



HERBERT E. ORR COMPANY

SUPPLIER ENVIRONMENTAL GUIDELINES





SUPPLIER ENVIRONMENTAL GUIDELINE

Preface

Orr has established and incorporated the “Orr Supplier Environmental Guidelines” into its purchasing requirements and decision-making process for two primary reasons.

The first of these is to ensure that the suppliers of products and services are not causing environmental impacts which risk tarnishing the reputation of Orr, with the subsequent potential loss of credibility with Orr’s customers and the public.

The second purpose is to encourage good environmental standards in the supply and disposal chain and to work with suppliers to improve overall levels of environmental performance.

This guideline is comprised of two parts:

Part I – Suppliers, is applicable in whole or in part to all Orr suppliers which includes:

- a. suppliers providing direct raw materials, indirect raw materials and / or parts and components
- b. suppliers with whom we outsource
- c. service providers
- d. transporters
- e. contractors

Its purpose is to highlight Orr environmental and safety purchasing requirements. It is not intended to be comprehensive or deal with all situations that may be encountered.

Part II – Contractors, applies to all contractors and persons performing work on facilities or property of the Herbert E. Orr Company. Its purpose is to highlight environmental and safety requirements in certain areas of work. It is not intended to be comprehensive or deal with all situations that may be encountered.

Supplier’s ability to satisfy the requirements of this environmental guideline will be one of the criteria that will be considered in the purchasing decision-making process as we move forward into the future.

Please visit our web-site at www.heorr.com for further information regarding Orr’s environmental policy and commitment to environmental protection as incorporated into the Orr Mission Statement.



SUPPLIER ENVIRONMENTAL GUIDELINE

Part I.

Suppliers

A. Environmental Management System

Orr strongly encourages those suppliers providing direct raw materials, indirect raw materials and / or parts and components to Orr to develop and implement an environmental management system. The preferred approach is 3rd party certification to the ISO 14001 standard. However, self-certification and self-declaration of conformance with the ISO 14001 standard or an equivalent standard is acceptable.

B. Prohibited Materials

Orr has established reducing the potential environmental impact from handling, storing and using toxic and / or hazardous materials in its manufacturing process as an environmental objective. A key step in achieving this objective is identifying those chemicals and other toxic or hazardous substances that we want to prohibit from use.

In conjunction with Orr's own internal objective, many of Orr's major automotive customers have provided Orr with chemical ban lists with the requirement that Orr eliminate these chemicals from the composition of materials we supply to them.

Orr, in its efforts to reduce its own environmental impacts, **has developed a Chemical Approval Process. Prior to any chemical being brought into the Orr facility, said chemical will have prior approval.**

Orr, in its efforts to conform to the requirements of its automotive customers, **utilizes the International Materials Data System (IMDS). All component suppliers are required to submit to the Herbert E. Orr Company (IMDS ID: 24924) their IMDS data, at a minimum, when requested.**

C. Transportation

1. Orr requests that suppliers regularly clean all vehicles to minimize contamination of roads and water drains.
2. Orr requests that suppliers provide spill containment equipment for use by delivery drivers.
3. Orr requires that any supplier who ships a direct raw material, indirect raw materials and / or parts or components that is suspected to contain a compound or article that is hazardous, comply with all applicable DOT and other national, state and local hazard material regulations and the requirements for classifying, packaging, labeling, documenting, handling and transporting hazardous materials (also called hazmat). This includes but is not limited to materials that are toxic, flammable, shock-sensitive, or can cause fires, release gas, be corrosive, or is under pressure.

D. Recycling

1. Recycle Content

Orr suppliers are requested to investigate whether recycled material can be used in direct raw materials, indirect raw materials and / or parts and components supplied to Orr and still meet the functional and economical requirements established by Orr. If so, it should be submitted to Orr for evaluation and approval. As a general guideline, suppliers should strive for a minimum 20% post-consumer recycled content.



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Part I.

Suppliers

2. **Recyclable**

Orr suppliers are to investigate whether alternative material, part or packaging, is better to recycle than that currently in use and still fulfills the functional and economical requirements from Orr. If so, it should be submitted to Orr for evaluation and approval.

3. **Purchase**

Orr encourages its suppliers to do their share in buying recycled. Buying recycled products throughout the entire supply chain creates an economic incentive for recyclable materials to be collected, manufactured, and marketed as new products.

E. Legal and Regulatory Requirements

1. Orr suppliers shall not construe any content or context of these guidelines as relieving suppliers from the obligation of obtaining all required permits, licenses, or other clearances. These guidelines also do not relieve suppliers from their obligation to comply with all laws, regulations or other requirements from approval, regulatory or enforcement agencies, such as, but not limited to, the EPA, OSHA and DOT.
2. Suppliers will make available to Orr, upon request, copies of permits, licenses, identifications and conformance and performance reports to confirm supplier's capabilities and compliance.
3. Suppliers will notify Orr of any environmental non-compliance and / or prosecution.



SUPPLIER ENVIRONMENTAL GUIDELINE

Part II.

Contractors

This guideline applies to all contractors and persons performing work on facilities or property of the Herbert E. Orr Company. Its purpose is to highlight environmental and safety requirements in certain areas of work. It is not intended to be comprehensive or deal with all situations that may be encountered.

A. Environmental & Safety Compliance and Awareness Training

1. Contractors working at any Orr facility are required to perform contracted work in compliance with all federal, state, and local regulations pertaining to safety and the environment at all times.
2. Contractors shall ensure all their on-site personnel, including sub-contractors, are familiar with the contents of this guide, as well as regulatory requirements applicable to contract performance and document the training provided to all employees.

