Environmental Policy

Aviocom
propelled by innovations

Health, Safety & Environment

Responsible Care®
Our commitment to sustainability.

Content

The chemical industry's commitment to sustainability

Responsible Care® is the global chemical industry's unique initiative to improve health, environmental performance, enhance security, and to communicate with employees and customers about products and processes.

Responsible Care commits companies, national chemical industry associations and their partners to:
Continuously improve the environmental, health, safety and security knowledge and performance of our technologies, processes and products over their life cycles so as to avoid harm to people and the environment.
Use resources efficiently and minimize waste.
Report openly on performance, achievements and shortcomings.
Listen, engage and work with people to understand and address their concerns and expectations.
Cooperate with governments and organizations in the development and implementation of effective regulations and standards, and to meet or go beyond them.
Provide help and advice to foster the responsible management of chemicals by all those who manage and use them along the product chain.

Launched in Canada in 1985 to address public concerns about the manufacture, distribution and use of chemicals, Responsible Care has since spread to nearly 60 economies all around the world. Launched in 2006, the Responsible Care Global Charter expands and extends the process of continuous improvement beyond chemicals manufacturing to other activities, especially those associated with the safe use and handling of products along the value chain.

In 2010, Cefic and its member federations adopted the European Responsible Care Security Code. Cefic's role is to advance Responsible Care in Europe promoting and ensuring consistency of implementation by national member federations. Each Cefic member federation is responsible for developing and running its own national Responsible Care program with its member companies, and for overseeing implementation by those companies. Cefic also focuses on engaging with stakeholders, increasing the involvement of SMEs (Small & Medium-sized Enterprises) and extending Responsible Care throughout the value chain.

At global level, Responsible Care is addressed by the International Council of Chemical Associations (ICCA), of which Cefic is a member.

Responsible Care Policy

I am delighted to introduce you to the Aviocom's Responsible Care Policy. This important document marks a renewal of Aviocom's commitment to continuous improvement in the environmental, health and safety performance of the products we supply and the services we offer. Fittingly, after two decades since the launch of Responsible Care in 1985, the global charter expands and extends the process of continuous improvement beyond manufacturing to other activities, especially those associated with the safe use, storage and handling of chemical products along the value chain.

Aviocom is committed to Responsible Care® as a key element to our business success. Responsible Care is our commitment to do and be seen as doing the "right thing". The Responsible Care principles form the basis of our business philosophy towards societal, economic, and environmental sustainability. Aviocom applies the following principles in its implementation of the Responsible Care ethic:

1. Promoting awareness of Responsible Care and inspiring our employees and others to adhere to these principles to instill a Responsible Care culture throughout our organization.

2. We are committed to supplying products and services that, throughout their life-cycle, involve minimum risk to human beings and the environment, while best meeting the needs of our customers.

3. We are committed to managing both our warehousing sites and the transport of our products in such a way as to avoid harm to communities and to our employees, and to minimize the impact of these activities on the environment.

4. Being proactive in taking preventative actions to identify, reduce and manage our risks and to protect the safety, health, and security of our and our customers employees.

5. Communicating our Responsible Care performance to our stakeholders and holding ourselves accountable to our employees and customers, who have the right to understand the risks and benefits of what we do and to have their input heard regarding the products, services, activities and operations.

6. Supporting education and research on environmental, safety and health effects and security of the products we supply and processes that may improve people's lives and striving to meet or exceed expectations for social responsibility and community involvement; and

7. Cooperatively participating in the public policy process for effective laws and standards that safeguard the community, workplace and environment and meeting or exceeding them in letter and spirit.

