

Bell Canada Environmental Management System

Environmental Management System - Certified ISO 14001:2004

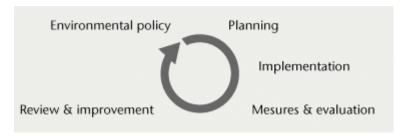
Our Environmental Management System (EMS) is an integrated management tool that identifies potential problems or opportunities, reduces risks, ensures continuous improvement through a rigorous feedback process, and controls costs. On-going legal monitoring is an integral part of the system which enables us to exercise due diligence in managing environmental issues.

In April 2009, Bell Canada became the first telecommunication company in Canada to become ISO 14001:2004 certified.

The certificate delivered by *BSI Management Systems America, Inc.* certifies that Bell Canada operates a EMS which complies with the requirements of ISO 14001:2004 for all Bell Canada business sectors. These include landline, wireless, television, Internet services, connectivity, broadband services, data hosting, cloud computing, radio broadcasting services and digital media services, in addition to related general administrative functions.



The main components of our EMS



Environmental policy

Initially adopted in 1993, <u>Bell's environmental policy</u> is regularly reviewed and updated by the Health & Safety, Security, Environment and Compliance Oversight Committee which is made up of company officers. Our policy is aligned with the company's daily business realities and demonstrates Bell's high environmental management standards.

Planning

The Corporate Environmental Action Plan (CEAP) is the system's main management and control tool. Revised and approved annually, the plan details all the environmental activities to be undertaken by the company and its subsidiaries The CEAP identifies funding requirements, as well as accountabilities and deliverables, and allows for follow-up of the company's progress in meeting its objectives. Results and analysis for improvement opportunities are presented to the Health & Safety, Security, Environment and Compliance Oversight Committee for review and action.

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Implementation

Within the Environmental Management System, we have clearly defined a series of programs encompassing all environmental issues of our business. To ensure each program meets its goals, we set specific objectives, identify responsibilities and develop procedures.

Measures and Evaluation

To ensure that our management system and each of the programs are effective, Bell has put a number of control points in place. These include:

- Legal and GAP analyses conducted on a continuous basis to identify and correct non-compliances.
- Environmental reviews which are performed to follow up on environmental programs at various company sites.
- The Environment Risk Evaluation process which is used to evaluate the environmental performance of some of our suppliers.
- The Environmental Questionnaire which is sent to our suppliers to collect information on their environmental performance and to assist the company in the selection of environmentally responsible suppliers.
- Internal and external audits which are performed on a regular basis.
- Performance measures related to the Corporate Environmental Action Plan which are reviewed by business unit Officers and subsidiary Presidents on a yearly basis.

Review and Improvement

Reporting quarterly to the Audit committee, the Health & Safety, Security, Environment and Compliance Oversight Committee's role is to ensure that our environmental policy is current, and that we are taking the necessary action to comply with its environmental policy. As well, we have implemented various working committees to ensure that the programs work in harmony and they reflect the reality of daily operations.

On a yearly basis we conduct Environmental Reviews that consist in performing inspections on a representative number of sites and interviewing employees working at these locations. The information gathered is used to quantify the level of operational control and its influence on the company's risk exposure. The methodology used allows for establishing, amongst other things:

- how programs and procedures are applied by the employees, at a given point in time; and
- areas for improvement, specifically with regards to awareness and training, and systemic issues.

Programs covered by our reviews include residual materials, incidents, petroleum products, air emissions, pole storage, network and general site conditions.

Environmental information system

The management system is supported by comprehensive documentation and a robust information system. The web-enabled system serves three main purposes: one, it is used as an information database on all issues and programs, second, as a planning tool in preparation for the yearly CEAP, and third as a reporting tool by which performance is measured and by which issues of importance are resolved.