

Environmental System Manual

PHX073

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1. Document Control

1.1 Purpose of this Manual

To define our Environmental Management System in accordance with the ISO14001:2015 Standard.

1.2 <u>Scope</u>

The Environmental management system scope applies to the environmental aspects of all software and hardware reselling, IT services, software asset management, Environmental Management System, and business processes in line with the needs of the interested parties identified in the environmental management system within Blenheim House, Pocklington, York, YO42 1NS.

2. Context Of the Organisation

2.1 Understanding the organisation and its context

Established in 1990, the company provides IT solutions to markets including Public Sector, Voluntary and Charities, Housing, Education and Corporate sectors.

In December 2020 it became part of the Bytes Technology Group PLC, with over 350 employees working out of the Yorkshire based office, remotely or in a hybrid working pattern.

The IT Solutions offered to our customers include the resell of industry standard software licensing and hardware, consultancy (Professional) and managed IT services across leading edge technologies including software asset management tooling and services.

Phoenix Software Ltd has determined the internal and external issues that are relevant to its purpose and those that affect our ability to achieve the intended outcome of our environmental management system in line with our Environmental Policy and risk register.

Political Factors

Change of government political parties and policies affect the spending patterns and decision making within Central and Local Government Authorities along with the NHS and other government bodies. These decisions may affect the timing and budgets of these organisations which may in turn influence the performance of Phoenix Software Ltd and associated supply chains.

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Economic Factors

The economic climate can influence the timing of purchasing new IT solutions or may reduce the budgets available. Phoenix Software Ltd sales and marketing strategies have the ability to adapt and adjust to reflect these changes by offering alternative cost-effective solutions.

Social Factors

Phoenix Software Ltd are one of the largest employers in the local area. The Company ethos is to both employ locally and support local businesses where practicable.

Technology Factors

The rate of technology change is for forever increasing. Phoenix Software Ltd must continually upskill to ensure that they are providing the latest technological advice to customers.

Phoenix Software Ltd must maintain their current supplier accreditations in order to remain a forerunner in the industry. It must also be aware of emerging technology offerings from new sources.

Environmental Factors

Phoenix Software Ltd has drastically reduced products that are physically transported to be replaced with electronic alternatives. Tracking of utilities are carried out and reductions made wherever possible. Solutions offered to customers include environmental considerations

Legislative Factor

Phoenix Software Ltd is affected by government policies and legislation that determine the purchasing processes that are imparted onto their government authority customers.

As part of the Bytes Technology Group PLC we must now provide data to support mandatory reporting of emissions and waste and water usage.

2.2 <u>Understanding the needs and expectations of Interested Parties</u>

Interested parties are persons or organisations that can influence the environmental position of Phoenix or can be affected by our business continuity activities including:

- a) interested parties that are relevant to the environmental management system
- b) the requirements of those interested parties relevant to an environmental system
- c) which of these needs become part of our compliance obligations

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Interested parties are persons or organisations that can influence the processes of Phoenix Software Ltd:

- **employees** we provide guidance and understanding relating to environmental matters that pertain both to business and personal environments.
- **government agencies/regulators** we adhere to regulations and requirements of these bodies and provide data as and when requested
- **customers** we engage with customers to provide them with guidance on their IT requirements based on technical, commercial, and environmental impact. Government agencies are required to request carbon reporting plans where the bid value is over £5M
- **neighbours** we are located on a light industrial estate, next to an A road and must be aware of the potential hazards we could impact or be impacted by this proximity
- **shareholders** we need to ensure confidence and assurance that we are adhering and exceeding where possible environmental regulations
- **media** quick and accurate response to environmental incidents. Control of social media output as per the Acceptable Use Policy.
- **suppliers** both Phoenix and suppliers need to be confident that environmental activities are in compliance with UK Law, supporting customers' expectations within the Phoenix supply chain.

Determining the scope of the Environmental management system

The organisation has determined the boundaries and applicability of the EMS to establish its scope. When determining this scope, the organisation considered:

- a) the identified external and internal issues
- b) the organisational units, functions, and physical boundaries
- c) the activities, products, and services
- d) the authorities and ability to exercise control and influence

The scope of the environmental management system for Phoenix Software Ltd is:

"The environmental aspects of all software and hardware reselling, IT services, software asset management, environmental management system and business processes in line with the needs of the interested parties identified in the environmental management system within Blenheim House, Pocklington, York, YO42 1NS."

