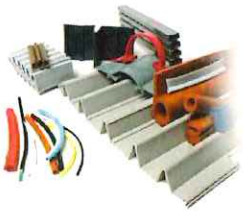
ENVIRONMENTAL MANAGEMENT SYSTEM POLICY MANUAL

Revision: B



Extruded Products

We have the capabilities to extrude products up to 20" wide from a large selection of materials.

- Silicone extrusions
- Natural rubber extrusions
- Synthetic rubber extrusions
- Flexible plastic extrusions

Molded Products

Our molding line can accommodate molds up to 32" square. Our molding capabilities include:

- Compression molding
- Transfer molding
- Injection molded products
- Rubber-to-metal bonded
- Fabric reinforced molding

Railroad Products

We have been supplying elastomeric products to the railroad industry for over 20 years. Products include:

- Rail Boots
- Crossing tie pads
- Under tie pads
- Elastomeric grout

Value Added

In addition to our custom extruding and molding capabilities we offer numerous value added services:

- Park marking
- Color matching
- Special packaging
- Adhesive tape backing
- Splicing
- Flocking
- Assembly

Approval

Thomas Gile
General Manager

Randy Robbins
Technical & Quality Director

Northwest Rubber Extruders, Inc
Since 1978

Environmental Management System Policy Manual

Revision: B

Table of Contents

Section	Section Title
1	Revision History
2	Introduction, Scope, Boundaries
3	Process Interaction
4	Context of the Organization
5	Leadership
6	Planning
7	Support
8	Operations
9	Performance Evaluation
10	Improvement

1 REVISION HISTORY

Revision History			
Revision	Date	Section(s) Updated	Description of Change
A	04/01/2019	All sections & Policy	Initial development of NWRE EMS
B	09/22/2026	Sec. 2, 4.1, 4.4, 5.2, 5.3, 6.1.1, 7.1, 7.4.2, 9.1.1, 9.2, 9.3, 10	Since ISO14001 certification is not required, changed to maintain effectiveness in place of compliance

2 INTRODUCTION, SCOPE & BOUNDARIES

This manual describes the Environmental Management System (EMS) policy that has been developed to conform to the requirements stated in our Environmental Policy Statement and the most current version of ISO 14001. The manual describes the policy, activities and responsibilities applicable to the manufacturing operations of Northwest Rubber Extruders, Inc. (hereafter referred to as NWRE, Inc.).

BOUNDARIES OF OUR ENVIRONMENTAL MANAGEMENT SYSTEM

This Environmental Management System (hereafter abbreviated as the EMS) applies to NWRE's manufacturing facility located in Beaverton, Oregon where elastomeric seals and gaskets are manufactured out of organic, silicone and thermoplastic rubber compounds. This manual takes into consideration the extent of control or influence our organization can exert over all associated activities, products and services and is designed to address internal and external issues, compliance obligations, organizational activities, functions and the site infrastructure and grounds that may influence our environmental performance, as defined within this manual.

PURPOSE

- Formally document the policy, objectives and organization of the EMS at NWRE in order to facilitate its understanding, implementation and maintenance.
- Clearly define the roles, responsibilities and authorities for environmental control for all relevant functions and levels.
- Provide an overview of the systematic approach and framework of environment management to achieve intended outcomes and contribute to environmental sustainability.

The intent of developing this EMS policy manual is to:

- Protect the environment by preventing or mitigating adverse environmental impacts and risks that result from NWRE's MFG operations
- Protect the property owners from loss in property value due to negative environmental impact from NWRE's operations
- Assist in the fulfillment of compliance obligations
- Enhance environmental performance
- Consider and influence environmental impacts from a life cycle perspective
- Realize financial and operational benefits from implementing environmental activities
- Communicate environmental information to relevant interested parties
- Achieve our environmental objectives

