Environmental Management Policy

1. POLICY PURPOSE AND SCOPE:

SA Group Enterprises (SAGE) is committed to minimising the impacts of its activities on the environment. In stating this commitment the SAGE recognizes that it has an ethical and legal responsibility to protect and enhance the environment.

The Environmental Management Policy covers all activities of SAGE with specific aspects that engage in manufacturing (Wire Ware) and electronics recycling (Aspitech).

All employees, contractors, volunteers and of SAGE are required to comply with the principles of this policy and to support fulfillment of the SAGE’s stated environmental management objectives. To this end employees, contractors and visitors are expected to familiarise themselves with and support the Environmental Management System (EMS), and to take appropriate action to ensure that their activities are carried out in an environmentally friendly manner.

2. DEFINITIONS:

For the purpose of this procedure the following definitions apply:-

<table>
<thead>
<tr>
<th>Word</th>
<th>Definitions</th>
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<tbody>
<tr>
<td>Aspitech</td>
<td>A trading name of SA Group Enterprises (e-cycling)</td>
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<tr>
<td>Wire Ware</td>
<td>A trading name of SA Group Enterprises (manufacturing)</td>
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<td>e-cycling</td>
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<td>Environmental Impact</td>
<td>Is any change to the environment, whether adverse or beneficial, wholly or</td>
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<td>partially resulting from an organisation's activities, products or services</td>
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<td>(e.g. air pollution, water pollution, contamination of soil and groundwater).</td>
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<td>Environmental Management System (EMS) ISO AS/NZS 14001</td>
<td>Means a framework that assists an organisation to identify and manage environmental issues in a structured manner through the allocation of resources, assignment of responsibilities and ongoing assessment and improvement of practices, procedures and processes.</td>
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<td>Environmental Management System (EMS) Manual</td>
<td>Means the environmental manual that provides an overview of SAGE activities and environmental commitment, outlines its management structure and responsibilities as well as its system and process procedures.</td>
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<tr>
<td>Environmental Management Procedures</td>
<td>Detail a chronological method of performing a particular task to achieve a result which conforms to environmental and work health and safety best practice and legislative requirements.</td>
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3. POLICY STATEMENT:

SAGE will, as a minimum, meet its statutory requirements under the relevant legislation and Standards, toward the fulfillment of its stated commitment SAGE will:

- Resources, implements and maintains an Environmental Management System to ensure a systematic approach to environmental and safety management. Maximise efficiencies, prevent pollution, eliminate or control hazards and effectively manage risks across SAGE;
- Develop, maintain and communicate an Environmental Management System (EMS) Manual, that documents in detail the requirements placed on the SAGE by relevant legislation. The EMS Manual provides a detailed schedule of strategies to ensure that the SAGE’s practices are examined regularly with a view to compliance. Supporting the EMS Manual are environmental procedures, guidelines standard operating procedures, and explanatory material related to specific areas of environmental management within SAGE that will continue to be produced in accordance with the directions set in the EMS Manual;
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- The EMS Manual will contain links to relevant SAGE procedures as well as information on how to achieve compliance on environmental management issues within SAGE. Where specific procedures are available they must be followed;
- Set objectives and targets for those activities which significantly affect the environment and measure performance against those targets over time;
- Minimise waste production and pollution, as far as practicable and seek to re-use and recycle materials where possible;
- Promote and improve the delivery of a safe workplace for all employees by developing an interdependent safety culture, reducing risk and consulting with employees and external stakeholders;
- Protect the health, safety and welfare of all persons involved in Wire Ware and Aspitech activities; and
- Integrate the consideration of environmental concerns and impacts into decision making, and undertake operations using minimum impact methods. Where necessary, refine practices and procedures to ensure the fulfillment of stated objectives;
- Proactively work with industry to help consumers make more informed and sustainable choices regarding the management of redundant technology;
- Provide a safe and healthy working environment by promoting employee welfare and reducing the impact of workplace injuries and illnesses;
- Communicate its environmental performance both within SAGE and the community and promote awareness and understanding of and responsibility for environmental issues both within SAGE and the community;
- Ensure employees, contractors and visitors are informed and aware of their roles in implementing this policy;
- Ensure employees have the skills and resources required to carry out their duties safely by identifying and documenting responsibilities and accountabilities; and
- Use internal and/or external expertise when required.

4. LEGISLATIVE REQUIREMENTS:

Includes, but is not limited to:

- Environmental Protection Act 1993 (SA)
- Work Health Safety Act 2012 (SA)
- Work Health Safety Regulations 2012 (SA)

5. SUPPORTING DOCUMENTATION AND ADDITIONAL INFORMATION:

Internal Resources:

- EMS 1000 Manual and supporting documentation

External Resources:

- ISO 14001 Environmental Management System
- AS/NZS 5377.2013 Collection, storage, transport and treatment of end-of-life electrical and electronic equipment
- AS/NZS 4801 Occupational Health and Safety Management Systems
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6. ROLES AND RESPONSIBILITIES:

6.1 The SAGE Board
   Responsible for ensuring effective governance mechanisms are in place.

6.2 The Chief Executive Officer
   Ensures due diligence and takes reasonable steps to ensure SAGE is meeting its obligations.

6.3 The Executive team
   The Executive team members are responsible for monitoring and ensuring adherence to this Policy, the EMS Manual and related procedures.

6.4 Senior Managers and Managers
   Managers are responsible for ensuring adherence to this and the related policies, procedures and forms developed that support this policy and the EMS Manual.

6.5 Employees, Contractors and Volunteers
   Are responsible to be aware of and adhere to this and the related policies, procedures and forms developed that support this policy and the EMS Manual.

7. KEY PERFORMANCE INDICATORS (KPI), RECORDS, AUDIT AND REVIEW:

   • Annual Internal Audit of Compliance against ISO standards
   • Programmed Schedule of Self Assessments against requirements of the ISO standards
   • Operational or Site Environmental Audit - carried out to identify the environmental aspects and impacts associated with activities and processes. This may include audits to determine environmental legislative compliance

8. APPENDIX AND FLOWCHARTS:

   Not applicable

9. POLICY & PROCEDURE APPROVAL:

   Document Approved by: [Signature]
   Date: 15 / 02 / 2015

   Chief Executive Officer