# Subset of Timken Global EHS Standards

## Global EHS Policy

Every associate is responsible for complying with Timken's Global EHS Policy, which includes:

- complying with all EHS laws, regulations, company policies and standards
- making EHS a priority in our business, always conducting activities safely and responsibly
- assessing and controlling risks and potential hazards that can impact our EHS performance
- supporting environmental sustainability
- contributing to EHS objectives

## Plant Manager Responsibilities

All levels of management are expected to provide leadership for delivering on our EHS objectives and enforcing adherence to the global standards.

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 discussing these during 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 your plant's EHS coordinator(s)
- supporting initiatives to educate and engage associates in EHS
- assessing EHS performance through participation in or the review of audits, inspections and improvement projects
- participating/reviewing incident investigations, root-cause analysis and corrective/preventive actions
- reviewing EHS performance and scorecard at least quarterly
- ensuring contractors comply with Timken's EHS expectations

## Environmental, Health and Safety Management System

Manufacturing facilities must implement an effective EHS management system in accordance with the Corporate EHS standards/procedures that have been developed using the ISO 14001 and 45001 Standards as the framework.

The schedule/timeline for developing and implementing an EHS management system at a facility must be established, or approved by Corporate EHS considering:

- regulatory requirements
- customer requirements
- performance

- hazards/risks
- integration plan for new acquisitions

Internal audits must be completed, by qualified associates, using audit protocol approved by Corporate EHS unless otherwise approved by a 3$^{rd}$ party ISO 14001/45001 registrar.

Third-party certification must be obtained when required by customers or regulatory agencies, or if approved by Corporate EHS.

## Performance Goals and Targets

Corporate EHS proposes strategic direction and goals to the EHS Leadership Council considering:
- EHS Policy
- Company Strategy (e.g., cost savings)
- Compliance Obligations
- Customer Requirements
- Significant Risks
- Audit Results
- Views of Interested Parties
- Feedback from Leadership/CEO

The EHS Leadership Council includes VP of EHS, Corporate EHS Managers, VP of Manufacturing and Directors from each business. EHS Leadership Council reviews and approves goals. The Directors establish business level measurable goals/targets then cascade goals to Plant Managers.

Plant manager must establish annual goals and targets considering:

- Business level goals/targets
- Facility-specific additions:
  - Compliance obligations
  - Work related Injuries and illnesses
  - Significant environmental aspects/impacts
  - Significant occupational health & safety risks and opportunities
  - Safety culture of the organization
  - Trends/gaps identified during analysis of EHS data
- Audit findings, incidents/issues, gaps in defenses/controls for significant hazards/risks
- Cost saving opportunities

Corporate EHS Scorecards will be reviewed with the EHS Leadership Council quarterly.

## Training

All persons working for or on behalf of Timken (including associates, temporary employees and, as appropriate, contractors / suppliers) must be made aware of the Global Environmental, Health and Safety Policy as well as the EHS risks/aspects pertinent to their occupation and the location where they will be working.  All compliance training must be completed according to national, regional, state and local regulations.

## Assessments/Audits

Corporate EHS will conduct audits at manufacturing facilities.  The frequency of audits will be based on the following:
- date of last audit or date acquired
- results of last audit or regulatory inspection
- performance history (three-year), including any incidents and compliance issues
- potential hazards/risks
- 3rd party visits, requirements or inquiries

The type and scope of the audit will be defined during the annual business planning process and modified as necessary throughout the year with approval from the VP - EHS.

Manufacturing sites must complete environmental and safety self-assessments and submit to Corporate EHS as requested.  Facilities must also establish a process for completing routine EHS audits/inspections.

Corrective and preventive actions from audits and assessments must be tracked to completion using the system/software approved by Corporate EHS (e.g., Gensuite Action Tracking System).  A similar format may be used until the site has been fully trained on the use of the software.

## Emergency Action Planning

Facilities must have an Emergency Action Plan (EAP) to cover response activities and evacuations for fire, medical emergency, severe weather and hazardous chemical releases.

Facilities are required to conduct a drill (involving each work-shift) of their EAP on an annual basis.  In addition, facilities must complete an annual 90 minute battery test of illuminated exit signs and back up lighting.

## 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 (e.g., on a plant drawing).

Approvals, permits and licenses must be obtained as required, and compliance with terms/conditions must be monitored.  If permitting is not required, the facility must maintain documentation in file.

Air emission inventories must be updated, air emissions calculated/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/requirements must be referenced to determine height of any ventilation stacks.

**Waste Management**
Every waste stream from industrial operations, such as grinding swarf, heat treat sludge, paint waste, filters, etc., must be evaluated and analyzed, when appropriate, and characterized as hazardous, regulated, special or non-hazardous waste.  Documentation must be maintained on-site specifying how hazardous class was determined (e.g., laboratory analysis, SDS, etc.).

At a minimum, recycling programs must include: cardboard, plastic, paper and aluminum cans.  If local recycling programs are not feasible, the reasons for not recycling must be documented and forwarded to Corporate EHS.

Associates are required to follow facility-specific waste management and recycling procedures.

Records of waste generated and associated cost must be reviewed at least quarterly and provided to Corporate EHS upon request.  Facilities must look for opportunities to reduce waste and cost, and record improvements.

**Energy**
Records of energy use (e.g., electricity, natural gas, fuel oil, gasoline, propane, etc.) must be documented, reviewed quarterly and provided to Corporate EHS upon request.

Facilities must look for opportunities to reduce consumption and cost, and record improvements. Energy efficient lighting must be installed for new construction or replacement; 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 equipment installation/replacement.

**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.