

Environmental Management System
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1. Introduction

1.1 The need for environmental management

Environmental management is important to Reed Elsevier for several reasons including:

- Meeting our responsibility as a global leader in our business sector
- Managing environmental risks to the business
- Identifying opportunities for our business
- Ensuring we are compliant with environmental legislation
- Supporting the requirements of our investors and the wishes of many of our employees and other stakeholders who are concerned that we minimise our environmental impact where possible
- Measuring our efforts to continually improve against environmental targets
- Enabling us to publicly demonstrate that we are managing our environmental impact
- Realising cost savings and therefore supporting improved profitability

This Environmental Management System (EMS) has been developed in line with ISO 14001 principles. Our aim is to work toward ISO 14001 certification through the BS 8555 phased approach. We encourage our global business units to implement this approach through the RE Environmental Standards programme, which identifies environmental certification as a key environmental management objective.

1.2 Reed Elsevier's environmental impacts

Reed Elsevier has environmental impacts in common with all companies and some areas that are unique to the company or sector. These result both directly from Reed Elsevier activities, but also as a result of activities carried out on behalf of Reed Elsevier, such as through contracting to third party printers. Examples of environmental impacts resulting from Reed Elsevier's activities include:

<i>Reed Elsevier activity (environmental aspect)</i>	<i>Examples of environmental impact</i>
'Brain Print'	<ul style="list-style-type: none">• Environmental content is a growing business area. As leading information providers, we can build on existing environmental products and services with new offerings. We continue to publish unbiased peer reviewed articles, legal advice, and information, and to host exhibitions encompassing environmental related issues. We aim to inform debate, aid decision makers, and encourage research and development.
Property and facilities management	<ul style="list-style-type: none">• Greenhouse gas (GHG) emissions from energy use and air conditioning systems• Water use and waste water production• Chemical use and disposal e.g. for cleaning and maintaining buildings and grounds• Resource use and disposal impacts arising from the

2. Environmental Policy Statement

2.1 The Group environmental policy

Reed Elsevier has a positive impact on the environment, principally through the information it produces that can inform debate, aid decision makers and encourage research and development. Reed Elsevier also recognises the impact it has in its direct operations, supply chain, and consumer use of its products and services, through the consumption of natural resources, energy, water, and the generation of waste. Reed Elsevier is committed to complying with all applicable environmental legislation and other environmental requirements to which it subscribes. Reed Elsevier aims to prevent pollution and continually reduce and improve its environmental impact where practicable by:

- ensuring resources and materials used by its businesses are sustainable, are capable of being reused or recycled, and are used effectively with minimum waste
- ensuring technologies which it and/or its suppliers adopt, utilise to the extent possible materials and processes that do not have an adverse impact on the environment and, where such impact is unavoidable, it is minimised
- requiring its suppliers and contractors to meet the same objectives

Reed Elsevier assesses, prioritises, and mitigates environmental risks and seeks to maximise environmental opportunities as part of its risk management process.

The Reed Elsevier Corporate Responsibility Forum has ultimate responsibility for this policy, while the Chief Executive Officers responsible for each business unit are accountable for ensuring compliance with the policy and with any specific environmental regulations applicable to their businesses. They are supported by an Environmental Champions network of employees with functional responsibility for environmental initiatives.

A report to the Board will be made each year on Reed Elsevier's environmental performance compared with targets and subject to external validation as appropriate. This policy will be reviewed annually.

2.2 Availability of the policy

The environmental policy statement is available for all employees on Reed Elsevier's intranet and to other stakeholders and the general public through the external Reed Elsevier website (www.reedelsevier.com).

