ACE COMPUTERS
Corporate Environmental Policy Statement

Corporate Environmental Policy

Purpose

To outline the policy and procedures effective throughout the Company concerning environmental protection.

Environmental Principles

Realizing that the world's natural resources are limited and fragile, the Company considers environmental protection to be consistent with its overall goals and values and an important consideration in its total activities. This commitment to environmental protection is reflected in our policies, programs and practices for conducting operations in an environmentally as well as economically responsible manner.

Furthermore, Ace Computers recognizes that an effective environmental management system can positively impact corporate profitability in several important ways. First, programs designed to make efficient use of natural resources often minimize operating costs. Second, environmental quality programs help sustain and enhance the Company's presence and reputation in domestic and international markets. Third, compliance programs minimize risk and potential legal liability. In these ways and more, environmental protection is viewed by the Company as important to the economic well-being of the Company.

In light of the above principles, the following corporate environmental policy has been established:

Environmental Policy Statement

Ace Computers is committed to environmental stewardship and we believe that environmental protection is a management responsibility as well as the responsibility of every employee of the Company. This policy concerning environmental protection addresses aspects of the Company's operations which can potentially impact the environment.

As a computer systems integrator of finished goods from component manufacturers, our environmental impacts are limited and include greenhouse gas emissions (from energy used in buildings and for transport), water use and waste (mainly from offices), and solid wastes (primarily from component packaging).

In addition, to this policy we have two other policies that set out our commitment to the environment and the standards we expect from our employees and business partners. This includes our Paper Procurement and disposal policy and our measures to increase the proportion of environmental-friendly alternatives (such as renewable energy or recycled paper, recycled packaging and high-efficiency power supplies in all of our products).

We also have undertaken efforts to promote not only the direct environmental benefits of the design of our products, but also in the consequential benefits of the environment-friendly design features in our products which may allow customers to realize energy savings in environmental areas, like reducing server room cooling as our newest servers can reliably operate at ambient temperatures 30°F higher than most typical data centers.
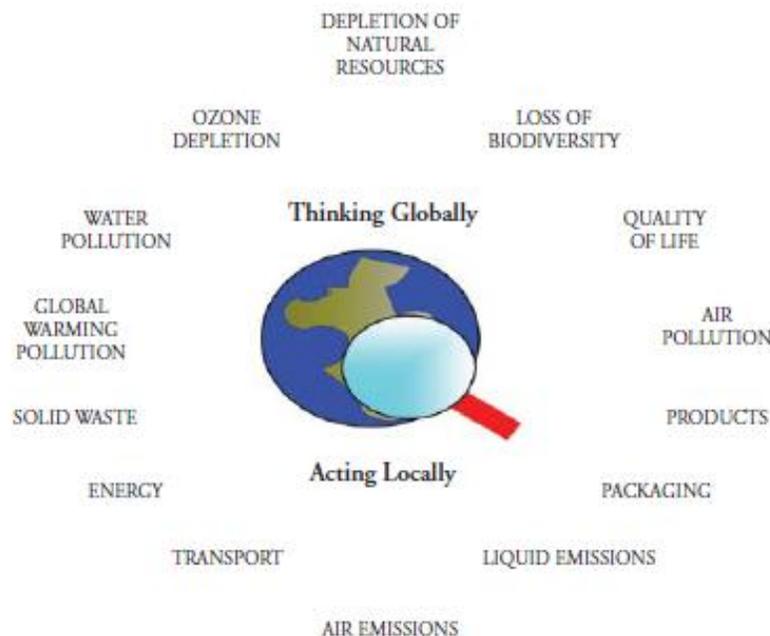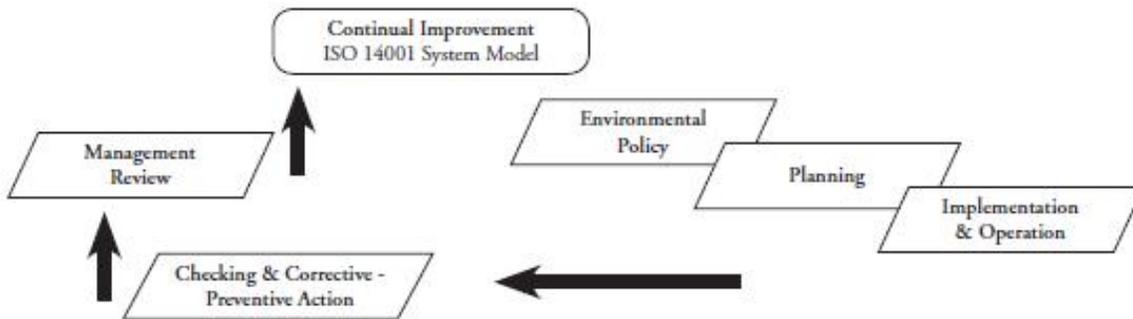
Ace Computers shall seek to:

- Conduct its operations in compliance with applicable laws, regulations and standards concerning environmental protection and provide a mechanism for self-monitoring to ensure compliance and continual improvement.

