

Effective Date for this Policy: January 1, 2011

Policy Steward(s):

Individual Name(s): Nancy S. Cleveland

Intent:

As a company whose primary purpose is to support other businesses in becoming more sustainable, our environmental policy directly reflects our company mission and values, and inherently serves as an example to those with whom we work. We are steadfast in our commitment to managing environmental matters as a critical, integral, and ongoing aspect of our business. This policy states the environmental commitments of our company. It is signed by our Principals and is made available via the Sustrana website to all employees, suppliers, partners, vendors, users, and clients. Our environmental policy assures the highest level of environmental integrity for our company operations, all company activities in the course of providing our sustainability planning tools and products, and consulting services.

Scope:

This policy applies to all business operations, consulting activities, and products.

Policy:

Our environmental policy is to

- comply with applicable laws and regulations,
- strive to have a net positive impact on human health and the environment, and
- maintain an integrated sustainability management system through which we regularly communicate and continually evaluate and improve the quality of our environmental performance.

Compliance

We will comply with applicable laws and regulations and will implement programs and procedures to assure compliance. Compliance with environmental standards will be a standard component of training, performance reviews, and incentives of all employees.

Net Positive Environmental Impact

We will seek opportunities to have a net positive impact on the environment as a result of our business operations and our work with our clients. We will employ management systems and procedures specifically designed to prevent activities and / or conditions that harm or pose a threat to the environment.

We will continually look for ways to minimize risk to and protect the environment by committing to:

- Reduce our use of energy and to purchase clean energy whenever possible
- Minimize harmful releases to the air, land, or water through use of cleaner technologies and the safer use of chemicals
- Minimize the use of materials and resources and practice the most responsible management of scarce resources, such as water, non-renewably sourced energy, land, forestry products
- Minimize the overall amount and toxicity of waste generated
- Ensure the safest treatment, disposal, and recycling of non hazardous and hazardous waste
- Include environmental performance as an key performance indicator for the company

Beyond our own operations, we commit to helping our clients manage their environmental impact by strategically incorporating concern for the environment into their business processes and practices. We also commit to engaging in proactive practices that rejuvenate the environment, including but not limited to, enhancing the natural capacity of our company grounds and supporting non-profits and community organizations that work to restore a positive balance between the activities of mankind and a healthy ecosystem.

Communication

We will publicly communicate our commitment to our company's environmental performance on our website, and encourage input from our employees, suppliers, partners, vendors, users, clients, and other stakeholders. We will make our environmental policy available on our company website to the general public.

Continuous Improvement

At least on an annual basis, we will measure and review our environmental impact and progress towards having a net positive environmental impact. We will continually seek opportunities to

improve our adherence to these principles and our environmental performance, and we will periodically report progress to our stakeholders.

Role & Responsibilities of the Steward(s):

The Steward shall be responsible for ensuring that certain data points related to the company's environmental impact, as designated by senior management, are being recorded on an ongoing basis. The Steward shall ensure that information is consolidated into a company scorecard report for presentation to senior management. The Steward also shall manage the process of regularly soliciting input from stakeholders regarding the environmental policy and its implementation, and bring suggestions for changes to the attention of senior management.

Performance Measures:

Taking into consideration external and internal stakeholder input, senior management shall meet at least annually to identify, discuss, and set the coming year's key performance indicators and establish annual targets for those areas of concern. Annual indicators and targets will be published on the company website. At least annually, the company shall report on its progress relative to the targets, inclusive of explanations and corrective course of action if targets have not been met.

Last reviewed/revised: April 4, 2018