

**Company Name** : Moses Lake Industries, Inc.  
**Facility English Name** : Moses Lake Industries, Inc. (Moses Lake Facility) 100%  
**Facility Local Name** : Moses Lake Industries, Inc.  
**Reporting Period** : 2015

[-] Facility-Level Social and Environmental Responsibility

[-] F1 - Facility Information & Contact

F1.1 - Company Name:

Moses Lake Industries, Inc.

F1.2 - Facility Name (Business License Name):

Moses Lake Industries, Inc.

F1.3 - Facility Address:

8248 Randolph Rd NE

F1.4 - Facility City:

Moses Lake

F1.5 - Facility State or Province:

WA

F1.6 - Facility Country:

United States

F1.7 - Facility Postal Code:

98837

F1.8 - Please choose your PRIMARY Deliverables:

Products

F1.9 - Main Contact name for EICC audit:

Nicole McEachran

F1.10 - Contact Telephone Number:

509-762-5336 ext 277

F1.11 - Contact Email:

qualityassurance@mlindustries.com

F1.12 - Social and Environmental Responsibility Contact Name:

Liana Cockrum

F11.13 - Contact Position or Title:

Director of Human Resources

F11.14 - Contact Telephone Number:

509-762-5336 ext 204

F11.15 - Contact Email:

lcockrum@mlindustries.com

F11.16 - Company Headquarters Address (if different from above)(Enter N/A if not applicable):

n/a

F11.17 - Notes and Comments on any question in this section: (answer required, If none enter N/A)

n/a

## FC-Facility Characteristics

FC1.1 - What are the principal Product based activities performed at your facility? (To select multiple rows hold down the Ctrl key and click additional choices):

Chemical/Gas Production

FC1.27 - How many people are employed onsite at your facility (under the business license, NOT limited to one customer)?

267

FC1.5 - How many males are employed at your facility?

215

FC1.6 - How many of these are male office staff or management?

49

FC1.7 - How many females are employed at your facility?

52

FC1.8 - How many of these are female office staff or management?

36

FC1.9 - How many male workers employed at your facility are under the age of 18?

0

FC1.10 - How many female workers employed at your facility are under the age of 18?

0

FC1.11 - How many male indirect, contract or dispatch workers are employed at your facility?

3

FC1.12 - How many female indirect, contract or dispatch workers are employed at your facility?

2

FC1.13 - How many male migrant or foreign employees are employed at your facility?

5

FC1.14 - How many female migrant or foreign employees are employed at your facility?

0

FC1.28 - Describe the number of migrant workers by nationality: (e.g. 45 country 1, 60 country 2,...)

5 Japan

FC1.29 - Main languages spoken by workers: (including migrant workers)

English and Japanese

FC1.15 - How many student workers are employed at your facility? (refer to guidance text for the full definition)

0

FC1.16 - How many interns are employed at your facility? (refer to guidance text for the full definition)

0

FC1.17 - How many apprentices are employed at your facility? (refer to guidance text for the full definition)

0

FC1.18 - Is your facility site owned or leased?

Owned

FC1.19 - Please include the year your company began operations at this location.

1/1/1984 0:0:0

FC1.20 - During the last 12 months, were there any public demonstrations, protests, or adverse media reports involving your facility's operations or business conduct?

No

FC1.22 - How many buildings do you have at this facility?

11

FC1.23 - What is the total property size in square meters (SQM)?

323749

FC1.24 - What is the total floor space (under roof, including all floors) in square meters (SQM)?

13320

FC1.26 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

#### FOS - Onsite-Location Services

FOS1.1 - Do any of your processes include the use or storage of polychlorinated biphenyls (PCB)?

No

FOS1.2 - Do your onsite-location services include a Clean Room?

Yes

FOS1.3 - Please describe:

Clean rooms and booths meet and follow the ISO 14644-1 standard.

FOS1.4 - Do your onsite-location services include Waste Water or Solid Waste Treatment or Processing?

Yes

FOS1.5 - Please describe:

Our processing is done by neutralization.

FOS1.6 - Do you have an onsite Emergency Response team?

Yes

FOS1.7 - Please describe:

MLI Emergency Response Team Contact Information Incident Command Team Member Home Phone Mobile Phone Co-Incident Commander: Brent Hansen N/A (509) 989-4777 Co-Incident Commander: Manny Vela N/A (509) 760-6411 Operations Chief: Ken Tucker N/A (509) 989-2704 Safety Coordinator: Garrett Watkins (509) 760-4182 (509) 760-8228 Regulatory Liaison(s): Jon Erlenmeyer N/A (509) 855-6343 ERT Coordinator: Dave Rowland N/A (509) 989-0742 Note: All ERT Responders Names and Phone numbers are available on the ERT SharePoint page <http://mlisharepoint/ERT/Lists/ERT%20Members/Members.aspx> MLI Emergency Response Internal Notification and Advice Expert Contact Information Advice Expert Home Phone Mobile Phone Hiro Era (President) (509) 764-8419 (509) 760-8224 Mike Tiffany (Vice President of Operations) N/A (509) 750-8587 Darren Stensland (Process Engineer) N/A (509) 771-0755 Laura Sofield (Additive Synthesis) N/A (509) 760-3463 Jim Blanchard (R&D) (509) 246-0681 (509) 431-1187 Randy Lutz (Electrical Dept. Manager) (509) 754-3940 (509) 989-0601

FOS1.8 - Does your facility provide housing for its workers (dormitory or worker housing, hostels, apartments or any other form of living quarters)?

No

FOS1.10 - Do your onsite-location services include a fire brigade?

