Approvals:

PJ Thompson
President

Vice President Global Operations

Definitions

Environmental Core Team (or sometimes referred to as the Sustainability Core Team)
For Holland Production Center: A council consisting of the Vice President of Global Operations, the Vice President of Manufacturing and Engineering, the EHS Manager, the Director of Engineering, and the QS Facilitator, in addition to others as deemed appropriate by the team.
For Arizona Production Center: A council consisting of the Plant Manager, the Plant Quality Representative, and others as deemed appropriate by the Plant Manager.
Executive Team (ET) – Top Management at Trans-Matic, including the President and Vice Presidents, as well as others deemed appropriate by the President
Facilities Management at HPC: Consists of the EHS Manager and the Director of Engineering

4 Context of the Organization

4.1 Understanding the organization and its context
Trans-Matic has determined external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcomes of its Environmental Management System (EMS). These issues include the environmental conditions being affected by or capable of affecting the organization. Refer to ED-031 or APC-ED-031.

4.2 Understanding the needs and expectations of interested parties
Trans-Matic has determined its interested parties and their relevant needs and expectations. Included in this discussion were determining which needs/expectations become compliance obligations. Refer to ED-032 or APC-ED-032.

4.3 Determining the scope of the EMS
Trans-Matic has determined the boundaries and applicability of the EMS when establishing its scope. When determining this scope, Trans-Matic considered: a) external and internal issues referred to in 4.1; b) compliance obligations referred to in 4.2; c) organizational units, functions and physical boundaries; d) activities, products and services; and e) its authority and ability to exercise control and influence.

Top management at Trans-Matic (which is the Executive Team) has defined the scope of the EMS at each of its locations. The scope at each facility is the inclusion of all activities, products, and services that are performed at that location including the surrounding property owned by Trans-matic, as well as the consideration of a lifecycle perspective as defined in ED-001 (for HPC &HDC), and the consideration of a lifecycle perspective as defined in APC-ED-001 (for APC). See below for a list of locations, products and services.The scope is available to interested parties upon request.

Corporate Office and Holland Production Center- HPC
300 E. 48th St.
Holland, MI 49423
Deep Drawn Metal Stampings and Assemblies

Holland Distribution Center (Site Extension)- HDC
471 East 40th St.
Holland, MI 49423
Packaging, Storing, Sorting, and Low Volume Assemblies

Arizona Production Center- APC Satellite Plant
4250 E. Oasis St.
Mesa, AZ 85215
Deep Drawn Metal Stampings and Assemblies

4.4 Environmental Management System
Trans-Matic has established, implemented, and maintained the EMS, and continually improves upon the EMS, including the processes needed and their interactions, to achieve the intended outcomes and enhance its environmental performance. Knowledge gained in 4.1 and 4.2 was considered when establishing and maintaining the EMS.

5 Leadership

5.1 Leadership and commitment
Top management demonstrates leadership and commitment with respect to the EMS by taking accountability for the effectiveness of the EMS, ensuring that the environmental policy and objectives are established and are compatible with the strategic direction, ensuring the integration of the EMS into Trans-Matic's business processes, and ensuring that resources are available. Top Management also communicates the importance of an effective EMS that conforms to the requirements, ensures that the EMS achieves its intended outcomes, directs and supports persons to contribute and promote continual improvement, and supports other relevant management roles to demonstrate their leadership.

5.2 Environmental Policy

The environmental policy at Trans-Matic is the driving force behind the implementation and improvement of Trans-Matic's Environmental Management System.

The primary purpose of the EMS is to ensure the full implementation of the environmental policy. Trans-Matic is committed to achieving the goals of the environmental policy.

Top management at Trans-Matic has defined the organization's environmental policy within the defined scope of the EMS as follows: *"We are committed to protecting the environment by striving to continually improve our processes to minimize waste and pollution, while striving to comply with all relevant environmental regulations and other requirements."*

In developing the environmental policy, Trans-Matic ensures that the policy:
a. is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services;
b. provides the framework for setting environmental objectives;
c. includes a commitment to the protection of the environment, including prevention of pollution and other specific commitments relevant to the context of the organization;
d. includes a commitment to fulfill its compliance obligations;
e. includes a commitment to continual improvement of the EMS to enhance environmental performance;
f. is documented;
g. is communicated within the organization, and;
h. is available to interested parties.

