



ENVIRONMENTAL POLICY

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200. ENVIRONMENTAL POLICY

1.0 Purpose

- 1.1 Ensure that Environmental programs at Vantiva are continuously improved and managed in a manner consistent with the commitments established within Vantiva's Charter for Health, Safety, and the Environment.
- 1.2 Ensure that Environmental programs at Vantiva are continuously improved and managed in compliance with applicable legal requirements in an effort to protect human health and the environment and to minimize potential and actual environmental liabilities.
- 1.3 Provide worldwide standards for all facilities in order to ensure a consistent approach to managing significant environmental aspects and impacts.
- 1.4 Promote continual improvement in recycling, and efficient use of natural resources and raw materials.

2.0 Scope

- 2.1 The policy applies to all Vantiva sites, brands, and employees (whether full-time, part-time, or temporary) and Vantiva Contractors.

3.0 Responsibilities

- 3.1 **Corporate HSE** is responsible for establishing corporate direction and strategies and ensuring implementation of Corporate environmental policies and guidelines which meet or exceed applicable regulatory standards for compliance.
- 3.2 **Senior Management** (Vice Presidents and above) have the ultimate responsibility for environmental matters within their operations.
- 3.3 **Site Managers** have the ultimate responsibility for site environmental issues including establishment and submittal of annual goals, data, progress, and information to Corporate HSE. Each site manager shall designate a person responsible for site Environmental who is qualified by means of training, education, and experience.
- 3.4 **Site Environmental Coordinators** are responsible for directing, developing, implementing, and maintaining site environmental program(s) to meet the criteria established within this policy, for the modification of corporate guidelines to meet the local conditions, (including laws and regulations) if more stringent, and managing day-to-day activities.

Responsibilities also include notifying appropriate agencies when circumstances require

communication and informing Corporate HSE of such communications for chemical releases, non-compliance conditions and/or citations, site remedial action, etc.

- 3.5 **Supervision and Management** - at all levels, have the responsibility to lead by example, in demonstrating a commitment to and involvement in Environmental Program activities, and for enforcing provisions of the site's environmental policies, programs, procedures, and specifications.
- 3.6 **Vantiva Workers**, in accordance with training received, are responsible for understanding and following the designated environmental policies, programs, procedures, and specifications relevant to their jobs, and for immediately notifying their supervisor of any condition or procedure that does not adequately meet environmental program requirements. Workers are encouraged to make proposals to further reduce any adverse environmental impact of facilities, processes, and product.

4.0 Environmental Programs

- 4.1 Site-Specific Programs – Each site is responsible for developing and maintaining site-specific programs consistent with Corporate HSE policies, programs and guidelines. Sites are required to incorporate these policies and programs into a comprehensive Environmental Management System. The following programs are required at each facility, as applicable.
 - 4.1.1 **Environmental Risk Assessment** – Upon start of operations, and thereafter whenever changes are introduced, site-level environmental risk assessment must be performed to assess risk of human health and risk of damage to the environment. At a minimum, materials, processes, and equipment should be linked with their environmental aspects (biological, chemical, physical), and the potential associated impacts documented. With aspects and impacts compiled, along with consideration of likelihood of occurrence and severity of impact, site management must work to mitigate identified risks to a level acceptable to site management and protective of human health and the environment.
 - 4.1.2 **Waste Minimization** – Waste minimization plans must be implemented to reduce the generation of hazardous and non-hazardous wastes in manufacturing and business operations. Some examples include internal and external recycling or reuse of materials, operational improvements, and chemical or raw materials substitutions.
 - 4.1.3 **Energy Conservation** - Energy management and conservation plans must be implemented to maximize the efficient use of energy within the facility and its surrounding operational perimeter, including associated operations such as transport and logistics. The plans shall be documented and updated at least every two years. (See Resource Conservation Guideline #227.)

