interested parties and their relevant requirements according to Annual Wheel.

ISO 14001 scope is as follows:

- Design, development and testing of software. Consulting service for delivered products. ICT services.
- no services nor organization areas excluded
- both locations: Szczecin and Wrocław
- all Interested Parties
- all customers
- no exclusions

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ROLES AND RESPONSIBILITIES

The responsibility for compliance with the rules defined in Environmental Management System and protecting the environment lies with all the Company employees.

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ENVIRONMENTAL ASPECTS

Environmental aspects such as water consumption, electric energy usage, exhaust gas emissions, waste generation and disposal, and others were identified during workshop.

The complete list of environmental aspects is available in Context of Organization. The list is reviewed and updated according to Annual Wheel.

The significant environmental aspects were chosen based on previously defined criteria which are as follows:

1. The significant aspect must affect most employees
2. The significant aspect must be greater than the average household

The chosen aspects are:

- electric energy usage
- waste generation and disposal
- legal requirements

For those significant aspects Operational plans are implemented and maintained, see chapter 10.

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LEGAL REQUIREMENTS

Legal requirements regarding environmental protection have been identified in cooperation with legal advisors and are listed in Environmental legislations.

All legal requirements are reviewed and updated according to Annual Wheel.

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RISK MANAGEMENT

Risks and opportunities were identified during the workshop and documented in Context of Organization.

The Company implemented the following solutions for risks mitigation:

- Legal compliance operating plan
- Annual air conditioning check to prevent hazardous leakage
- Improving recycling behavior of employees by accurately describing trash bins
- Cooperation with the company specialized in waste renewal and utilization

The Company actively aims to minimize environmental impact, so exploiting and enhancing identified opportunities has particular importance.

The actions already taken are as follows:

- Motion sensors lights installed in bathrooms and time light switches installed in the office
- Equipment replacement for energy efficient
- Energy consumptions as an important factor in purchasing new equipment
- Cooperation with local canteens (subsidies) to reduce the amount of generated waste
- Not using bottled water

The Company planned actions are as follows:

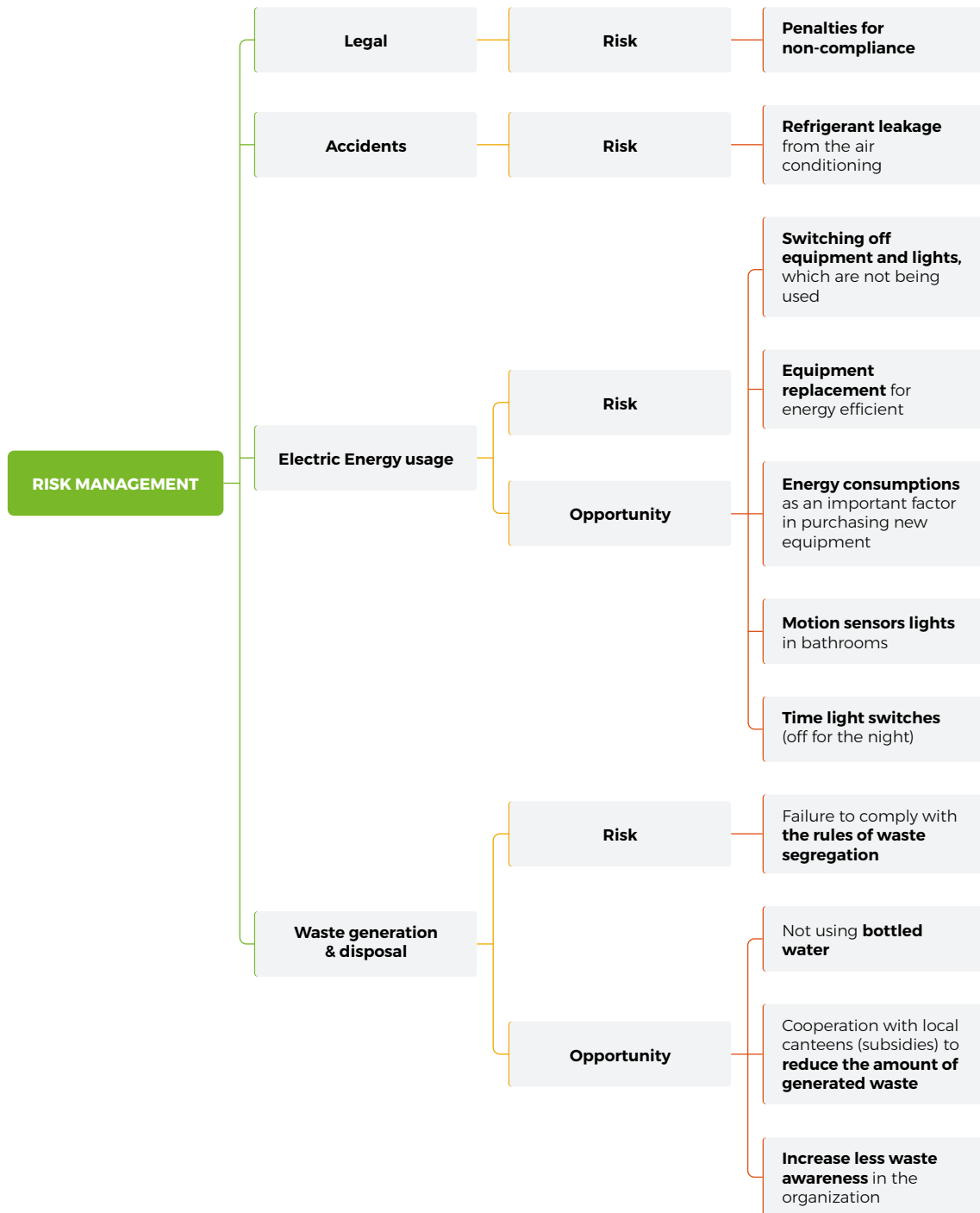
- Increase less waste awareness in the organization
- Introduction of monitoring of computers left turned on overnight

