



CORPORATE RESPONSIBILITY

AND

ENVIRONMENTAL MANAGEMENT SYSTEM

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INTRODUCTION

TechnoTraining, Inc. wholeheartedly accepts and is working within the parameters of the Social and Environmental Management System as outlined in the IBM Chief Procurement Officer's letter dated April 01, 2010. (enclosure #1)

We take pride in our accomplishments to date and look forward to continued success in all areas. We are working daily on creating a working atmosphere where people look forward to coming to work, are working in a safe environment, work is equitably distributed, employees are trained in their positions and cross trained to help their peers when needed. We strive to be free of discrimination of any kind regardless of race, color, national origin, sex, age, physical handicap or religious affiliation

We have been equally committed to protecting our environment, conserving our nation's natural resources, recycling as much as possible and limiting consumption since our incorporation in 1999. To this end we embrace the new ideas and concepts that have been presented to us by IBM and are actively looking to incorporate improvements and efficiencies whenever and wherever we can.

However, it is important to note that we are not in the manufacturing or manufactured products sales market place and our small size (six employees) makes measuring trends and efficiencies difficult to do and somewhat impractical. So we have and will continue to comply fully with the intent of the Social and Environmental Management System program outlined by IBM and attempt to adapt our oversight process to our small business size and services. As TechnoTraining, Inc. continues to grow, we will correspondingly increase our data collection efforts as they become more measurable.

CORPORATE RESPONSIBILITY

MISSION

Our mission is to be the best at identifying, qualifying and delivering consulting / training solutions and services that enhance our customer's bottom line.

We are committed to supporting our client's requirements by delivering cost effective, ethical, reliable, and high quality solutions of strategic value, while promoting long-term, seamless partnerships based on mutual respect. It is our policy to conduct business in a sustainable manner that protects the environment, health and safety of our employees/trainers, clients and host communities.

QUALITY POLICY

It is the policy of TechnoTraining to provide quality services in support of our mission and to be responsive to the individual and collective needs of our clients as well as those of the public at large. Our client commitments, supporting actions, and services delivered must be recognized as expressions of quality.

TechnoTraining shall be a trustful and reliable long-term business partner. Our solutions and services shall meet the customers' needs and demands. Our customers' faith in the ability of our organization to deliver excellent service is crucial for survival as a company. The quality put forth in our daily business is created by collective actions of each employee and subcontractor collectively and not through a rigid system of control. The good intentions and the good spirit of our co-workers generate decisions and actions, which is crucial for our success.

CODE OF CONDUCT

Our values, Code of Conduct, business conduct policies and standards guide our associates in deciding which activities to undertake and how to perform them. High standards on integrity are thus central to achieving responsible good business. It is our firm conviction that responsible business results in better business.

Serving Our Clients

Agreements With Clients, Vendors/Suppliers, and Sub-tiers

We are committed to building and maintaining high-quality business relationships with our clients, vendors, and sub-tiers. All associates who have contact with clients, vendors/suppliers, and sub-tiers—including those who have decision-making and approval authority—must not engage in any activity that might affect the integrity and effectiveness of these relationships. We expect our associates to understand and comply with this principle and abide by TechnoTraining's policies, local business practices, country-specific customs, and applicable legislation.

Preventing Legal Liability and Financial Loss for TechnoTraining and Our Clients

Every associate has an obligation to take reasonable steps to minimize the risk that our services could cause legal liability or financial loss to TechnoTraining or our clients. This includes delivering high-quality work, ensuring that our actions and client discussions are held confidential, managing client information with third parties, and acting with the highest level of honesty and professionalism in all we do. We are careful about accepting assignments that can bring risk to TechnoTraining or our clients.

Gifts, Entertainment and Other Gratuities

At TechnoTraining, we are committed to building and maintaining sound business relationships with our clients, suppliers and other business partners. For this reason we purposely avoid any situation that could damage the integrity of these relationships such as accepting gifts, entertainment or other forms of gratuity.

Working With Each Other

Equal Opportunity Employment Policy

We are committed to create a favorable work environment in which all employees, regardless of race, color, national origin, sex, age, physical handicap or religious affiliation, can enjoy equal opportunities in their employment relationship with our company or clients.