Roy Klockenbrink
Managing Director

Verification of Responsible Care Implementation

Verification is one of the fundamental features and considered an essential element of the Responsible Care initiative. Self-assessment by companies on their implementation of Responsible Care is a mandatory requirement within Europe and seen as the means on delivering on this fundamental feature.
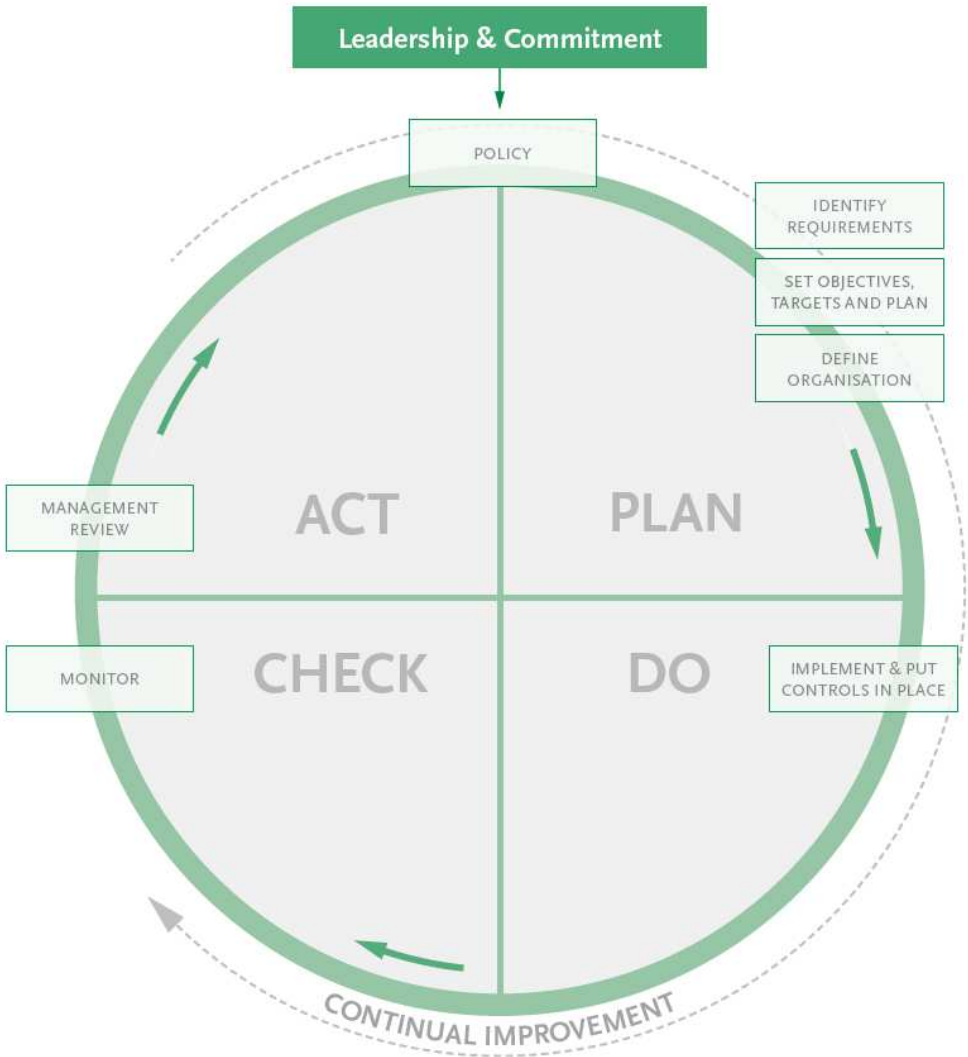
Aviocom Guidelines

The seven principles of our Responsible Care ® policy presented on the previous page are expressed in **guidelines** indicating how the policy should be applied to our staff working with health, safety and environment matters. They cover, in particular:

- **employee safety**
- **safety of installations at Aviocom and at our customers**
- **pollution prevention and waste management**
- **energy saving and economizing on resources**
- **protecting health**
- **product stewardship**
- **communication**

The guidelines cover the sequence of five steps laid down our AS 9120 standard: management commitment, planning, implementation, monitoring the performance obtained, and review in order to decide on further action and thus ensure continual improvement.
Complementing the guidelines there are management tools that specify the procedures to apply.

