



# CSR Management System



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## 1) INTRODUCTION

WETAC is a leading independent supplier of batteries and stored energy services in the European market with offices in the Netherlands, Germany, UK and the Czech Republic.

We have developed and implemented an integrated CSR management system (CSR-MS) to identify, manage and control the health and safety, environmental, labour, ethical and business continuity impacts of our operations

Effective application of the system shall drive continual improvement in our CSR performance.

WETAC is the trading name for WETAC BV.

This manual defines the manner in WETAC has developed, implemented and will maintain it's CSR-MS.

### Scope

The scope of this CSR-MS is;

**The procurement, sale of lead acid batteries and all supporting activities of WETAC**

The activities to support the system are managed from offices at;

- The Netherlands: Galvanistraat 117, 6716 AE Ede
- Germany: Bonner Strasse 365, 40589 Düsseldorf
- UK: 14-16 St. Thomas's Road Chorley, Lancashire PR7 1HR
- Czech Republic: Nadrazni 344/23, 150 00 Praha

This extends to all our staff, whether permanent, temporary or contract whilst working on or off site.



## 2. CSR POLICY

Our **CSR Policy** statement is the foundation of our CSR-MS and is authorised by our senior management to demonstrate their commitment to compliance to legal and other requirements relevant to our activities.

Our policy shall be communicated to all employees and to people working on behalf of the organisation. The policy is also available to the public through our website [www.wetac.com](http://www.wetac.com).

## 3. PLANNING

### 3.1 CSR Risks and impacts

WETAC will identify its:

- health and safety risks
- environmental impacts – any change to the environment, whether adverse or beneficial, resulting from an environmental aspect
- labour management risks
- ethical risks
- business continuity risks

The organisation will then determine the activities, products or services which have, or may have, significant risks or impacts to staff, the environment, business fairness and continuity. CSR risks and impacts shall be evaluated in line with procedure

#### ***WP-01 - Assessment of CSR risks***

Criteria have been established for classification of significance. Where available, quantified data is to be included in the assessment of significance, and where necessary operational controls implemented to minimise or eliminate the risk of pollution. The output of this assessment will be recorded on ***WR-08 WETAC Internal CSR risk assessment register***.

The Management System Manager (MSM) is responsible for arranging for the assessment of significance of CSR risks and impacts at least annually, using external expertise when required and ensuring the register is maintained and updated as necessary.

In addition, where there is a significant change or planned developments in our activities or where a new risk or impact is identified they will be evaluated in CSR terms, as they occur. Records shall be maintained of these activities.

Significant CSR risks and impacts shall be taken into account when reviewing policy, setting annual objectives and targets, and in the prioritisation of action programmes.



### 3.2 Legal & other requirements

WETAC shall identify the key legislation that relates to its activities and operations and also any other requirements such as from contracts, customers or lease agreements.

The responsibilities and process for identifying these is determined in the procedure **WP-02 - Control of Legal & Other Requirements**. Details of the output of this process shall be recorded on the document **WR-02 Register of Legislation & Other Requirements**.

The Register is subject to review and update following the introduction of new legislation or requirements and in response to any changes in WETAC's activities, products or services, at regular intervals, no less than annually.

### 3.3 Objectives, targets and programme(s)

CSR objectives and targets are established on an annual basis and takes into account:

- CSR Policy
- Significant CSR risks and impacts
- Legal and other requirements
- Results from CSR audits and reviews
- Projected technological developments
- Financial, operational and business requirements
- Views of interested parties.

Implementation of the required activities to achieve these will positively contribute towards continual improvement in CSR performance.

The responsibilities and process for setting these and monitoring against planned timescales, are documented in **WR-09 - CSR Improvement Programmes**.

The Management Representative and MSM are responsible for establishing appropriate and achievable CSR objectives and targets, including the identification of the resources needed and timescales for their achievement. Objectives and targets set are subject to the approval of the Managing Director.

The CSR management programme is subject to amendment for new or modified activities. The MSM is responsible for issuing and updating of the **WR-09 Improvement Programmes** forms.

