EMS MANUAL

D.L. MARTIN CO.

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ENVIRONMENTAL POLICY

The D.L. Martin Co. is committed to continual environmental improvement through the prevention of pollution as well as complying with all legal and other requirements to which it subscribes.

Todd M. Musso
President & CEO

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Revision 1 is original issue: September 1, 2007

Section 1

Scope of Environmental Management System (EMS)

1.1 General

This D.L. Martin Co. EMS Manual specifies the requirements for our environmental management system, which is in compliance with the requirements of International Standard ISO 14001:2015 and, consistent with our organization's environmental policy, implemented as a means to

- enhance our environmental performance,
- fulfill our compliance obligations, and
- achieve our environmental objectives.

To facilitate cross-referencing, the sections of this D.L. Martin Co. EMS Manual are organized according to the clause structure of International Standard ISO 14001:2015. Each clause of ISO 14001:2015 is addressed in the corresponding section of this EMS manual. A cross-reference matrix (see Appendix B) is provided to show the correspondence between the sections of this EMS manual and other applicable EMS documents, including environmental procedures (EPs), environmental work instructions (EWIs) and environmental instructions (EIs).

This EMS manual is prepared by the Environmental Management Representative (EMR) and reviewed and approved for suitability and adequacy by the President & CEO.

1.2 Boundaries & Applicability

The D.L. Martin Co. Environmental Management System (EMS), as described in this EMS manual, applies to our manufacturing facility located in Mercersburg, PA and is designed to comply with all requirements of ISO 14001:2015. Our organization is primarily a manufacturer of machined and fabricated metal components and assemblies meeting customer product specifications, but has the engineering capabilities necessary to design products or provide design assistance based on customer product design specifications. Giving consideration to the extent of control or influence our organization can exert over the associated activities, products and services, the scope of our EMS includes any activities, products and services, including those provided by on-site external providers, that affect our environmental performance and ability to fulfill compliance obligations (see 4.3).

Section 2

Normative Reference

In establishing the D.L. Martin Co. Environmental Management System (EMS) described in this environmental manual, consideration was given to the provisions of the following normative document:

ISO 14004:2016, Environmental Management Systems — General Guidelines on Implementation
ISO 14006:2011, Environmental Management Systems — Guidelines for Incorporating Ecodesign

Section 3

Terms & Definitions

For the purposes of this D.L. Martin Co. EMS Manual, the terms and definitions given in Appendix A apply.

Context of the Organization

4.1 Understanding the Organization & Its Context

Our organization has determined external and internal issues that are relevant to our purpose and that affect our ability to achieve the intended outcomes of our environmental management system. Such issues include environmental conditions being affected by or capable of affecting our organization (see EP01-1).

Our organization determines whether climate change is a relevant issue (see EP01-1 & EAR-1).

4.2 Understanding the Needs & Expectations of Interested Parties

Our organization has determined

   a)   the interested parties that are relevant to our environmental management system;

   b)   the relevant needs and expectations (i.e., requirements) of those interested parties (see EP01-1);

   c)   which of those needs and expectations became our compliance obligations (see EP02-1).

4.3 Determining the Scope of the EMS

Our organization has determined the boundaries and applicability (see 1.2) of our environmental management system to establish its scope.

When determining this scope, our organization considered

   a)   the external and internal issues referred to in 4.1;

   b)   the compliance obligations referred to in 4.2;

   c)   our organizational units, functions and physical boundaries;

   d)   our activities, products and services;

   e)   our authority and ability to exercise control and influence.

Once the scope was defined, all activities, products and services of our organization within that scope were included in our environmental management system.

The scope of our environmental management system is documented in this EMS manual (see Section 1) and the manual is available to interested parties by accessing our organization's website.

4.4 Environmental Management System (EMS)

To achieve the intended outcomes, including enhancing environmental performance, our organization established, implemented, maintains and continually improves our environmental management system, including the processes needed and their interactions, in accordance with the requirements of ISO 14001:2015.