2.3 Other environmental policies within Reed Elsevier

The Group Environmental Policy statement is applicable to all business units within the Reed Elsevier Group. In addition, where considered appropriate by the business unit CEO, additional environmental policies may exist. As a minimum these must:

- Be consistent with the Groups environmental policy
- Commit to comply with relevant legislation and pursue continual improvement
- Provide a framework for setting and reviewing environmental performance
- Be appropriate for the nature and scale of the activities, products and services

3. Planning

3.1 Risk Management

Reed Elsevier has established risk management practices embedded into its operations. These are based on the framework in internal control issued by the Committee of Sponsoring Organisations of the Treadway Commission (COSO), and are reviewed by the Reed Elsevier Audit Committee and Boards. The assessment, prioritisation, mitigation and review of environmental risks are included in this process, and actions taken as appropriate. Business units are required to complete an environmental risk review on an annual basis. In particular, risks to consider include those environmental issues that:

- Require legislative compliance
- Have significant cost implications for the business
- Have the potential to impact negatively on Reed Elsevier's reputation
- Likely to lead with a non-compliance with the environmental policy

3.2 Legal requirements

Each business unit must maintain a process to ensure that relevant and up to date environmental legislation is identified and that actions are taken to ensure compliance.

3.3 Objectives, targets and standards

To augment the risk based approach objectives, targets and standards will be set at the Group and local or personal level where appropriate. These will be based on:

- Legal requirements
- Risk assessments and audit findings
- Environmental performance and good practice
- Dialogue with stakeholders
- Group objectives set as part of the Corporate Responsibility Forum

The objectives and targets will be agreed with those that have local responsibility for achieving them. Objectives and targets will be SMART – specific, measurable, agreed, realistic and time-based. Targets can be found in the Corporate Responsibility report, which is updated annually.

3.4 Environmental Management programmes

Each of the objectives, targets and standards will be supported by a business plan and/or documented programme. These will include:

- A named individual with responsibility for managing the programme
- An outline of resource requirements
- Timescales and milestones against which achievement can be measured
- Agreement to the programme and resources by senior management

Performance will be monitored on a regular basis, at no more than six month intervals.

4. Implementation and Operation

4.1 Structure and responsibilities

Ultimate responsibility for the implementation of the environmental policy lies with the Chief Executive Officer. Within each business unit, responsibility lies with the business unit CEO, who shall ensure that the resources are available for the adequate achievement of the EMS as set out in this manual.

The following structure and responsibilities have been established to ensure the implementation of environmental management programmes and to provide direction and support for the achievement of objectives and targets:

Organisational structure	Responsibilities
Corporate Responsibility Forum	<p><i>Group Environmental Policy</i></p> <ul style="list-style-type: none"> • Review environmental risks and impacts • Regular review of Group environmental policy <p><i>Planning and implementation</i></p> <ul style="list-style-type: none"> • To define and agree environmental objectives, targets and areas of focus • To establish and monitor initiatives to achieve environmental objectives and targets • Periodic review of the elements of the environmental management system • To provide advice to the working groups and business units as required <p><i>Monitoring and reporting</i></p> <ul style="list-style-type: none"> • Review compliance with the Group environmental policy • To initiate and drive data gathering in preparation for environmental disclosures including for the Annual Report and Accounts and website disclosure • To review environmental disclosures • To report to the RE Board as appropriate on environmental issues
Environmental Champions Network comprising representatives from key areas within the business including: <ul style="list-style-type: none"> – Facility management – Manufacturing – Purchasing – IT – Volunteer Green Teams 	<p><i>Planning and implementation</i></p> <ul style="list-style-type: none"> • To develop action programmes to achieve objectives and targets; • To implement action programmes; <p><i>Monitoring and reporting</i></p> <ul style="list-style-type: none"> • To facilitate data gathering and information to report on progress of the action programmes • The Environmental Champions Network will include individuals responsible for year-end data gathering

The business unit CEOs shall appoint a competent person to coordinate the implementation of the environmental policy and related management programmes within their business unit. This person shall be supported as required by other individuals including the Reed Elsevier Global Environmental Manager, Environmental Champions and local Green Teams to enable achievement of the aims of the EMS.

4.2 Awareness and communication

The objective of internal communication is to build awareness and commitment regarding environmental issues and environmental management, and to develop employee involvement in achieving Group environmental objectives.