Top management demonstrates its commitment to the environmental policy by leading by example, shown through training, support, and providing the necessary resources.

5.3 Organizational roles, responsibilities and authorities

Trans-Matic is dedicated to the preservation of the environment and to the safety and health of all employees and customers. To ensure that environmental programs are fully implemented, the environmental policy holds Trans-Matic's Top Management responsible for ensuring that this policy is implemented and that the responsibilities and authorities for relevant roles are assigned and communicated with the organization. Top Management has appointed the QS Facilitator as the Management Representative of Trans-Matic's EMS for HPC, to report on the performance of the system to management for review, and to serve as the overall Corporate management representative for the EMS. At the satellite locations, the Plant Quality Representative would serve as the overall management representative for the EMS for that satellite. The satellite Plant Quality Representative is also responsible to report the performance of the system to corporate management, to be included in the annual Management Review.

The Director of Human Resources works with each Environmental Core Team to define the necessary roles and responsibilities to implement and maintain the EMS. These roles and responsibilities are documented through written work instructions, procedures, and Responsibility Matrix (ED-012 for HPC or APC-ED-012). Management will supply the necessary resources needed to complete the required tasks. Roles and responsibilities are communicated through a variety of standard communication programs, including performance meetings, environmental briefing programs during new employee orientation sessions, training, and Trans-Matic's open-door policy.

6 Planning

6.1 Actions to address risks and opportunities

6.1.1 General

Trans-Matic has established, implemented and maintained the processes needed to meet the requirements in 6.1.1 to 6.1.4. Trans-Matic has considered issues referred to in 4.1, requirements referred to in 4.2, and the scope of the EMS when planning for the EMS.
Trans-Matic has determined the risks and opportunities related to its environmental aspects 6.1.2, compliance obligations 6.1.3 and other issues and requirements defined in 4.1 and 4.2 that need to be addressed in order to give assurance that the EMS can achieve its intended outcomes, prevent or reduce undesired effects (including the potential for external environmental conditions that affect the organization), and to achieve continual improvement. Potential Emergency situations, including those that can have an environmental impact, are determined within the scope of the EMS. Risks and opportunities that need to be addressed are defined in ED-001 or APC-ED-001 and ED-033 or APC-ED-033. These risks and opportunities will be evaluated periodically by members of the Env. Core Team to ensure that information is current and that issues are identified and addressed in a timely manner.

6.1.2 Environmental Aspects

In an effort to understand the environmental impact of Trans-Matic's operations, the Environmental Core Team at each location has conducted an environmental aspects analysis to identify and evaluate activities, products, and services within the defined scope that it can control and those that it can influence, considering a life cycle perspective. The result of this evaluation was an inventory of environmental aspects and a corresponding list of environmental impacts. (Doc. # ED-001 for HPC or APC-ED-001) The Risks and Opportunities were defined for each aspect, and then rated to determine which aspects are significant. The significant environmental aspects are the focal point of setting objectives and procedures that will enable Trans-Matic to better manage and reduce its overall environmental impact. (Refer to EP-100 for HPC or APC-EP-100 for details.) Significant environmental aspects are taken into account when establishing, implementing, and maintaining the EMS. They are also communicated among various levels and functions of the organization, as appropriate.

As an ongoing element of the EMS, the Trans-Matic Environmental Core Team at each location is responsible for conducting reviews of environmental aspects and significant impacts applicable to Trans-Matic, following the procedure set forth mentioned above. As per the procedure, this review of environmental aspects and impacts is conducted on an annual basis, or more frequently, as warranted by physical or operational changes at Trans-Matic, including planned and new developments, and new or modified activities, products and services. Abnormal conditions and foreseeable emergency situations are also taken into account. Physical or operational changes that could affect our environmental aspects are addressed through the following channels:

1) ECRs – any coolant changes, material changes, chemical changes, or process changes are addressed through the ECR process.
2) MSDS – any new chemicals brought in to the plant are addressed through procedure QP-QA-801.
3) APQP Meetings – customer requirements are reviewed during this process, including any changes that would impact our environmental aspects.
4) New Equipment – any new capital equipment that is considered for purchase will be evaluated using the "Environmental Impact Checklist for Capital Equipment", Form #16209P, page 4. A line has also been added to the Capital Expenditure Request Guidelines, p. 3, to ensure that this form is reviewed before approval has been made.
5) Changing circumstances related to env. aspects are also addressed during Management Review.