Our organization considered the knowledge gained in 4.1 and 4.2 when establishing our environmental management system and that knowledge is also considered when maintaining our system.

Leadership

5.1 Leadership & Commitment

Our top management demonstrates leadership and commitment with respect to our environmental management system by

   a)   taking accountability for the effectiveness of our environmental management system;

   b)   ensuring our environmental policy and environmental objectives are established and compatible with the strategic direction and context of our organization;

   c)   ensuring the integration of our environmental management system requirements into our organization's business processes;

   d)   ensuring the resources needed for our environmental management system are available;

   e)   communicating the importance of effective environmental management and of conforming to our environmental management system requirements;

   f)   ensuring our environmental management system achieves its intended outcomes;

   g)   directing and supporting employees to contribute to the effectiveness of our environmental management system;

   h)   promoting continual improvement;

   i)   supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.2 Environmental Policy

The following environmental policy is established by the President & CEO of D.L. Martin Co. considering the purpose and context of our organization and is communicated throughout our organization:

> *The D.L. Martin Co. is committed to continual environmental improvement through the prevention of pollution as well as complying with all legal and other requirements to which it subscribes.*

D.L. Martin Co. operates an environmental management system meeting the requirements of ISO 14001:2015 as the means of moving our organization in the strategic direction defined by this environmental policy. The policy provides a framework for setting environmental objectives in order to continually improve our environmental management system and enhance environmental performance.

Top management has the responsibility for developing and supporting our environmental management system and ensuring it is implemented to protect the environment through the prevention of pollution, and as a means of fulfilling our compliance obligations, including all applicable legal requirements and other requirements to which we subscribe such as resource conservation and recycling.

The top management of D.L. Martin Co. is committed to the environmental management system described in this EMS manual and communicates throughout our organization the importance of meeting the requirements specified herein. All of our employees are expected "To Mind The Natural Environment" by complying with the requirements of our environmental management system as they apply to their respective assignments.

This environmental policy is available to interested parties by viewing this EMS manual on our website.

5.3 Organizational Roles, Responsibilities & Authorities

Our top management ensures that the responsibilities and authorities for relevant roles are assigned and communicated within our organization.

Environmental management is the responsibility of all levels of management but is led by our top management. Our Environmental Management Team is the management group, operating under the direction of the President & CEO, with overall responsibility for decisions concerning the establishment, implementation, maintenance and continual improvement of our environmental management system. In addition to the President & CEO, this management group consists of the Director of QA & Engineering, Environmental Management Representative (EMR) and other relevant management personnel.

The President & CEO establishes our environmental policy (see 5.2) and is ultimately responsible for providing the resources (e.g., human, infrastructure, technology & financial resources) needed for the establishment, implementation, maintenance and continual improvement of our environmental management system (see 7.1).

The Environmental Management Representative (EMR) has the assigned responsibility and authority for

a)   determining and ensuring that the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system are provided (see 7.1);

b)   ensuring that our environmental management system is established, implemented, maintained and continually improved in accordance with the requirements of ISO 14001:2015;

c)   addressing the risks and opportunities related to our environmental aspects (see 6.1.2), compliance obligations (see 6.1.3) and other issues and requirements identified (see 4.1 & 4.2);

d)   ensuring that performance evaluations (i.e., monitoring, measurement, analysis & evaluation; internal audits; and management reviews) are conducted at planned intervals (see 9.1-9.3);

e)   preparing and submitting information (e.g., applications & reports) necessary to comply with the legal requirements of federal, state, county and local regulatory agencies (see 4.2);

f)   ensuring that corrective actions are appropriate to the significance of the effects of any nonconformities encountered, including the environmental impacts (see 10.2);

g)   ensuring our environmental management system conforms to the requirements of ISO 14001:2015;

h)   reporting on the performance of our environmental management system, including environmental performance, to our Environmental Management Team (see 9.3).

The environmentally-related responsibilities of management and supervisory personnel, and other relevant roles, are further defined in applicable EMS documents, including environmental procedures (EPs), environmental work instructions (EWIs) and environmental instructions (EIs).

