

ISO 14001 Environmental Management System

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This revision approved for release under ECA 28311E.

Approval:

Quality Manager

Date

1. Purpose

Keithley Instruments, Inc. developed and implemented this Environmental Management System (EMS) to improve its environmental management and, ultimately, to reduce the impact of its operations, activities, products, and services on the environment. This EMS complies with the International Standards ISO 14001:1996.

This Manual corresponds to the main sections and subsections of ISO 14001. This Manual includes Keithley Instruments, Inc. Environmental Policy statement expressing the commitment to implement the basic principles of the EMS. The purpose of this manual is to document Keithley's Environmental Policy, to define and describe the EMS, to define authorities and responsibilities of the management personnel involved in the system, and to provide summaries of procedures for all elements and activities of the EMS.

Another purpose of this manual is to present the EMS to our customers and other interested parties, and to inform them what specific controls are implemented to assure responsible environmental management.

2. Policy

**KEITHLEY INSTRUMENTS, INC.
ENVIRONMENTAL POLICY**

Keithley Instruments, Inc. is committed to protecting the environment and the health and safety of our employees, our customers, and the public. We strive to conduct our activities in an environmentally sustainable manner, taking into consideration the complex and interconnected relationship of our ecosystem.

Keithley Instruments, Inc. is committed to compliance with all applicable governmental requirements and internal environmental, health and safety (EHS) requirements. We maintain management systems designed to ensure compliance, and which support integration of EHS considerations into our business process.

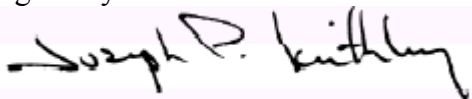
Keithley Instruments, Inc. is committed to the protection of human health and prevention of pollution. We strive to identify and eliminate negative EHS impacts associated with our facilities, activities, services, and products.

Keithley Instruments, Inc. is committed to continual improvement of our EHS management systems and performance. Keithley Instruments, Inc. will establish objectives and targets, conduct regular management systems and performance evaluations, and periodically report on our performance to our employees, our customers and the public.

Keithley Instruments, Inc. will foster communications with interested parties, including our employees and the public, and be responsive to their EHS concerns and suggestions. We will share information and openly communicate our EHS management systems and performance and the impacts of our activities, services, and products.

Management at all levels will take actions to ensure that all employees understand the meaning and the importance of this policy. Our employees are responsible for integrating EHS consideration into their work activities.

Signed by



Joseph P. Keithley,
Chairman of the Board

Revised August 14, 2002

3. Scope

Our Environmental Management System covers the environmental activities at both 28775 Aurora Rd. and 30500 Bainbridge Rd.

4. Structure and Responsibility

The Executive Team is ultimately responsible for the Environmental Management System (EMS), and for providing resources necessary to establish, implement, and maintain the system.

4.1 Executive Team

For the purpose of the EMS, the Executive Team is defined to comprise the following functions:

- Chairman of the Board, President, & CEO
- Executive Vice President
- Vice President, Human Resources
- Director of Operations
- Director, Worldwide Marketing
- Vice President, Worldwide Sales
- Director, New Product Development
- General Managers
- Vice President and Chief Financial Officer

4.2 Management Representative

Keithley Instruments, Inc. appoints the Corporate Facilities Manager as the Environmental Representative. The Environmental Representative has the authority and responsibility to ensure that the EMS is established, implemented, and maintained in accordance with the requirements of ISO 14001; and to report EMS performance to the Executive Team. Keithley Instruments, Inc. appoints the Manager of Quality as the alternate Environmental Representative.

4.3 Organization and Responsibilities

All departments and functions in the company are responsible for implementing, maintaining, and supporting the EMS.