All employees should be made aware of:

- Reed Elsevier's environmental policy
- The impact or potential impact of their activities on the environment
- Specific actions and responsibilities that can reduce environmental impacts

Communication of performance and related issues shall be included in existing communication channels.

Two-way communication and dialogue on environmental management should be encouraged through:

- A section on the corporate intranet (Green Room)
- Regular meetings of appropriate committees
- Feeding views through 'Open door' communication tools
- A staff appraisal process (where relevant)
- Regular Corporate Responsibility newsletter
- Local Green Team events
- Respond survey (Global Employee opinion Survey)
- Other informal channels as appropriate

The Reed Elsevier website (www.reedelsevier.com) allows external access to environmental documents including this EMS, the Reed Elsevier Climate Change Statement, Paper Policy, Environmental Standards, Code of Conduct, Editorial Policy, Health & Safety Policy and Corporate Responsibility Reports. The business units also use their individual external websites for communication on environmental issues.

We believe it is important to enter into two-way communication and dialogue with all of our stakeholders and facilitate and attend various forums and meetings throughout the year.

4.3 Training

In certain cases, formal training may be required to manage specific issues for example legal compliance, internal auditing, evaluation, energy efficiency, waste minimisation etc.

Training needs should be identified on an ongoing basis and appropriate training provided where gaps occur.

4.4 Other environmental management systems within the Group

The EMS set out in this document covers environmental management at Group level. Some business units or sites may also have their own EMS as a complement to the Group EMS, addressing issues specific to their particular operations.

4.5 Documentation

All relevant documentation shall be appropriately controlled, with current versions being provided to and retained by the RE Environmental Coordinator and the Director of Corporate Social Responsibility. This documentation includes Group level environmental:

- Policies
- Guidelines
- Standards
- Minutes of Environmental Champions Network meetings
- Documentation relating to the achievement of the Group wide targets such as the business case, action plans, monitoring reports etc.

Documentation relating to locally managed issues not part of the Group environmental management programme should be retained locally as appropriate.

Documentation should be legible, dated (including modification date where appropriate) signed by appropriate manager (where necessary) and readily identifiable.

4.6 Operational control

Those activities and operations that require regular operational control, such as manufacturing activities are the responsibility of, and are covered by appropriate environmental documentation at the business unit level.

5. Checking and corrective action

5.1 Monitoring and measurement

The performance outputs of the EMS will be regularly monitored and measured to ensure that the system is working effectively and is achieving its aims. In particular monitoring and measuring activities will include:

- Review of compliance with the Group environmental policy
- Review of progress against objectives and targets through agreed key performance indicators (KPIs)
- Ensuring that material environmental risks have been identified and are being appropriately managed
- Ensuring that there is a regular and periodic evaluation of legal compliance

KPIs will be monitored, as a minimum, on an annual basis at Group level, but more frequently than this as required at the business unit level.

Monitoring and measuring will be undertaken as part of:

- The monitoring of objectives and targets
- Regulatory requirements
- Normal business monitoring processes
- The year end disclosure process (see 5.2 below)
- The Global Environmental Manager's or Internal Audit team's annual activities including environmental audits, the annual self-assessment questionnaire and the year-end disclosure audit

5.2 Year end data gathering and reporting

The scope of issues has been defined as a result of our knowledge and prioritisation of the environmental impacts of the Group's core activities, and through comments received from key stakeholders including investors, regulator and employees.

The data gathered forms the basis of performance measurement relevant to Group environmental objectives, targets and forecasting.