Harassment and Discrimination

We are committed to an environment of mutual appreciation and respect. Our position on harassment and discrimination is clear and explicit in that we do not tolerate any behavior that degrades, harasses, or discriminates against any other associate, client, vendor/supplier, contractor, or employee of a sub-tier provider.

Substance Abuse and Smoke-Free Workplace Environments

We are committed to providing a safe, healthy, and professional work environment that is not impacted by the risks of associates working while under the influence of alcohol, illegal drugs, or the abuse of legally prescribed or legally available drugs. To fulfill this commitment, we have established a principle that prohibits the possession, use, manufacture, sale, or distribution of illegal drugs within TechnoTraining or within the scope of their employment while at a client's site. We also promote a smoke-free work environment within TTI and our client's sites.

Maintaining a Nonviolent Workplace

We are committed to the goal of providing a safe work environment without violence or weapons. Our position is clear in that we do not tolerate acts of violence and abusive or threatening behavior, including verbal, written, or other nonverbal threats, or physical attacks. This includes behavior at TechnoTraining, as well as at our client sites where the associate performs work. Weapons are prohibited in the workplace, as well as in any personal motor vehicle brought to the premises. We

expect associates not to encourage, initiate, or engage in workplace violence. This also applies to behavior with clients, vendors/suppliers, and contractors. The purpose of our position is to stop potentially violent, abusive, or threatening situations before they start or escalate.

Protecting the Security and Privacy of Information

Confidentiality Agreements

We recognize that some information, often referred to as “privacy protected,” could be detrimental to TechnoTraining or our clients if confidentiality is violated. Our position is to protect our associates and clients from harm through the misuse of information that could have a negative impact on the firm, our clients, or our prospective clients. When an associate leaves a client’s site, that associate’s work products remain the property of the firm unless otherwise agreed upon.

Privacy

TechnoTraining strives to ensure the confidentiality and security of the data it processes. This means that associates are expected to be sensitive to the way they treat personal information. All associates must protect the confidentiality of personal information—of our clients, our clients' employees, and associates at TechnoTraining.

Information Security

TechnoTraining places a high importance on securing the information we collect and process on behalf of our clients and associates. TechnoTraining information security policy and supporting procedures are intended to preserve the integrity of our client relationships, protect client and associate data, and maintain legal compliance. Our objective is to maintain business continuity and avoid business damage by preventing and minimizing the impact of information security incidents.

Recording and Reporting

Expense Reimbursement

Expense reports are an important responsibility for associates who travel on business or have other approved business expenses. We expect all associates to only submit legitimate business expenses and complete expense reports in a timely and accurate manner since these reports impact our client billing and financial reporting.

Time Recording

For some of our products and services, we invoice our clients based upon the amount of time required by our associates to perform the work. We are committed to ensuring that all billings are fair and accurate. We expect all associates to accurately record the amount of time worked to the correct billing or client number. It is unacceptable to falsify or misrepresent your time on timecards, invoices, or other time-recording systems.

Records Retention and Disposal

We maintain and support a comprehensive worldwide records management program to properly maintain, protect, and dispose of records, as appropriate, on a local basis in the normal course of our business.

Records that are relevant to pending or ongoing litigation, investigation, or audit shall not be destroyed.

Emergency Planning

Every business has one thing in common – they are equally susceptible to emergency situations. Business continuity planning must account for both man-made and natural disasters. TechnoTraining has implemented a Business Emergency Survival plan (www.ready.gov) to prepare for, respond to, and recover from disasters whether it is a hurricane or a bomb threat, terrorist activity or a chemical spill. It is not meant to override any policies, procedures, rules, regulations, and protocols. It is not an absolute guide for every situation and does not relieve the receipts of responsibility for any standing policies, procedures, rules, regulations, and protocols.

One of the best methods of assuring your company's recovery is through emergency planning, communication with employees while securing the company's physical assets.

ENVIRONMENTAL MANAGEMENT

Environmental impact is an important issue across the globe, with pressure to minimize that impact coming from many sources, including governments, trade associations, supply chains and other social and financial stakeholders. Our Environmental Management System (EMS) provides a framework for managing environmental responsibilities efficiently in a way that is integrated into our overall operations.