Section 6

Planning

6.1 Actions to Address Risks & Opportunities

6.1.1 General

Our organization establishes, implements and maintains processes needed to meet the requirements in 6.1.1, 6.1.2, 6.1.3 and 6.1.4 (see EP01-1 & EP02-1).

When planning for our environmental management system, our organization considers

    a)   the issues referred to in 4.1 (see EP01-1);
    b)   the requirements referred to in 4.2 (see EP02-1);
    c)   the scope of our environmental management system (see Section 1);

and determines the risks and opportunities related to our environmental aspects (see 6.1.2), compliance obligations (see 6.1.3), and other issues and requirements identified in 4.1 and 4.2 that need to be addressed to

    •   give assurance that our environmental management system can achieve its intended outcomes;
    •   prevent or reduce undesired effects, including the potential for external environmental conditions to affect the organization;
    •   achieve continual improvement.

Within the scope of our environmental management system, our organization determines potential emergency situations, including those that can have an environmental impact (see EP10-1 & EP11-1).

Our organization maintains documented information (see EP01-1 & EP02-1) of

    •   risks and opportunities that need to be addressed;
    •   processes needed in 6.1.1-6.1.4 to the extent necessary to ensure they are carried out as planned.

6.1.2 Environmental Aspects

Within the defined scope of our environmental management system, our organization determines the environmental aspects of our activities, products and services that we can control and those that we can influence, and their associated environmental impacts, considering a life cycle perspective (see EP01-1).

When determining environmental aspects, our organization takes into account

    a)   change, including planned or new developments, and new or modified activities, products and services;
    b)   abnormal conditions and reasonably foreseeable emergency situations (see EP10-1 & EP11-1).

Our organization determines those aspects that have or can have a significant environmental impact (i.e., significant environmental aspects) by using established criteria.

Our organization communicates our significant environmental aspects among the various levels and functions of our organization, as appropriate (see EP01-1).

Our organization maintains documented information (see EP01-1) of our

    •   environmental aspects and associated environmental impacts;
    •   criteria used to determine significant environmental aspects;
    •   significant environmental aspects.

6.1.3 Compliance Obligations

Our organization

    a)   determines and has access to compliance obligations related to our environmental aspects;
    b)   determines how those compliance obligations apply to our organization;
    c)   takes those compliance obligations into account when establishing, implementing, maintaining and continually improving our environmental management system.

Our organization maintains documented information (see EP02-1) of our compliance obligations.

6.1.4 Planning Action

Our organization plans

    a)   to take actions to address our

        1)   significant environmental aspects (see EP01-1);

        2)   compliance obligations (see EP02-1);

        3)   risks and opportunities identified in 6.1.1 (see EP01-1);

    b)   how to

        1)   integrate and implement those actions into our environmental management system processes (see 6.2, 7, 8 & 9.1) or other business processes;

        2)   evaluate the effectiveness of those actions (see 9.1).

When planning those actions, our organization considers its technological options and its financial, operational and business requirements.

6.2 Environmental Objectives & Planning to Achieve Them

6.2.1 Environmental Objectives

Our organization establishes environmental objectives at relevant functions and levels, taking into account our organization's significant environmental aspects (see EP01-1) and associated compliance obligations (see EP02-1), and giving consideration to our risks and opportunities (see EP01-1).

Our environmental objectives are

    a)   consistent with our environmental policy;

    b)   measurable (where practical);

    c)   monitored;

    d)   communicated (see EP01-1);

    e)   updated as appropriate.

Our organization maintains documented information (see EP01-1) on our environmental objectives.

6.2.2 Planning Actions to Achieve Environmental Objectives

When planning how to achieve our environmental objectives (see EP01-1), our organization determines

    a)   what will be done;

    b)   what resources will be required;

    c)   who will be responsible;

    d)   when it will be completed;

    e)   how the results will be evaluated, including indicators for monitoring progress toward achievement of our measurable environmental objectives (see 9.1.1).