No

FOS1.12 - Do your onsite-location services include power generation?

No

FOS1.14 - Do your onsite-location services include a hospital/infirmary?

No

FOS1.22 - Do you have any on-site combustion? (gas or coal-fired boilers, on-site electricity or steam generation, gas or coal-fired incinerators, etc.)

Yes

FOS1.23 - Please describe:

Steam generation is on site.

FOS1.24 - Do you use diesel fuel, gasoline, or propane in a vehicle fleet you own?

Yes

FOS1.25 - Please describe

Yes, our forklifts use propane and company vehicles use gasoline.

FOS1.16 - Do your onsite-location services include a Crèche/Nursery?

No

FOS1.18 - Are there any other onsite-location services?

No

FOS1.20 - How many canteen/catering personnel does your facility have?

0

FOS1.26 - Does your facility have on-site service providers?

No

FOS1.28 - Does your facility use private recruitment or employment agencies?

No

FOS1.21 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

#### FLBR - Labor Risk Elements

FLBR1.1 - What percentage of the workers employed at your facility have a written and signed employment agreement or contract in their own language?

100%

FLBR1.2 - What percentage of the workers employed at your facility are contract or dispatch workers?

Less than 25%

FLBR1.3 - Does your facility use third-party workforce recruiters or labor agents in any way to provide foreign or migrant workers?

No

FLBR1.6 - Are any new workers required to deposit money or to turn over / hand in their personal identity documents for the company to store?

No

FLBR1.7 - How are your employees paid?

Money paid directly to the employees

FLBR1.8 - During the last 12 months, has your facility hired or utilized any persons under an apprenticeship, internship, or as a student worker?

Yes

FLBR1.9 - If you use apprentices, interns, or student workers, does your facility have comprehensive employment policies in place for these types of workers in accordance with local law?

Yes

FLBR1.10 - Does your facility employ young workers (over the local legal minimum age but under 18)?

Yes

FLBR1.11 - What percentage of your total workforce is under 18?

Less than 10%

FLBR1.12 - Does your facility ensure that workers under 18, even if over the legal minimum age, do not perform night work or hazardous work?

Yes

FLBR1.13 - What are the average weekly work hours of the busiest workers in your facility?

48-60 hours

FLBR1.14 - Do all your workers have regular rest days (at least one day off during every seven-day week)?

Yes, as required by our policy

FLBR1.15 - Do all of your workers have regular breaks or are they allowed to rest when they choose during their working hours?

Yes, as required by our policy

FLBR1.16 - On what basis do workers accept overtime work?

Mostly voluntary but sometimes mandatory

FLBR1.17 - Are the wages and benefits for ANY worker at your facility less than the minimum legal wage and benefits OR if there is no legal minimum is it less than industry standard?

No

FLBR1.18 - Are any of your workers paid according to a piece rate?

No

FLBR1.19 - Do you pay workers for overtime hours above the base wage rate?

Yes

FLBR1.20 - Do you have procedures to ensure that base wage, overtime, and other wages are calculated correctly, AND only lawful deductions are made?

Yes

FLBR1.21 - Are wage calculations clearly communicated to workers using a pay stub or similar documentation?

Yes

FLBR1.22 - Does your facility use fines or pay/bonus deductions as a disciplinary measure?

No

FLBR1.23 - Does your facility use job or grade demotion, suspension, or termination as disciplinary methods before attempting to investigate causes of employee misconduct and apply such remedies as discussion, explanation, training, etc.?

No

FLBR1.24 - Are workers permitted time off for medical needs?

Yes

FLBR1.37 - Does your facility require job applicants to provide ANY of the following prior to hiring or promotions: Ethnic

Origin, Religion, Political Affiliation, Marital Status, Pregnancy Status, Sexual Orientation, Gender Identity and Expression, National Origin, Covered Veteran's Status, Protected Genetic Information, Medical History, Physical Disability, Union Membership Information?

No

FLBR1.26 - Do your facility's job postings include statements of non-discrimination and are they free from any criteria which would be discriminatory?

Yes

FLBR1.27 - Is your facility equipped with accommodations for Disabled persons (e.g. access to worksites, use of toilets, elevators, cafeteria, etc.)?

Yes

FLBR1.28 - Does your facility conduct medical testing of job applicants prior to hiring or promotions (e.g., pregnancy testing of female workers, Hepatitis, HIV, etc.)?

No

FLBR1.29 - During the last 12 months, were any workers asked to leave the company, fired, moved to a lower paying job, or demoted due to medical or maternity leave?

No

FLBR1.30 - Are there any facility imposed restrictions or prohibitions, other than by the requirements of country or local laws, concerning workers creating or joining any labor organizations in your facility?

No

FLBR1.31 - Do workers at your facility participate democratically in the selection of representatives for labor organizations?

No labor organization present

FLBR1.32 - During the last 12 months, were any workers disciplined or in any way penalized for joining, refusing to join, or quitting any organization?

No

FLBR1.33 - Do you have any of these types of labor organizations present: Independent Trade Union, Government Union, other external employee representation organization?

No

FLBR1.38 - Does your facility allow workers the right to peaceful assembly?

Yes

FLBR1.39 - Does your facility allow employees to Bargain Collectively and/or is a Collective Bargaining Agreement in place?

No

FLBR1.34 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

#### FLBC - Labor Control Elements

FLBC1.1 - Is a management representative assigned responsibility for assuring and facilitating compliance with current LABOR laws, regulations and codes for this facility?