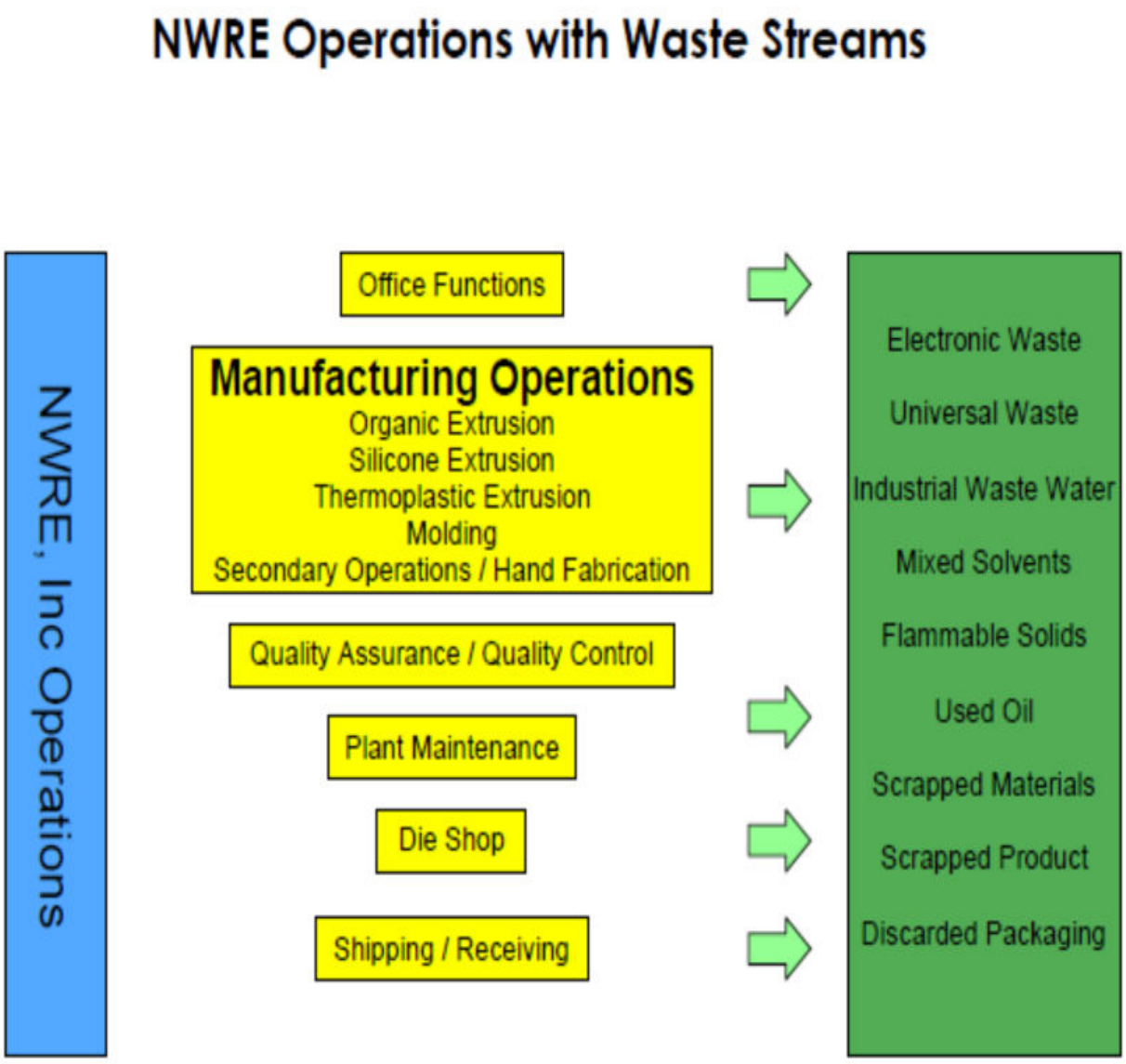
ENVIRONMENTAL MANAGEMENT SYSTEM OUTCOMES

Three key intended outcomes of NWRE's EMS are as follows:

1) Enhancement of environmental performance
2) Fulfillment of compliance obligations
3) Maintain the EMS to enhance NWRE's environmental conformance

