

I. PURPOSE:

To provide a documented statement of the organization's policy relative to the operation and control of its Environmental Management System (EMS). This section is structured to correspond to the EMS requirements defined in ISO/DIS 14001.2. The following defines the organization's policy relative to the establishment and maintenance of its EMS.

II. SCOPE:

All functions within the manufacturing operations that are affected by the requirements of ISO/DIS 14001.2.

III. POLICY:

A. Environmental Policy

Colleagues are committed to being environmentally responsible corporate citizens. This will entail:

- Being proactive in our efforts to improve production processes to eliminate waste;
- Seeking out and considering current technologies in:
 - ⇒ Waste water discharge reduction
 - ⇒ Solid waste handling and disposal
 - ⇒ Hazardous materials handling and storage
 - ⇒ Environmental preferred packaging
 - ⇒ Reusable material handling and recycling systems

Through the use of these technologies and systems, we will continue to move forward toward our objective of zero waste discharge through continual improvement.

Manufacturing Operations is committed to complying with relevant environmental legislation, regulations, and Section 1.0 of the corporate environmental policy. The Environmental Policy will be made available to any member of the public requesting it.

B. Planning

1. Environmental Aspects:

Documented procedures are maintained to identify the environmental aspects of the organization's activities and products that it can control and over which it can be expected to have an influence. These aspects are identified in order to determine those, which have, or can have, significant impacts on the environment. Those aspects related to significant impacts are considered in setting the organization's environmental objectives. The procedure is the responsibility of the Manager of Environmental Projects (MEP) and includes update provisions to ensure that the information concerning environmental aspects is kept up to date.

2. Legal and Other Requirements:

Procedures are maintained to identify and provide access to legal and other requirements to which the organization subscribes that are directly applicable to the environmental aspects of its activities and products.

3. Objectives and Targets:

Procedures are maintained for establishing and maintaining documented environmental objectives and targets at each relevant function and level within the company.

The procedures include provisions for the consideration of legal and other requirements, significant environmental aspects, technological options, financial, operational and business requirements and the views of interested parties when establishing and reviewing EMS objectives.

The objectives and targets are reviewed to ensure that they are consistent with the environmental policy including the commitment to prevention of pollution.

III. POLICY: (Continued)

B. Planning (Continued)

4. Environmental Management Programs:

Management programs are established and maintained.. At a minimum, the programs include:

- Designation of the responsibility for achieving objectives and targets at each relevant function and level of the organization.
- The means and time frame by which they are to be achieved.

The procedure includes provisions for the review of new and/or modified activities and products to ensure they are taken into consideration in establishing and/or modifying management programs.

C. Implementation and Operations

1. Structures and Responsibility:

The roles, responsibilities, and authorities of key personnel are defined. Management personnel are responsible for providing resources within their functional areas essential to the implementation and control of the EMS. These resources include human resources, specialized skills, technology, and financial resources.

The MEP has been appointed as the EMS management representative and has responsibility and authority for:

- Ensuring that the EMS requirements are established, implemented, and maintained in accordance with this policy document.
- Reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the EMS.

III. POLICY: (Continued)

C. Implementation and Operations (Continued)

2. Training, Awareness, And Competence:

Procedures are maintained for identifying training needs. All personnel whose work may create a significant impact upon the environment receive appropriate training as defined by procedures.

Procedures are maintained to make employees at each relevant function and levels aware of:

- The importance of conformance with the environmental policy, procedures and the requirements of the EMS.
- The significant environmental impacts, actual or potential of their work activities, and the environmental benefits of improved personal performance.
- Their roles and responsibilities in achieving conformance with the environmental policy, procedures, and requirements of the EMS including emergency preparedness and response requirements.
- The potential consequences of departure from specified operating procedures.

Competency of personnel performing tasks, which can cause significant environmental impacts, is based on appropriate education, training and/or experience.

3. Communication:

Procedures are maintained for:

- Internal communications between various levels and functions of the organization.
- Receiving documentation and responding to relevant communications from external interested parties regarding the organization's environmental aspects and EMS.

Procedures are maintained for consideration of external communications on significant environmental aspects. Decisions related to these considerations are recorded.

III. POLICY: (Continued)

C. Implementation and Operations (Continued)

4. Environmental Management System Documentation:

The core elements of the EMS are defined in this policy document. The interaction and directions to related documentation of these elements are defined in this policy document and the referenced procedures.

5. Document Control:

Procedures are maintained for controlling all documents required by this policy to ensure that:

- They can be located.
- They are periodically reviewed and revised as necessary and approved for adequacy by authorized personnel.
- The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the system are performed.
- Obsolete documents are promptly removed from all points of issue and points of use.
- Obsolete documents retained for legal and/or knowledge preservation purposes are identified.

Documentation is maintained such that it is legible, dated (with dates of revision) and readily identifiable. It is maintained in an orderly manner with retention period specified.

Procedures are maintained defining responsibilities for, and methods of, creation and modification of all documents within the system.

C. Implementation and Operations (Continued)

6. Operational Control:

Procedures are maintained to identify operations and activities associated with the identified significant environmental aspects. These activities, including maintenance, are planned in order to ensure that they are carried out under specified conditions.

Documented procedures are maintained to cover applicable activities as listed below. These procedures include operating criteria as appropriate.

Documented procedures exist for communicating relevant procedures and requirements to suppliers and contractors.

7. Emergency Preparedness and Response:

Procedures are maintained for identifying the potential for, and responding to accidents and emergency situations, and for preventing and mitigating the associated environmental impacts.

Emergency preparedness and response procedures are reviewed and revised after the occurrence of accidents or emergency situations and as deemed necessary by the MEP.

Tests of the emergency preparedness and response procedures are conducted according to a schedule established by the MEP.

D. Checking and Corrective Action

1. Monitoring and Measurement:

Documented procedures are maintained to regularly monitor and measure the key characteristics of operations and activities that can have a significant impact on the environment. These procedures include provisions for recording information to track

Documented procedures are maintained for the periodic evaluation of compliance with relevant legislation and regulations.

2. Non-Conformance and Corrective and Preventive Action:

Documented procedures are maintained for defining responsibility and authority for handling and investigating non-conformances, taking action to mitigate any impacts caused, and for initiating and completing corrections and preventive actions.

Changes in the documented procedures resulting from corrective and preventive actions are implemented and recorded.

3. Records:

Documented procedures are maintained for the identification, maintenance, and disposition of environmental records. These records include training records and the results of audits and reviews.

The records are maintained such that they are legible, identifiable and traceable to the relevant activity, product or service. They are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Retention times are established and recorded.

Records are maintained to demonstrate conformance to the requirements of this standard.

III. POLICY: (Continued)

D. Checking and Corrective Action (Continued)

4. Environmental Management System Audit:

Documented procedures are maintained to define the environmental management system audit program. The program requires periodic audits be carried out in order to determine whether or not the EMS:

- Conforms to the requirement of ISO 14001 and this Environmental Management System Policy Manual.
- Is implemented and maintained in accordance with this policy manual.

Information on the results of audits is one of the inputs to the formal management review.

The audit program is based on the environmental importance activities and the results of previous audits. The audit procedures include audit scope, frequency, methodologies, responsibilities and requirements for conducting and reporting results.

5. Management Review:

Documented procedures exist for the review of the EMS by top management to ensure its continuing suitability, adequacy and effectiveness. Minutes of the review meeting are recorded.

The EMS is reviewed for the possible need for changes to policy, objectives, and other elements of the EMS in light of EMS audit results, changing circumstances, and the commitment to continual improvement.