Our organization considers how actions to achieve our environmental objectives can be integrated into our organization's business processes.

Support

7.1 Resources

Our organization determines and provides the resources needed for the establishment, implementation, maintenance and continual improvement of our environmental management system (see 5.3).

7.2 Competence

Our organization

 a) determines the necessary competence of persons doing work under our control that affects our environmental performance and our ability to fulfill our compliance obligations;

 b) ensures those persons are competent on the basis of appropriate education, training and/or experience;

 c) determines the training needs associated with our environmental aspects and our environmental management system;

 d) takes appropriate action to acquire the necessary competence and evaluates the effectiveness of the actions taken, where applicable.

Our organization retains appropriate documented information (see EP03-1) as evidence of competence.

7.3 Awareness

Our organization ensures that persons doing work under our control (see EP03-1) are aware of

 a) our environmental policy;

 b) the significant environmental aspects and related actual or potential environmental impacts associated with their work;

 c) their contribution to the effectiveness of our environmental management system, including the benefits of enhanced environmental performance;

 d) the implications of not conforming with our environmental management system requirements, including not fulfilling our organization's compliance obligations.

7.4 Communication

7.4.1 General

Our organization establishes, implements and maintains the processes needed for internal and external communications relevant to our environmental management system, including

 a) what to communicate;

 b) when to communicate;

 c) with whom to communicate;

 d) how to communicate.

When establishing our communication processes, our organization

- takes into account our compliance obligations;
- ensures environmental information communicated is reliable and consistent with information generated within our environmental management system.

Our organization responds to relevant communications on our environmental management system (see EP07-1).

Our organization retains documented information (see EP08-1) as evidence of our communications, as appropriate.

7.4.2 Internal Communication

Our organization

a) internally communicates information relevant to our environmental management system among the various levels and functions of our organization (see EP01-1, EP02-1 & EP07-1), including changes to our system (see EP03-1), as appropriate;

b) ensures our communication processes enable persons doing work under our organization's control to contribute to continual improvement (see EP07-1 & EI02-1).

7.4.3 External Communication

Our organization externally communicates information relevant to our environmental management system, as established by our organization's communication processes (see 4.3, 5.2 & EI02-1) and as required by our compliance obligations (see EP02-1).

7.5 Documented Information

7.5.1 General

Our organization's environmental management system includes

a) documented information required by ISO 14001:2015 (see 4.3, 5.2, 6.1.1, 6.1.2, 6.1.3, 6.2.1, 7.2, 7.4.1, 7.5.3, 8.1, 8.2, 9.1.1, 9.1.2, 9.2.2, 9.3 & 10.2);

b) documented information determined by our organization as being necessary for the effectiveness of our environmental management system (see EP04-1 & EP08-1).

The extent of our environmental management system documentation depends on

- the type of activity, process, product and/or service involved;
- the need to demonstrate fulfillment of our compliance obligations;
- the complexity of processes and their interactions;
- the competence of persons doing work under our organization's control.

7.5.2 Creating & Updating

When creating and updating documented information (see EP04-1 & EP08-1), our organization ensures appropriate

a) identification and description (e.g., title, date, author or reference number);

b) format (e.g., language, software version & graphics) and media (e.g., paper & electronic);

c) review and approval for suitability and adequacy.

7.5.3 Control of Documented Information

Documented information required by our environmental management system and by ISO 14001:2015 is controlled (see EP04-1 & EP08-1) to ensure that it is

a) available and suitable for use, where and when it is needed;

b) adequately protected (e.g., from loss of confidentiality, improper use or loss of integrity).

For the control of documented information, our organization addresses the following activities, as applicable:

- distribution, access, retrieval and use;
- storage and preservation, including preservation of legibility;
- control of changes (e.g., revision control);
- retention and disposition.

Documented information of external origin determined by our organization to be necessary for the planning and operation of our environmental management system is identified, as appropriate, and controlled.