3 PROCESS INTERACTION

NWRE has determined the processes needed for manufacturing operations and the quality management system (**see NWRE's Quality Assurance Policy Manual sec. 3.0**). The process interaction diagram identifies NWRE's core processes, support processes, sub-processes, outsourced processes, information flow to and from the customer and feedback into the system for continual improvement. Each core process and sub process is described in the applicable process (turtle) diagram. The process (turtle) diagrams may contain proprietary information and are not included in this manual but are available for customer review upon request. **(note: Outsourced processes under a different QMS are handled as Suppliers per sec. 8.4 Purchasing).**



4 CONTEXT OF THE ORGANIZATION

4.1 Understanding the organization and its context

NWRE has determined external and internal issues that are relevant to our purpose and that affect our ability to achieve the intended outcomes of our EMS. Such issues include environmental conditions that affect or have the capability to affect our organization.

External and internal issues are monitored and reviewed on an ongoing basis and necessary changes are implemented in the EMS as required.

Relevant Internal / External Issues may include, but are not limited to:
a) Environmental conditions that affect our purpose or be affected by its aspects
b) External factors and competitive circumstances
c) Internal characteristics

REFERENCE DOCUMENTS:
NWRE's Quality Assurance Policy Manual
NWRE's Annual Business Plan

4.2 Understanding the Needs and Expectations of Interested Parties

The strategic direction of NWRE is identified and communicated through the annual business plan that is developed by the General Manager. The business plan conveys the external and internal issues that are relevant to NWRE's strategic direction as identified in the SWOT analysis. NWRE has determined the interested parties that are relevant to our EMS and reviewed the relevant needs and expectations (i.e. requirements) of these interested parties to identify which of these needs and expectations become compliance obligations.

4.2.1 Due to their effect or potential effect on our ability to consistently provide products that meet customer and applicable statutory and regulatory requirements, NWRE has identified internal and external interested parties that are relevant to the EMS, their requirements and the associated processes needed to meet their expectations. Interested parties are monitored and reviewed on an ongoing basis, and, when appropriate, changes are implemented in the EMS. The business plan includes a list of interested parties and their needs, expectations and requirements.

4.3 Determining the scope of the environmental management system

NWRE has determined the boundaries and applicability of the EMS to establish its scope by considering the external and internal issues referred to in 4.1 and the compliance obligations referred to in 4.2. The organization's functions and physical boundaries, activities, product, services in which NWRE has authority and ability to exercise control and influence over are contained in section 2.0 and 3.0 of this policy. All NWRE activities, products and services defined within the scope have been included in the EMS.

4.3.1 The scope of our EMS has been established based on the elements in 4.3 and endorsed by NWRE, Inc. Management at Management Review. Our scope is maintained as documented information within this manual and may be communicated to interested parties upon request.

REFERENCE DOCUMENT:
NWRE Quality Assurance Manual

4.4 Environmental Management System

To achieve the intended outcomes, including enhancement of NWRE's environmental performance, NWRE has established, implemented, and is maintaining the EMS. This includes the processes needed and their interactions in accordance with the requirements of the current revision of ISO 14001.

4.4.1 Our organization uses the Plan, Do, Check, Act (PDCA) model and documented information to establish and maintain our EMS. The consideration and assessment of Clause 4.1 Understanding the organization and its context & 4.2 Understanding the needs and expectations of interested parties will be reviewed periodically to determine if changes to the EMS are warranted.

Exclusions – There are no exclusions to ISO14001 in the scope of our EMS.

