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### Environmental, Health and Safety Policies, Procedures and Forms

(mo/yr)

Revisions		Rev:	
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## A 1.10 Company Commitment

ISO 14001 Reference: N/A

### 1.0 Background

#### The Company Commitment

Top management shall define the organization's employee safety and environmental commitment and ensure that it is appropriate to the nature, scale and impacts of its activities, products or services;

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

### 1.1 Requirements of the Management System

The Company Commitment (herein called the Commitment) sets the stage for all of the other elements of the organization's Management System (EHS System). The Commitment establishes the company's vision and principles for performance against which the effectiveness of the management system will be judged.

The Commitment is the company's written policy statement that fully conforms to the specific items listed above. The Commitment should be communicated to all personnel within the organization and must be made available to the public. The Commitment contains the following:

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

### 2.0 Scope

This procedure applies to all manufacturing and support operations of the Company.

### 3.0 Objective

The purpose of this procedure is to describe the Commitment and how it is communicated and maintained.

### 4.0 Procedure/Responsibilities

#### 4.1 Policy Description

The Company has developed an integrated commitment policy that is applicable to all sites and facilities

[Redacted] The Company has endorsed the Commitment to provide the principles and overall sense of direction for the site relative to [Redacted].

Supported by top management, the Commitment defines [Redacted]

[Redacted] The Commitment has been signed by the top management of the Company to demonstrate [Redacted]

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#### 4.2 Internal Communication

The Commitment is communicated to all employees in the facility. Communication of the Commitment is included in [REDACTED]

#### 4.3 External Communication

Copies of the Commitment are made available to the public upon request.

#### 4.4 Management Review of Policy

The Commitment is reviewed by facility management during the periodic Management Review of the EHS System process described in Section A 7.30 of this Manual. The Commitment will be reviewed to ensure [REDACTED]

As a result of the Management Review or other site-driven issues, should it become necessary to revise the Commitment, the EHS Coordinator [REDACTED]

[REDACTED] Alternately, if the recommended policy changes only impact the site, the Director of Environmental Affairs and Safety recommends [REDACTED]. In the event that management initiates a change in the Commitment, the Director of Environmental Affairs and Safety is responsible for:

- [REDACTED]
- [REDACTED]
- [REDACTED]

#### 5.0 Related Documents

Company Commitment

EHS System Manual Section A.1.30 (External Communication)

EHS System Manual A.4.30 (Internal Communication)

EHS System Manual Section A.7.30 (Management Review)

#### 6.0 Records

No records will be generated as a result of this procedure.

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**Implementation Tips**

- *A local (site-specific) or Divisional Policy that supplements the Commitment may be developed. Review any such policy carefully with site management, Division Management and Corporate to make sure it accurately reflects the Company’s intentions as well as to evaluate conformance to the program.*
- *Top management of each division must sign the Commitment indicating that they support the principles contained therein.*
- *The written Commitment must be placed into a document control system (i.e., with revision number and date). This may be accomplished by including the Commitment in the EHS System Manual or other controlled document.*
- *The Commitment must be communicated to all employees. All employees, regardless of their job function, must be able to communicate (in their own words) the essence of the organization’s Commitment. Multiple methods of communication are generally most effective, (e.g., a combination of training sessions, signs and posters and re-enforcement during staff meetings) to ensure employee retention of the Commitment information. While the employees are not expected to memorize the entire policy, they should be able to demonstrate understanding of its key elements, in particular: a commitment to: continual improvement; Commitment to complying with regulations; protecting employee health and safety and property, producing safe and environmentally sound products, resource conservation and prevention of pollution.*
- *Consider providing employees with refresher training on the Commitment to ensure their continued understanding. This may be accomplished via the inclusion of Commitment information as part of regularly provided training programs (e.g., OSHA Hazard Communication).*
- *The Commitment must be made available to the public. This may be done via a variety of mechanisms. Many organizations elect to post their Commitment on their Internet web site. A copy of the policy must be provided to anyone upon request.*
- *The Commitment must be periodically reviewed to ensure that it is still suitable, adequate and effective. This is typically accomplished during the periodic Management Reviews required by the EHS System.*

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## Company Commitment

**The Company is committed to worldwide recognition as a safe and environmentally responsible company that** [REDACTED]

**- this commitment extends** [REDACTED]

Sound safety and environmental leadership must be an essential and integral part of a business culture and decision-making process. It is the responsibility of every manager and employee of the Company to ensure [REDACTED]

To achieve our Commitment, it is policy to:

- **Have a business culture that values safety, cleanliness and responsibility** [REDACTED]
- **Protect our Employees, Environment and Property.** [REDACTED]
- **Conserve our Resources.** [REDACTED]
- **Manufacture high quality, safe and environmentally sound products that** [REDACTED]
- **Maintain the operating policies, programs and resources needed to** [REDACTED]