Progress on these objectives shall be reviewed and recorded quarterly and communicated to all staff.

## 4. IMPLEMENTATION AND OPERATION

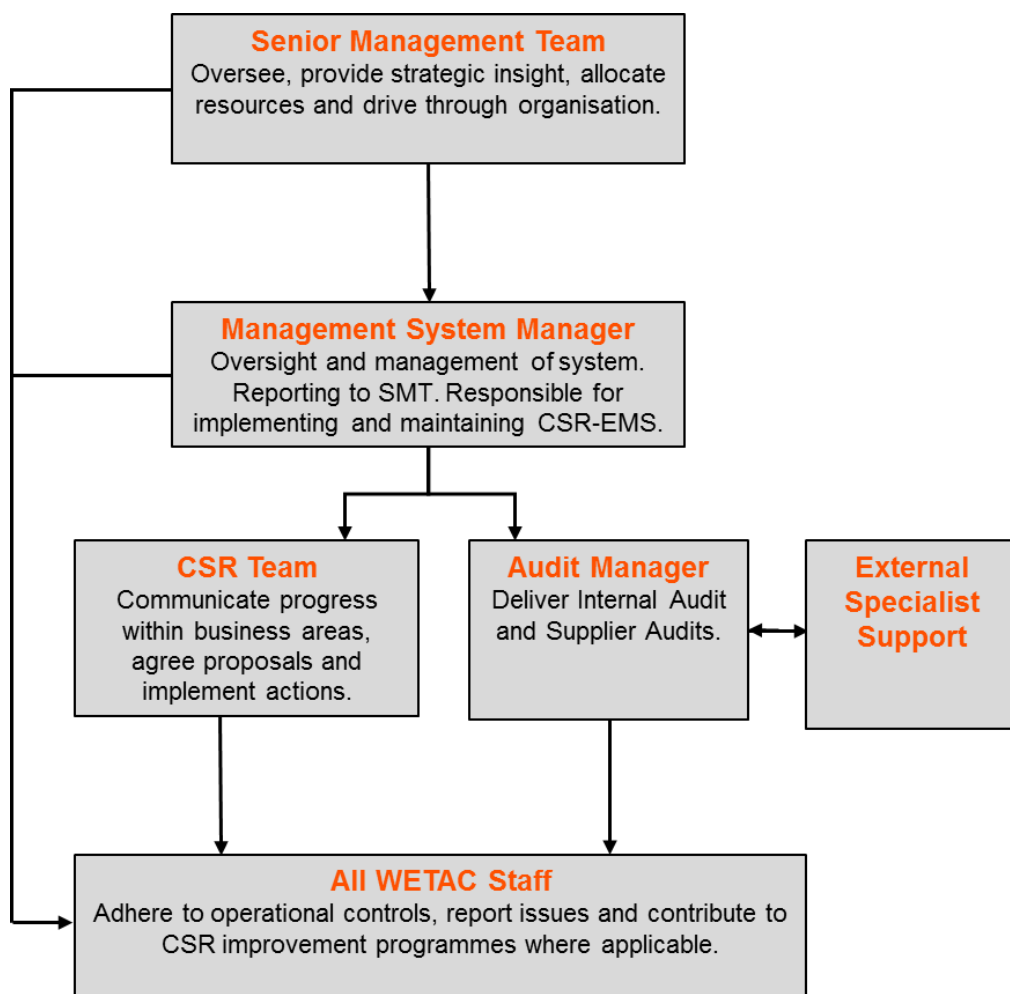
### 4.1 Resources, roles responsibility and authority

Through the annual business planning process, WETAC's Senior Management Team (SMT) shall ensure resources are available to establish, implement, maintain and improve the CSR-MS. These shall include staff, specialised skills, organisational infrastructure, technology and financial resources.

Responsibilities and authorities are defined within documented Operational Controls and Job Descriptions. All staff are responsible for following procedures and having awareness and contributing wherever possible to the organisation's objectives and targets.