POLICY

The following elements are the environmental initiatives at TechnoTraining:

- **Compliance:** TechnoTraining will responsibly manage all aspects of our business to ensure environmental laws and recognized standards are met or exceeded. We will monitor compliance with our own policies, procedures, and standards.
- **Responsible Business:** TechnoTraining will develop, maintain, and communicate effective policies, procedures, standards and guidelines for our business activities, to address environmental issues and risks material to TechnoTraining, its clients and its sub-tiers.
- **Monitoring:** TechnoTraining continuously seeks ways to reduce its environmental footprint. Through our policies, management systems, review processes and programs we ensure that our operations first meet all applicable environmental requirements; we then seek to elevate our performance above and beyond the legal and regulatory requirements.
- **Environmental Footprint Reduction:** TechnoTraining will pro-actively apply sound environmental practices to internal operations and purchasing decisions. We will seek ways to minimize our consumption of resources, including energy, paper and water, and our generation of waste and emissions. We will help create opportunities for our suppliers and employees to do the same.
- **Employee Involvement:** TechnoTraining has regular discussions with all employees relevant to means by which we can reduce the use of natural resources and recycle our used materials in concern with the programs available in our area. We encourage our employees to act in an environmentally responsible manner, and support our company's objectives. We also support opportunities to become personally engaged in environmental sustainability initiatives that are important to our business and/or our community.
- **Reporting and Transparency:** TechnoTraining does not currently report regularly on our key environmental performance indicators due to our small size (six employees). However we have begun monitoring our usage and will continue to improve our system for monitoring, measuring and transparent reporting of our performance relative to our targets, priorities and objectives. As the data is collected, we will report regularly on our key environmental performance indicators.
- **Partnership:** TechnoTraining will establish and maintain productive partnerships to ensure that we remain informed about relevant concerns and issues and are well-positioned to manage environmental risks and opportunities.

COMPLIANCE

We commit to operate consistently with applicable environmental legislation and regulations and to provide our services consistent with international standards developed to avoid, reduce or control pollution to the environment.

We pledge to monitor our performance as an ongoing activity, to strive for continual improvement and to provide a framework for establishing and reviewing quality and environmental objectives and targets. With a systematic work with collecting facts and figures we can reach an improved way of managing our environmental work.

RESPONSIBLE BUSINESS

While TechnoTraining doesn't have factories or manufacture products, we still believe we have a responsibility to be good stewards of the environment. A cross-functional leadership team ensures that we take a companywide view of environmental risks and responsibilities. Some notable successes in the past year, including:

Energy Conservation

Reducing Stand-by Power

- Turn off all equipment evenings/weekends

Energy Efficient Heating/Cooling

- Programmable Thermostats: Outdated thermostats in entire building were replaced with digital and programmable thermostats to reduce heating/cooling during non-working hours.
- Double Pane Windows: New high energy efficient windows installed to reduce loss of cooling and heating and to allow use of natural light and ventilation during tepid seasons.
- Personal fans to circulate air in offices for personal comfort and to allow higher AC and lower heating settings.
- Ductwork upgraded to ensure maximum efficiency of the HVAC system and extra insulation added.
- Air filter scheduled change to increase HVAC efficiency.
- Use of window blinds for keeping light out during the hot summer months and allowing sunlight in during the cooler months.

Energy Efficient Lighting

- Florescent bulbs: Four bulb light fixtures reduced to two bulbs to save energy.
- Parking lot security lights replaced with low pressure sodium (LPS) bulbs set on motion detection sensors to reduce both wattage and usage.
- Emergency lights converted to LED bulbs.

Energy Efficient Equipment

- Outdated computers/monitors replaced with more energy efficient models. All PCs are equipped with low energy flat screen display.
- Server storage area designed to use low energy variable speed fans with a thermostat controlled on/off switch to reduce usage yet maintain safe operating temperatures needed to maintain the life of the equipment.
- Energy Star compliant scanners and printers reducing energy use and carbon foot print.