6.1.3 Compliance Obligations

The Environmental Core Team at each location is responsible for conducting an analysis of compliance obligations that are applicable to Trans-Matic's operations, and determining how they apply to the environmental aspects. The Core team conducted such an analysis and has:

- Identified and listed applicable laws, regulations, and other requirements. Trans-Matic relies on a designated environmental consulting firm to alert us to the current requirements, where appropriate and necessary for compliance. Copies can also be obtained via the Internet.
- Any relevant customer requirements have also been considered
- Determined how these compliance obligations apply to the organization
- Taken these compliance obligations into account when establishing, implementing, maintaining and continually improving its environmental management system.

The Compliance Obligations list is kept up-to-date through a designated environmental consulting firm, who contacts Trans-Matic on any changes. The designated environmental consulting firm is thoroughly aware of the Compliance Obligations needed by Trans-Matic, and will notify Trans-Matic's Facilities Management or appropriate satellite plant Quality Representative of any changes or additions to all Compliance Obligations. Facilities Management or appropriate satellite plant Quality Representative will contact the designated environmental consulting firm if Trans-Matic wants to obtain a hard copy of the latest revision. Copies can also be obtained via the Internet. Document ED-002 for HPC or APC-ED-002 lists all Trans-Matic's relevant environmental Compliance Obligations. The Quality Facilitator or Plant Manager shall maintain any relevant "other" requirements, including customer requirements. Refer to ED-014 for HPC or APC-ED-014 for a complete list of customer and other requirements. Applicable Compliance Obligations are taken into account when establishing, implementing, and maintaining the EMS.

6.1.4 Planning Action

Trans-Matic has plans to take actions to address its significant environmental aspects, compliance obligations, and risks and opportunities identified in 6.1.1, as well as how to integrate and implement the actions into its EMS processes 6.2 and 9.1, or other business processes, and evaluate the effectiveness of these actions. Technological options and financial, operational and business requirements are also considered.

6.2 Environmental Objectives and planning to achieve them

6.2.1 Environmental objectives
Environmental objectives are set annually. Details are described in procedure EP-101 for HPC or APC-EP-101.

The Environmental Core Team at each location is responsible for establishing, implementing, and maintaining a set of comprehensive objectives to be proposed to Top Management on an annual basis. These objectives are developed based on the significant environmental aspects for Trans-Matic, its compliance obligations, and considering its risks and opportunities. They shall be: consistent with the environmental policy, measurable, monitored, communicated, and updated as appropriate. The Vice President of Global Operations is responsible for review and final approval of objectives for all locations, as part of the planning process, balancing both environmental and other management issues in the final approval process.

Financial, technological, operational, and business interests, as well as the views of other interested parties are considered when setting objectives.

The final set of approved objectives is documented, and copies of these documents are filed in the Quality Department.

6.2.2 Planning actions to achieve environmental objectives
When planning to achieve its environmental objectives, Trans-Matic shall determine what will be done, what resources are required, who will be responsible, and when it will be completed, as well as how the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental objectives. Also considered is how actions to achieve its environmental objectives can be integrated into other business processes. Refer to EP-101 or APC-EP-101.

7 Support

7.1 Resources

Trans-Matic has determined and provided resources needed for the establishment, implementation, maintenance and continual improvement of the EMS.

7.2 Competence

Trans-Matic determines the necessary competence of a person doing work under Trans-Matic's control that affects the environmental performance, and their ability to fulfill our compliance obligations. We ensure that these persons are competent on the basis of appropriate education, training, or experience. Training needs are determined associated with the environmental aspects and the EMS, and actions are taken to acquire the necessary competence where applicable. **Company-wide training including the use of online training surveys** can be utilized to achieve this.