Yes

FLBC1.2 - Name of management representative:

Liana Cockrum

FLBC1.3 - Position or Title:

Director of Human Resources

FLBC1.4 - Email:

lcockrum@mlindustries.com

FLBC1.5 - Does your facility adhere to a written LABOR policy (or statement of commitment) endorsed by senior management that includes all the EICC Code LABOR elements: Freely Chosen Employment, Child Labor Avoidance, Working Hours, Wages & Benefits, Humane Treatment, Non-Discrimination and Freedom of Association?

Yes - includes ALL EICC Code LABOR elements

FLBC1.6 - How will you make the LABOR policy available?

Available upon request via email and/or through the website link

FLBC1.8 - Please provide contact name and email address and/or URL:

www.mlindustries.com

FLBC1.10 - Has your facility implemented a SUPPLIER code of conduct that covers LABOR standards including all the EICC Code LABOR elements: Freely Chosen Employment, Child Labor Avoidance, Working Hours, Wages & Benefits, Humane Treatment, Non-Discrimination, and Freedom of Association?

Yes - includes ALL EICC Code LABOR elements

FLBC1.11 - Do you place a contractual requirement on your SUPPLIERS (including labor agencies) to be in compliance with current LABOR laws, regulations, or codes of conduct?

Yes

FLBC1.12 - Has your facility implemented a policy stating that government issued identification and personal documentation originals are only held with formal consent from the workers?

Policy states we do not hold any original documents

FLBC1.13 - Has your facility implemented a program to monitor your supply chain for forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons?

Partial

FLBC1.14 - Has your facility implemented a policy and procedure allowing workers to resign without penalty after giving reasonable notice?

Yes

FLBC1.15 - Do you keep or require copies of documentation from job applicants to verify their age?

Yes

FLBC1.16 - Does your facility have a system or documented procedure for discovering workers that may be below minimum age and taking corrective actions (Including policy to assist underage workers found working in the facility)?

In Place

FLBC1.17 - Is there a policy and procedure in place at your facility to ensure access to educational needs for workers below the age for compulsory education?



No workers below compulsory school age

FLBC1.18 - Has your facility implemented a policy prohibiting the employment of workers under the age of 15?

Yes

FLBC1.19 - Has your facility implemented a system and/or documented procedure to verify that your suppliers do not use under-age workers?

Partial

FLBC1.20 - Does your facility place a limit on the number of hours that workers can work for the following: Per Day / Week / Month?

Yes - ALL (day, week and month)

FLBC1.21 - Is there a policy on legal regular hours, overtime, and facility working hours that is communicated to all workers?

Yes

FLBC1.22 - Do you have a process to track and act accordingly when workers are approaching the legal working hour limits or 60 hours/week (whichever is lower)?

Yes track and review with HR or Management for all workers

FLBC1.23 - Are records on workers' regular and overtime working hours kept on a daily basis and retained for at least 12 months?

Yes

FLBC1.24 - Do your workers review for accuracy and approve the hours they worked for each pay period in their local own language(s)?

Yes

FLBC1.25 - Do you provide all workers upon hire with a clear, written description of employment policies including: method for calculating wages, terms of payment and government deductions, employer-provided housing and meals, and disciplinary fines?

Yes

FLBC1.26 - Do you have a method for establishing worker wages to be based on the type of work, consistent with market wages, and compliant with the legal minimum wage?

In Place

FLBC1.27 - Do you have procedures to ensure that payment to workers and government programs is not delayed or withheld AND proof of payment records are maintained?

Yes

FLBC1.28 - Do you have procedures for verifying and continually monitoring the labor agencies to ensure that fees, wages and deductions conform to local and national law?

In Place

FLBC1.29 - Has your facility implemented and does it communicate in the language(s) of the workers, policies that describe acceptable worker conduct, expectations, and disciplinary measures where those principles are not complied with?

Yes

FLBC1.30 - Are managers and supervisors trained on the acceptable worker practices and disciplinary measures?

Yes

FLBC1.31 - If employees or workers violate company policies, does your facility management have a procedure for issuing warnings to them, taking a progressive approach?

Yes

FLBC1.32 - Has your facility implemented procedures for prevention of harassment, coercion, threatening behavior, physical abuse or punishment, sexual abuse, or verbal abuse towards workers?

In Place

FLBC1.33 - Does your facility have a process for workers to confidentially report cases of harassment, coercion, threatening behavior, physical punishment or abuse, sexual or verbal abuse and are these recorded and investigated?

In Place

FLBC1.43 - Do you have written policies and guidelines to prevent discrimination in hiring, promotion, equal pay, benefits, and training based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status?

Yes, we cover all of these in our policies

FLBC1.35 - Are records kept and periodically reviewed to confirm adherence to these guidelines?

Yes

FLBC1.36 - Do you communicate and conduct training on non-discrimination guidelines to all workers, supervisors, and managers?

Yes

FLBC1.37 - Is there a policy permitting employees to perform religious obligations without restriction AND is it practiced / allowed?

Yes

FLBC1.38 - Other than through a labor organization, does your facility have an active ongoing process for workers to communicate openly with each other and with management regarding their collective views and interests?

In Place

FLBC1.39 - Is there a policy, that is communicated and trained on, stating that workers at your facility are free to join labor organizations or trade unions or other collective bargaining organizations of their choice, where country or local laws do not prohibit it?

Yes

FLBC1.40 - Is there a policy in place prohibiting the facility from interfering with or attempting to control the labor organization or trade union in any way?

No labor organization present

FLBC1.41 - Are workers informed if they are automatically enrolled in a labor organization or trade union?

