Environmental System Manual
ISO14001:2004E

Connor Winfield Corp.
Date: 1/12/12
Revision: 0

Environmental System Manual   Connor Winfield

Approved by: Dan Olp, V.P / General Manager	Date: 1/12/12

Introduction

Connor Winfield Corp. has developed and implemented an environmental management system to insure our ability to operate as an environmentally responsible partner while providing products that meet all customer expectations and applicable regulatory requirements. The Connor Winfield quality system complies with the international standard ISO 9001 (2008), while the environmental system is compliant with ISO14001 (2004).

The manual is divided into several sections modeled on the organizational outline of the ISO 14001 (2004) standard. Sections are further subdivided into several subsections representing main system elements or activities. Each subsection starts with a general policy statement expressing the commitment to implement the basic principles of the pertinent system element or activity. The general policy statement is followed by more specific procedural policies outlining how the general policy is implemented, and referencing applicable operational procedures.

The purpose of this manual is to define and describe the environmental management system, to define authorities and responsibilities of the management personnel involved in the operation of the system, and to provide general procedures for all activities comprising the environmental management system.

Another purpose of this manual is to present the outline of our environmental management system to our customers and other external interested parties, and to inform them what specific controls are implemented at Connor Winfield Corp. to demonstrate our commitment to environmental responsibility.

SCOPE: This manual pertains to the environmental management systems at all of Connor Winfield's Aurora, IL facilities.

ISO9001:2008

Regarding compliance to the latest revision of the overall Quality System Standard (IS09001:2008), all identified changes have been reviewed for content and impact. Specific revisions in Connor Winfield's internal policies and procedures have been completed to reflect those changes – where necessary and/or appropriate. Where changes in the standard have been deemed to have had no measurable impact on system operations - and any previously issued documents - and no changes to those documents were effected, those

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documents remain at their previous revision levels and issue dates. Where noted in this manual, specific elements of the Quality Management System (Eg: Corrective Action, Management Review, Internal Audits, Records, Non-Conforming Material, Document Control, Continuous Improvement) are also utilized for the Environmental Management System.

CORPORATE HISTORY

The Connor-Winfield Corporation has manufactured electronic timing devices continuously for over thirty years since its incorporation in May 1963. During that time Connor-Winfield Corporation has grown to be a significant U.S. manufacturer of quartz crystal-based hybrid circuits, commonly referred to as crystal oscillators. It also manufactures oscillator products which are not crystal based. Connor-Winfield's frequency control products are used in a wide variety of applications, including telecommunications, LAN and WAN products, computers and other microprocessor and electronic equipment. Connor-Winfield specializes in designing custom and semi-custom frequency control products, but it also offers a broad line of standard oscillator products.
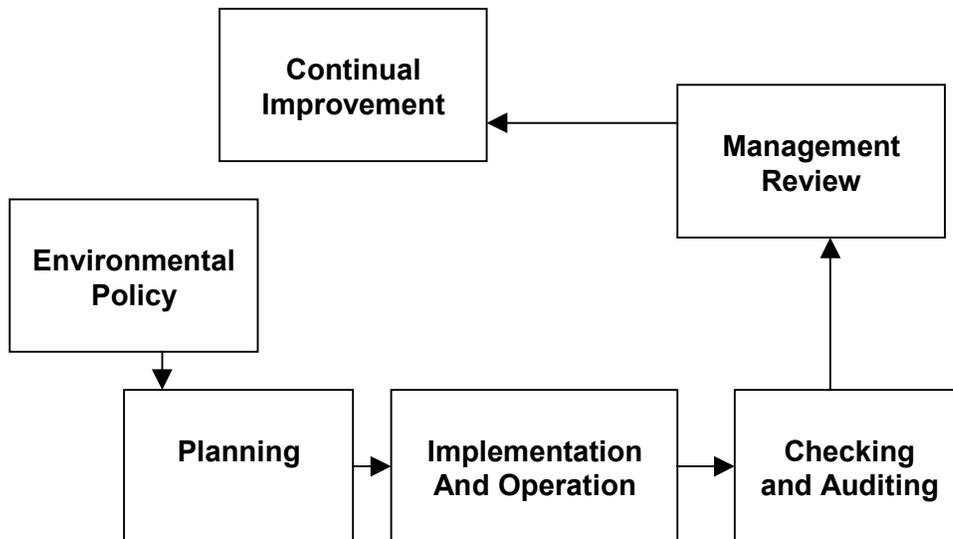
Connor-Winfield has grown significantly during the past ten years. Presently it occupies facilities in Aurora, Illinois, where it employs a staff of over 200 assembly operators, technicians, engineers, and support personnel.