5 LEADERSHIP

5.1 Leadership and Commitment

NWRE's Management Team is committed and dedicated to the development, implementation and maintenance of the EMS. Evidence of this commitment can be seen by the following activities:

- Taking accountability for the effectiveness of the EMS.
- Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organization.
- Ensuring the integration of the EMS into the organization's business processes.
- Ensuring that the resources needed for the EMS are available.
- Communicating the importance of effective environmental management and of conforming to the EMS requirements.
- Ensuring that the EMS achieves its intended outcomes.
- Directing and supporting persons to contribute to the effectiveness of the EMS.
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.1.1 NWRE Top Management is defined as the NWRE Management Team as identified in our Organization Chart. The General Manager provides active leadership to the NWRE Management Team and is ultimately responsible for the strategic direction and effectiveness of NWRE's business systems. The General Manager is responsible for taking actions to instill a culture of environmental awareness with focus on maintaining environmental conformance, delegating environmental responsibilities and promoting the integration of EMS requirements into standard business processes where appropriate. The General Manager has delegated responsibility for above actions to

the Technical & Quality Director but retains accountability for ensuring the actions are performed according to procedures.

REFERENCE DOCUMENT:
NWRE Quality Assurance Manual, appendix 4, Page A4 Organizational Chart

5.2 Environmental Policy

In support of NWRE's Mission and the listed core value of supporting and encouraging activities that lead to environmental responsibility, NWRE's Top management has established, implemented and is responsible for maintaining an environmental policy within the defined scope of our EMS that conforms to the following:

- Is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services.
- Provides a framework for determining environmental conformance.
- Includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of NWRE.
- Includes a commitment to fulfill its compliance obligations.

Northwest Rubber Extruders, Inc. Environmental Policy

NWRE, Inc. is committed to conducting our operations in a responsible manner that protects the environment and supports our environmental management system within the following key policy objectives:

- **Obey the Law** - comply with all local, regional, state and federal environmental laws & regulations.
- **Prevent Pollution** - protect our environment by emphasizing good stewardship, reuse & recycle.
- **Maintain** – continually maintain the environmental management system to enhance NWRE's environmental conformance.

Thomas Gile, General Manager

Brenda Gaither, Document Control, Assist. Treasurer (Corporate President)

Fred Schwab, Director of Sales & Marketing

Joe Lucas III, Plant Manager (Corporate Vice President)

Randy Robbins, Technical & Quality Director

Amy Harris, Controller & Admin. Manager (Corporate Treasurer & Secretary)

5.3 Roles, Responsibilities and Authorities

All employees are expected to act as good stewards of the environment by understanding and taking responsibility for: resource conservation, appropriate disposition of waste materials, meeting environmental compliance and management requirements. All employees must comply with the intent of this policy and the environmental laws and regulations relevant to their respective jobs.

Top management has assigned the responsibility and authority for ensuring that the EMS conforms to ISO14001 and reporting on the effectiveness of the EMS to the Technical & Quality Director.

Top management has assigned the responsibility and authority for ensuring that environmental compliance obligations are met to the Environmental Compliance Coordinator.

6.0 Planning

6.1.1 NWRE, Inc. has planned, established, implemented and actively maintains the processes needed to meet the external and internal issues that are relevant to our purpose and that affect our ability to achieve the intended outcomes of our EMS. Our EMS takes into consideration the scope of our organization as well as the relevant needs and expectations of interested parties.

We have determined the risks and opportunities, related to NWRE's environmental aspects, compliance obligations as well as other issues and requirements that need to be addressed to:

- Give assurance that the EMS can achieve its intended outcomes.
- Prevent or reduce undesired effects, including the potential for external environmental conditions to affect the organization.
- Ensure that the EMS is effectively maintained.

Within the defined scope of our EMS, NWRE has determined potential emergency situations, including those that can have an environmental impact. NWRE maintains documented information of our:

- Risks and opportunities that need to be addressed.
- Processes needed in 6.1.1 to 6.1.4, to the extent necessary to have confidence they are carried out as planned.

6.1.2 For environmental aspects within the defined scope of the EMS, our organization has determined the environmental aspects of its activities, products and services that it can control and those that it can influence, and their associated environmental impacts while considering these from a life cycle perspective. When determining environmental aspects, NWRE takes into account:

- Changes, including planned or new developments, and new or modified activities, products and services

- Abnormal conditions and reasonably foreseeable emergency situations.