No labor organization present

FLBC1.42 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

FLBM1.1 - Does your facility utilize a management systems approach (including policies, programs, procedures, and review processes) to assure proper management of LABOR practices?

Management System in place but not 3rd party certified

FLBM1.4 - On what system or standard is it modeled?

It is modeled after the EICC guidelines.

FLBM1.5 - To what extent are your LABOR management system(s) documented?

All elements documented

FLBM1.6 - When was the most recent LABOR management systems reviewed for current status and possible improvement opportunities?

Within the past 2 years

FLBM1.7 - Does your facility monitor LABOR laws and regulations that apply to your facility?

Yes

FLBM1.8 - Does your facility have written performance objectives for LABOR practices, including metrics and targets with implementation plans for achieving those objectives?

Yes

FLBM1.9 - When did your facility review performance against LABOR objectives and targets?

Within the past 12 months

FLBM1.10 - When did your facility conduct a risk assessment to identify (including root cause determination), prioritize, and mitigate the potential LABOR risks associated with your operations and activities?

Within the past 12 months

FLBM1.11 - When did your facility conduct an audit of LABOR practices in order to assess conformance with regulatory requirements, internal facility requirements, appropriate external codes of conduct and other requirements?

Within the past 2 years

FLBM1.12 - Are LABOR records maintained according to a documented record retention schedule that aligns with applicable regulations and company policy?

Yes

FLBM1.13 - When was the last training of ALL employees on acceptable LABOR practices in a language(s) all workers can easily understand?

Within the past 2 years

FLBM1.14 - Has your facility implemented a program to assess risks and manage the identified risks relating to the LABOR practices of your SUPPLIERS (including any contractors or labor agents)?

Partial

FLBM1.15 - Is information about the facility LABOR performance practices and expectations communicated to workers, customers, and suppliers?

Yes

FLBM1.18 - When was the last time your facility received a LABOR practices audit or assessment by a customer or other external organization at this facility?

Within the past 12 months

FLBM1.19 - Has your company identified a senior executive and company representatives to ensure implementation of your LABOR policy and achievement of LABOR objectives?

Yes

FLBM1.17 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

#### ☐ FETR - Ethics Risk Elements

FETR1.1 - During the past 3 years, has the facility been prosecuted or cited for labor or ETHICS violations resulting in penalties or corrective actions mandated by a court or government authority?

No

FETR1.2 - During the last 12 months, how many confidential notifications regarding ethical or legal violations were investigated at your facility?

0

FETR1.3 - Does your company agree to not pay or give anything of value to any government official or 3rd party for the purpose of improperly influencing any official decision or process?

Yes

FETR1.8 - Does your company agree to not offer, give, or accept anything of value to obtain or retain business or influence a decision?

Yes

FETR1.4 - Do you have a system in place to allow anonymous reporting of Ethical concerns or Ethics Violations concerns?

Yes

FETR1.5 - Has your facility implemented a process for independently investigating reports of ethical or legal misconduct and for taking disciplinary actions?

In Place

FETR1.6 - Is management held accountable for labor, ethics, environmental, and health & safety in the facility?

Yes

FETR1.7 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

#### ☐ FETC - Ethics Control Elements

FETC1.1 - Is a management representative or an ethics and compliance officer assigned responsibility for assuring and facilitating compliance with current business ETHICS laws, regulations and codes (e.g. bribery, corruption, etc.) for this facility?

Yes

FETC1.2 - Name of management representative:

Charlton Shen

FETC1.3 - Position or Title:

General Counsel

FETC1.4 - Email:

cshen@mlindustries.com

FETC1.5 - Has your facility implemented a written ETHICS code of conduct or business integrity policy which is endorsed by senior management that includes all the EICC Code ETHICS elements: Business Integrity, Prohibition of payment of Bribes, Extortion and Embezzlement; Disclosure of Information; Intellectual Property; Fair Business, Advertising and Competition; Protection of Identity; Responsible Sourcing of Minerals; Privacy; Non-Retaliation?

Yes - includes ALL EICC Code ETHICS elements

FETC1.6 - Are your ETHICS policies and procedures communicated clearly to workers in the language(s) of the workers?

Yes

FETC1.7 - How will you make the ETHICS policy available?

Available upon request via email and/or through the website link

FETC1.9 - Please provide contact name and email address and/or URL:

www.mlindustries.com

FETC1.11 - Has your facility implemented a SUPPLIER code of conduct that covers ETHICS standards including all the EICC Code ETHICS elements: Prohibition of payment of Bribes, Extortion and Embezzlement; Disclosure of Information; Intellectual Property (including using software license compliance); Fair Business, Advertising and Competition; Protection of Identity; Responsible Sourcing of Minerals; Privacy; Non-Retaliation?

Yes - includes ALL EICC Code ETHICS elements

FETC1.12 - Do you place contractual requirements on your SUPPLIERS (including any contractors or labor agencies) to be in compliance with current ETHICS laws, regulations, or codes of conduct?

Yes

FETC1.13 - Has your facility implemented a program and/or procedures to uphold all of the EICC Code ETHICS elements: Business Integrity (corruption, extortion, embezzlement, conflict of interest); No Improper Advantage (bribery, excessive gift-giving); Disclosure of Information; Intellectual Property (including software compliance license compliance), Fair Business, Advertising and Competition; Responsible Sourcing of Minerals; Privacy and Non-Retaliation?

Yes - includes ALL EICC Code ETHICS elements

FETC1.15 - Does your facility have a program and/or procedures to detect, eliminate, and prohibit situations in which managers or workers have a potential conflict between the company's interests and their own?