The SMT, MSM and Audit Manager assumes the role of a steering group for the CSR-MS. The MSM assumes the role of the Management Representative who has responsibility for ensuring the CSR-MS is maintained, meets the requirements of the standard, reporting on performance and recommendations for improvements.

The CSR Team shall provide an important advisory role to support the above responsibilities.





## 4.2 Competence, training and awareness

WETAC shall ensure that all staff involved with activities that may have a significant effect on CSR management receives the appropriate training to be aware of;

- the importance of conformity with the CSR policy
- the significant CSR risks and impacts associated with their activities
- their responsibilities in achieving conformity with the requirements of the CSR-MS
- the potential for departure from specified procedures.

The WETAC Induction Programme includes our CSR policy and general CSR awareness. Briefings and appropriate training is provided to ensure that personnel are aware of the company's CSR policy, procedures and the requirements of the management system. Personal development plans are used to identify training requirements for staff and the training is planned and recorded. CSR awareness and training requirements for key roles are controlled as detailed in **WR-10 CSR Training & Awareness.**

Suppliers and contractors involved in activities with or on our behalf shall be made aware of our CSR policy and Supply Chain Code of Conduct.

## 4.3 Communication

Various channels have been established for communications with employees, partners, contractors, external organisations and interested parties with respect to the CSR risks and impacts of the organisation. The organisation welcomes feedback of both a positive and negative nature regarding its impact on the environment.

### Internal Communications

- Team meetings, CSR Team meetings
- Staff briefings
- Intranet, use of notice boards

### External Communications

The MSM is the focal point for communications with external interested parties on any aspect of its CSR effects and management system.

**WP-06 CSR Communications** procedure details controls and responsibilities for dealing with these communications.

Complaints from any source relating to CSR issues will be recorded by the MSM. Such complaints will be investigated by the designated personnel to identify and implement corrective action. Response to the complainant will be the responsibility of the MSM. All such issues will be recorded on handled in accordance with **WP-04 CSR Issues & Non-conformances.**

WETAC does not pro-actively communicate externally regarding its significant CSR risks and impacts. Any requests for information will be considered on a case-by-case basis. Copies of our CSR policy will however be provided to the public on request.

#### 4.4 Documentation

This manual forms part of the CSR-MS, which is structured as follows;

Document type	Purpose
<ul style="list-style-type: none"> <li>· CSR Management Manual</li> <li>· CSR Policy</li> </ul>	Outlines how we will address the requirements of the standard
<ul style="list-style-type: none"> <li>· Register of Significant CSR risks and impacts</li> </ul>	Details the activities which WETAC considers to have a significant impact on health, safety, environment, ethics, labour and business continuity
<ul style="list-style-type: none"> <li>· Register of Legal &amp; Other requirements</li> </ul>	Details the applicable legislation and other requirements for WETAC's activities.
<ul style="list-style-type: none"> <li>· CSR Management Improvement Programmes</li> </ul>	Details objectives and targets for improvement in CSR performance
<ul style="list-style-type: none"> <li>· Operational Controls</li> </ul>	These define and control the processes operated by the company to support implementation of the system
<ul style="list-style-type: none"> <li>· Controlled Forms</li> </ul>	Standard forms and templates used to record information required to support the effective operation of the processes.
<ul style="list-style-type: none"> <li>· External Records</li> </ul>	Required for verification of compliance

#### 4.5 Control of Documents

The latest issue of CSR-MS documents shall be available for all staff on the intranet and at any other relevant location. All such documents shall be restricted from unauthorised changes.

The identification, approval, review, amendment, issue and availability of documents and data essential to the effective operation of the CSR-MS are controlled in accordance with the procedure **WP-07 Document Control**.





#### 4.6 Operational Control

Operations and activities associated with significant CSR aspects are controlled by the issue of a CSR Procedures (CSP).

The procedures supporting the system are as follows:

- WP-01 Assessment of CSR Risks and Impacts
- WP-02 Control of Legal & Other Requirements
- WP-03 Supply Chain Management Process
- WP-04 Issues & Non-conformances
- WP-05 Site Emergency Plans
- WP-06 CSR Communications
- WP-07 Document Control
- WP-08 CSR Management System

These are subject to document control and all relevant staff shall be made aware of these procedures.