NWRE determined the environmental aspects and their impacts and has identified those that are significant based on NWRE's aspects / impacts rating criteria. The significant environmental aspects are communicated to various levels and functions of the organization, as appropriate.

NWRE maintains documented information of the environmental aspects and associated environmental impacts, the criteria used to determine its significant environmental aspects and listing of significant environmental aspects.

6.1.3 For compliance obligations NWRE has developed a method to determine and have access to the compliance obligations related to its environmental aspects, determine how these compliance obligations apply to the organization and take these compliance obligations into account when establishing, implementing, maintaining and continually improving its EMS. NWRE maintains documented information related to its compliance obligations.

6.1.4 For planning action NWRE's EMS requires planning to take actions to address our significant environmental aspects, compliance obligations, risks and opportunities identified in 6.1.1 and how to integrate and implement the actions into the EMS processes or other business processes and then evaluate the effectiveness of these actions.

REFERENCE DOCUMENTS:
NWRE's Contingency Plans
NWRE's EMS Aspects / Impacts Matrix

6.2 Environmental objectives and planning to achieve them

6.2.1 For environmental objectives, NWRE has taken actions to establish environmental objectives at relevant functions and levels, taking into account the significant environmental aspects and associated compliance obligations, and considering its risks and opportunities.

The environmental objectives will be consistent with the environmental policy, measurable (if practicable), monitored, communicated and updated as appropriate.

6.2.2 For planning actions to achieve environmental objectives and when planning how to achieve our environmental objectives the NWRE Management Team will determine what will be done, what resources will be required, who will be responsible, when the action will be completed and how the results will be evaluated, including indicators for monitoring progress toward achieving the measurable environmental objectives. These actions will be considered to determine how the actions to achieve environmental objectives can be integrated into business processes.

7 SUPPORT

7.1 Resources

The NWRE Management Team determines and provides for the resources needed for the establishment, implementation and maintaining the effectiveness of the EMS. The EMS is monitored by the NWRE Management Team to ensure its suitability, adequacy and effectiveness.

7.2 Competence

NWRE quality procedure **QP10050 Training** defines the methods used to determine the necessary competence for personnel and provide and evaluate training and on-the-job training to ensure that training activities are effective. The procedure also identifies the method used to maintain records of education, training, skills and experience. This method is in place to ensure that all persons under the control of the organization are competent or receive the appropriate level of training based on their job assignment and to meet NWRE's environmental objectives. As an organization we determine the necessary competence of person(s) doing work under our control that affects our environmental performance and our ability to fulfil our compliance obligations. We ensure that these persons are competent on the basis of appropriate education, training or experience and determine training needs associated with any environmental aspects and the EMS. Where and when applicable, we take actions to acquire the necessary competence and evaluate the effectiveness of the actions taken. NWRE retains appropriate documented information as evidence of competence per the above listed quality procedure.

7.3 Awareness

Persons doing work under NWRE's control are made aware of NWRE's environmental policy, the significant environmental aspects and related actual or potential environmental impacts associated with their work, their contribution to the effectiveness of the EMS, including the benefits of enhanced environmental performance and the implications of not conforming to the EMS requirements and not fulfilling the organization's compliance obligations.

7.4 Communication

NWRE has established, implemented and maintains the processes needed for internal and external communications relevant to the EMS including what it will communicate, when to communicate, with whom to communicate how to communicate.

When establishing NWRE's communication processes NWRE will take into account compliance obligations and ensure that environmental information communicated is consistent with information generated within the EMS and that it is reliable. NWRE will respond to relevant communications regarding the EMS and will retain documented information as evidence of these communications as appropriate.

7.4.2 For internal communication NWRE, Inc. will communicate information relevant to the EMS throughout the various levels and functions of the organization, including any changes to the EMS, as appropriate. NWRE will ensure that its communication processes also enable the people doing work under NWRE's control to contribute feedback on the EMS effectiveness and opportunities for improvement.