The following specific responsibilities are assigned:

The Executive Team

- Formulates the Environmental Policy
- Provides resources necessary to maintain the EMS
- Reviews significant environmental aspects, and environmental objectives and targets
- Conducts management reviews of the EMS

Engineering

- Identifies environmental aspects in the design of Keithley's products and services
- Evaluates and optimizes designs to reduce environmental impacts of the designed products and services

Operations

- Identifies environmental aspects in production processes and related operations
- Optimizes production processes to minimize emissions, waste generation, and energy consumption
- Manages and controls materials and wastes

Purchasing

- Selects qualified suppliers and subcontractors who can meet environmental requirements
- Monitors quantities of hazardous chemical usage

Facilities

- Identifies environmental aspects in maintenance activities
- Optimizes maintenance processes to minimize waste generation and control disposal of waste
- Maintains the facility, equipment, and operational controls to ensure optimal performance with regard to significant environmental aspects

Marketing, Sales & Quality

- Establishes specifications for environmental characteristics for new products (product briefs)
- Advertises and promotes company's environmental initiatives

Human Resources

- Defines personnel qualification requirements for functions and positions associated with significant environmental aspects
- Implements measures to motivate personnel to improve their environmental performance and support the EMS

Environmental Representative

- Establishes, implements, and maintains the EMS
- Coordinates identification of environmental aspects, evaluation of significance of environmental aspects, and establishment of environmental objectives and targets
- Conducts company-wide environmental awareness training
- Coordinates establishment and implementation of management programs to achieve objectives and targets
- Identifies legal, regulatory, and other requirements
- Facilitates internal communication regarding environmental issues
- Communicates with external interested parties
- Coordinates EMS document control activities
- Implements and maintains operational controls, including work instructions and training for activities associated with significant environmental aspects
- Develops and implements emergency preparedness and response plans
- Monitors environmental performance with respect to significant environmental aspects and regulatory requirements
- Initiates corrective and preventive actions
- Coordinates maintenance of environmental records
- Audits implementation and effectiveness of the EMS
- Reports to the Executive Team on the performance and effectiveness of the EMS (management reviews)
- Reviews new chemicals for company use

5. Environmental Aspects

Keithley Instruments, Inc. identifies environmental aspects of its operations, activities, and services. A list of environmental aspects is documented in a database, and is updated in response to changing circumstances.

5.1 Applicable Documents

Activities related to this section are documented in QSIP-636, Environmental Aspects

5.2 Summary of Procedure

5.2.1 A multidisciplinary team representing various departments and functions in the company identifies initial environmental aspects. The Environmental Team coordinates this activity. Criteria and guidelines for identifying environmental aspects are provided in QSIP-637.

5.2.2 On an ongoing basis, the Environmental Team identifies changes in activities, products, and services that create new environmental aspects, or invalidate previously identified aspects. New environmental aspects may also be identified through the management review or by internal or external audits of the EMS. The changes are reported to the Environmental Representative, who reviews and documents the new aspects.

5.2.3 Environmental aspects are documented in the Environmental Aspect Log maintained by the Environmental Representative.

6. Significant Environmental Aspects

Environmental aspects are subjected to a systematic evaluation of their significance, using a disciplined and documented method. Evaluation criteria and method, and the final selection of significant aspects, are documented.

6.1 Applicable Documents

6.1.1 Activities related to this section are documented in QSIP-638 Significant Environmental Aspects, and QSIP-639, Evaluation of Significance of Environmental Aspects.

6.2 Summary of Procedure

6.2.1 The Environmental Team representing various departments and functions in the company evaluates significance of initial environmental aspects. On an ongoing basis, evaluation of significance is carried out by the Environmental Representative.

6.2.2 Significance of environmental aspects is evaluated using a systematic risk analysis methodology. Aspects are rated with regard to the severity of associated impacts, probability of occurrence, and other relevant factors. The results are entered on the Environmental Aspect Evaluation Chart. The combined significance rating is calculated using a special formula. The method is outlined in the procedure.

6.2.3 Selected significant environmental aspects are reviewed and approved by the Executive Team, and are recorded in Significant Environmental Aspect Master List.

7. Legal, Regulatory and Other Requirements

Keithley Instruments, Inc. identifies, and has access to legal, regulatory and other requirements to which the company subscribes. Procedures for identifying the requirements, and the requirements themselves, are documented.

7.1 Applicable Documents

7.1.1 Activities related to this section are documented in QSIP-640, Legal, Regulatory and Other Requirements.

7.2 Summary of Procedure

7.2.1 The process of identifying legal, regulatory and other requirements is developed in the following phases:

- Identification of current compliance programs, and preliminary research of activities and products that could potentially be subject to environmental regulations (using survey from Procedure;
- Management review to determine whether in-house expertise and resources are sufficient to identify all applicable requirements;
- Initial identification and documentation of specific laws, regulations, and other requirements that apply to the facility;
- Ongoing identification of new or modified activities that could potentially be subject to environmental regulations; and ongoing review of new environmental regulations and changes in regulatory and other requirements that may apply to the facility.
- Legal, regulatory, and other requirements are documented in Regulatory Requirements Matrix.

