

**Subcontractor Environmental Rules**

FR-ENVI-122

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| **Subcontractor Environmental Rules** |
| **Date** | **Revision Level** | **Description of Changes** | **Written By** |
| 07/07/2021 | Original | Documentation of Subcontractor Environmental Rules and Requirements | Jay Stewart |
| 12/15/2021 | Updates based on CAR | Inclusion of Business Management Policy and Significant Aspects | Jay Stewart |
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**ARTAZN BUSINESS MANAGEMENT POLICY**

Safety, Quality, and Environmental stewardship are integral to ARTAZN’s history, its culture, and its future. Customer expectations drive ever-improving product quality and variety upon a foundation of ARTAZN’s business management system that fosters innovation.

**Value:** We believe Safety performance, a Commitment to Quality, and Environmental Compliance are wellsprings of value, to be pursued, improved, and celebrated.

**Stewardship:** We value the communities in which we operate and the resources they provide. Our integrated systems will ensure that pollution prevention and waste minimization is a priority.

**Customer Commitment:** We listen to our customers, their needs, and consistently deliver valuable products.

**Continuous Improvement:** Our Business Management System, atop ISO 14001 and IATF 16949, requires developing objectives and targets that ensure continuous innovation and process improvements.

**Leadership:** We share a vision that unites us, and we lead our industry in expanding the positive impact of Zinc in society.

**Market Flexibility:** We participate in established market channels where it is most efficient, and will confidently pioneer new markets should innovation require it and society appreciate it.

**ARTAZN SIGNIFICANT ENVIRONMENTAL ASPECTS**

As part of the ISO 14001:2015 requirements Artazn has reviewed operations and identified the processes at Artazn that have a significant impact on the environment. Those processes are listed below along with the environmental impacts that they have. Any work on these processes must be carefully planned to ensure that no excursions in environmental compliance occur.

Hazardous Waste Generation, uncontrolled Chemical Releases, Air Emissions from the Primary Operations, Air Emissions from Electroplating Processes, and Wastewater releases.

**1.0 PURPOSE**

To establish ISO 14001:2015 fundamental understanding for Subcontractors working for Artazn and to elaborate on environmental rules and requirements for Subcontractors and other individuals working at the facility in Greeneville, Tennessee.

**2.0 SCOPE**

This policy applies to the Artazn facility in Greeneville, Tennessee. Artazn has implemented an Environmental Management System (EMS) according to ISO 14001:2015. The scope of the EMS applies to manufacturing processes and associated activities in the production of metal products that are under the direct control or influence of Artazn. This scope only pertains to legal and other requirements applicable to the environmental aspects resulting from these processes.

**3.0 POLICY**

All Subcontractors working for Artazn will comply with all applicable Federal, State, and Local regulations related to the protection or conservation of the air, land, water or other aspects of the environment. A Subcontractor will immediately report any spill, discharge, release or migration of a substance of any quantity to air, land or water, to the Environmental Compliance Manager or the Engineering Manager at Artazn. The Subcontractor shall be responsible for cleaning-up all spills, discharges or releases resulting from their operations on Artazn property. The disposal of wastes resulting from spills, discharges or releases caused by the Subcontractor shall be the responsibility of the Subcontractor, handled and disposed in compliance with all regulatory requirements.

Trash and waste may not be left on Artazn property and shall be placed in appropriately labeled and covered containers. Disposal of subcontractor-generated waste is the responsibility of the subcontractor and shall be done in compliance with all applicable regulations.

Subcontractors involved in an emergency response and/or the clean-up of an oil or hazardous substance spill shall have the appropriate level of training and documentation of training to meet applicable regulatory standards.

No environmental emission control devices such as a scrubber, flare, vapor recovery unit, etc. will be bypassed or taken out of services without permission of the Artazn Environmental Compliance Manager, Engineering Manager, or VP of Operations. Any venting of gas shall be minimized as much as feasible and not without permission of the Artazn Environmental Compliance Manager, Engineering Manager, or VP of Operations.

The Subcontractor shall notify the Artazn Environmental Compliance Manager, Engineering Manager, or VP of Operations before bringing any hazardous materials on site and shall provide a Safety Data Sheet (SDS) for each such item. The Subcontractor shall provide Artazn employees and subcontractor employees with the appropriate training regarding hazard identification, proper handling procedures, personal protective measures, physical characteristics and proper clean-up and disposal procedures for each chemical or product which they may come into contact with during their normal work activity.

Subcontractors should periodically conduct environmental, health and safety inspections and audits of their operations, equipment and work areas as recommended by industry standards. Artazn Subcontractor management shall review audit findings and corrective action plans with the Environmental Compliance Manager or the Engineering Manager.

**Acknowledgement by Subcontractor**

I acknowledge receipt of the Artazn Subcontractor Environmental Rules. By signature below, I acknowledge that I have read and understand the contents, including the incident reporting requirements, which require that all hazardous situations or incidents, including near misses, injuries, illnesses, releases to the environment, vehicle accidents, thefts, acts of vandalism or property damage, be reported as soon as possible, but no later than within 24 hours.

I further acknowledge that the Requirements will be distributed or conveyed in an appropriate form to all \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (Company name) employees working on property or at facilities owned by Artazn LLC, the employees will be trained on the information contained in the Requirements and documentation related to the training will be maintained and made available to Artazn Environmental Compliance Manager or Engineering Manager.

Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Company Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_