Environmental data is collected monthly (where possible) and consolidated annually, covering such areas as:

Activity	Data	Unit
Energy and climate change	Electricity use	MWh
	Gas	MWh
	City Heating	MWh
	Other fossil fuels including coal, heavy fuel oil, gas oil	MWh
	Total energy consumption	tCO ₂ e emissions & MWh
	Refrigerant /suppressant loss	tCO ₂ e emissions
	Scopes 1,2 and 3 emissions (Greenhouse Gas Protocol)	tCO ₂ e emissions
	Cost of electricity, gas and other fuels used	Local currency converted to GBP
Waste and recycling	Waste Disposed split into going to landfill, being incinerated, creating energy from waste or being recycled/donated	Metric Tonnes
	UK packaging waste obligations	Metric Tonnes
Paper use	Product paper purchased	Metric Tonnes
	Office paper purchased	Metric Tonnes
	Sustainability of paper	PREPS
Water use	Mains and other water supplies	m ³
	Cost of water used	Local currency
	Areas of water scarcity within our operations and supply chain	WBCSD Global Water Tool

Compliance	Number of prosecutions from breaches in national and international legislation	Actual number
	Size of fines	Local currency
	Number of enforcement notices	Actual number
	Number of regulatory breaches	Actual number
Any direct manufacturing impacts	Heavy metal emissions to air	tCO ₂ e emissions
	Emissions to air (Volatile Organic Compounds or Hazardous Air Pollutants)	tCO ₂ e emissions
	Greenhouse gas emissions	tCO ₂ e emissions
Transport	Emissions from air, road or rail business travel	tCO ₂ e emissions
	Emissions from commuting to and from work	tCO ₂ e emissions
	Cost of business travel	Local currency converted to GBP

5.3 Data gathering processes and controls

Environmental data is gathered using Reed Elsevier’s systems and the Hara EEM, third party tool. This is in conjunction with the Accounting Services Department, Internal Audit, the Global Environmental Manager, the Director of Corporate Responsibility and the Environmental Champions Network. It is then reviewed externally to gain assurance. Guidelines relating to data gathering are issued annually, and include:

- Schedule of data gathering
- Sources and details of data to be collected
- Methodologies for data collection
- Data quality and control issues
- Instructions for data sign off at the business unit level

5.4 Non-conformance, corrective and preventative action

Non-conformance with the Group’s environmental policy and EMS, group standards or any non-compliance with legislation may occur for a number of reasons. The reasons for non-compliance should be identified and prompt corrective or preventive action taken.

5.5 Records

Records shall be kept of all elements of the EMS. This should include records relating to:

- Establishing and implementing objectives and targets
- Performance monitoring against objectives and targets
- Compliance reviews and monitoring

The retention times of documents should be established and recorded. Records should be stored and maintained in a way that is accessible and retrievable.

5.6 Audit of the system

This manual establishes the Group EMS. The Group EMS shall be audited periodically by the Internal Audit department as required by the Corporate Responsibility Forum and be externally verified.

6. Management review

The environmental management system will be overseen and managed on an ongoing basis through the structure described in section 4.1. This includes senior review (according to section 4.6 (a-h) from EN ISO 14001:2004) of the Group environmental policy and EMS through the CR Forum chaired by the Group Chief Executive Officer at regular intervals, with not more than 12 months elapsing between reviews.

7. Glossary & Acronyms

EMS	Environmental Management System
Environment	Surroundings in which the organisation operates including air, water, land, natural resources, plants, animals including humans, and their interactions
Environmental aspect	An activity carried out that could wholly or partly cause a change to the environment, whether adverse or beneficial
Environmental disclosures	Environmental disclosures are public information sources relating to environmental impacts, environmental management activities and environmental performance of organisations
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partly resulting from an organisations activities, products or services
Environmental objectives	Overall environmental goal arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practical
Environmental targets	Detailed performance requirement quantified where practicable, that arises from the environmental objectives and needs to be set and met to achieve the objectives
Greenhouse gases	Greenhouse gases (GHG's) reduce the rate at which heat is lost, contributing to changes in the earth's atmosphere. GHG's are produced from burning fossil fuels (for power and transport), as a by-product from some industrial processes and from air conditioning and refrigeration plants.
KPI	Key Performance Indicator
PREPS	Publishers database for Responsible, Ethical Paper Sourcing