In Place

FETC1.16 - Has your facility implemented a program and/or procedures to ensure accurate disclosure of information regarding business activities, structure, financial situation, and performance in accordance with applicable regulations?

In Place

FETC1.17 - Does a program and/or procedures exist to assure non-disclosure of sensitive or confidential information about customers, channel partners, suppliers, workers, and other business partners as required by law or your contracts with the listed parties?

In Place

FETC1.18 - Has your facility implemented a program and/or procedures to ensure that required standards of fair business, including advertising and competitive marketing, are upheld?

None

MLI does not advertise, this does not apply.

FETC1.19 - Has your facility implemented a written procedure for workers to report about discrimination, ethical violations, harsh treatment, or other issues without threat of reprisals?

In Place

FETC1.20 - Has your facility implemented a program and/or procedures to allow workers to submit grievances anonymously if they so choose and protect the identity of workers that report suspected cases of ethical or legal misconduct?

In Place

FETC1.21 - Has your facility implemented programs/procedures to uphold EICC Code ETHICS elements on suppliers, contractors, or agents representing the facility: Business Integrity; No Improper Advantage; Disclosure of Information; Intellectual Property, Fair Business, Advertising, and Competition; Responsible Sourcing of Minerals; Privacy and Non-Retaliation?

Yes - includes SOME EICC Code ETHICS elements

FETC1.22 - Are the cases tracked and then results shared with workers at a summary level (without disclosing individuals involved)?

Yes

FETC1.23 - Is there active ongoing communications to employees on key ETHICS topics and the code of conduct or business integrity policy to all employees in the local or appropriate languages?

No

FETC1.24 - How often does your facility provide formal training to employees on business ETHICS which includes training on all items in the code of conduct or business integrity policy and how to prevent and detect corruption in local or appropriate languages?

Every 2-4 years

FETC1.25 - Who attends the training?

ALL Employees

FETC1.26 - Is there targeted ETHICS training for new hires within the first 90 days?

Yes

FETC1.27 - Do your employees verify compliance to the Code or ETHICS policy?

Yes - ALL employees

FETC1.28 - Is there a survey/process for understanding whether employees feel safe in raising labor, ethics, environmental, health & safety concerns in the facility?

Yes

FETC1.29 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## ☐ FETM - Ethics Management Systems

FETM1.1 - Does your facility utilize a management systems approach (including policies, programs, procedures, and review processes) to assure proper management of ETHICS practices?

Management System is in place but not 3rd party certified

FETM1.4 - On what system or standard is it modeled?

It is modeled after the EICC guidelines.

FETM1.5 - To what extent are your ETHICS management system(s) documented?

Most elements documented

FETM1.6 - When was the most recent ETHICS management systems reviewed for current status and possible improvement opportunities?

Within the past 12 months

FETM1.7 - Does your facility monitor ETHICS laws and regulations that apply to your facility?

Yes

FETM1.8 - Does your facility have written performance objectives for ETHICS practices, including metrics and targets with implementation plans for achieving those objectives?

No

FETM1.10 - When did your facility conduct a risk assessment process to identify (including root cause determination), prioritize, and mitigate the potential Business ETHICS risks associated with your operations and activities including conformance with regulatory and legal requirements?

Not Yet Conducted

FETM1.11 - When did your facility conduct an audit of ETHICS practices in order to assess conformance with regulatory, internal requirements, appropriate external codes of conduct and other requirements?

Not Yet Conducted

FETM1.12 - Are ETHICS records maintained according to a documented record retention schedule that aligns with applicable regulations and company policy?

Yes

FETM1.13 - When was the last training of ALL employees on acceptable ETHICS practices in a language(s) all workers can easily understand?

Within the past 12 months

FETM1.14 - Has your facility implemented a program to assess risks and manage the identified risks relating to the ETHICS practices of your SUPPLIERS (including any contractors or labor agencies)?

Partial

FETM1.15 - Is information about the facility ETHICS performance, practices and expectations communicated to workers, customers and suppliers?

Yes

FETM1.18 - When was the last time your facility received an ETHICS practices audit or assessment by a customer or other external organization at this facility?

Within the past 2 years

FETM1.19 - Has your company identified a senior executive and company representatives to ensure implementation of your ETHICS policy and achievement of ETHICS objectives?

Yes

FETM1.17 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## ☐ FHSR - Health & Safety Risk Elements

FHSR1.1 - During the past 3 years, has the facility received a notification of, been prosecuted, or cited for any HEALTH and SAFETY violations resulting in penalties or corrective actions mandated by a court or government authority?

Yes

FHSR1.2 - Describe the nature of the notice and who it is from.

Citation from Washington State Division of Occupational Safety and Health regarding hazard assessments performed during new equipment commissioning.

FHSR1.3 - Are all required permits, licenses and required testing for HEALTH and SAFETY In Place and current?

Yes all current

FHSR1.4 - Does the potential exist that your workers come in contact with flammable or corrosive substances, biological agents, harmful emissions or lasers?

Yes

FHSR1.44 - Does the potential exist for your workers to be exposed to extreme temperatures?

Yes

FHSR1.45 - Does the potential exist for your workers to be exposed to extreme noise?

Yes

FHSR1.6 - Does the potential exist for your workers to come in direct contact with unprotected energized electrical circuits?

Yes

FHSR1.7 - Do your workers need to work on or around high-pressure vessels, powered industrial vehicles or dangerous machinery?

Yes

FHSR1.8 - Does the potential exist for your workers to enter a confined space (an area whose enclosed conditions and limited access would make an emergency exit difficult)?

