Global Environmental Health and Safety (EHS) Policy

Global Environmental Health and Safety (EHS) Policy Our excellent health and safety performance starts with our Global EHS Policy, with which every associate must comply. At a high level, the policy calls on associates to:

- Comply with all EHS laws, regulations, company policies and standards
- Make EHS a priority in our business, always conducting activities safely and responsibly
- Assess and control risks and potential hazards that can impact our EHS performance
- Support environmental sustainability
- Contribute to EHS objectives

Anyone working for or on behalf of Timken (including associates, temporary employees and, as applicable, contractors and suppliers) must be made aware of the Global EHS Policy, as well as EHS risks and considerations relevant to their occupation and the location where they will be working. All compliance training is completed according to national, regional, state and local regulations. We also have an extensive suite of function-specific EHS training requirements.

EHS Leadership Council

Oversight of EHS performance lies with our EHS Leadership Council, which includes the vice president of operations, corporate EHS managers, and directors from each business unit. The EHS Leadership Council establishes business-level strategy, which cascade down to the plants. Plant managers set measurable goals and targets for facility level implementation, which are shared with the manufacturing directors and EHS Leadership Council for approval. This ensures that associates throughout the organization are engaged and contributing to Timken's EHS program.

EHS Management Systems

Timken manufacturing facilities must implement an effective EHS management system in accordance with our corporate EHS standards and procedures, which are regularly reviewed and updated to conform with ISO Standard 45001 (occupational health and safety) and 14001 (environmental management). In 2019, Timken Global EHS standards, which go beyond regulatory compliance, were revised and communicated to our EHS coordinators and to the Timken leadership team. All global facilities are routinely audited to ensure compliance with these standards.

Facility-level management systems consider regulatory requirements, customer specifications, facility performance, hazards and risks, and integration of new acquisitions. Third-party certification must be obtained when required by customers or regulatory agencies, or if approved by Corporate EHS.

Two critical components of these systems are internal, targeted assessments and audits, which are conducted by Corporate EHS. Audits must be completed by qualified associates using audit protocols approved by Corporate EHS

unless otherwise approved by a third-party ISO 14001/45001 registrar. Third-party certification must be obtained when required by customers or regulatory agencies, or if approved by Corporate EHS. The frequency of these assessments or audits is based on:

- Date of last audit or date facility was acquired
- Results of most recent audit or regulatory inspection
- Three-year performance history, including any incidents and compliance issues
- Potential hazards and risks unique to that facility
- Third-party visits, requirements or inquiries

The type and scope of audits are defined during the annual business planning process and modified as necessary throughout the year with approval from the vice president of operations. Corrective and preventive actions from audits and assessments must be tracked to completion.

Putting EHS into Action

All levels of management are expected to provide leadership for delivering on our EHS objectives and enforcing adherence to our global standards. Nowhere is this more important than at the plant level.

Plant managers are responsible for:

- Making EHS performance a top priority
- Ensuring compliance with EHS laws, regulations, company policies and standards
- Establishing and committing resources to annual EHS goals and including these in business planning sessions
- Communicating site-specific EHS goals, incidents and accomplishments
- Holding site leadership accountable for EHS performance
- Engaging in the selection and development of plant EHS coordinators
- Supporting initiatives to educate and engage associates in EHS
- Reviewing and assessing EHS performance and completing quarterly scorecards
- Participating in and reviewing incident investigations, root-cause analysis and corrective/preventative actions
- Ensuring contractors comply with Timken EHS expectations

Environmental Processes

Plant-Level Environmental Requirements

Our thorough EHS standards dictate the following actions at each Timken manufacturing facility to further our commitment to environmental stewardship:

Energy

- Records of energy use (e.g., electricity, natural gas, fuel oil, gasoline, propane, etc.) must be documented and reviewed quarterly
- Facilities must look for opportunities to reduce consumption and cost, and record results of actions taken to reduce climate related risks
- Energy-efficient lighting must be installed for new construction or replacements, and plants must optimize the use of natural light when possible
- Energy-efficient equipment such as motors, pumps, compressors, HVAC systems and variable speed drives must be considered for new or replacement equipment installation

Air Emissions

- An inventory of air emissions must be documented and kept current.
- All significant or regulated air emission sources must be identified and documented.
- Approvals, permits and licenses must be obtained as required, and compliance with terms and conditions must be monitored. If permitting is not required, documentation must be maintained on file at the facility.
- Air emission inventories must be updated, air emissions calculated and documented, and reports submitted as required by regulations or permits.
- Equipment emitting air emissions must be properly ventilated, when required, or for associate comfort. Local codes and requirements must be referenced to determine the height of ventilation stacks.

Waste Management

- Every waste stream from industrial operations – such as grinding and heat-treat byproducts, paint waste, filters and other waste – must be evaluated and analyzed, when appropriate, and characterized as hazardous, regulated, special or nonhazardous waste. Documentation must be maintained on site specifying how the hazardous waste classification was determined (e.g., laboratory analysis and safety data sheets).
- At a minimum, recycling programs must include cardboard, plastic, paper and aluminum cans. In the event that local recycling programs are not feasible, the reasons for not recycling must be documented and supported.
- Associates are required to follow facility-specific waste management and recycling procedures.
- Records of waste generated and associated costs are reviewed at least quarterly. Facilities must look for opportunities to reduce waste and cost, and record improvements.

Spill Prevention, Control and Countermeasures

- Facilities must have a written, up-to-date plan(s) that includes procedures for spill and release notification and response/cleanup. Applicable regulations must be referenced to ensure plans include all required information.
- Procedures or plans for responding to spilled materials such as oil, soaps, solvents, corrosives and other chemicals must be documented, communicated to affected associates and evaluated for effectiveness.
- Spill response equipment must be located in appropriate areas and routinely inspected.