Operational plans are developed for risks that are associated with the significant environmental aspects (see chapter 6).

The risk management diagram can be found on the next page 

8.1

RISK MANAGEMENT DIAGRAM



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ENVIRONMENTAL GOALS

The Company conducts its business operations in a responsible way and aims to use natural resources carefully and minimize environmental impact. The Company applies the principles of continuous improvement thus environmental goals are set, monitored and updated according to Annual Wheel.



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OPERATING PLANS

Operating plans for legal requirements are listed in Environmental legislation file and are reviewed and updated every year, according to Annual Wheel.

Operating plans for significant environmental aspects are listed in Quality Objectives Operating plan and is reviewed and updated every year, according to Annual Wheel.

Operational plans are developed for risks that are associated with the significant environmental aspects (see chapter 6).

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ENVIRONMENTAL AWARENESS

The Company understands the fragility of our environment and the importance of its protection. We choose to conduct business in a responsible way. Our way of practice environmental awareness include:

- Implementing **ISO 14001** rules
- Using non-toxic detergents
- Choosing environmentally friendly products when possible
- Recycling obsolete office material and waste according to local recycling opportunities
- Using detailed description for various trash bins
- Replacing travel, where feasible, by video or telephone conferences
- Choosing green buildings for our offices
- Energy efficient equipment
- Taking good care of environmentally harmful materials
- Giving guidelines to the employees through training, newsletter articles
- Switching off equipment and lights, which are not being used

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COMMUNICATION

The internal communications relevant to the Environment Management System are published on **ISO 14001 SharePoint** available to every Company employee.

The external communications relevant to Environment Management System are determined by the Company Communication Policy and happen on demand.

The communications to Management Board happen **once a year during Operation Review**. Meetings are documented in Quality Objectives Operating plan.

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EMERGENCY PREPAREDNESS AND RESPONSE

The Company established Business Continuity Plan to coordinate recovery of critical business functions and operations, managing and supporting the business recovery in the event of a disruption or disaster.

During the preparation of the BCP, environmental aspects, natural disasters, risks and legal requirements were considered.

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PERFORMANCE EVALUATION

The environmental performance of the Company is monitored, measured, analyzed and evaluated which allows for continuous improvement. The status of operating plan and environmental goals achievement degree is updated according to **Annual Wheel**.

14.1

INTERNAL AUDITS

ISO 14001 internal audits are conducted according to defined Audit Procedure with the planned frequency in Annual Plan. The observations, suggestions and improvement proposals are reported in Observation Data Base.

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MANAGEMENT REVIEW

Management Board carry out an Environmental Management System review once a year during Operational Review, according to Annual Wheel.

The Management Review includes the status of taken, corrective and improving actions, the changes regarding organizational context, Interested parties, significant environmental aspects, risk management and the degree of achievement of environmental goals.

Codelab Sp. z o.o.

Address Plac Brama Portowa 1, 70-225 Szczecin, Poland

Phone +48 91 819 9116

Email DLPLEnvironmentalSafety@codelab.eu

Management Board Radosław Borek, Marek Kopyto, Joerg Winkler

KRS 0000461356 **NIP** (VAT No) PL8513169010

REGON 321372658 **Share capital** 670 000 PLN

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