- Establish corporate environmental objectives and targets relevant to the environmental impacts of its activities and a means to measure progress against these objectives. These objectives and targets shall be reviewed and revised as necessary on an annual basis.

- Continually improve our environmental management system and related policies, programs, and performance, based on the results of our periodic reviews and taking into account regulatory changes, customer needs, technical developments, scientific understanding, and community expectations.

- Minimize the environmental risks to our employees and the communities in which we operate.

- Promote employee awareness of environmental concerns, actions and responsibilities through our programs and various communication channels.

- Promote the adoption of environmental protection goals and practices by contractors and suppliers acting on behalf of the Company, strongly encouraging improvements in our contractors' and suppliers' practices to make them consistent with those of the Company. This includes sound paper procurement practices that ensure the sustainability of forests and other natural resources.

- Operate facilities and conduct the Company's activities taking into consideration the efficient use of energy and materials.

- Reduce and where possible eliminate waste through recycling and handle and dispose of all waste through safe and responsible methods.

- Assess the environmental condition of property interests that are acquired by the Company and appropriately address the environmental impacts caused by these properties.

- Utilizing the best available techniques not entailing excessive costs (BATNEEC) to comply with the requirements of existing and future legislation, and encouraging those working on our site to meet the same standards.

- Ensure that Management is fully informed about pertinent environmental issues and the Company's environmental policy.

Climate Change

At Ace Computers we are committed to reducing our impact on climate change and increasing our contribution to understanding sustainability issues, including climate change, through our information products.

Some measures we are taking to reduce our impact include:

- Benchmarking the existing energy performance of all buildings (owned and leased) and continuing ongoing measurement of building performance to identify targets for improvement.
- Striving to meet our environmental performance targets to reduce the environmental impact of our operations over time.
- Continuing to engage employees through programs such as the Green Teams and Personal Sustainability Practice (PSP) module to reduce the Corporation's environmental footprint.
- Shaping the sustainability agenda through our product offerings including our new Powerworks™ EcoBlade Servers, our Vision™ Series desktop PC's and our LogiCAD™ workstations.
- Continuing our partnerships with industry groups, policymakers and organizations to advocate for positive change, and provide relevant information to assist in their leadership and policy efforts on climate change.
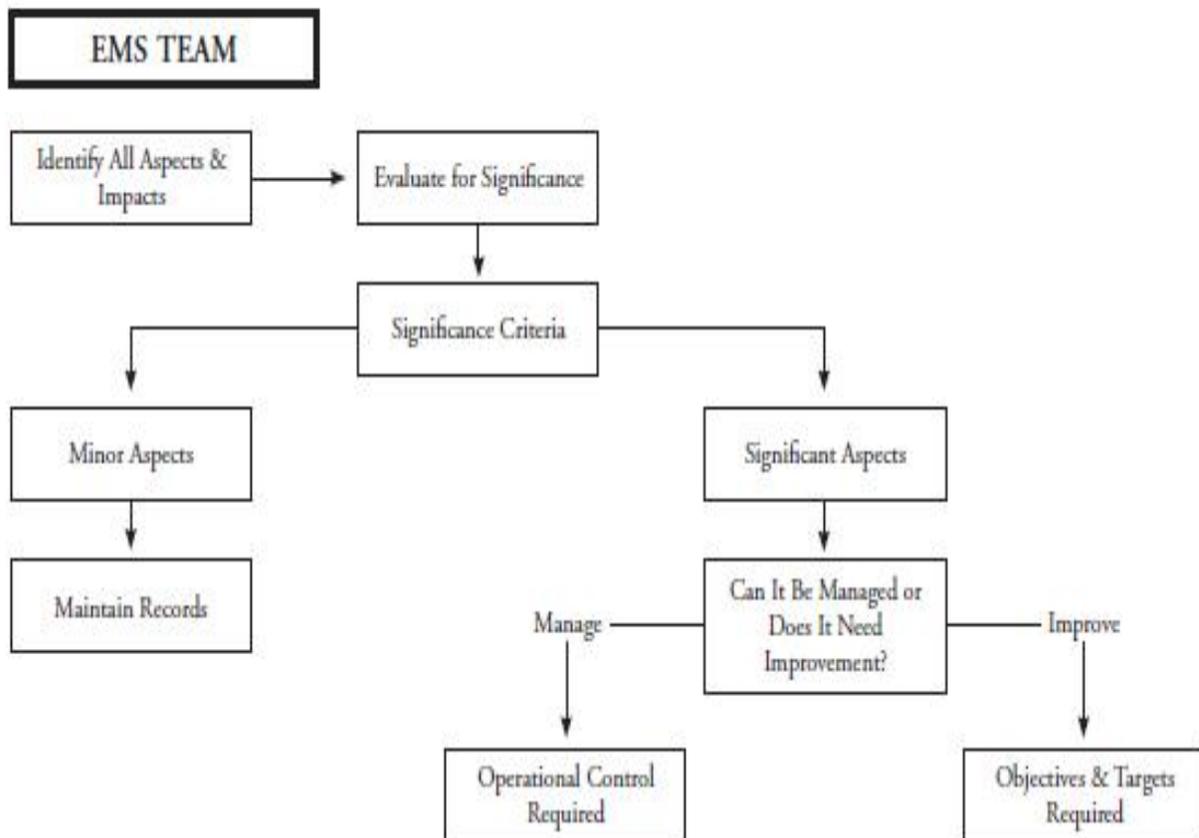
Environmental Policy Governance