Section 8

Operation

8.1 Operational Planning & Control

Our organization establishes, implements, controls and maintains the processes needed to meet our environmental management system requirements and to implement the actions identified in 6.1-6.2 by

a) establishing operating criteria for those processes;

b) implementing control of those processes in accordance with the operating criteria.

Our organization controls planned changes and reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

Our organization ensures outsourced processes are controlled or influenced. The type and extent of control or influence applied to those processes is defined within our environmental management system (see EP03-1).

Consistent with a life cycle perspective, our organization

a) establishes controls, as appropriate, to ensure environmental requirements are addressed in the design and development process (i.e., ecodesign) for products considering each life cycle stage (see EP01-1);

b) determines environmental requirements for procurement of products or services, as appropriate (see EI02-1);

c) communicates relevant environmental requirements to external providers (see EP03-1 & EI02-1);

d) considers 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 products (see EP01-1).

Our organization maintains documented information (see EP01-1, EP03-1, EP10-1, EWIs, EIs & EI02-1) to the extent necessary to have confidence that processes have been carried out as planned.

8.2 Emergency Preparedness & Response

Our organization establishes, implements and maintains the processes needed to prepare for and respond to potential emergency situations identified in 6.1.1.

Our organization

a) prepares to respond by planning actions to prevent or mitigate adverse environmental impacts resulting from emergency situations;

b) responds to actual emergency situations;

c) takes action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;

d) periodically tests planned response actions, where practical;

e) periodically reviews and revises our processes and planned response actions, in particular after the occurrence of emergency situations or tests;

f) provides relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under our control (see EI02-1).

Our organization maintains documented information (see EP10-1, EP11-1 & EI02-1) to the extent necessary to have confidence that our processes are carried out as planned.

Section 9

Performance Evaluation

9.1 Monitoring, Measurement, Analysis & Evaluation

9.1.1 General

Our organization monitors, measures, analyzes and evaluates our environmental performance (see EP06-1).

Our organization determines

a) what needs to be monitored and measured;

b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;

c) the criteria against which our organization will evaluate our environmental performance, and appropriate indicators;

d) when the monitoring and measuring shall be performed;

e) when the results from monitoring and measurement shall be analyzed and evaluated.

Our organization ensures that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.

Our organization evaluates our environmental performance and the effectiveness of our environmental management system (see 9.3).

Our organization communicates relevant environmental performance information both internally and externally, as identified in our communication processes and as required by our compliance obligations (see 7.4).

Our organization retains appropriate documented information (see EP08-1) as evidence of the monitoring, measurement, analysis and evaluation results.

9.1.2 Evaluation of Compliance

Our organization establishes, implements and maintains the processes needed to evaluate fulfillment of our compliance obligations.

Our organization

a) determines the frequency that compliance will be evaluated;

b) evaluates compliance and takes action if needed;

c) maintains knowledge and understanding of our compliance status.

Our organization retains documented information (see EP06-1) as evidence of compliance evaluation results.

9.2 Internal Audit

9.2.1 General

Our organization conducts internal audits at planned intervals to provide information on whether our environmental management system

a) conforms to

    1) our organization's own requirements for our environmental management system;

    2) the requirements of ISO 14001:2015;

b) is effectively implemented and maintained.

9.2.2 Internal Audit Program

Our organization establishes, implements and maintains an internal audit program, including the frequency, methods, responsibilities, planning requirements and reporting of internal audits.

When establishing our internal audit program, our organization takes into consideration the environmental importance of the processes concerned, changes affecting our organization and results of previous audits.

Our organization

a) defines the audit criteria and scope for each audit;

b) selects auditors and conducts audits to ensure objectivity and impartiality of the audit process;

c) ensures that the results of audits are reported to relevant management.

Our organization retains documented information (see EP09-1) as evidence of the implementation of our audit program and the audit results.

9.3 Management Review

Our top management reviews our organization's environmental management system on a monthly basis to ensure its continuing suitability, adequacy and effectiveness.