This communication begins at the management level where the effectiveness of the EMS is discussed and analyzed. The communication is flowed throughout the organization by management to supervisors and other employees. A controlled copy of the EMS policy is made available to all employees. The EMS policy statement is posted in break rooms and conference rooms. Periodic training is conducted to provide EMS awareness. Bulletin boards are used to display company objectives, performance, customer feedback and continuous improvement activities as applicable. Staff and department meetings are held as needed to communicate company performance, safety issues and report on the state of the company.

7.4.3 For external communication NWRE, Inc. will communicate information relevant to the EMS to external parties through established communication processes and as required by our compliance obligations.

NWRE's EMS policy is made available for review by external parties on the company's website. Communication regarding EMS compliance is provided upon request to regulatory agencies and / or communicated as required by the regulatory agencies.

7.5 Documented Information

NWRE's EMS includes documented information that is required by ISO14001 and the documented information determined by the organization as being necessary for the effectiveness of the EMS.

The General Manager and the Technical & Quality Director approve all releases of the Environmental Management System Policy Manual. Controlled copies are identified and provided with revision and up-date service. Uncontrolled copies are so marked. The Technical & Quality Director is responsible for issuing controlled copies and maintaining a distribution list.

7.5.2 Document & Data Control

NWRE maintains a controlled procedure for documents, of either internal or external original, that have been determined by NWRE to be necessary for the planning and operation of the EMS per Quality Procedure QP10020. These EMS related documents are released and controlled by content, revision, and issue date. This policy applies to all of NWRE's EMS documents. Documents and data can be in the form of any media such as hard copy or electronic media and may be of internal or external origin.

NWRE's policy requires that documents are identified, controlled, reviewed, and approved prior to issue. Pertinent issues of the appropriate documents are available at all locations requiring such documents (point of use). Documents of the latest revisions supersede previous issues and are distributed in a timely manner. Obsolete documents are removed from use and discarded or marked obsolete to prevent unintended use. (Note: timely review should be as soon as possible and generally should not exceed ten business days.)

The documents are to be legible, dated and include the revision level or revision date. The documents will be maintained in an orderly and accessible manner.

Changes to documents are implemented in a controlled manner with traceability. NWRE will evaluate the impact of documentation changes, as necessary, prior to release. NWRE will maintain a record of change affectivity that may affect the customer and if affected by the change, shall coordinate implementation with the customer. NWRE personnel are notified of changes to documents that affect them and / or are applicable to their job function.

8 OPERATIONS

8.1 Operational Planning and Control

NWRE has established, implemented, controls and maintains the processes needed to meet EMS requirements, and to implement the actions identified in 6.1 and 6.2, by establishing operating criteria for the processes and implementing control of the processes, in accordance with the operating criteria. NWRE has a process to control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects as necessary. NWRE will ensure that outsourced processes are controlled or influenced as appropriate. The type and extent of control or influence to be applied to the processes will be defined within the EMS.

Consistent with a life cycle perspective, NWRE has establish controls, as appropriate, to ensure that its environmental requirements are addressed in the development process for the product, considering each life cycle stage and determining the environmental requirement(s) for the purchase of products and services, as appropriate. NWRE will communicate any relevant environmental requirement(s) to external providers, including contractors and consider the need to provide information about potential significant environmental impacts that may be associated with the transportation, delivery, use, end-of-life treatment and final disposal of products.
NWRE will maintain documented information to the extent necessary to have confidence that the processes have been carried out as planned.

8.2 Emergency preparedness and response

NWRE has established, implemented and maintains contingency plans to prepare for and respond to potential emergency situations identified by NWRE. The contingency plans in place require the following actions:

- Prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations.
- Respond to actual emergency situations and take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact.
- Periodically test the planned response actions, where practicable.
- Periodically review and revise the processes and planned response actions, in particular after the occurrence of emergency situations or tests.
- Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control.
- Maintain documented information to the extent necessary to have confidence that processes are being carried out as planned.

9 PERFORMANCE EVALUATION

9.1.1 NWRE will monitor, analyze and evaluate environmental effectiveness to determine if and when changes or modifications are needed. Generally, this is in relation to EMS compliance obligations.