8. Environmental Objectives and Targets

Keithley Instruments, Inc. establishes environmental objectives and targets to fulfill the Environmental Policy and improve environmental performance in areas related to significant environmental aspects, legal and other requirements, and views of interested parties.

8.1 Applicable Documents

8.1.1 Activities related to this section are documented in QSIP-641, Environmental Objectives and Targets.

8.2 Summary of Procedure

8.2.1 The Environmental Team representing various departments and functions in the company recommends the selection of initial environmental objectives and targets. Criteria and guidelines for selecting environmental objectives are provided in this procedure.

8.2.2 On an ongoing basis, the Environmental Representative identifies the need for new objectives and targets and recommends new objectives to the Executive Team.

8.2.3 Initial and new environmental objectives and targets, and associated programs are formally reviewed and approved by the Executive Team before they are authorized for implementation.

8.2.4 Environmental objectives and targets are documented in OTMP (Objective and Target Management Program) specification sheets (refer to QSIP-642, Environmental Management Programs).

9. Environmental Management Programs

Environmental management programs are established and maintained for achieving environmental objectives and targets. Responsibilities, methods, means, and timeframe of achieving objectives are defined and documented. Management programs and the entire EMS are updated to address new or modified activities, products, or services.

9.1 Applicable Documents

Activities related to this section are documented in QSIP-642, Environmental Management Programs.

9.2 Summary of Procedure

9.2.1 Environmental management programs define methods, means, and timeframe for achieving environmental objectives and targets.

9.2.2 The Environmental Representative initiates management programs and coordinates and supervises their implementation.

9.2.3 Management and other functions assigned with overall responsibility for specific objectives are responsible for defining and implementing relevant management programs, and for reporting on their status and progress.

9.2.4 Environmental management programs are documented in, and are monitored through OTMP (Objective and Target Management Program) specification sheets.

9.2.5 Environmental management programs and other elements of the EMS are updated to ensure that they apply to new developments and to new or modified activities, products, and services.

10. Training Awareness and Competence

Keithley Instruments, Inc. identifies training needs and provides environmental awareness and EMS training to all personnel. Competence training is provided to personnel whose work may create a significant environmental impact. All training is recorded.

10.1 Applicable Documents

10.1.1 Activities related to this section are documented in QSIP-643, Training, Awareness, and Competence.

10.2 Summary of Procedure

10.2.1 The Environmental Awareness Program comprises EMS general orientation training; communication of Environmental Policy and other information about the EMS (Environmental bulletin board-Keithley internal website); distribution and instruction in the use of procedures and work instructions; and training in emergency response.

10.2.2 Environmental competence and skill training is provided for those groups of personnel whose work can cause a significant environmental impact.

10.2.3 Training programs are reviewed and amended to address new developments and changes, and in response to nonconformances identified through the system of corrective and preventive actions and internal audits of the EMS.

10.2.4 All EMS training is recorded (refer to QSIP 655, Environmental Records).

11. Internal Communications

Keithley Instruments, Inc. maintains systems for communicating within the organization information about the EMS and environmental issues.

11.1 Applicable Documents

11.1.1 Activities related to this section are documented in QSIP 644, Internal Communication

11.2 Summary of Procedure

11.2.1 Internal communication regarding the EMS flows two ways: The Environmental Team communicates to the organization significant environmental aspects; the environmental policy, objectives, targets, and management programs; EMS procedures and work instructions; and major events and achievements, and recognition of individual employees and groups.

11.2.2 The organization communicates to the management information and data regarding new environmental aspects; status of environmental performance; progress in achieving objectives and targets; status of implementation and effectiveness of the EMS; specific concerns regarding the environment; and suggestions on how to improve the EMS and environmental performance.

11.2.3 Information is communicated through distribution of EMS documentation, records and reports; training; and the environmental bulletin boards and Keithley's internal website.

12. External Communication

Keithley Instruments, Inc. maintains a procedure for communicating with external interested parties. The procedure instructs in receiving, documenting, and responding to relevant communication.