Our management reviews include consideration of

a) the status of actions from previous management reviews;

b) changes in

    1) external and internal issues that are relevant to our environmental management system;

    2) the needs and expectations of interested parties, including compliance obligations;

    3) our significant environmental aspects;

    4) risks and opportunities;

c) the extent to which environmental objectives have been achieved;

d)   information on our organization's environmental performance, including trends in

   1)   nonconformities and corrective actions;

   2)   monitoring and measurement results;

   3)   fulfillment of compliance obligations;

   4)   audit results;

e)   adequacy of resources;

f)   relevant communications from interested parties, including complaints;

g)   opportunities for continual improvement.

The outputs of management reviews include

- conclusions on the continuing suitability, adequacy and effectiveness of our environmental management system;
- decisions related to continual improvement opportunities;
- decisions related to any needed environmental management system changes, including resources;
- actions, if needed, when environmental objectives have not been achieved;
- opportunities to improve the integration of our environmental management system with other business processes, if needed;
- any implications for the strategic direction (i.e., environmental policy) of our organization.

Our organization retains documented information (see EP08-1) as evidence of the results of management reviews.

Section 10

Improvement

10.1 General

Our organization determines opportunities for improvement (see 9.1-9.3) and implements necessary actions to achieve the intended outcomes of our environmental management system.

10.2 Nonconformity & Corrective Action

When a nonconformity occurs, our organization

a)   reacts to the nonconformity and, as applicable

   1)   takes action to control and correct it;

   2)   deals with the consequences, including mitigating adverse environmental impacts;

b)   evaluates the need for action to eliminate the causes of the nonconformity in order that it does not recur or occur elsewhere by

   1)   reviewing the nonconformity;

   2)   determining the causes of the nonconformity;

   3)   determining if similar nonconformities exist or could potentially occur;

c)   implements any action needed;

d)   reviews the effectiveness of any corrective action taken;

e)   makes changes to our environmental management system, if necessary.

Corrective actions are appropriate to the significance of the effects of the nonconformities encountered, including the environmental impacts.

Our organization retains documented information (see EP07-1) as evidence of

- the nature of the nonconformities and any subsequent actions taken;
- the results of any corrective action.

10.3 Continual Improvement

Our organization continually improves the suitability, adequacy and effectiveness of our environmental management system to enhance environmental performance (see EP01-1, EP06-1, EP07-1, EP09-1 & 9.3).

Terms & Definitions

Compliance Obligation - Legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with.

Context of the Organization - Combination of internal and external issues that can have an effect on an organization's approach to developing and achieving its environmental objectives.

Continual Improvement - Recurring activity related to the use of the environmental management system to enhance environmental performance consistent with an organization's environmental policy.

Documented Information - Information (i.e., documents & records) required to be controlled and maintained by an organization and the medium on which it is contained.

Ecodesign - Integration of environmental aspects into product design and development with the aim of reducing adverse environmental impacts throughout a product's life cycle.

Environment - Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.

Environmental Aspect - Element of an organization's activities, products or services that interacts or can interact with the environment.

Environmental Condition - State or characteristic of the environment as determined at a certain point in time.

Environmental Impact - Change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.

Environmental Management System (EMS) - Management system used to manage environmental aspects, fulfill compliance obligations, and address risks and opportunities.

Environmental Objective - Objective set by an organization consistent with its environmental policy.

Environmental Performance - Measurable results (i.e., quantitative or qualitative findings) related to an organization's management of its environmental aspects.

Environmental Policy - Intentions and direction of an organization related to environmental performance, as formally expressed by its top management.

Interested Party - Person or group that can affect or be affected by an organization's decisions or activities related to environmental performance (e.g., customers, communities, suppliers, regulators & employees).

Prevention of Pollution - Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutants or waste, in order to reduce adverse environmental impacts.

Process - Set of interrelated or interacting activities which transforms inputs into outputs.

Risk - Effect of uncertainty.

Risks & Opportunities - Potential adverse effects (threats) and potential beneficial effects (opportunities).

Significant Environmental Aspect - Environmental aspect that has or can have one or more significant environmental impacts.

Appendix B

Cross-Reference Matrix

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