Yes

FHSR1.9 - Does the potential exist for workers to be working from heights?

Yes

FHSR1.10 - Are all your permits, test reports, certificates and licenses related to Occupational Safety and Machine Safeguarding current and in full compliance?

Yes

FHSR1.11 - Are the emergency exits clearly and properly marked, maintained, unlocked, and free from blockage at all times?

Yes

FHSR1.12 - Has your facility installed and maintained effective emergency detection and alarm systems to address all



building areas?

Yes

FHSR1.13 - Are all emergency supplies placed in proper locations at the facility for immediate use?

Yes

FHSR1.14 - During the last 12 months, were there any fires, explosions, industrial accidents, hazardous releases outside of secondary containment at your facility that resulted in serious injury, fatality, environmental releases, or property damage?

No

FHSR1.16 - Do you have operations in a building where the workers are in floors above the ground floor?

Yes

FHSR1.17 - Is there a warehouse, manufacturing assembly, or storage of any kind in the ground floor?

Yes

FHSR1.18 - Are any of your workers performing physically demanding work?

Yes

FHSR1.19 - Does your facility have a program, providing appropriate tools and equipment, etc., to control worker exposure to physically demanding work to prevent work-related INJURIES?

Yes

FHSR1.20 - Does your facility have written guidance that defines and classifies different types of work-related INJURIES or ILLNESSES?

Yes

FHSR1.22 - In the last 12 months did any work-related INJURIES/ILLNESSES occur at your facility?

Yes

FHSR1.23 - In the last 12 months did any work-related FATALITIES occur at your facility?

No

FHSR1.24 - Does your facility provide housing for its workers (dormitory or worker housing, hostels, apartments or any other form of living quarters)?

No

FHSR1.37 - Does your facility provide or contract for canteen services for workers?

No

FHSR1.43 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## ☐ FHSC - Health & Safety Control Elements

FHSC1.1 - Is a management representative at this facility assigned responsibility for assuring compliance with current HEALTH and SAFETY laws, regulations and codes?

Yes

FHSC1.2 - Name of management representative:

Jon Erlenmeyer

FHSC1.3 - Position or Title:

EHSS Manager

FHSC1.4 - Email:

jerlenmeyer@mlindustries.com

FHSC1.5 - Has your facility implemented written HEALTH & SAFETY policies and procedures which is endorsed by senior management that includes all the EICC Code HEALTH & SAFETY elements: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food and Housing?

Yes - includes ALL EICC Code HEALTH & SAFETY elements

FHSC1.6 - Are your HEALTH and SAFETY policies and procedures posted and communicated clearly to workers in the language(s) understood by the workers?

Yes

FHSC1.7 - How will you make the HEALTH and SAFETY policies available?

Available upon request via email and/or through the website link

FHSC1.9 - Please provide contact name and email address and/or URL:

www.mlindustries.com

FHSC1.11 - Has your facility implemented a SUPPLIER code of conduct that covers HEALTH & SAFETY standards including all the EICC Code HEALTH & SAFETY elements: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food and Housing?

Yes - includes ALL EICC Code HEALTH & SAFETY elements

FHSC1.12 - Do you place a contractual requirement on your SUPPLIERS (including any contractors or labor agents) to be in compliance with current HEALTH and SAFETY laws, regulations, or codes of conduct?

Yes

FHSC1.33 - You noted that the potential exists for your workers to be exposed to flammable or corrosive substances, biological agents, lasers or harmful emissions. Does your facility provide adequately maintained engineering controls AND is Personal Protective Equipment (PPE) provided for free to these workers and is it in good working condition?

Yes, properly maintained engineering controls are in place AND PPE is provided for free to these workers and is in good working condition

FHSC1.34 - You noted that the potential exists for your workers to be exposed to extreme temperatures. Is PPE provided for free to these workers and is it in good working condition?

Yes

FHSC1.35 - You noted that the potential exists for your workers to be exposed to extreme noises. Is PPE provided for free to these workers and is it in good working condition?

Yes

FHSC1.15 - You noted that the potential exists for your workers to come in direct contact with unprotected energized electrical circuits. Are all workers who come into contact with unprotected energized electrical circuits fully certified or qualified to work on electrical issues and employ a lock-out tag-out approach when appropriate?

Yes

FHSC1.16 - You noted that your workers need to work on or around high-pressure vessels, powered industrial vehicles, or dangerous machinery. Do you have documented and implemented procedures in place for safeguarding workers from potential hazards related to ALL of the conditions occurring at your facility?

Yes

FHSC1.17 - You noted that the potential exists for your workers to enter a confined space. Are the confined spaces properly marked, have only restricted access and do workers know how and when to enter them safely?

Yes

FHSC1.18 - You noted that the potential exists for workers to be working from heights. Is fall protection equipment in all of the appropriate places and safety gear used by workers in all appropriate cases?

Yes

FHSC1.19 - Do you provide mandatory occupational and process safety instructions to workers, including operating machines safely, proper machine maintenance, materials handling, understanding MSDS / SDS (Material Safety Data Sheets) in the language of the workers?

Yes

FHSC1.20 - Has your facility identified, assessed, and implemented preparedness systems/procedures for potential emergencies such as process failures, accidents, storms, floods, or other events that could pose a threat to workers, the community, and the environment?

Yes

FHSC1.21 - Are all employees instructed in a way they can understand on how to respond in case of fire or other emergencies including an annual drill of all shifts in all buildings?

Yes

FHSC1.22 - Is your facility equipped with fire and or chemical emergency detection and suppression system?