12.1 Applicable Documents

12.1.1 Activities related to this section are documented in QSIP 645, External Communication.

12.2 Summary of Procedure

12.2.1 All incoming external communication regarding environmental issues is forwarded to the Environmental Representative and is recorded in the External Communication Log.

12.2.2 Environmental Representative reviews the incoming communication and determines which other functions should be informed or involved, what response should be given to the originator (if any), and whether any internal actions should be considered to address issues raised in the communication.

12.2.3 The Environmental Policy is available to the public and is posted on the company's internet site.

13. EMS Documentation

The EMS is documented in the present manual, operational procedures, environmental guides, work instructions, and other related documentation.

13.1 Applicable Documents

13.1.1 Activities related to this section are documented in QSIP 646, EMS Documentation.

13.2 Summary of Procedure

13.2.1 Documents pertaining to the EMS comprise:

- EMS manual, operational procedures, and guides
- Documentation defining significant environmental aspects, objectives and targets, legal and regulatory requirements, and management programs for reaching objectives and for monitoring environmental performance and compliance
- Laws, regulations, standards, codes of practice, and other such documents defining applicable requirements
- Training programs and materials
- Emergency preparedness and response procedures
- Work instructions, operational data sheets, and other written instructions for personnel whose work can create a significant environmental impact
- Documentation defining equipment and other operational controls, and instructions for their use and maintenance

14. Document Control

Keithley Instruments, Inc. controls all documents related to the EMS to ensure that they are reviewed and approved by authorized personnel; that current versions of documents are available where they are required; that obsolete documents are promptly removed; and to otherwise ensure integrity of documents.

14.1 Applicable Documents

14.1.1 Activities related to this section are documented in QSIP 647, Document and Data Control.

14.2 Summary of Procedure

14.2.1 Applicable documents are identified by their title, code/number, date of issue, revision level, and the issuing and approval authority.

14.2.2 Prior to issue and release, documents are reviewed for adequacy, correctness, and conformity with the Environmental Policy.

14.2.3 The Environmental Representative or designee removes and destroys superseded versions of the document. Maintaining unauthorized files with superseded revisions of controlled documents is prohibited.

14.2.4 Retained masters and copies of obsolete documents are marked OBSOLETE and are kept separate from active documents.

14.2.5 Documents issued to personnel and outside parties who are not affected by the document, but need a copy for information only, are marked UNCONTROLLED or REFERENCE ONLY. Such documents are not followed up with revisions.

15. Operational Control

Special control measures are implemented to control operations and activities associated with significant environmental aspects. These operational controls include methods, systems, processes, and equipment to safeguard the environment; and documented procedures and work instructions.

15.1 Applicable Documents

15.1.1 Activities related to this section are documented in QSIP-648, Operational Control.

15.2 Summary of Procedure

15.2.1 Operational controls are methods, systems, processes, and equipment to safeguard the environment. This also includes operational criteria and procedures, work instructions, and inspection and preventive maintenance programs.

15.2.2 Work instructions are established where their absence could lead to deviation from environmental policy, objectives, targets; or could cause significant environmental impact. The procedure stipulates specific criteria for determining where work instructions are required.

15.2.3 Inspection and/or maintenance programs are developed and implemented for equipment, machines and, systems associated with significant environmental aspects and emergency response programs.

16. Purchasing and Subcontractor Control

Keithley Instruments, Inc. communicates environmental requirements to its suppliers and subcontractors, and monitors their conformance with the requirements.

16.1 Applicable Documents

16.1.1 Activities related to this section are documented in QSIP 649, Purchasing and Subcontractor Control.

16.2 Summary of Procedure

16.2.1 The following categories of purchased products and subcontracts are controlled by the EMS:

- Hazardous materials, substances, and chemicals; equipment for processing, storing and handling hazardous wastes; and hazardous waste haulers, treatment, and disposal facilities.
- Personal protective equipment, and equipment to be used for emergency response.
- Measuring and test equipment intended for monitoring environmental performance and regulatory compliance (including calibration).
- Subcontractors performing services at the facility, which bring in hazardous materials or chemicals, or generate hazardous waste.
- Additional products and services that may be identified by the Environmental Representative because of their association with significant environmental aspects, objectives, or targets.

16.2.2 Purchasing is controlled by specifying and communicating environmental requirements, and by monitoring of supplier performance.