The Director of Human Resources is responsible for defining and developing an effective training program. Environmental training is monitored through Trans-Matic's quality system procedures, as follows:

TS-SOP-113 Identify Training Needs for HPC and APC.
Job-specific training (Refer to Supervisor's Checklist – Form# 16022HR)
Internal Auditor Training (Refer to quality procedure QP-QA-806 for HPC and APC for details.)

7.3 Awareness

The QS Facilitator or appropriate Plant Quality Representative assists the Director of Human Resources and Safety Manager to ensure that awareness training is implemented across the organization. Training programs include the following:

- EMS awareness training (including initial training programs for new employees)
- Emergency Action Plan Training

Training records are filed in the Human Resources Department or at satellite locations. Training needs and responsibilities are reviewed through the Supervisor's Checklist. Team Leaders/Supervisors are alerted as to what significant aspects their team will be involved with and appropriate training will be conducted on the related work instructions. Training program documentation is updated as necessary.

Importance of conformance with the environmental policy and procedures and with the requirements of the EMS are stressed during training, including employees' contributions to the effectiveness of the EMS and the benefits of enhanced environmental performance, and implications of not conforming with the EMS requirements (including not fulfilling our compliance obligations.) Significant aspect training is described in EP-104 for HPC (or APC-EP-104).

7.4 Communication

7.4.1 General

The Safety Manager or appropriate Plant Quality Representative is responsible for ensuring the development and coordination of the internal and external communication programs. Included in the decisions are: what will be communicated, when to communicate, with whom to communicate, and how to communicate. Compliance obligations are taken into account when establishing a communication process. We must also ensure that environmental information communicated is consistent with other information within the EMS and that it is reliable. Relevant communications shall be responded to and recorded.

7.4.2 Internal Communication is an important part of any management system. Thus, Trans-Matic has developed several standard communication programs that are supplemented on an as-needed basis. These include:

- Performance meetings
- An environmental briefing program during new employee orientation sessions.
- Training
- **Online Training Surveys**
- Trans-Matic's Open-door Policy
- Internal Environmental Concern, outlined in EP-102 for HPC or APC-EP-102.

Information relevant to the EMS, including changes, are communicated through the various functions and levels. The communication ensures that people working under Trans-Matic's control contribute to continual improvement. The

Safety Manager or appropriate Plant Quality Representative is responsible for overseeing the implementation of these internal communication programs and ensuring their effectiveness.

7.4.3 External communications concerning environmental matters are all forwarded to the attention of the Safety Manager for HPC, or appropriate Plant Manager and/or Quality Representative for the satellites, following the procedure outlined in appropriate EP-102 procedure mentioned above. Relevant information to the EMS is communicated externally as established by the communication process and as required by compliance obligations. Records of external communications are filed in the Quality Department/Group.

7.5 Documented Information

7.5.1 General
Trans-Matic has established and maintained documented information required by the ISO14001 standard and determined by Trans-Matic as being necessary for the effectiveness of the EMS.

7.5.2 Creating and Updating
Documents are identified and described with title and document number and are reviewed and approved by responsible management.
7.5.3 Control of Documented Information
The QS Facilitator or appropriate Plant Quality Representative at the satellites is responsible for overseeing the defining and implementing of an effective document control system. Environmental document control is maintained in accordance with Trans-Matic's quality system procedures and work instructions as listed below.
For HPC & APC:
QP-QA-801 Corporate Document Control
WI-QA-802 Initiating a Policy, Procedure or WI
WI-QA-805 Accessing WI, Procedures and Forms

The QS Facilitator or appropriate Plant Quality Representative is responsible for overseeing the defining and implementing of an effective records management system, including identification of EMS records, record retention times, record storage location, record management responsibility, and implementation of record retention procedures. Environmental records will be kept in accordance with Trans-Matic's quality system policy for Control of Quality and Environmental Records, QP-QA-823. Any Compliance Obligations' retention times are specified on ED-002 for HPC or APC-ED-002.

Documented information of external original deemed necessary for the planning and operation of the EMS is identified in ED-014 (or APC-ED-014.)