Yes

FHSC1.23 - Are fire and emergency instructions for workers posted in convenient locations at the facility in the language (s) of the workers?

Yes

FHSC1.24 - Does your management encourage workers to report all work-related INJURIES or ILLNESSES?

Yes

FHSC1.25 - Are there properly trained and equipped medical emergency responders at your facility?

Yes

FHSC1.26 - Does your facility have a program to provide regular medical examinations for workers to detect any symptoms of work-related ILLNESSES or INJURIES?

Partial

We provide medical evaluations to anyone showing signs or symptoms of exposure.

FHSC1.27 - You noted work-related INJURIES/ILLNESSES occurred at your facility in the last 12 months. Was root cause analysis conducted and corrective action taken, including appropriate documentation?

Yes, all documented

FHSC1.30 - Does your facility utilize or have on site HEALTH and SAFETY technical specialists such as industrial hygienists?

Yes

FHSC1.31 - Please specify what types of specialists:

Safety affairs specialist and a hazard communication specialist

FHSC1.32 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## [-] FHSM - Health & Safety Management Systems

FHSM1.1 - Does your facility utilize a management systems approach (including policies, programs, procedures, and review processes) to assure proper management of HEALTH and SAFETY practices?

Management System is 3rd party certified

FHSM1.2 - Please name, explain or describe the type of certificate and certifying body:

UL ISO 14001:2004 certificate

FHSM1.3 - Expiration Date:

6/16/2018 0:0:0

FHSM1.15 - Does your facility communicate information about its HEALTH and SAFETY performance practices and expectations to external groups?

Yes

FHSM1.18 - When was the last time your facility received a HEALTH and SAFETY practices audit or assessment by a customer or other external organization at this facility?

Within the past 12 months

FHSM1.19 - Has your company identified a senior executive and company representatives to ensure implementation of your HEALTH and SAFETY policy and achievement of HEALTH and SAFETY objectives?

Yes

FHSM1.17 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## [-] FENR - Environmental Risk Elements

FENR1.1 - During the past 3 years, has the facility received a notification of, been prosecuted, or cited for any ENVIRONMENTAL violations resulting in penalties or corrective actions mandated by a court or government authority?

No

FENR1.2 - Does your facility perform activities or handle materials that require an environmental permit (i.e., wastewater, hazardous waste, air emissions, treatment, storage, disposal, etc.)?

Yes

FENR1.3 - During the last 12 months, was your facility cited or warned by a government agency regarding regulatory or permit/license noncompliance?

No

FENR1.5 - Does your facility store and/or use hazardous materials (flammable, corrosive, toxic, reactive, etc.) for any reason?

Yes

FENR1.6 - Does your facility use any hazardous materials in volumes that require storage or use permits?

Yes

FENR1.7 - In the past 3 years, have you received a notice of violation or penalty for non-compliance of these permits?

No

FENR1.8 - Do you have chemicals at your facility that are stored outside or in uncovered areas?

Yes

FENR1.9 - Do the chemical storage areas at your facility have secondary containment for all chemicals?

Yes

FENR1.10 - Does your facility store any of the following in underground tanks: hazardous, flammable or corrosive chemicals?

No

FENR1.11 - Does your facility generate hazardous wastes in volumes that require storage or use permits?

Yes

FENR1.12 - Are the following methods of hazardous waste management used by your facility: Onsite waste treatment?

Yes

FENR1.13 - Onsite long-term (longer than one year) storage?

No

FENR1.14 - Discharge to ground or water (e.g. pond)?

No

FENR1.15 - Collection and transfer to a licensed hazardous waste management facility?

Yes

FENR1.16 - What type of wastewater is generated at your facility?

Both Sanitary and Industrial

FENR1.17 - Does your facility treat wastewater onsite in any way?

Yes

FENR1.18 - In the last 2 years, did you receive any notice of violation from authorities regarding waste water treatment, discharge or release?

No

FENR1.19 - Does your facility dispose of non-hazardous waste at your facility?

No

FENR1.20 - Does your facility dispose of non-hazardous waste at a public non-hazardous waste facility?

Yes

FENR1.21 - Does your facility dispose of non-hazardous waste using properly licensed third party waste management / disposal firms, approved by local authorities?

Yes

FENR1.22 - How does your facility handle excess or obsolete non-hazardous materials and/or parts?

Send/sell to recycler

FENR1.23 - Does your facility generate air emissions?

Yes

FENR1.24 - Are all air emissions currently within the regulated discharge limits?

Yes

FENR1.32 - Does your facility release any Chlorofluorocarbons (CFCs), Sulfur Hexafluoride (SF6) or other significant non-hydrocarbon greenhouse gas emissions from your facility?

No

FENR1.25 - Are all noise levels at the facility currently within regulatory limits?

Yes

FENR1.26 - Has your facility implemented programs and/or procedures to phase out controlled materials from its product within a specified time period, consistent with international legislation on restriction of hazardous substances?

Yes

FENR1.27 - During the last 12 months, have any of your facility's products been rejected by the buyer or banned from any market as a result of the use of controlled materials?

No

FENR1.29 - Has your facility implemented programs and/or procedures to assure proper information disclosure for your products, including material composition and product safety information?

Yes

FENR1.30 - Does your facility have a program to facilitate recovery of discarded products, components, or materials at the end of their useful life (product take-back)?

Yes

FENR1.31 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## ☐ FENC - Environmental Control Elements

FENC1.1 - Is a management representative at this facility assigned responsibility for assuring and facilitating compliance with current ENVIRONMENTAL laws, regulations and codes?