Dan Olp

Vice President / General Manager _____

Introduction

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              │   Improvement   │◄──────────┐
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   ┌─────────────────┐              │   Management    │
   │  Environmental  │              │     Review      │
   │     Policy      │              └─────────────────┘
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   ┌──────────┐   ┌─────────────────┐   ┌─────────────────┐
   │ Planning │──►│ Implementation  │──►│    Checking     │
   │          │   │  And Operation  │   │  and Auditing   │
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Environmental Management Model

Model Key:

Environmental policy provides the framework for the environmental management system.

Planning takes place to identify environmental aspects and their impact on the environment. Programs are defined to mitigate negative impacts, reduce consumables, and establish emergency protocols.

Programs are implemented and supported.

Programs are checked and monitored for effectiveness (Goals & Metrics and Internal Audits).

The status of the environmental management system is reviewed annually.

Cycle is repeated to insure continuous improvement.

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General Requirements

GENERAL POLICY

Connor Winfield Corp. is committed to establish, document, implement and maintain an environmental management system, and continually improve its effectiveness, in conformance with requirements of ISO14001 (2004) International Standard. The scope of the environmental management system includes all crystal, thick-film and PCB based frequency control device design and manufacturing operations, and custom manufacturing services at our Aurora, Il facilities.

PROCEDURAL POLICIES

1.   Environmental Policy *<par 4.2>*

Connor Winfield has adopted an environmental policy as a framework for our environmental management system. See section 4.2 for policy statement. This policy has been communicated to all personnel and is posted on our internet web site

2.   Planning *<par 4.3>*

2.1   Upper Management, the Facilities Manager and the Environmental team are responsible for identifying relevant environmental aspects and determining which are significant considering all operations (normal and abnormal). Top management is responsible for ensuring the availability of necessary resources and information.

2.2   The management team defines responsibilities and commits resources to measure and control those aspects that are identified as being significant.

2.3   The management team also fosters the development of specific programs to control and reduce those environmental aspects that have been identified as significant.

2.4   The management team reviews all legal and regulatory requirements that are applicable to the environmental aspects.

2.5   The management team provides environmental objectives and targets that are specific and measurable. They cover both short and long-term issues.

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General Requirements

3. Implementation and Operation *<<4.4>>*

3.1 **Resources, Roles & Responsibilities and Authority -** Upper management ensures the availability of resources that are essential to establish, implement, maintain and improve the environmental management system. These resources include human resources and skills, organizational infrastructure, technology and financial resources. The performance of environmental system processes are systematically monitored and/or measured. This is to ensure their effectiveness and to identify opportunities for improvement. *<<4.4.1>>*

3.2 Top management has defined the environmental responsibilities and authority in order to facilitate effective environmental management. Top management has designated Thomas Olp (Legal Counsel) as the management representative. Irrespective of his other duties, the management representative will a) ensure that the environmental management system is established, implemented and maintained in accordance with the IS14001 standard, b) report to top management on the performance of the environmental management system. *<<4.4.1>>*

3.3 **Competence, Training and Awareness –** The organization ensures that any person(s) performing tasks that have the potential to cause significant environmental impact are competent on the basis of education, training or experience. Records of competence are retained. The organization identifies training needs associated with environmental aspects and the environmental management system. Training – or other specific actions – are taken to meet these needs. Records of training are retained. *<<4.4.2>>*

3.4 **Communication –** The organization has established, implemented and maintains procedures for internal communication among the various levels and functions. Also, the organization has established external means of communication *<<4.4.3 >>*

3.5 **Documentation –** The environmental system documentation has been established and consists of the following: environmental policy, objectives and targets, the scope of environmental management system, the description of the main system elements and their interaction, documents required by the ISO14001 international standard, and records. *<<4.4.4>>*

3.6 **Control of Documents –** Documents – including records - that are required by the ISO14001 international standard are controlled through the normal quality system procedures outlined in our IS9001:2008 quality management system manual (see par. 4.2.1, 4.2.3. *<<4.4.5>>*

General Requirements

3.7 **Operational Control –** The organization identifies and plans operations that are associated with the identified environmental aspects consistent with the environmental policy and objectives to ensure that they are carried out by, a) establishing, implementing, and maintaining documented procedure(s) to control situations where their absence could lead to deviations from the policy and objectives, b) stipulating the operating criteria in the procedure(s), and c) establishing, implementing and maintaining procedures related to identified environmental aspects and communicating applicable procedures and requirements to suppliers, including contractors. *<<4.4.6>>*