The Corporate Responsibility and Sustainability Committee (CRSC) has oversight responsibility for our corporate responsibility and sustainability activities. These are managed under the guidance of Vice President, John Samborski, PE.

The CRSC is comprised of all senior management responsible for the Company's corporate responsibility policies and practices. The Committee convenes semi-annually and helps to coordinate and manage assessment of the risks associated with climate change and tracking of the Company's performance data.

Reporting to the full CRSC is the Environmental Action Committee (EAC), which is specifically charged with addressing Ace Computers' climate change and emission reduction efforts, and establishing and monitoring the Company's Environmental Sustainability Strategy. The EAC meets approximately quarterly, or as needed. The EAC reviews the Company's environmental impacts and establishes performance targets aimed at cost efficiencies and enhanced risk and reputation management.

The CRSC is responsible to communicate all the results of the meetings to all stakeholders involved.

Notes to the Environmental Policy

Scope Statement:

This EMS applies to all activities and operations at the Company and includes the assembly, integration and testing of personal computers, servers and related equipment.

ISO 14001:2004 Application:
All requirements are applicable.

Environmental Policy Review:
Environmental Policy shall be reviewed at least bi-annually, or in the light of significant change.

EMS Processes:
The Environmental Management system processes/procedures and are outlined in the chart on page 4. Our ISO 9001:2008 certified QMS (Quality Management System) and SMS (Safety Management System) processes are also supportive of the EMS.

Documented Procedures:
The EMS comprises a four tier structure incorporating: Environmental policy, procedures, records and where appropriate, the use of guidance documents to enhance understanding. Standards, specifications and recommended guidance documents are used as appropriate.

Records:
Records are established and maintained to provide evidence of conformity to requirements and all records are controlled.

Non-conformance control:
All endeavors will be taken to ensure that our operations and activities are controlled to avoid any detrimental impact to the environment throughout all stages but in the event of a non-conformity being discovered this shall be investigated with the aim of continual improvement – such incidents will be recorded.

Corrective & Preventive Action:
Documented procedures are implemented to ensure appropriate corrective actions are taken when so required and the EMS Team regularly consider actions required to prevent potential non-conformities.

Internal Audit & Management Review:
Audits are regularly carried out by trained staff to a predetermined schedule to ensure system and process compliance and continual improvement. Management Reviews are carried out at least biannually and minutes circulated to participants and interested parties.

Emergency Preparedness and Response:
Because the Company does not utilize any specialized materials which could become environmental hazards that a typical office environment uses, there are no environmental emergencies anticipated. The worst possible event would be a fire at our HQ and assembly facility but the size of the facility is 15,000 SF, with over half of this being office space with the relative low risks of this type of facility. We also have an excellent location with a fire station located only 400 feet away, so fire coverage is very good and close to our position. We do not anticipate causing any environmental emergency that would result in harm to the community, our employees or our neighbors.

The following table refers to the guidelines of ISO 14001 to link to our Corporate Environmental Policy:

Indicator	ISO 14001:2004 Section	Description of Section	Page No.
Scope	1	Scope of the Standard	1
Normative References	2	None are cited – this was only done to retain clause numbering with the previous edition of the ISO 14001:1996 standard	None
Terms and Definitions	3	Terms and Definitions	5 (plus chart on page 3)
Environmental Management System Requirements	4.1	General Requirements	1
	4.2	Environmental Policy	1
	4.3.1	Planning – Environmental Aspects	1
	4.3.2	Planning – Legal and other requirements	1
	4.3.3	Planning – Objectives, Targets and Programs	2 and 3
	4.4.1	Implementation and Operation - Structure and Responsibility	4
	4.4.2	Implementation and Operation – Competence, Training and Awareness	4
	4.4.3	Implementation and Operation – Communication	4
	4.4.4	Implementation and Operation – E.M.S. Documentation	4 and 5
	4.4.5	Implementation and Operation – Control of Documents	4 and 5
	4.4.6	Implementation and Operation – Operational Control	4 and 5
	4.4.7	Implementation and Operation – Emergency Preparedness and response	5
	4.5.1	Checking - Monitoring and Measurement	4 and 5
	4.5.2	Checking – Evaluation of Compliance	4 and 5
	4.5.3	Checking – Non-conformances, Corrective and Preventive action	4 and 5
	4.5.4	Checking – Control of Records	4 and 5
	4.5.5	Checking – Internal Audit	5
	4.6	Management Review	5

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