1. Commitment

Clear and effective leadership is essential to ensure that the vision, ethics, values and beliefs of the organization, support a positive Responsible Care culture.
Leaders demonstrate their commitment to all employees and stakeholders in a highly visible way, and ensure that changes take into account the organization's Responsible Care commitments.
Managers and leaders at all levels in the organization ensure that the effectiveness of the management system is maintained and addresses the current and future Responsible Care issues, together with the needs and expectations of the organization's stakeholders, both internal and external thereby supporting sustainable development.

- Aviocom's Managing Director decides upon the Responsible Care® policy and guidelines, and then incorporates them into the company's general strategy.

- Aviocom's management units (functional directions) incorporate the Responsible Care® policy and guidelines into their action plans and decision-making processes, giving careful consideration to the nature and level of risk associated with their activities. They will take account of the resources needed to disseminate, implement and comply with the guidelines.

- The management units will incorporate clear targets relating to health, safety and the environment into their action plans.

- All employees are responsible for applying the Responsible Care® guidelines to their own activities.

- Aviocom will encourage its partners to develop Responsible Care® guidelines comparable to ours.

2. Planning

An organization needs to put processes and plans in place to deliver strategic and tactical Responsible Care and other requirements, whether these are improvements, routine controls or emergency situations. In general, the policy will be translated into objectives and these, in turn, into more detailed targets down and across the organization.

2.1 Risk assessment

✦ We will identify the hazards associated with all products we supply and with all our current or future operations, acquisitions or divestitures. Risk will be assessed in relation to hazards that could affect the general public, our customers, employees, the environment or our installations.

2.2 Regulations and voluntary commitments

✦ In association with all employees, we will support the development of appropriate regulations relating to health, safety and the environment.

✦ We will favor voluntary commitments that best reconcile the various environmental, social and economic constraints.

✦ We will comply with applicable local, national and international regulations, and undertake to monitor developments in them.

3. Implementation

For effective implementation, an organization should develop the capabilities and support mechanisms necessary to achieve its policy, objectives and targets.

3.1 Employees

⚜ The procedures we use to recruit and select employees will ensure their qualifications correspond to the requirements for the relevant functions.

⚜ We will develop and apply management systems that are dynamic and proactive with regard to employee safety and industrial hygiene. We will favor prevention at the source and manage behavioral factors with a view to safeguard the health and well-being of our employees and to protect them from physical harm.

⚜ We will train our employees so as to maintain and improve their skills and motivation. This training will stress our policy and objectives in relation to health, safety and the environment, the hazards associated with each person's activity, and the importance of complying with regulations.

3.2 Customers

⚜ We will advise our customers and liaise with them, so as to improve the result in respect of health, safety and the environment that they obtain from using the products we supply.

⚜ We are committed to cooperate with all stakeholders regarding the improvement of overall performance in relation to health, safety and the environment: neighbors, governmental authorities, partners, scientists, the general public, the media, non-governmental organizations, end-users, etc.

⚜ We will encourage our suppliers and subcontractors to apply guidelines comparable to our own in relation to health, safety and environmental protection. We will give preference to suppliers and subcontractors who use these as a benchmark.

3.3 Installations

☼ We will endeavor to further reduce our consumption of energy, raw materials and water by optimizing our sources of supply and the efficiency of our processes and will advise our customers to do the same.

☼ We aim to reduce the quantities of waste products, and will encourage the sorting and recycling of wastes. We aim to avoid damage to the soil and groundwater.

3.4 Products and services

3.4.1 Product range

☼ We will endeavor to supply and promote alternative products with Best Achievable Technology (BAT), taking into account their impact on health, safety and the environment at each stage in their life-cycle: manufacture, transport, store, use, recycling and disposal.

☼ We will request our partners to develop reliable solutions to the problems of recycling and disposal for the products we supply from them, and encourage the use of these solutions at our customers.

☼ We will collaborate with customers and suppliers who want to develop products and services that are safer and more environmentally friendly (environmentally acceptable).

3.4.2 Distribution

☼ All products we supply will be packaged, labeled stored and transported in ways that minimize the risk to persons and to the environment.