Yes

FENC1.2 - Name of management representative:

Jon Erlenmeyer

FENC1.3 - Position or Title:

EHSS Manager

FENC1.4 - Email:

jerlenmeyer@mlindustries.com

FENC1.5 - Does your facility adhere to a written ENVIRONMENTAL policy (or statement of commitment) endorsed by senior management that includes all the EICC Code ENVIRONMENTAL elements: Environmental Permits & Reporting; Pollution Prevention and Resource Reduction; Hazardous Substances; Wastewater and Solid Waste; Air Emissions; Product Content Restrictions?

Yes - includes ALL EICC Code ENVIRONMENTAL elements

FENC1.6 - Are your ENVIRONMENTAL policies and procedures communicated clearly to workers in the language(s) of the workers?

Yes

FENC1.7 - How will you make the ENVIRONMENTAL policy available?

Available upon request via email and/or through the website link

FENC1.9 - Please provide contact name and email, and/or URL.

www.mlindustries.com

FENC1.11 - Has your facility implemented a SUPPLIER code of conduct that covers ENVIRONMENTAL standards including all the EICC Code ENVIRONMENTAL elements: Environmental Permits & Reporting; Pollution Prevention and Resource Reduction; Hazardous Substances; Wastewater and Solid Waste; Air Emissions; Product Content Restrictions?

Yes - includes ALL EICC Code ENVIRONMENTAL elements

FENC1.12 - Do you place a contractual requirement on your SUPPLIERS (including contractors) to be in compliance with current ENVIRONMENTAL laws, regulations, or codes of conduct?

Yes

FENC1.13 - Does your facility have a program and/or procedures for obtaining environmental permits/approvals and managing compliance with the permit requirements?

Yes

FENC1.14 - Are your facility operations currently in compliance with all local and national monitoring, reporting, and permit/approval requirements?

Yes

FENC1.15 - Does your facility have a program and/or procedures including record keeping and metrics to systematically reduce or eliminate pollution and waste in your operations?

Yes

FENC1.16 - Does your facility have a program and/or procedures including record keeping and metrics to systematically track and reduce the use of energy, water, and other resources in your operations?

Yes

FENC1.17 - You noted that your facility stores and/or uses hazardous materials. When did the workers who handle hazardous materials last receive the appropriate training?

Within the past 12 months

FENC1.18 - You noted that your facility generate hazardous wastes in volumes that require storage or use permits. Does your facility have a program and/or procedures for management of hazardous wastes, including monitoring, characterization, treatment or conversion, and disposal?

In Place

FENC1.19 - You noted that there is collection and transfer of hazardous waste to a licensed management facility. When did you last audit the hazardous waste management facility that collects and transfers your hazardous waste?

Within the past 12 months

FENC1.20 - You noted that waste water is generated at your facility. Does your facility have a program and/or procedures for management of wastewater, including monitoring, characterization, treatment, discharge, and/or recycling?

In Place

FENC1.32 - Does your facility have a stormwater management plan in place to prevent stormwater contamination from chemicals and other materials used at your facility?

In Place

FENC1.21 - Does your facility have a program and/or procedures for management of non-hazardous waste (e.g. office waste, trash), including collection, separation, disposal, and/or recycling?

In Place

FENC1.22 - You noted that your facility generates air emissions. Does your facility have a process to identify, characterize, monitor and control all air emissions from your facility in accordance with country/local regulations?

Yes

FENC1.23 - You noted that your facility generates air emissions. Are engineering controls (oxidizer, scrubber, precipitator, etc.) required for any reason to safely manage air emissions from your facility?

Yes

FENC1.24 - Please specify the controls you use:

scrubbers, flare

FENC1.25 - Do you have a preventive maintenance schedule to ensure proper operation of air emission controls?

Yes

FENC1.33 - Does your facility have a program to inventory, reduce, and report the emissions of greenhouse gasses (GHGs) from your operations?

Partial

FENC1.34 - Does your facility translate energy use into greenhouse gas emissions at the facility level?

No

FENC1.27 - Has your facility implemented programs and/or procedures to determine the quantities of controlled materials (e.g. lead, mercury, cadmium, CFCs, flame retardants) in your products and any material you purchase (to be compliant with regulatory and customer requirements)?

Yes

FENC1.28 - Does your facility utilize or have on site ENVIRONMENTAL technical specialists such as pollution control or waste management engineers?

Yes

FENC1.29 - Please specify what types of specialists:

Environmental Specialist



FENC1.30 - Has your facility implemented programs and/or procedures to ensure that your SUPPLIERS are in compliance with product content restrictions?

Yes

FENC1.31 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a

## [-] FENM - Environmental Management Systems

FENM1.1 - Does your facility utilize a management systems approach (including policies, programs, procedures, and review processes) to assure proper management of ENVIRONMENTAL practices?

Management System is 3rd party certified

FENM1.2 - Please name, explain or describe the type of certificate and certifying body:

UL ISO 14001:2001 Audit and Certificate

FENM1.3 - Expiration date:

6/16/2018 0:0:0

FENM1.15 - Does your facility communicate information about its ENVIRONMENTAL performance practices and expectations to external groups?

Yes

FENM1.18 - When was the last time your facility received an ENVIRONMENTAL practices audit or assessment by a customer or other external organization at this facility?

Within the past 12 months

FENM1.19 - Has your company identified a senior executive and company representatives to ensure implementation of your ENVIRONMENTAL policy and achievement of ENVIRONMENTAL objectives?

Yes

FENM1.17 - Notes and Comments on any question in this section: (answer required, if none enter N/A)

n/a