

PURPOSE

The purpose of this Corporate Policy is to describe how Rightway Fasteners, Inc. determines external and internal elements that are relevant to its purpose and that affect the company's ability to achieve intended outcomes of our environmental management system.

4.1 UNDERSTANDING THE ORGANIZATION AND ITS CONTEXT

Rightway Fasteners, Inc. (RFI) will determine both internal and external issues that are relevant to the organization and that have both a direct influence on the effectiveness of the environmental management system and an impact on global environmental and sustainability issues. Top management, together with heads of departments will determine issues relevant to the EMS, including the following:

- Air quality including both local and global impacts,
- Water quality and preventing contamination of controlled waters,
- Land use including waste management,
- Use of natural resources and their depletion,
- Protection and enhancement of both local ecology and biodiversity and that of the wider community, and
- Legal and regulatory obligations and guidance.

In addition to these core values Rightway Fasteners, Inc. should also consider the implications and risks to our business in respect to:

- Cultural and social responsibility, and
- Use of best available technologies where financially feasible and practical.

In applying the above criteria and techniques Rightway Fasteners, Inc. will actively manage and implement programs, procedures, and its business plans to mitigate risk of pollution and/or harm to the environment and global climate change. These aspects will form the core strategy of Rightway Fasteners, Inc. when managing both its risks and opportunities for enhancing the local and global environment. These key strategies and management programs will form the core values of Rightway Fasteners, Inc. when implementing and managing its environmental management system. The context of the organization will be reviewed during management review meetings at the facility.

4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

Rightway Fasteners, Inc. Environmental Managers/Representatives (EMRs) will carry out regular reviews with regards to all interested parties whether internal or external. In doing so, Rightway Fasteners, Inc. EMRs will consider the needs and expectations of interested parties in terms of its overarching environmental strategy and performance. The RFI manufacturing facility will develop an Environmental Site Profile (ENV.522) to describe property boundaries, processes, equipment, chemical and waste storage capacities, and recycling activities as per procedure EMP1. These profiles will consider and document interested parties requirements relevant to a sites environmental management system, such as;

- Federal, state and local regulatory agencies operation and reporting requirements,
- Customer reporting requirements,
- Internal reporting requirements,
- Employees,
- Contractors,
- Suppliers, and
- Local communities.

The Environmental Site Profiles are to be registered in the Rightway Fasteners, Inc. internal network and reviewed on an annual basis. The RFI EMS Managers/Representatives will document regulatory reporting requirements, customer reporting requirements, internal performance reporting, employee meetings, supplier reviews, contractor training and meetings with local community representatives on Environmental Calendar section of the EMS Performance Report each year (ENV.519). The Environmental Calendar, in conjunction with the Environmental Site Profile is the basis for the RFI facility's compliance obligations. The EMS Performance Report requirements are detailed in the EMP1 procedure.

4.3 DETERMINING THE SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

Rightway Fasteners, Inc. has considered the external and internal issues referred to in 4.1 above and elements of 4.2 related to compliance obligations in determining the scope of the corporate environmental management system. The scope for Rightway Fasteners, Inc. EMS is in Clause 1 of this EMS manual.

4.4 ENVIRONMENTAL MANAGEMENT SYSTEM

Rightway Fasteners, Inc. has established an environmental management system in accordance with the requirements detailed in ISO 14001:2015. Refer to Clause 2, Rightway Fasteners, Inc.'s Introduction to the Corporate EMS.

GENERAL RULES

Controlled documents are available on the Rightway Fasteners, Inc. internal plant network. All other printed documents are considered not controlled.

RELATED DOCUMENTS

ENV522 - Environmental Profile Form
EMP1 - EMS Performance Reporting
ENV517 - Heat Treat Aspect Determination Form

CHANGE HISTORY

00 - Initial Release 8/25/23