#### 4.7 Emergency Preparedness and Response

Emergency preparedness and response procedures have been established in **WP-05 Site Emergency Plans** for each site, as appropriate, to prevent and mitigate the CSR impacts that may arise from emergency situations.

The procedures specify responsibilities and actions to be taken and include contact and communication details within the company and with external organisations e.g. Fire Brigade, and the Environment Agency.

Emergency procedures will be subject to review and revision, if necessary, after the occurrence of emergency situations. Procedures are tested periodically by simulation of incidents as part of training exercises and drills.

## 5. CHECKING

### 5.1 Evaluation of compliance

A check shall be performed at least annually on all legal and other requirements listed on the Register of CSR Legal & Other Requirements document. There shall also be a check against any changed or new legal or other requirements and these shall be added to the register as appropriate.

This activity shall be recorded and action taken where necessary to address any issues. Procedure **WP-02 Control of Legal & Other Requirements** describes the process and responsibilities of this activity.

### 5.2 Nonconformity, corrective action and preventive action

Non-conformances may arise as a result of deviations from CSR policy, procedures, actual or potential CSR incidents, failure to meet regulatory requirements or issues identified during CSR management system audits.

Where an issue is identified, the details shall be forwarded to the MSM and recorded on the CSR Issue log. This issue is then dealt with in accordance with procedure **WR-04 CSR Issues & Non-conformances**. This will include identifying the cause, corrective action, preventive action where appropriate, and reviewing the effectiveness of the action taken.

### 5.3 Control of records

CSR records are retained to provide evidence of the effective operation of the system. All records will be identified, stored for a defined period of time (taking account of any regulatory requirements) in conditions, which protect them from damage, deterioration/loss and allow them to be retrieved as appropriate.

These controls will be applied to all records whether they are on paper or electronic media. Where records are retained on computer they will be protected from unauthorised access and amendment and will be subject to regular 'back-up'. The identification and responsibilities relating to these records are detailed within the procedure **WP-07 Document Control**.

### 5.4 Audit

The MSM is responsible for establishing an audit programme both internally to check compliance and system coverage and externally within the supply base. Audit frequency takes into account:

- The CSR impact of the activities and operations
- The CSR management programme
- Nature, scale and complexity of the activities/operations
- Results from the initial review or previous audits
- CSR incidents and issues of concern.



Internal audits shall determine whether the CSR-MS conforms to planned arrangements, the legal requirements and that the system has been effectively implemented and maintained. Non-conformities identified are recorded and communicated to the relevant staff within the audit report.

Supplier audits are to ensure conformity to WETAC's Supply Chain Code of Conduct requirements. Audits are carried out in accordance with **WR-06 Audit Assessment tool**. The Audit Manager shall ensure that corrective actions are implemented by the relevant area(s) of the organisation and actions shall be tracked to completion.

Results from CSR-MS audits shall be considered at management reviews as a basis for improvement and in the setting of future objectives and targets.

## **5.5 Management review**

WETAC will carry out annual management reviews of its CSR-MS to ensure its suitability, adequacy and effectiveness in achieving the aims set out in the organisation's CSR Policy and the Improvement Programme.

The MSM is responsible for establishing the agenda for the review. The MSM is responsible for arranging the collection of CSR performance data for presentation at the management review meeting.

The scope of the review will include;

- CSR objectives, targets and performance
- Findings of internal and external CSR audits
- Follow-up of actions from previous management reviews
- Evaluation of compliance with legislation and other requirements e.g. from stakeholders
- Review of CSR policy, objectives and targets, the CSR management programme and the need for changes due to changes in activities or legislative requirements, new or forthcoming significant CSR impacts
- Advances in technology
- Lessons from CSR incidents
- Expectations and requirements of interested parties, including the public and regulatory authorities
- Recommendations for improvement

The MSM shall document the reviews, including observations, conclusions and recommendations for actions. Agreed actions shall be tracked to completion.