17. Emergency Preparedness and Response

Keithley Instruments, Inc. identifies potential accidents and emergency situations, and develops appropriate response plans for preventing and mitigating associated environmental impacts. Emergency response procedures are tested where practicable, and are reviewed, in particular, after occurrence of accidents or emergency situations.

17.1 Applicable Documents

17.1.1 Activities related to this section are documented in QSIP 650, Emergency Preparedness and Response

17.2 Summary of Procedure

17.2.1 Environmental Representative identifies potential hazards that can cause accidents and emergency situations, to include hazardous materials and substances, dangerous activities, and potential hazards created by outside forces and natural disasters.

17.2.2 Each potential hazard is evaluated to determine whether emergency response plans are warranted and, where relevant, appropriate emergency plans and procedures are developed.

17.2.3 Emergency preparedness and response procedures are documented. All personnel are made aware of the procedures and where they are located. Where practicable, emergency procedures are periodically tested.

17.2.4 The Environmental Representative is responsible for reviewing and, as necessary, revising emergency procedures after each occurrence of accidents and emergencies.

18. Monitoring and Measurement

Keithley Instruments, Inc. monitors and measures performance of operations and activities that can cause a significant environmental impact, and evaluates its compliance with applicable laws and regulations. Measuring and test equipment used for verification of environmental performance is calibrated and properly controlled.

18.1 Applicable Documents

18.1.1 Activities related to this section are documented in

- QSIP-651, Significant Aspects Monitoring
- QSIP-652, Legal and Regulatory Compliance
- QSIP-653, Measuring and Test Equipment

18.2 Summary of Procedure

18.2.1 Two similar but independent systems are used for monitoring environmental performance with regard to significant aspects, and for evaluating compliance with environmental laws and regulations. The systems are documented in QSIP-651 and QSIP-652, respectively.

18.2.2 For each monitored or measured characteristic, The Environmental Representative determines the measurement or test method, frequency, acceptance criteria, responsibility, and the manner for recording results.

18.2.3 When environmental performance falls below desirable level, or when there is a possibility of a noncompliance against laws or regulations, the Environmental Representative initiates corrective or preventive actions, or establishes appropriate objectives and targets to improve performance.

19. Corrective and Preventive Action

Keithley Instruments, Inc. maintains corrective and preventive action procedures for handling and investigating nonconformances, and for eliminating their causes. Corrective and preventive actions are followed up to verify their implementation and effectiveness.

19.1 Applicable Documents

19.1.1 Activities related to this section are documented in QSIP-654, Corrective and Preventive Action.

19.2 Summary of Procedure

19.2.1 Corrective and preventive action requests (CARs) are initiated and implemented to address EMS nonconformances. Nonconformance is a deviation from a policy, procedure, standard, instruction, specification, legal or regulatory requirement; or from any other requirement, which the company established, or to which it subscribes.

19.2.2 CARs assign the responsibility for handling and investigating the nonconformance, for mitigating any impacts caused, and for implementing measures to prevent recurrence of the nonconformance.

19.2.3 CARs may be issued to internal departments of the company, as well as its suppliers and subcontractors.

19.2.4 Upon implementation of corrective or preventive action, CARs are followed up to verify that the action was indeed implemented and that it is effective.

19.2.5 CARs are initiated, documented, processed and monitored using a Corrective Action Request form (refer to QSIP-654).

20. Environmental Records

Keithley Instruments, Inc. maintains environmental records to demonstrate conformance with legal, regulatory, and other requirements; and with requirements of ISO 14001. There is a procedure for establishing, storage, and retention of environmental records.

20.1 Applicable Documents

20.1.1 Activities related to this section are documented in QSIP 655, Environmental Records.

20.2 Summary of Procedure

20.2.1 Following types of records are maintained:

- Aspect identification and significant evaluation records
- Objectives, targets, and management program records
- Subcontractor evaluation and monitoring records
- Material and waste management records
- Environmental performance monitoring records
- Calibration certificates
- Operational controls and maintenance records
- Training records
- Emergency preparedness and response records
- Corrective and preventive action records
- External communication records
- Internal EMS audit reports
- Management review records

20.2.2 Storage locations and retention times for records are specified in QSIP-655.

21. Internal EMS Audits

Keithley Instruments, Inc. periodically conducts internal audits of the EMS. The purpose of the audit is to verify whether the EMS conforms with stated requirements, including ISO 14001, and whether it is properly implemented and maintained. Internal audits are conducted in accordance with an established audit program.