- 4.1.4 **Water Conservation** - Water management and conservation plans must be implemented to maximize the efficient use of water within the facility and its surrounding operational perimeter. The plans shall be documented and updated at least every two years. (See Water Management and Conservation Guideline #223.)
- 4.1.5 **Raw Materials Conservation** – Raw materials management and conservation plans must be implemented to maximize the efficient use of raw materials within the facility. The plans shall be documented and updated at least every two years. (See Resource Conservation Guideline #227.)
- 4.1.6 **Contingency/Emergency Response Plans** - The site contingency plan must identify specific responses to emergencies that could potentially occur. The written plan must be updated whenever changes are made to the facility which impact the plan or when deficiencies in the plan are discovered, and at least annually. (See Emergency Preparedness and Response Plan Guideline # 221.)
- 4.1.7 **Hazardous Waste Management** - Written programs must include steps necessary to meet the extensive regulatory standards for the safe handling, storage, treatment, transportation, and disposal of hazardous waste - including training of affected employees. (See Hazardous Waste Management Guideline #218.)
- 4.1.8 **Record Retention** - Records regarding Environmental activities, transactions, inspections, etc. shall be maintained and retained. (See Record Retention Policy #204.)
- 4.2 Corporate HSE Programs – The programs listed below are developed at the corporate level to monitor the establishment and effectiveness of site-specific programs consistent with Vantiva’s Charter for Health, Safety, and the Environment.
- 4.2.1 **Site Monitoring:** Site performance goals shall be established in accordance with the site’s environmental management system and consistent with overall Corporate HSE goals. Performance against these goals shall be reported annually to Corporate HSE. Industrial facilities shall also submit site-specific environmental data at a frequency and via a method established by Corporate HSE.
- 4.2.2 **Site Environmental Risk Assessment:** Initially, and then periodically, Corporate EHS will develop site-level environmental risk assessments according to the below aspects and thresholds, and when identified risks are present, the site must adopt and achieve ISO 14001 certification within 2 years of first risk presence or identification:
- On-site hazardous waste generation greater than 100 kg per month (or 1 kg per month of acutely hazardous waste¹)
 - On-site water or wastewater treatment plant (WWTP)
 - Permitted water or effluent
 - On-site metal plating or metal deposition operations

- On-site above ground storage (single) tank (AST) for chemical process or chemical mixing with volume greater than 2500 liters (excludes single integral fuel storage tanks for back-up generator or fire-pump operations)
- On-site above ground storage (multiple) tanks (AST) for chemical process or chemical mixing with combined volume greater than 5000 liters
- On-site permitted or regulated underground storage tank (UST)
- On-site solvent process operations (VOC or HVOC) other than normal maintenance operations
- Air emissions process permit (excludes permits and reporting related to back-up generator or fire pump operations)
- On-site product molding operations
- On-site product finishing and decorating operations

4.2.3 **Periodic Corporate HSE Audit:** Industrial facilities shall receive a periodic comprehensive HSE Audit to review compliance with Corporate HSE Policies and Guidelines, specific laws and regulations, and good management practices. The Audit Program will be directed by Corporate HSE. Audit Teams will consist of Corporate and plant HSE personnel who have received training on the Vantiva audit program.

4.2.4 **Site Closure Requirements and Site Acquisitions** - Prior to closure of any Vantiva site or property Corporate HSE must be notified as early as possible. Appropriate steps will be taken to determine the extent of any site environmental assessment or investigation and if deemed necessary environmental disclosure forms will be completed.

¹ Acutely hazardous waste have been found to be fatal to humans in low doses or, in the absence of data on human toxicity, they have been shown in studies to have an oral LD 50 toxicity (rat) of less than 50 milligrams per kilogram, an inhalation LC 50 toxicity (rat) of less than 2 milligrams per liter, or a dermal LD 50 toxicity (rabbit) of less than 200 milligrams per kilogram or are otherwise capable of causing or significantly contributing to an increase in serious irreversible, or incapacitating reversible, illness.