B. Management of Hazardous Materials

1. Contractors shall:
 - a. available an inventory of hazardous material to be used during contract performance; and
 - b. **submit for approval Safety Data Sheets of all chemicals to be used.**
2. Contractors shall have available and submit for approval if requested by Orr:
 - a. a labeling system to identify the contents of all containers on-site, per 29 CFR 1910.1200, Hazard Communications Standards, and shall include as minimum the following:
 - Chemical name
 - Manufacturer's Name and Address
 - Explanation of the Chemical Hazard
 - b. an implemented plan for protecting personnel, property, and the environment during the transport, storage and use of the materials, as specified in 29 CFR 1910.1200 Hazard Communication Standard.
3. Contractors shall not transport, store or use radioactive materials or instruments capable of producing ionizing radiation, as well as materials which contain asbestos, mercury, methylene chloride, lead, or polychlorinated biphenyls during contract performance without prior approval by the Orr company.
4. If material that may be dangerous to human health or the environment upon disturbance is encountered during contract performance, the Contractor shall stop that portion of work and notify the Plant Manager immediately. If the situation is an immediate threat to human health or the environment, call 911.

C. Handling and Disposal of Waste

1. Any item not incorporated into the project and not reusable will be considered a waste. Recycling is preferred and encouraged.
2. In no event shall any waste, including wastewater, be disposed of in the storm sewer system.
3. Solid waste shall be segregated at the source and containerized to prevent spills or discharges to the environment. Cover and contain all solid waste to prevent it from blowing away and to prevent water run-on or run-off. Solid waste shall not be taken to any site not approved by Orr prior to removal from the worksite and should be covered to prevent littering during transport.
4. All dangerous / hazardous waste must be placed in containers and labeled and under no circumstances shall Contractor remove it from work-site.



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D. Spills

1. Contractors shall take all reasonable and necessary precautions to prevent oil and hazardous substances from reaching the air, ground, or waterway.
2. In the event of a spill, the Contractor shall follow the Orr Emergency Spill Cleanup Policy for Spills.

E. Water Pollution

1. Comply with the Federal Clean water Act, 40 CFR 122, and 40 CFR 403.
2. In no event shall waste or any other material be disposed of into the storm sewer system. Allowing non-approved discharges may result in a direct violation of regulations and /or permits issued by the Environmental Protection Agency (EPA).

F. Air Pollution

1. Containers of paint, epoxy, solvents or other volatile organic compounds (VOCs) are not to be left open to the atmosphere unless they are being used.
2. Evaporation of solvents shall not be used as a means of minimizing or disposing of dangerous waste.
3. Utilize best available control technology to minimize dust emissions.
4. Use of silica sand is prohibited in sandblasting. Use of Blastox or similar product, which minimizes the generation of hazardous waste is recommended.
5. Control fugitive emissions from loading and unloading abrasive blast media.

G. Health and Safety

1. The Contractor shall conduct all work in a safe manner.
2. Contracting personnel shall perform all work in accordance with the most current OSHA rules and regulations issued by the Department of Labor, 29 CFR parts 1910, 1915, and 1926 as applicable.
3. The Contractor shall make the maximum use of low-noise emission equipment as certified by the EPA.
4. During contract performance, all Contractor personnel shall have in their possession and shall properly wear OSHA approved personnel protective safety equipment, i.e., hard-hats, steel-toe safety shoes, safety glasses and hearing protection.
5. The Contractor shall provide all appropriate safety barricades, signs and signal lights.
6. The Contractor shall report to Orr all accidents or damage to Orr property.
7. The Contractor and Contractor employees shall know where the alarms are located and how to turn them on.
8. The Contractor shall handle and store all combustible supplies, materials, waste, and trash in a manner that prevents fire or hazards to persons, facilities, and materials.
9. Contractor employees operating critical equipment shall be trained to properly respond during a fire alarm or fire.

H. Resource Conversation

1. Contractors shall avoid wasting site resources, including electricity and water.
2. Contractors shall recycle when and where feasible.



SUPPLIER ENVIRONMENTAL GUIDELINE

Part II.

Contractors

Record of Revisions

| Level | Date | Description | Section Affected |
|-------|------------|---|------------------|
| 00 | 2001-10-01 | Implementation | All |
| 01 | 2022-01-10 | Removed: "has developed a consolidated list of prohibitive materials and substances, which Orr expects its suppliers to eliminate from materials supplied to Orr. This list will be provided under separate cover." | Part I, B |
| | | Removed: In the event a supplier currently uses a material or substance on the prohibitive materials list, the supplier shall be required to disclose a time-table for phasing out the material. | |
| | | Added: "has developed a Chemical Approval Process. Prior to any chemical being brought into the Orr facility, said chemical will have prior approval" | |
| | | Added: "utilizes the International Materials Data System (IMDS). All component suppliers are required to submit to the Herbert E. Orr Company (IMDS ID: 24924) their IMDS data, at a minimum, when requested:" | |
| | | Added: "submit for approval Safety Data Sheets of all chemicals to be used" | Part II, B |
| | | Removed: "any material on the Orr Prohibited Materials List nor" | Part II, D |
| | | Changed: Emergency Preparedness and Response procedure to Emergency Spill Cleanup Policy | |
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Record of Reviews

| Date | Performed by | Changes |
|------------|---|-------------------------|
| 2022-01-10 | Environmental Manager & Human Resources Manager | Per Record of Revisions |