8 Operation

8.1 Operational Planning and Control
The QS Facilitator or appropriate Plant Manager at the satellites is responsible for overseeing the establishing, implementing, controlling and maintaining of appropriate documented operational procedures. Through a review and evaluation of the operating criteria process, a general procedure has been developed and implemented, EP-104 for HPC or APC-EP-104. Planned changes are controlled and the consequences of unintended changes are reviewed, taking action to mitigate any adverse effects, as necessary. Outsourced processes are also controlled or influenced by this procedure, consistent with a life cycle perspective. Also included in the life cycle perspective are the establishment of controls to ensure that environmental requirements are addressed as appropriate in the design and development process of the product or service; determining the environmental requirements for the procurement of products and services as appropriate; communicating the relevant environmental requirements to external providers, including contractors; and considering the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services. EP-104 or APC-EP-104, item 4.0, includes further information on outsourced process controls.
Revisions and additions to the operational procedures are made according to the needs of the EMS, the results of monitoring and measurement programs and EMS audits, the corrective action programs, and the management review program. The QS Facilitator or appropriate Plant Quality Representative coordinates these revisions.

8.2 Emergency Preparedness and Response
The Director of Human Resources and/or Safety Manager and appropriate Plant Managers are responsible for establishing, implementing and maintaining an emergency prevention, mitigation, and response program. The Director of Human Resources and/or Safety Manager, along with each Core Team, has conducted a review of operations to identify potential emergency situations and has created procedures to handle them.

The emergency planning process will be updated by a review and critique of any environmental incident and the response that occurs. Documentation will be maintained by the Human Resources Department for HPC, or in the satellite plants.

A procedure for detecting, reporting, and handling emergency situations is contained in the EMS documentation, EP-110 for HPC or APC-EP-110. Specific procedures for incidents involving hazardous materials are included in the Environmental Work Instructions, EWI-series for HPC or APC-EWI-series, and key individuals who would be directly involved in responding to such incidents are trained on the procedures, and have access to them. Trans-Matic maintains an Emergency Contact Sheet, (ED-018 for HPC or APC-ED-018) for easy access to critical emergency response information.
Included in the review of emergency situations includes:

1) Preparing to respond by planning actions to prevent or mitigate adverse environmental impacts
2) Responding to actual emergencies
3) Taking action to prevent or mitigate the consequences of emergency situations
4) Periodically testing the planned response actions, where practicable
5) Periodically reviewing and revising the processes and planned response actions, especially after the occurrence of emergency situations or tests
6) Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties
7) Maintain documented information to have confidence the processes are carried out as planned.

The Human Resources Department or appropriate Plant Manager will conduct testing of the emergency response procedures. Records of the testing process are maintained by the Human Resources Department and filed in the HR and Quality office or in the appropriate satellite plant.

9 Performance Evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General
The operational controls and implementation programs must be monitored, measured, analyzed, and evaluated for effectiveness. We needed to determine what needs to be monitored and measured; the methods for monitoring, measuring, analysis and evaluation to ensure valid results, as applicable; the criteria against which the organization will evaluate its environmental performance, and appropriate indicators; when the monitoring and measuring will be performed; when the results shall be analyzed and evaluated.

Trans-Matic has implemented a variety of environmental monitoring and measurement programs designed to satisfy various federal, state, and local regulations and requirements, as well as meet the organization's environmental policy and goals and implement the EMS.

Review of the progress towards meeting the organization's established objectives is conducted at a minimum of twice per year by the Core Team at each facility. Results of these reviews are reported to management. These reviews are carried out in accordance with procedure number EP-101 for HPC or APC-EP-101. Specific data is recorded and tracked on the EMP Report, Form# 16704ENV. Specifics on monitoring and measuring objectives are also

documented in EP-101 for HPC or APC-EP-112 and 113 for APC. Trans-Matic's only key characteristics are associated with its objectives and targets.

The equipment that requires calibration includes: 1) a set of refractometers, which are part of the calibration system, and electronic records are retained; and 2) confined space gas detection, which is calibrated by the Safety and Training Manager, who maintains records.