The Environmental Compliance Coordinator will periodically report compliance activities and obligations to the General Manager and Technical & Quality Director as necessary. The Technical & Quality Director will report relevant environmental performance and the effectiveness of the EMS internally to the NWRE Management Team and externally, as required by compliance and interested party obligations. Appropriate documented information will be retained as evidence.

9.1.2 For evaluation of compliance NWRE has established, implemented and maintains the processes needed to evaluate fulfillment of its compliance obligations and retains documentation information as evidence of the compliance evaluation results and actions taken to resolve any noncompliance. The process will determine the frequency that compliance will be evaluated, evaluate compliance and take action if needed and maintain knowledge and understanding of NWRE's compliance status. This information will be documented as evidence of the compliance evaluation results.

9.2 **Internal Audit** (When seeking or maintaining ISO14001 certification)

9.2.1 Internal audits of the EMS will be conducted at planned intervals to provide information on whether the EMS conforms to NWRE's own requirements, the requirements of ISO14001 and to determine if it is effectively implemented and maintained.

9.2.2 NWRE's internal audit program for the EMS is outlined in Quality Procedure QP10170. The program will be implement and actively maintained to include the frequency, methods, responsibilities, planning requirements and reporting of its EMS internal audits.

When establishing the internal audit program, NWRE takes into consideration the environmental importance of the processes concerned, changes affecting the organization and the results of previous audits. The audit program will define the audit criteria and scope for each audit, select auditors and conduct audits to ensure objectivity and the impartiality of the audit process and ensure that the results of the audits are reported to NWRE's top management. The audit program and audit results information will be documented and retained as evidence of the effective implementation.

9.3 **Management Review** (When seeking or maintaining ISO14001 certification)

NWRE Management Team reviews the EMS annually to ensure its continuing suitability, adequacy and effectiveness. Management review inputs will include the following for consideration:

- The status of actions from previous management reviews of the EMS.
- Changes in the external and internal issues that are relevant to the EMS and the needs and expectations of interested parties, including compliance obligations.
- NWRE's significant environmental aspects, risks and opportunities and the extent to which environmental objectives have been achieved.
- Information on the organization's environmental performance, including trends in nonconformities, corrective actions, monitoring and measurement results, fulfilment of its compliance obligations, audit results, adequacy of resource, relevant communication(s) from interested parties, including complaints and opportunities for continual improvement.

The outputs of the management review of the EMS will include the following as applicable:

- Conclusions on the continuing suitability, adequacy and effectiveness of the EMS.
- Decisions related to continual improvement opportunities and decisions related to any need for changes to the EMS, including resources.
- Actions, if needed, when environmental objectives have not been achieved.
- Opportunities to improve integration of the EMS with other business processes, if needed, and any implications for the strategic direction of the organization.

This information will be documented and retained as evidence of the results of management review.

10 Improvement (When seeking or maintaining ISO14001 certification)

10.1 Based on the input and output information gathered about the EMS from section 9.0 above, NWRE will determining if there are any opportunities for improvement and for implementing the necessary actions to achieve the intended outcomes of the EMS.

10.2 When an EMS related nonconformity occurs it will be processed according to NWRE's quality procedures QP10210 Control of Nonconforming Product and QP10220 Corrective and Preventative Action. This is to ensure that NWRE reacts to the nonconformity and, as applicable, takes action to control and correct it, deal with the consequences, including mitigating adverse environmental impact(s) and evaluate the need for action to eliminate the causes of the nonconformity and ensure that it does not recur or occur elsewhere. This includes reviewing the nonconformity, determining the causes of the nonconformity, determining if similar nonconformities exist, or could potentially occur, and implement any action needed. NWRE will review the effectiveness of any corrective action taken and make changes to the EMS, if necessary.

10.3 By adhering to this EMS policy and the associated procedures and processes NWRE will continually improve the suitability, adequacy and effectiveness of our environmental performance.