2.3 Environmental management system

Phoenix Software Ltd has established and implemented an environmental management system to determine:

- application and reporting of monitoring and measurement of effective operation and controls
- resources required
- leadership and top management responsibilities
- responsibilities and authorities for the maintenance of the management system



- interested parties
- risks and opportunities in accordance with the maintenance of the environmental system and how to address them
- evaluation of the maintenance of the system through internal and external audit procedures
- improvement in the processes of the environmental management system
- maintained documented information to support the operation of its environmental processes
- continual improvement of Phoenix's approach to environmental impact management.

3. Leadership

3.1 Leadership and commitment

Management of Phoenix Software Ltd demonstrate leadership and commitment with respect to the environmental management system by:

- taking accountability for the effectiveness of the environmental management system
- ensuring the environmental policy and objectives are established and are in line with the strategic aims of the company
- ensuring the integration of the environmental management system requirements into Phoenix Software Ltd.'s processes
- ensuring that the resources needed are available
- communicating and conforming to the importance of an effective environmental management system
- ensuring that the system achieves its intended results
- engaging, directing, and supporting all employees to contribute to the effectiveness of the system
- promoting continual improvement
- supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility

3.2 Environmental Policy

Management of Phoenix Software Ltd has established, implemented, and maintains an Environmental policy. This is available to all staff and interested parties.

3.3 Organisation roles, responsibilities, and authorities

Phoenix Software Ltd ensures that the responsibilities and authorities for roles relevant to environmental management are assigned and communicated at Board level.

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Management assign the responsibility and authority for:

- ensuring that the Environmental Management System conforms to the requirements of the Standard ISO14001:2015
- reporting on the performance of the system to management
- ensuring of customer focus while delivering the Environmental Management System
- ensuring the integrity of the Environmental Management System is maintained when changes to the system are planned and implemented

Environmental Management Committee roles, responsibilities and authorities have been clearly identified and communicated to members of staff.

The Environmental Management Committee consists of:

Trevor Hutchinson	Employee Engagement and	Environmental Management System	
Trevoi Tiutchinison	Staff Welfare Manager	Manager	
Clare Metcalfe	Operations Director	Liaison and member of the company Board	
Fay Mercer	Business Operations Manager	Head of Operations and Governance	
Geoff McGann	Governance Manager	Oversees the framework	
Andy Baker	Building Maintenance Manager	Internal Auditor	
Rebecca Tosler	Governance Administrator	Administration and maintenance support for the Standard	

4. Planning

4.1 Actions to address risks and opportunities

4.1.1 General

When planning for the environmental management system, the company considers the issues referred to in 4.1 and the requirements referred to in 4.2 and the scope of the environmental management system and determines the risks and opportunities that need to be addressed to:

- a) ensure the system can achieve its intended outcomes
- b) prevent or reduce undesired effects, including the potential for external environmental conditions that may affect Phoenix Software Ltd
- c) achieve continual improvement

The Environmental Management Committee meet regularly to assess and evaluate the system and determines potential emergency situations, including those that may have an environmental impact (see Risk Register) in line with processes needed within 6.1.1 and 6.1.4 and continual improvement via performance and evaluation measurements.

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4.1.2 Environmental Management risk assessment

Phoenix Software Ltd defines and applies an Environmental management risk assessment process for aspects that are within our control (and those outside but could pose a risk are identified within our risk register), these include:

- a) change, new developments, new/modified activities of the business
- b) changes to products and services
- c) abnormal conditions and any foreseeable emergency situations

The Environmental Aspects Register details those aspects that can have a significant environmental impact and is communicated to all staff, as appropriate detailing:

- the environmental aspects and associated environmental impacts
- criteria used to determine the significant environmental aspects
- significant environmental aspects (identified through risk assessed aspects identifying as High Risk)
- adverse conditions of aspects

These are reviewed at regular intervals to understand any risks and opportunities associated with either adverse environmental impacts (threats) or beneficial impacts (opportunities).

4.1.3 Compliance obligations

Phoenix Software Ltd determines the following:

- the EMC has access to the statutory; contractual and interested party obligations appropriate to Phoenix
- how these compliance obligations apply to Phoenix Software Ltd
- ensure the identified compliance obligations are taken into consideration when establishing, implementing, maintaining, and continually improving our environmental management system

Documented evidence of our compliance obligations is maintained within the Legal Register.