Water Conservation

Indoor Water Usage

- Low-Flush Toilets installed
- New energy efficient hot water heater installed with a minimum gallon size water heater capacity and settings lowered

Outdoor Water Usage

- Landscaping conservation: TechnoTraining uses drought-tolerant native plants, ornamental grasses, and trees in our landscaping to reduce water usage.
- Annual replacement of mulch around plants to retain water.

Recycling

Paper Reduction/Recycling:

- Paperless data handling to minimize waste
- Double-sided printing when possible
- Used paper and cardboard collected and recycled in support of our regional recycling program
- Contracts and Correspondence sent electronically
- All invoicing sent electronically
- ACH payment options to reduce printing and paper waste.

Waste

Electronic Waste Recycling –

- Annually collect and properly dispose of out dated electronics through local programs.
- Used ink cartridges returned to a local recycling partner.

Plastic/Metal Container Recycling –

- TechnoTraining collects metal, plastic, and glass packaging recyclables in support of the local recycling program.
- Digital Lock System: Lock system is programmable and eliminates the waste of metal keys and disposing of them and eliminates an additional cost to changing the locks.

Gas Emissions

Travel Reduction:

- Teleconferencing with clients/co-workers to reduce and/or eliminate fuel waste and gas emissions caused by traveling
- Promote online training when possible to reduce
- Remote access granted to employees to allow work from home and to reduce carbon printing.

MONITORING

TechnoTraining will work within the framework of our services to undertake activities including, but not limited to, the following:

- further develop, maintain and communicate environmental policies, procedures, and guidelines;
- engage with clients and sub-tiers to advance and launch initiatives necessary to meet our objectives;
- monitor key activities and track performance, including cost-effectiveness of initiatives;
- assess the need for improvements; and
- report annually on our progress in implementing the Environmental Management System.

In addition, TechnoTraining's business and operational units will provide input into environmental strategy and policy, share information on and assist with efforts to reduce our environmental footprint, address risks and promote and leverage business opportunities.

ENVIRONMENTAL FOOTPRINT REDUCTION

We believe that our actions can make a significant and positive contribution to helping solve some of the problems posed by these issues.

TechnoTraining works together with its employees at every level in our business; looking at how improvements can be made and, where these are recognized, save on resources being consumed. This involves every single aspect of resource efficiency.

In the coming months and years, we will be strengthening existing programs, polices, procedures and guidelines, and where necessary, developing new ones to implement TechnoTraining's Environmental Management System. We will seek to make significant gains in these areas, ensure alignment with our environmental policy, and monitor and report publicly on our progress.

Energy Conservation

We use energy to heat and cool buildings, run our technology infrastructure and lighting systems, and for other purposes.

TechnoTraining is committed to:

- reducing energy use intensity within our premises through replacement of standard florescent bulbs with compact florescent bulbs, switching off lights in unused rooms
- pursuing opportunities to reduce energy use in our information technology systems and operations; by our continuing replacement of outdated equipment and plugging machines into power strips that can be shut down during nights and weekends.
- encouraging our sub-tiers to use energy-efficient products and increasing our involvement in certified green programs. Currently an E2 member of the Virginia Environmental Excellence Program VEEP. (<http://www.deq.state.va.us/veep/>)

- a 10% decrease our energy usage by the end of 2011.
- Planting of trees in surrounding open areas to promote shading of building and reduce cooling cost.

Water Conservation Program

While TechnoTraining's level of direct water consumption is relatively small and we are committed to improving our water use and conservation practices. Unfortunately, our water meter is combined with several other businesses in the building and we are unable to track our individual usage.

TechnoTraining is committed to:

- reducing the use of water in our office, on a per employee basis
- encouraging the use of reusable water containers and water coolers or tap water in our premises, where appropriate;
- encouraging our sub-tiers to conserve water and
- increasing the use of environmentally-friendly cleaning products in our facilities in order to reduce the quantity of hazardous substances in wastewater

Recycling Program

TechnoTraining is committed to a healthy environment and a sustainable economy. Along with that is a growing recognition that we need to get past the "throw away" mentality. In fact, we now understand that much of what used to be called "waste" is a resource that can be re-used. Recycling helps reduce the amount of solid waste going into our landfills, encourages the development of new technologies and creates jobs.