3.8 **Emergency Preparedness and Response –** The organization has established, implemented and maintains procedures to identify potential emergency situations and potential accidents that can have an impact on the environment and how to respond to them. The organization responds to emergencies to mitigate the environmental impact, periodically reviews and updates emergency procedures, and periodically tests those procedures where practical. *<<4.4.7>>*

4. Checking *<<4.5>>*

4.1 **Monitoring and Measurement –** The organization has established, implemented and maintains a procedure to monitor on a regular basis key operational characteristics that have a significant environmental impact. Records of these activities are maintained. *<<4.5.1>>*

4.2 **Evaluation of Compliance –** Consistent with our commitment to compliance, the organization has established, implemented and maintains a procedure for monitoring compliance with applicable legal requirements. Records of these activities are maintained. *<<4.5.2>>*

4.3 **Nonconformity, Corrective Action and Preventive Action –** Activities identified in this paragraph that are required by the ISO14001 international standard are controlled through the normal quality system procedures outlined in our IS9001:2008 quality management system manual (see par. 8.3, 8.5) *<<4.5.3>>*

4.4 **Control of Records -** Activities identified in this paragraph that are required by the ISO14001 international standard are controlled through the normal quality system procedures outlined in our IS9001:2008 quality management system manual (see par. 4.2) *<<4.5.4>>*

4.5 **Internal Audit -** Activities identified in this paragraph that are required by the

General Requirements

ISO14001 international standard are controlled through the normal quality system procedures outlined in our IS9001:2008 quality management system manual (see par. 8.2) *<<4.5.5>>*

4.6 **Management Review -** Activities identified in this paragraph that are required by the ISO14001 international standard are controlled through the normal quality system procedures outlined in our IS9001:2008 quality management system manual (see par. 5.6) *<<4.5.6>>*

ASSOCIATED DOCUMENTS

- ISO9001:2008 Quality Management System Manual: All sections

GENERAL			
Section 4.2	Section Rev.: **0**	Rev. Date: **1/12/12**	Section Page **1**

Environmental Policy

Environmental Policy

Connor Winfield is committed to conducting corporate business in a globally responsible manner that is consistent with principles that are sensitive to the environment. We understand that we have a vital role to play in sustaining our environment. Therefore, we will take an active role in reducing the environmental impact of our operations and products. Further, we pledge to our stakeholders that we are in compliance with all local, state, and federal environmental regulations, and that wherever possible, we will strive to reduce the environmental impact of our business operations.

To demonstrate our commitment to these principles we:

- Have been CFC free in all of our manufacturing operations since 1994

- Have embraced RoHS principles and now offer a broad range of compliant products

- Meet all applicable environmental, health and safety-legal requirements to which we subscribe in the countries where we do business

- Have incorporated the principles outlined in the EICC (Electronic Industry Code of Conduct) as an internal company policy

- Will maintain active programs to reduce our use of consumables (energy, water, materials, etc)

- Will work with our employees to provide and maintain a safe and healthy workplace

1. Authority

1.1 The environmental policy is established by the top management and is approved by the President and the Vice President/General Manager. Any changes to the policy must be likewise approved by the President and the Vice President/General Manager.

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Environmental Policy

2.   **Role of the policy**

2.1   The main role of the environmental policy is to communicate the company's commitments and aspirations with regard to environmental responsibility, and to define principal objectives for the environmental management system as defined in ISO14001.

2.2   The environmental policy provides a framework for establishing specific goals and objectives, and provides direction for the continual improvement effort. The use of environmental policy in establishing objectives is addressed in this manual.

3.   **Communication**

3.1   The environmental policy is communicated throughout the company, and its role is explained and discussed at the general orientation training provided to all employees.

3.2   The environmental policy is also communicated to customers, consumers and other interested parties. For this purpose, it is displayed in the reception area and posted on the company's internet site.

4.   **Review**

4.1   The environmental policy is periodically reviewed within the framework of management reviews of the quality system. This is to ensure its continual relevance and suitability. The process for reviewing the environmental policy is defined in Operational Procedure 05-06-01, Management Review.

ASSOCIATED DOCUMENTS

- Operational Procedure 05-06-01: Management Review

- Operational Procedure 08-05-03: Continual Improvement