4.1.4 Planning action:

Phoenix Software Ltd takes all necessary actions to address the following:

- significant environmental aspects
- compliance obligations
- risk and opportunities identified within 6.1.1



Including details of how to:

- integrate and implement the actions into the environmental management system processes in line with clauses 6.2, 7, 8 and 9.1 and other business processes, including technological and financial options
- evaluate the effectiveness of these actions (9.1)

4.2 Environmental Management Objectives & planning to achieve them

4.2.1 Environmental Objectives

Phoenix Software Ltd has established the environmental management objectives for relevant functions and levels.

The environmental management objectives are:

- a) consistent with the environmental policy
- b) measurable or monitored (as practicable)
- c) to consider applicable requirements and results from risk assessment and risk treatment
- d) communicated
- e) updated as appropriate

The company retains documented information on the environmental management objectives in the Environmental Aspect Register.

Objectives are documented within the Environmental Policy.

4.2.2 Planning actions to achieve environmental objectives:

When planning how to achieve its environmental management objectives, the company determines:

- a) what will be done
- b) what resources will be required
- c) who will be responsible
- d) when it will be completed
- e) how the results will be evaluated (9.1.1)

5. Support

5.1 Resources

Phoenix Software Ltd has allocated the resources, responsibilities, infrastructure and the Environment required for the establishment, implementation, maintenance and continual improvement of the environmental management system and its processes.



5.2 Competence

The company has:

- a) determined the necessary competence of person(s) doing work under its control that affects its environmental management system
- b) ensure that these persons are competent on the basis of appropriate education,
- c) training and experience
- d) determined the training needs associated with our environmental aspects and environmental management system
- e) where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken

5.3 Awareness

Persons doing work under the company's control are aware of:

- a) the Environmental policy
- b) the significant environmental aspects and related actual or potential environmental impacts associated with their work
- c) their contribution to the effectiveness of the environmental management system, including the benefits of improved environmental management performance
- d) the implications of not conforming with the environmental management system requirements

All Staff at Phoenix Software Ltd are aware of the Environmental Management System.

5.4 Communication

5.4.1 General

Phoenix Software Ltd will establish, implement, and maintain processes needed for internal and external communications relevant to the environmental management system, including:

- a) what is communicated
- b) when communications take place
- c) whom to communicate with
- d) how we will communicate

Taking into account:

- e) our compliance obligations
- f) ensuring that environmental information communicated is consistent with information generated within the environmental management system



- g) we will respond to relevant communications on our environmental management system
- h) retained documented evidence of our communications, as appropriate.

5.4.2 Internal communications

Phoenix Software Ltd:

- a) internally communicates information relevant to the environmental management system among the various levels and functions of our organisation, including changes to the environmental management system
- b) ensures the communication processes enable those persons doing work under Phoenix Software Ltd.'s control to contribute to continual improvement

5.4.3 External communications

Phoenix Software Ltd externally communicates information relevant to the Environmental management system as established by our communication process(es) and as required by our compliance regulations.

5.5 Documented Information

5.5.1 General

Phoenix Software Ltd.'s environmental management system includes:

- a) documented information required by ISO14001:2015
- b) documented information determined by the organisation as being necessary for the effectiveness of the environmental management system

When creating and updating documented information, Phoenix Software Ltd will ensure:

- a) identification and description (title; date; author; and reference number)
- b) format and media are appropriate
- c) review and approval for suitability and adequacy

Documented information required by the environmental management system and ISO14001:2015 are controlled to ensure:

- a) it is available and suitable for use, where and when it is needed
- b) it is adequately protected (from loss of confidentiality, improper use, or loss of integrity)

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Addressing all of the following activities (as applicable):

- distribution, access, retrieval, and use
- control of changes (e.g. version control);
- retention and disposition

Documented information of external origin as defined by Phoenix Software Ltd and deemed necessary for the planning and operation of the environmental management system, is identified, and controlled.

6. Operation

6.1 Operational planning and control

 consideration of the needs to provide information about potential significant environmental impacts associated with the transportation, delivery use, end-of-life treatment and final disposal of products and services.

Maintained documentation is retained as necessary.

6.2 Emergency Preparedness and response

Phoenix Software Ltd has established, implemented, and maintains processes needed to prepare for and respond to potential emergency situations as identified in clause 6.1.1.

Phoenix Software Ltd:

Please treat this information as private and confidential.