☼ We will collaborate with all stakeholders – governmental authorities, transport contractors, distribution firms, customers and users of our products – so as to ensure optimal protection throughout the distribution chain.

3.5 Communication and involvement of stakeholders

- We will encourage information sharing, dialogue and cooperation with all stakeholders, to achieve a balanced and socially acceptable sustainable product portfolio. We aim to pursue this dialogue in a spirit of mutual respect.

- Providing on a "pro-active basis" information on the characteristics of the products (MSDS's) will form an integral part of our Product Stewardship policy.

- We will stress to our employees that they have an essential role to play in the dialogue with society in general.

3.6 Documentation

- The management systems relating to health, safety and the environment, and how they are to be implemented, are laid down in our AS 9120 quality documents to be updated regularly.

3.7 Emergency situations

- We will endeavor to prevent accidents related to our activities, products or services, and to limit the consequences of any that do occur.

- We will endeavor to make available our expertise and assistance in the event of an accident involving chemicals, and this may be possible even if we are not the manufacturer.

3.8 Management of change

- We will endeavor to manage temporary and permanent changes in organization, employees, procedures, equipment, information systems and products in such a way as to minimize their risks.

4. Monitoring

The organization ensures that monitoring provides objective evidence that the management requirements of Responsible Care, are being progressed and met.
Records of all monitoring activities be retained.
An organization should measure, monitor and evaluate its overall health, safety and environmental performance.

- We will monitor our installations, products and services in terms of health, safety and environmental protection.

- We will report and investigate accidents and other incidents in order to learn from them and seek to prevent a recurrence; we will take corrective measures.

- We will establish performance indicators, and communicate them internally and externally.

- We will use internal and external auditing systems to confirm that our management systems are valid, and encourage our partners, suppliers and customers to do the same.

- We will measure, monitor and evaluate our overall health, safety and environmental performance." Incorporated in our AS 9120 quality system"

5. Review and Improvement

The organization's management should review the management processes and overall system at regular intervals to ensure that it is still effective and appropriate to the organization's activities and culminating in appropriate changes to support continual improvement in line with the need to achieve the organization's values, policy, strategies, performance objectives and targets. An opportunity for improvement may be found during any routine monitoring or as a result of an incident. All deficiencies/incidents be investigated to establish the root cause or causes and the investigations should be reported. Corrective action be taken to eliminate the cause and be appropriate to the magnitude of the problem and its potential effect. Any necessary changes to processes or working practice be properly implemented and recorded in documented procedures. The findings of the investigation be communicated to all relevant parties. Improvements be subject to review in order to assess their effectiveness in preventing a recurrence of the problem.

- Aviocom will organize regular meetings to assess the management of health, safety and environmental matters. Assessments of the potential for improvement will take into account developments in scientific knowledge and legislation, and the expectations of customers and other stakeholders.

- These meetings will be aimed at integrating Sustainable Development Programs optimally into all of our activities

6. Product Stewardship Policy

Aviocom's Responsible Care Policy is investigating the management of product stewardship by soliciting input from other distributors, partners and customers and benchmarking from existing product stewardship systems. The aims of our Product Strategy are to improve product stewardship within the chemical industry and with aerospace customers throughout the chain of commerce. Furthermore Product stewardship is related to the REACH legislation. We strongly believe that the next generation of leading businesses will be those that make the necessary corporate commitment and capital investments in product stewardship, green chemistry and global compliance. Key components of this program to improve product stewardship include:

- Guidelines for product stewardship, to share best practices within the chemical industry and with the aerospace industry;

- A tiered process for completing risk characterization and risk management actions for chemicals in use and to advise the industry about "BAT" or "MAT" equivalents;

- Product stewardship performance with a special focus on working directly with downstream customers of the chemical industry (the "value chain");

- Greater transparency, including ways to make relevant product stewardship information available to our stakeholders. Aviocom will be working with its partners to advance this program in the years ahead.

- Encourage and sustain support for education, research, and testing approaches that will yield useful information about the risks and benefits of chemicals (Full scale field testing of environmentally acceptable product alternatives)