## A 1.20 Roles and Responsibilities

ISO 14001 Reference: [REDACTED]

### 1.0 Roles and Responsibilities

#### 1.1 The Standard

*Roles, responsibilities and authorities shall be defined, documented and communicated to facilitate [REDACTED]*

*The organization's top management shall appoint specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for:*

- a) [REDACTED]
- b) [REDACTED]

#### 1.2 Requirements of the Standard

Clearly defined roles and responsibilities are fundamental requirements for an effective management system. The roles, responsibilities and authorities of the different groups and individuals involved in the EHS System must [REDACTED]

[REDACTED] Evidence must be provided to demonstrate [REDACTED]

#### 2.0 Scope

This procedure applies to the manufacturing and support operations of the Company.

#### 3.0 Objective

The purpose of this procedure is to define the organizational structure, roles, responsibilities and authorities for the activities associated with each site.

#### 4.0 Procedure/Responsibilities

4.1 An organizational chart showing the site's Management Representative and other staff with key responsibilities relative to the site's EHS System is included in this manual.

4.2 The EHS System Responsibility Matrix describes [REDACTED]

4.3 The EHS System Roles and Responsibilities Table further define [REDACTED]

4.4 Upper management ensures the availability of resources essential to the implementation and control of the EHS System. Resources include [REDACTED]  
Upper management shall also appoint a specific Management Representative who shall have a defined role, responsibility and authority to:

- a) [REDACTED]
- b) [REDACTED]

The roles and responsibilities are communicated to site employees via General Awareness training described in Section A 4.10 of this Manual.

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## 5.0 Related Documents

- EHS System Manual Section A.4.10 (Training-General)
- EHS System Manual Section A.4.30 (Internal Communication)
- EHS System Manual Section A.5.30 (Records)

## 6.0 Records

- EHS System Organization Chart
- EHS System Responsibility Matrix
- EHS System Roles and Responsibilities Table

### Implementation Tips

- The EHS System Organizational Chart, Responsibility Matrix and Roles and Responsibilities Table should be customized to your organization. References to positions should link to job titles and not specific employee names.*
- During the EHS System development phase, a cross-functional team should be established. The purpose of the EHS System team is to provide the resources necessary to develop the EHS System (e.g., develop procedures, conduct training) and ensure that the systems developed are well integrated into the organization. EHS System team membership will vary according to the size and structure of the organization but typically should include 4-8 members from the site's environmental operations, human resources/training, quality, engineering and/or facility support departments.*
- A breakdown in understanding of roles and responsibilities is frequently cited as the root cause of poor environmental performance. All employees of the organization should clearly understand their roles and responsibilities as well as understand the importance of the various aspects and the targets and objectives they can affect.*
- The key roles and responsibilities that affect performances should be included in the employee's job description where possible and be included in that employee's performance evaluation where feasible. Key roles and responsibilities should be documented in a consistent format that includes the person's name, title, organizational responsibilities, key tasks, authority and interrelation with other key task personnel.*
- Roles and responsibilities should be communicated throughout the organization as clearly as possible and in writing for responsibilities associated with significant aspects.*
- The management representative (EHS Coordinator) should be of sufficient seniority or stature within the organization to manage the EHS System effectively. The management representative must be able to speak with credibility to the site's upper management and to secure resources to support the EHS System where necessary.*

Figure 1: Management System Organizational Chart

Insert Org Chart

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**Table 1: EHS System Responsibility Matrix**  
 Legend: L= Lead Role, S= Supporting Role

ISO14001 ELEMENTS [EHS System Manual Number]	Gen Mgr	ISO Coord.	Env. Mgr	Human Resource Mgr	Fac. Mnt.	Process Operations	H&S Mgr.	Eng.	Emerg. Response Team
Establish, maintain and ensure implementation of [REDACTED]									
Define and maintain Commitment [REDACTED]	L	S	S	S	S	S	-	-	-
Communicate Commitment [REDACTED]					-	-	-	-	-
Identify and update aspects [REDACTED]	S	S	L	-	S	S	S	S	S
Identify and maintain legal and other requirements [REDACTED]	-								
Establish and maintain objectives and targets [REDACTED]									
Establish and maintain Management programs [REDACTED]									
Define/communicate roles, responsibilities, authorities [REDACTED]	S	L	S	L	-	-	-	-	-
Ensure resources are available for EHS System implementation [REDACTED]									
Identify training needs for all affected personnel [REDACTED]	-	S	S	L	S	S	S	S	-
Establish training & competency evaluation procedures [REDACTED]	-	S	S	L	-	-	-	-	S
Establish and maintain int/ext. communication process [REDACTED]									
Establish and maintain EHS System documentation [REDACTED]	-	-	L	S	S	S	S	S	-
Establish and maintain document controls [REDACTED]	-								
Establish and maintain operational controls [REDACTED]	-	S	L	-	S	L	L	S	-
Establish and maintain emergency procedures [REDACTED]	-	-							
Establish and maintain monitoring/measurement [REDACTED]	-	-	L	-	S	S	-	S	S
Calibrate monitoring equipment [REDACTED]	-	-	S	-	S	L	-	S	L
Periodically evaluate regulatory compliance [REDACTED]									
Manage nonconformance and C/PA [REDACTED]	L	L	S	S	S	S	S	S	-
Establish and maintain EHS System records [REDACTED]	-	-	L	-	-	S	-	S	-
Perform periodic EHS System audits [REDACTED]	-	L	S	S	-	-	-	-	-
Perform periodic management reviews [REDACTED]									