- a) will respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations
- b) will respond to actual emergency situations
- c) take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impacts
- d) periodically test the planned response actions (where practicable)
- e) periodically review and revise the processes and planned response actions, after the occurrence of emergency situations or tests
- f) provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control

Maintained documented information is available through SharePoint Online.



7. Performance Evaluation

7.1 Monitoring, measurement, analysis, and evaluation

7.1.1 General

Phoenix Software Ltd has determined what needs to be evaluated, monitored, and measured taking into account the methods used when it is performed and the analysis of the results relating to the environmental management system.

The methods selected should produce comparable and repeatable results to be considered valid. These will include what Phoenix Software Ltd evaluates its environmental performance and the effectiveness of the environmental management system. In addition, Phoenix Software Ltd communicates relevant environmental performance information both internally and externally, as identified within the communication process and as required by our compliance obligations.

7.1.2 Evaluation of Compliance

Phoenix Software Ltd has established, implemented, and maintained processes to evaluate fulfilment of its compliance obligations and has:

- a) determined the frequency that compliance is evaluated
- b) evaluated compliance and action(s) to be taken, if needed;
- c) maintained knowledge and understanding of our compliance status

Documented evidence is retained as evidence of the compliance evaluation results.

7.2 Internal Audit

7.2.1 General

Phoenix Software Ltd conducts internal audits at planned intervals to provide information on whether the environmental management system conforms to the audit results.

7.3 Management Review

Management formally reviews the company's environmental management system every 6 months to ensure its continuing suitability, adequacy, effectiveness, and alignment with the company strategy.

This forms the basis of the environmental management system Management Review and includes consideration of:

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- a) the status of actions from previous management reviews
- b) changes in external and internal issues that are relevant to the environmental management system
- c) feedback on the environmental management system performance, including trends in:
 - 1. external and internal issues that are relevant to the environmental management system
 - 2. significant environmental aspects
 - 3. risks and opportunities
- d) the extent to which environmental objectives have been achieved
- e) information on Phoenix Software Ltd.'s environmental performance, including trends in:
 - 1. nonconformities and corrective actions
 - 2. monitoring and measurement results
 - 3. fulfilment of our compliance obligations
 - 4. audit results
- f) adequacy of resources
- g) relevant communication(s) from interested parties, including complaints
- h) opportunities for improvement

The outputs of the management review include decisions and actions related to continual improvement opportunities, resources, and any need for changes to the environmental management system. Conclusions on the continuing sustainability, adequacy, and effectiveness of the environmental management system; Actions (if needed), when environmental objectives have not been achieved along with opportunities to improve integration of the environmental management system with other business processes (where needed) and any implications for the strategic direction of Phoenix Software Ltd.

The company retains documented information as evidence of the results of management reviews.

The agenda and documentation are put together by the Environmental Committee prior to the review.

8. Improvement

8.1 General

Phoenix Software Ltd determines opportunities for improvement (9.1, 9.2 and 9.3) and Implements necessary actions to achieve the intended outcomes of the environmental management system.

8.2 Non-conformity and corrective plan

When a nonconformity occurs, Phoenix Software Ltd:

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- a) reacts to the nonconformities encountered. Phoenix Software Ltd retains documented information as evidence of:
 - a. the nature of the nonconformities and any subsequent actions taken
 - b. the results of any corrective action

Non-conformities and corrective actions are recorded in the Nonconformity and Corrective Action log.

8.3 Continual Improvement

The company continually improves the suitability, adequacy, and effectiveness of the Environmental management system.

Continual Improvement is reviewed as part of the EMS Management Review.



Version Control

<u>Author</u>	<u>Version</u>	<u>Date</u>	<u>Description</u>
EMC	1.0	03/03/2020	Original Document
EMC	1.0	06/01/2021	Reviewed/no changes
EMC	1.1	08/01/2022	Roles & Responsibilities Update
EMC	2.0	13/02/2023	Roles & Responsibilities Update

Document Approval

<u>Name</u>	<u>Version</u>	<u>Date</u>	<u>Position</u>
Sam Mudd	1.0	03/03/2020	Managing Director
Sam Mudd	1.0	06/01/2021	Managing Director
Sam Mudd	1.1	08/01/2022	Managing Director
Clare Metcalfe	2.0	13/02/2023	Operations Director

Signed: Clare Metcalfe Clare Metcalfe, Operations Director

Dated: 13/02/2023