21.1 Applicable Documents

21.1.1 Activities related to this section are documented in QSIP-656, Internal EMS Audits.

21.2 Summary of Procedure

21.2.1 All elements and activities of the EMS are audited at least once a year. The actual frequency depends on the status, importance, and past conformance history of the element of activity.

21.2.2 Internal audits are conducted in accordance with a documented internal audit plan established by the Environmental Representative.

21.2.3 Personnel assigned to carry out internal audits are appropriately trained and, if possible, are independent from those responsible for the audited activities.

21.2.4 Results of internal audits are reported using an Audit Nonconformance Report form. The form is used to document identified nonconformances and for initiating and processing related corrective actions.

21.2.5 Results of internal audits are reported to the Executive Team and are discussed within the framework of management reviews.

22. Management Review

The Executive Team conducts periodic reviews of the EMS. The review evaluates environmental results and performance of the EMS, and considers changes to policy, objectives, and other elements of the system. The purpose is to ensure continuing suitability, adequacy, and effectiveness of the EMS. The review is documented.

22.1 Applicable Documents

22.1.1 Activities related to this section are documented in QSIP-657, EMS Management Review.

22.2 Summary of Procedure

22.2.1 Reviews of the EMS are conducted at least once a year by the Executive Team. More frequent reviews are scheduled in the initial maturation phase of the EMS. At a minimum, management reviews consider:

- Environmental aspects and their significance
- Environmental objectives, targets, and management programs
- Environmental performance and compliance
- Internal EMS audits

- Views of interested parties
- Corrective and preventive actions
- Continuous improvement
- Environmental policy

22.2.2 Results and conclusions of management reviews are documented.

23. Legal and Regulatory Survey

A guide to define areas and issues to identify legal, regulatory, and other environmental requirements that can be applied to Keithley Instruments, Inc.

23.1 Applicable Document

23.1.1 Activities related to this section are documented in QSIP-640, Legal, Regulatory, and other requirements.

23.2 Summary of procedures

23.2.1 Research any legal and regulatory requirements that may be directly related and/or applied to air, surface water, groundwater, drinking water, hazardous waste, contamination remediation (CERCLA or Superfund), under ground and above ground storage tanks, emergency planning and community right to know (EPCRA), toxic substances, and specific substances where and if applicable.

24. Selection of Environmental Objectives and Targets.

A guide to provide criteria for selecting environmental objectives and targets.

24.1 Applicable Documents

24.1.1 Activities related to this section are documented in QSIP-641, Environmental Objectives and Targets.

24.2 Summary of Procedure

24.2.1 Establish specific goals to fulfill policy, improve environmental control and/or performance in areas related to significant aspects.

25. Recycling

A procedure that describes proper handling for recycling electronic, hazardous, and solid waste.

25.1 Applicable Documents

25.1.1 Activities related to this section are documented in QSIP-660, Recycling.

25.2 Summary of Procedure

25.2.1 Recycling location charts list recyclable items, collection locations, and parties responsible for moving recyclables to central recycling locations.

26. Chemical Review Board

A procedure to review chemicals brought in as test samples or purchased for use in the Company.

26.1 Applicable Documents

26.1.1 Activities related to this section are documented in QSIP-661, Chemical Review Board.

26.2 Summary of Procedure

26.2.1 A submitted chemical review request form will initiate a Chemical Review Board review of any new material or chemical.

26.2.2 Chemical Review Board members will meet when a request has been submitted for review and issue a record of decision, QSIF-615.

27. Advertisement and Use of the Smither's Quality Assessments, Inc. Mark

A procedure to provide instructions to all Keithley locations worldwide on the use of referencing ISO 14001 certification in advertising and use of the Smither's Quality Assessments, Inc. Mark Number 02.353.1 attesting Keithley has met the requirements of the ISO 14001, 1996 International Quality System Standard

27.1 Applicable Documents

27.1.1 Reference of certification in advertising and use of the Mark exclusively.

27.2 Summary of Procedure

27.2.1 Proper use of ISO 14001 certification in advertising.

27.2.2 Proper use of the SQA Mark.

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