TechnoTraining is committed to:

- reducing the amount of paper we use, on a per employee or per customer basis by encouraging printing only when necessary and increasing double sided printing.
- continuing to encourage support the electronic delivery of documents to/from clients, where appropriate;
- ensuring that the paper we purchase contains recycled fiber where available and
- printing on scrap paper whenever possible.
- A 10% reduction of paper purchased/used by the end of 2011.

Waste Management

Waste minimization through demand management, reuse and recycling are the preferred methods of reducing solid waste. However, where solid waste cannot be eliminated, we are committed to careful management and disposal.

TechnoTraining is committed to:

- disposing of electronic equipment and devices in an environmentally-responsible manner and considering disposal when we make decisions about the procurement of products and services;
- recycling paper, glass, plastic and metal throughout the organization, wherever municipal recycling programs or practical alternatives exist; and
- promoting the reuse of furniture and other fixtures to reduce the amount of materials going to landfill

Gas Emissions

Most of TechnoTraining's greenhouse gas emissions are indirect, such as through our use of purchased electricity, the production and distribution of documents, and employee travel.

TechnoTraining is committed to:

- reducing the greenhouse gas emissions intensity within our owned premises and working with our tenants toward the same objective;
- pursuing support of Green Energy through our local supplier, Dominion Power (<http://www.dom.com/dominion-virginia-power/customer-service/energy-conservation/ec-programs.jsp>)
- promoting the use of alternatives to travel, such as videoconferencing and teleconferencing, where possible,
- and making flexible "work from home" arrangements available to employees where feasible

DISCLOSURE

TechnoTraining will publicly report on our progress on environmental issues and activities through our website, (www.technotraining.net). We will enhance our environmental data management and collection system to improve the quantity, quality and geographic scope of environmental performance data that we report on.

EMPLOYEE INVOLVEMENT

A successful environmental management system relies on the positive forces of responsibility and creativity of all employees. The real challenge is to ensure that environmental management becomes and remains a productive force and a continuous source of innovation, rather than another burden on top of other daily procedures.

The value of employee participation lies in:

- Alertness to important causes of inefficient use of inputs or emissions that may else go unnoticed. As inputs are also directly linked to costs and emissions signals a possible wasted input, sometimes even costly to handle, such alertness is of direct economic benefit, besides its merit for the environmental performance. We have numerous examples that employees in their mapping of material and energy flows within their unit discover electrical appliances running without apparent purpose, "hidden" water losses, and even a "forgotten" heater.
- Preparedness to accept changes, when new procedures have to be implemented as part of the environmental management system or to improve environmental performance.
- Spreading responsibility for the environment to all employees that take operational decisions is the best guarantee that problems are minimized and eventually entirely prevented.
- Alertness to opportunities for reaping benefits through communicating the improvements in environmental performance already achieved.
- A more stable workforce that takes more pride in their work and acts as ambassadors for their company in the community.

It should be clear from the above that learning the procedures of the environmental management system is the least part of environmental training. The major part of environmental training lies in developing a commitment to continuous investigation of the structures and activities constituting the production chain and its interaction with the environment, and a competence to respond to the result of this investigation.

REPORTING AND TRANSPARENCY

In the current financial and legal climate, environmental audits are no longer the reserve of only the most “green” or image conscious companies. They are a recognized necessity to keep costs down and increase profits.

TechnoTraining will carry out annual environmental audits and surveys (waste, resource and legal compliance) and report our findings on our website.

PARTERSHIPS

TechnoTraining aims to implement an Environmental Management System (EMS) in partnership with our clients, vendors/suppliers, and sub-tiers. TechnoTraining strives to contribute to our society by sharing vital information useful to a variety of associates in an effort to reduce and improve our environment. Making earnest efforts at encouraging our partners to join us in our efforts to reduce our environmental impact, will also promote communication with our clients, vendors/suppliers, and sub-tiers about their business activities and practices and stimulate joint efforts to improve our environment. TechnoTraining is committed to:

- Sending quarterly green newsletters to our clients, vendors/suppliers and sub-tiers and sharing their suggestions with others.
- recognizing on our website any of our clients, vendors/suppliers and sub-tiers that are active participants of local/state/federal green programs



(Enclosure #1 Letter dated April 01, 2010)

Subject: 2010 Supply Chain and Environment Responsibilities

Dear IBM Supplier:

IBM has expected its suppliers to operate in an environmentally responsible manner for decades. Accordingly, our management system has included various environmental and supply chain social requirements for our suppliers. In addition, in 1998, IBM explicitly encouraged its suppliers to align their own environmental management systems with ISO 14001 and to pursue registration under this international standard. In 2004, IBM published its Supplier Conduct Principles to articulate the company's overall supply chain social and environmental requirements.