**Table 2: EHS System Roles and Responsibilities Table**

Roles	Responsibilities	Authority
Vice-President	[REDACTED]	[REDACTED]
EHS Coordinator	[REDACTED]	[REDACTED]

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Roles	Responsibilities	Authority
<b>EHS Coordinator</b>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<b>Human Resources Manager</b>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<b>Facilities Maintenance</b>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p>

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Roles	Responsibilities	Authority
Process Operations	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p>
Engineering	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p>
All Supervisors	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p>
Purchasing	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p>

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Roles	Responsibilities	Authority
All Personnel	[REDACTED]	[REDACTED]

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## A 1.30 External Communication

ISO 14001 Reference: 4.4.3

### 1.0 Background

#### 1.1 Procedures (ISO 14001 Section 4.4.3)

*With regard to its Significant Operations and EHS System, the organization shall establish and maintain procedures for:*

- a) [REDACTED]
- b) [REDACTED]

*The organization shall consider processes for external communication on its environmental aspects and record its decisions.*

#### 1.2 Requirements of the Standard

The standard does not prescribe the public disclosure of environmental information; however, it does require that the organization make a conscious decision on the types of environmental information that will be disclosed and under what circumstances. It requires that the organization document their decision on what information will be disclosed, if any, regarding its significant aspects. The standard requires that the organization have a procedure for managing communication with external parties regarding its aspects and the management system. External parties may consist of [REDACTED]

### 2.0 Scope

This procedure applies to the manufacturing and support operations of the Company.

### 3.0 Objective

The purpose of this procedure is to describe the site's system for receiving, documenting and responding to relevant communication associated with external interested parties, such as regulatory agencies, environmental interest groups, customers, local residents, suppliers, etc.

### 4.0 Procedure/Responsibilities

All employees who receive external communication concerning environmental matters are responsible for [REDACTED]

The site's Emergency EHS Coordinator or designee has the responsibility for [REDACTED]

#### 4.1 Communication Flow

- 1) [REDACTED]
- 2) [REDACTED]
- 3) [REDACTED]
- 4) [REDACTED]
- 5) [REDACTED]
- 6) [REDACTED]
- 7) [REDACTED]

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8) [Redacted]

### 5.0 Related Documents

- Emergency Response Manual
- EHS System Manual Procedure A 1.10 (Commitment)
- EHS System Manual Procedure A 3.50 (Emergency Response)
- EHS System Manual Procedure A 4.30 (Internal Communication)
- EHS System Manual Procedure A 5.30 (Records)

### 6.0 Records

The following records will be generated as a result of this procedure:

- External Communication Log, EHS-986
- [Redacted]

All records associated with this procedure are maintained according to the procedure found in Section A 5.30 of this Manual.

### Implementation Tips

- *External communication is that communication between the organization and some other interested party outside of the facility (e.g., regulatory agencies, environmental organizations, adjacent facilities or residents of the neighboring community).*
- *All inquiries regarding issues should be forwarded to a designated person (e.g., the site Management Representative) who will make the decision as to whether further consultation from the Vice-President (and possibly the site’s legal Counsel) is required to prepare a response. The above procedure may be customized to provide for alternative recipients of external communication information, in cases where the primary designee is unavailable (e.g., on vacation).*
- *The site’s switchboard operators, security staff or other employees who may be the initial recipient of incoming inquiries from external parties should be trained to appropriately route the call. Consider developing a “reference sheet” that identifies the EHS Coordinator and any designated back-up staff who are qualified to receive the incoming inquiry.*
- *The External Communication Log sheet, EHS-986, must be completed for each inquiry, including documentation of the response.*

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**Figure 2: EXTERNAL COMMUNICATION LOG**