We evaluated the environmental performance information and the effectiveness of the EMS through Core Team Meetings and Management Review. Relevant environmental performance information, both internally and externally, is communicated, as identified in the communication process and as required by compliance obligations.

Documented evidence is maintained.

9.1.2 Evaluation of Compliance

A process has been established, implemented, and maintained to evaluate the fulfillment of our compliance obligations. Frequency is determined and action is taken if needed when evaluating compliance. Information is documented.

Compliance Obligations – MDEQ and EPA

The Facilities Management at HPC or appropriate Plant Manager is responsible for maintaining environmental compliance at Trans-Matic. He/she maintains a table of regulatory compliance requirements that apply to the organization. (Document #ED-002 for HPC or APC-ED-002.)

The Facilities Management at HPC or appropriate Plant Manager is responsible for maintaining a periodic evaluation of compliance with relevant environmental legislation and regulations, per procedure EP-111 for HPC or APC-EP-111.

Other Requirements Compliance

The QS Facilitator, along with the help of other ISO14001 Internal Auditors, will annually evaluate compliance with other requirements to which Trans-Matic subscribes at HPC. At the satellites, the Environmental Management Representative, along with help of other ISO14001 Internal Auditors, will annually evaluate compliance with other requirements to which Trans-Matic subscribes at that satellite facility. Refer to ED-014 for HPC or APC-ED-014 for a list of Customer and Other Requirements.

9.2 Internal Audit

9.2.1 General

Internal audits are conducted at planned intervals to ensure that the EMS conforms to the requirements of the ISO14001:2015 standard and Trans-Matic's own requirements.

9.2.2 Internal Audit Program

The QS Facilitator or appropriate Plant Quality Representative is responsible for developing and implementing an EMS audit program. The EMS audits are conducted in accordance with Trans-Matic's quality system procedures, Internal Audit Schedule, QP-QA-805, Internal Auditor Training, QP-QA-806, and Internal Audit Records, WI-QA-801 for HPC and APC. The audit schedule is subject to revision based on audit results and perceived audit priorities.

At the completion of the audit, the Quality Systems Facilitator or appropriate Plant Quality Representative forwards a copy of the findings to the Executive Team for use in the formal management review process.

9.3 Management Review

The overall EMS must be periodically reviewed by Top Management for effectiveness, suitability, and adequacy. The corporate Quality Systems Facilitator formally leads a management review meeting with the Executive Team to evaluate the effectiveness of the EMS on an annual basis, following the process outlined in TS-MOP-119 which includes inputs and outputs to the review. The review focuses on the overall effectiveness of the EMS to support all commitments in the policy and to achieve the objectives, and the company's efforts to remain in complete compliance with appropriate environmental laws and regulations. The review process identifies necessary resources and funding required for the next year.

Records of the management review meetings are filed in the Quality Department.

10 Improvement

10.1 General

Trans-Matic determines the opportunities for improvement and implements the necessary actions to achieve the intended outcomes of the EMS, as described in 10.3 below.

10.2 Nonconformity and Corrective Action

The QS Facilitator or appropriate Plant Quality Representative is responsible for development and implementation of the corrective action programs, with the overall intent of lessening the impact caused and to prevent occurrence.

When a non-conformity occurs, action is taken to control and correct it and to deal with the consequences, including mitigating adverse environmental impacts. We also evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere by reviewing the nonconformity, determining the causes, and determining if similar nonconformities exist or could potentially occur. Any action needed is implemented.

All non-conformances identified within the EMS will be addressed through Trans-Matic's quality system procedure for Corrective Action, QP-QA-200 for HPC and APC. Corrective Actions may be required to address issues raised by the EMS audits, any monitoring and measurement program, the management reviews, compliance audits, and any other program that indicates that the EMS program is not functioning properly or effectively. Corrective actions are appropriate to the significance of the effects of the nonconformities encountered. Effectiveness of corrective actions are reviewed at Internal Audits. Any changes to documented procedures resulting from corrective actions or preventive actions will be implemented and recorded.

10.3 Continual Improvement

Trans-Matic continually improves the suitability, adequacy, and effectiveness of the EMS to enhance environmental performance. Refer to EP-116 and TS-MOP-121 for more information on the Continual Improvement process.