These early initiatives and actions - taken well before the present day focus on "green" -- have served IBM and its suppliers well, underscoring how effective environmental management makes good business sense. As we begin a new decade and in recognition of the continually growing imperative for environmental and corporate responsibility across supply chains, I am writing to inform you about some new requirements we are now setting for our suppliers in this important part of business.

Specifically, IBM will now require all of its suppliers to:
define, deploy, and sustain a corporate responsibility and environmental management system;
measure performance and establish voluntary environmental numeric goals
publicly disclose results associated with these voluntary environmental goals and other environmental aspects of the management system

Many of you have already been doing this for several years, and you have recognized -- like IBM -- that environmental leadership fosters business efficiency and effectiveness. You have also accepted that environmental responsibility and accountability resides at home, in your own business operations. For others, these requirements may represent a new way of doing business. Nevertheless, we trust you are familiar with the underlying issues since we previously wrote about ISO 14001 and IBM's Supplier Conduct Principles. What may be new, therefore, is taking the next steps to establish a formal management system, measure performance, set goals, and disclose results.

There are certain basic elements that are necessary to put these requirements into action. We have stated them in the attachment below. IBM's own practices are built upon them, yet they are certainly not exclusive or limited in applicability to any one company or any particular industry sector. Although we are now asking you to include these elements in your work, we are not prescribing a uniform set of programs and goals. We realize there is not a "one size fits all" solution. Instead, we ask each supplier to deploy a management system, measure performance, set goals, and disclose results in a way that reflects your company's particular intersections with corporate responsibility and the environment.

Whether these requirements are new to you or not, IBM believes they are important and expects its suppliers to meet them. Questions pertaining to these requirements should be directed to your IBM procurement contact person.

Thank you for your attention to this important matter.

John Paterson
Vice President
Global Supply and
Chief Procurement Officer

Supplier Requirements:

IBM's Requirements for Suppliers Regarding a Corporate Responsibility and Environmental Management System, Measuring Performance, Setting Goals, and Disclosing Results

IBM asks its suppliers to:

- define, deploy, and sustain a corporate responsibility and environmental management system that identifies significant aspects of the supplier's intersections with these matters, including those articulated in IBM's Supplier Conduct Principles and the Electronic Industry Citizenship Coalition Code of Conduct
- establish programs (within the management system) to control operations that intersect with these matters and confirm compliance with applicable law, regulation and any particular contractual requirements
- measure performance associated with supplier's significant environmental aspects where applicable and include at a minimum each of the following aspects common to virtually all businesses:
 - energy conservation
 - scope 1 and scope 2 greenhouse gas emissions *
 - waste management and recycling
- set voluntary environmental goals to achieve positive results associated with significant aspects where applicable and include at a minimum one in each of the three aspects cited in item 3 above
- publicly disclose results associated with these voluntary environmental goals and other environmental aspects from the management system, including any regulatory fines or penalties that may have occurred
- train employees who are responsible for performing this work
- conduct self-assessments and audits as well as management reviews
- cascade this set of requirements to the supplier's suppliers who perform work that is material to the products, parts and/or services being supplied to IBM

*Note:

scope 1 greenhouse gas emissions: direct emissions generated by the company

scope 2 greenhouse gas emissions: indirect emissions that are associated with the generation of electricity that is purchased and consumed by the company

Illustrative information about IBM's own Global Environmental Management System and environmental reporting and disclosure can be found at:

<http://www.ibm.com/ibm/environment/ems/> (IBM's Global Environmental Management System)

<http://www.ibm.com/ibm/environment/annual/> (Environmental Reporting and Disclosure)