Communication #	Date Received	Who received	Nature of the Inquiry/Name & Organization	Date of Response	What was the Response
EHS SystemC001					
EHS SystemC002					
EHS SystemC003					
EHS SystemC004					
EHS SystemC005					
EHS SystemC006					
EHS SystemC007					
EHS SystemC008					
EHS SystemC009					
EHS SystemC010					
EHS SystemC011					
EHS SystemC012					
EHS SystemC013					
EHS SystemC014					
EHS SystemC015					
EHS SystemC016					
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EHS SystemC023					
EHS SystemC024					
EHS SystemC025					
EHS SystemC026					
EHS SystemC027					
EHS SystemC028					
EHS SystemC029					
EHS SystemC030					

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## A 2.10 Operations Analysis and Identification of Products, Activities and Services

ISO 14001 Reference: 4.3.1

### 1.0 Background

#### 1.1 The Standard

##### *Operation Analysis and Identification of Products, Activities and Services*

*The organization shall establish and maintain procedures to identify the functional areas of its products, activities or services that it can control and over which it can be expected to have an influence to determine those that have or can have significant impact on employees, the environment, property, resources and products. The organization shall ensure*

#### 1.2 Requirements

The identification of the organization's Significant Operations is a key element of the EHS System, as these determine those issues and areas that should be the primary focus for monitoring, control and improvement. Each functional area will be evaluated and scored according to

Significant

Operations include

### 2.0 Scope

This procedure applies to the activities, products and services that can be controlled or influenced by the manufacturing and support operations of the Company.

### 3.0 Objective

The purpose of this procedure is to describe the system by which the site identifies the functional areas of its activities, products and services over which it has control or influence.

### 4.0 Procedure/Responsibilities

4.1 The EHS System will assemble a team to conduct the baseline operations analysis. Team members should

4.2 The EHS System and the Significant Operations review team develop a list of "functional areas" that is inclusive of the entire site within the scope of the EHS System. The list of functional areas should, for example, include

4.3 For each functional area, the EHS Coordinator and the Significant Operations review team identifies the products, activities and services within each area. These are documented on the Products, Activities and Services (PAS) List provided at the end of this section.

4.4 The site's list of functional areas will be documented and placed in Section B1.0 of this Manual.

4.5 The EHS Coordinator is responsible for

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5.0 Related Documents

- EHS System Manual Procedure A.2.20 (Significant Operations Analysis)
- EHS System Manual Procedure A.3.40 (Operational Changes)
- EHS System Manual Procedure A.4.20 (Significant Operations Training)

6.0 Records

The following records will be generated as a result of this procedure:

- [Redacted]
- [Redacted]

All records associated with this procedure are maintained according to the procedure found in Section A 5.30 of this Manual.

**Implementation Tips**

- *Significant Operations identification is critical since it is from this identification of the potential to impact the rest of the organization’s EHS System is built. By identifying these various operations, they can be properly managed.*
- *The Significant Operations identification process includes all past, present and future impacts that an organization’s activities, products or services have had, are having or will have on the EHS System.*
- *The site’s Significant Operations must be considered when setting objectives and targets.*
- *The organization must identify both Significant Operations over which it has direct control (e.g. safety, air, waste and water emissions, property protection) as well as aspects over which it has influence. Examples of areas over which an organization has influence may include product design, suppliers and vendors, waste transportation and disposal facilities, customers and product end use.*
- *Identifying Significant Operations has two steps. The first stage involves dividing the site up into “functional areas.” For example, functional areas will include individual manufacturing or process areas such as machining, chemical processing, etc. Service areas would also be considered functional areas, such as maintenance, purchasing, tooling, shipping and receiving and administrative offices. There is no limit to which the site can be divided into functional areas but it should be logical. This is done to break the Significant Operations identification process into more manageable tasks and to ensure that the review is comprehensive, covering all areas within the scope of the site’s EHS System.*
- *The second stage involves a brief description of the products, activities and services associated with each functional area. This will be placed on a table as found at the end of this section. The description of the products, activities and services for each functional area should be limited to three to four lines.*

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Table 3: Example List of Functional Areas

1. Shipping and Receiving
2. Material Preparation
3. Contract Product Processing
4. Administrative Functions and Offices
5. Research & Development Lab
6. Maintenance
7. [REDACTED]
8. Storage Garage
9. Warehouse
10. Janitorial
11. Grounds
12. [REDACTED]
13. [REDACTED]
14. Purchasing
15. Product/Process Design and Engineering
16. Quality Control
17. Sales and Marketing
18. [REDACTED]
19. [REDACTED]
20. [REDACTED]
21. [REDACTED]

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Table 4: Example Products, Activities and Services List

Functional Area	Products, Activities, Services

The remainder of this demo has been truncated.

Please review table of contents to understand the scope of this procedure.

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