



Essex Furukawa Magnet Wire LLC

Environmental Policy



Essex Furukawa is the global leader in the production and distribution of magnet wire. It is the established policy of Essex Furukawa to conduct its affairs in an environmentally responsible manner. We are committed to reduce the environmental impacts of our activities, products and services to preserve and protect the natural environment including the air, water, land and other natural resources.





Objectives

In furtherance of this policy, the Company will:

- › Conduct its operations in full compliance with applicable federal, state and local laws and regulations
- › Seek to minimize the threat of harm or injury to human health or the environment.
- › Maintain current awareness of environmental laws, regulations, policies and control technology.
- › Cooperate with governmental authorities in the exercise of their responsibilities for environmental protection and support the development of sound, equitable, and realistic environmental standards, laws and regulations.
- › Commit to environmental protection, including prevention of pollution, at the source through continual improvement programs.
- › Include review of potential environmental impacts of its operations and changes to its operations.
- › Disseminate this Environmental Policy to all business units and maintain systems to establish management responsibility and control necessary for its implementation.
- › Continue the practices and procedures necessary to implement the spirit as well as the letter of this Environmental Policy.
- › Annually review the effectiveness of environmental protection activities at the facilities and operations of the Company.
- › Report to senior management the status of its environmental protection and improvement programs, and any material intrusions upon the environment which occur or are threatened from the operations of the Company in accordance with Company policies and procedures.
- › Recycle and reuse materials where possible.
- › Reduce energy use and conserve other resources.

Codes Of Practice

In order to uphold our commitment to the environment, the following codes of practice shall be followed:

› **Programs and Procedures** - Each business unit and each facility shall establish and implement goals, programs, and procedures in order to:

1. conduct operations safely and in an environmentally responsible manner; and
2. ensure conformance with all applicable and relevant EHS laws, Company policies, and requirements.

An environmental compliance officer shall be identified for each facility and shall have the responsibility to ensure the effective implementation of these programs and procedures.

› **Integrated Management** - Each business unit and facility shall integrate EHS programs and procedures into its business activities.

› **Continual Improvement** - Each business unit and facility shall ensure that Company operations are periodically evaluated, and continuously improved, to enhance worker health, safety, and environmental protection. Evaluations shall take into consideration technical developments, recognized EHS best practices, current scientific understanding, and expectations of customers, local communities, and other stakeholders.

› **Employee Education** - Each business unit and facility shall educate, train, and motivate employees to conduct their activities safely and in an environmentally responsible manner. Employee training shall be appropriate to fulfill each employee's EHS-related responsibilities and to comply with applicable EHS requirements.



- › **External Communications** - Each business unit and facility shall ensure that known EHS hazards or negative impacts of its products are appropriately communicated to potentially affected customers, distributors, and the public.
- › **Approach** - Each business unit and facility shall minimize negative EHS effects as a result of its activities. Modifications to the unit's and facility's activities shall comply with EHS requirements.
- › **Common Effort: Good Citizenship** - Each business unit and facility are encouraged to contribute, as appropriate, to public policy, business, governmental, and educational initiatives that will enhance EHS awareness and protection in the community.
- › **Communication with Stakeholders** - Subject to Company policies and procedures for external communications, each business unit and facility shall foster openness and dialog with Company and external stakeholders, anticipating and responding to their concerns about the potential EHS hazards and impacts of products and operations.



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