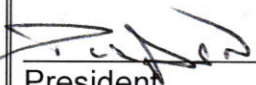
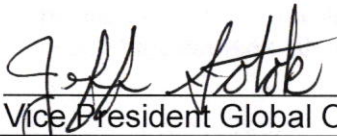


EMS Policy Title	Document Number	Page	Date
Environmental Management System	EMS-1	1 of 8	8/4/2020
Approvals:			
 _____ President	 _____ Vice President Global Operations		

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 General Manager, the EHS Manager, the Director of Engineering, and the QS Administrator, in addition to others as deemed appropriate by the team.
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.

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.

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). 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

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 through prevention of 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 Administrator 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.

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). 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