



CURTIS INSTRUMENTS INC.
200 KISCO AVE
MOUNT KISCO, NY 10549 USA

OPERATING PROCEDURE

NO. EnvOP-00-01

PAGE 1 OF 20

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REVISION C

EnvOP-00-01

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

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	CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA	OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>2</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u>
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REVISION HISTORY

REVISION	ECN	DESCRIPTION	DATE	APPROVAL
A	14472	Original Issue	3/10/08	DH
B	16932	Update to Section 2.1 Environmental Policy; replaced reference of “Top Management” with “Executive Management; and updated date on Management Representative page.	6/30/11	DH
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	CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA	OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>3</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u>
---	--	---

TABLE OF CONTENTS

1.0 SCOPE

2.0 REFERENCE DOCUMENTS

3.0 TERMS AND DEFINITIONS

4.0 CONTEXT OF THE ORGANIZATION

4.1 Understanding the Organization and its Context

4.2 Understanding the Needs and Expectations of Interested Parties

4.3 Determining the Scope of the Environmental Management System

4.4 Environmental Management System

5.0 LEADERSHIP

5.1 Leadership and Commitment

5.2 Environmental Policy

5.3 Organizational Roles, Responsibilities and Authorities

6.0 PLANNING

6.1 Actions to Address Risks and Opportunities

6.2 Environmental Objectives and planning to achieve them

7.0 SUPPORT

7.1 Resources

7.2 Competence

7.3 Awareness

7.4 Communication

7.5 Documented Information

8.0 OPERATION

8.1 Operational Planning and Control

8.2 Emergency Preparedness and Response

9.0 PERFORMANCE EVALUATION

9.1 Monitoring, Measurement, Analysis and Evaluation

9.2 Internal Audit

9.3 Management Review

10.0 IMPROVEMENT

10.1 General

10.2 Nonconformity and Corrective Action

10.3 Continual Improvement

Procedure Cross Reference

SECTION	CONTENT	Process / Procedures	
4.1	Understanding the organization and its context	EnvOP-00-01	
4.2	Understanding the needs and expectations of interested parties	EnvOP-00-01	
4.3	Determining the scope of the environmental management system	EnvOP-00-01	
4.4	Environmental management system	EnvOP-00-01	
5.1	Leadership and commitment	EnvOP-00-01	
5.2	Environmental policy	EnvOP-00-01	QOP-02-01
5.3	Organizational roles, responsibilities and authorities	EnvOP-00-01	QOP-02-01
6.1.1	Actions to address risks and opportunities - General	EnvOP-00-01	
6.1.2	Environmental aspects	EnvOP-00-01	EnvOP-31-01 EnvOP-31-02
6.1.3	Compliance obligations	EnvOP-00-01	EnvOP-32-01
6.1.4	Planning action	EnvOP-00-01	
6.2.1	Environmental objectives	EnvOP-00-01	EnvOP-33-01 EnvOP-33-02
6.2.2	Planning actions to achieve environmental objectives	EnvOP-00-01	EnvOP-33-01 EnvOP-33-02
7.1	Resources	EnvOP-00-01	QOP-02-01
7.2	Competence	EnvOP-00-01	HOP-18-01
7.3	Awareness	EnvOP-00-01	HOP-18-01
7.4.1	Communication – General	EnvOP-00-01	EnvOP-43-01 EnvOP-43-02
7.4.2	Internal communication	EnvOP-00-01	EnvOP-43-01 EnvOP-43-02
7.4.3	External communication	EnvOP-00-01	EnvOP-43-01 EnvOP-43-02
7.5.1	Documented information - General	EnvOP-00-01	QOP-02-01
7.5.2	Creating and updating	EnvOP-00-01	QOP-02-01
7.5.3	Control of documented information	EnvOP-00-01	QOP-02-01 QOP-16-01
8.1	Operational planning and control	EnvOP-00-01	EnvOP-46-01 EnvOP-46-02 EnvOP-46-03 EnvOP-46-04
8.2	Emergency preparedness and response	EnvOP-00-01	EnvOP-47-01
9.1.1	Monitoring, measurement, analysis and evaluation -General	EnvOP-00-01	EnvOP-51-01
9.1.2	Evaluation of compliance	EnvOP-00-01	EnvOP-52-01
9.2.1	Internal audit – General	EnvOP-00-01	QOP-17-01
9.2.2	Internal audit program	EnvOP-00-01	QOP-17-01
9.3	Management Review	EnvOP-00-01	QOP-01-01
10.1	Improvement - General	EnvOP-00-01	
10.2	Nonconformity and corrective action	EnvOP-00-01	COP-01-07 COP-01-08
10.3	Continual improvement	EnvOP-00-01	

	CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA	OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>5</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u>
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1.0 SCOPE

Curtis Instruments' Environmental Management System (EMS) is a corporate wide system. This manual describes and documents the organization's EMS, and has been developed to assist all facilities in meeting the requirements of ISO 14001. It defines and describes the EMS, the authorities and responsibilities of the management personnel involved in the operation of the system, and it provides a general description of all processes and activities comprising the EMS. The format of this document aligns with that of the AS 14001: 2015 standard.

The Curtis Instruments business units share ownership and use of this manual, which serves to drive consistency into the EMS. It enables increased use of common processes and sharing of best practices where practical, to better serve the environment, the business, and interested parties. The intended outcomes of the EMS include:

- enhancement of environmental performance;
- fulfillment of compliance obligations;
- Achievement of environmental objectives.

2.0 REFERENCE DOCUMENTS

ISO 14001:2015 - Environmental Management Systems, Requirements with Guidance for Use

EnvOP-31-01 - Environmental Operating Procedure for Environmental Aspects

EnvOP-31-02 - Environmental Operating Procedure for Significant Environmental Aspects

EnvOP-32-01 - Environmental Operating Procedure for Legal and Other Requirements

EnvOP-33-02- Environmental Operating Procedure for Environmental Management Program

EnvOP-43-01 - Environmental Operating Procedure for Internal Communication

EnvOP-43-02 - Environmental Operating Procedure for External Communication

EnvOP-46-01- Environmental Operating Procedure for Operational Control

EnvOP-46-02 - Environmental Operating Procedure for Purchasing and Subcontractor Control

EnvOP-46-03 - Environmental Operating Procedure for Material and Waste Management

EnvOP-46-04- Environmental Operating Procedure for Contractor Requirements

EnvOP-47-01 - Environmental Operating Procedure for Emergency Preparedness and Response

EnvOP-51-01 - Environmental Operating Procedure for Monitoring of Significant Aspects.

EnvOP-52-01 - Environmental Operating Procedure for Evaluation of Compliance

HOP-18-01 - Human Resources Operating Procedure for Competence, Training and Awareness

QOP-01-01 - Quality Operating Procedure for Management Review

QOP-02-01 - Quality Operating Procedure for Quality/Environmental System

QOP-16-01 - Quality Operating Procedure for Quality and Environmental Records Retention

QOP-17-01 - Quality Operating Procedure for Internal Quality and Environmental Audits

COP-01-07 - Quality Operating Procedure for Corrective Action

COP-01-08 - Quality Operating Procedure Preventive Action

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>6</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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3.0 TERMS AND DEFINITIONS

- 3.1 Environmental Management System – a set of interrelated or interacting elements that organizations use to implement their environmental policy, to achieve their environmental objectives, to meet their environmental compliance obligations, to manage their environmental aspects, and to address their environmental risks and opportunities. These elements include structures, programs, procedures, processes, practices, plans, rules, roles, regulations, responsibilities, relationships, contracts, agreements, documents, records, methods, tools, techniques, technologies, and resources.
- 3.2 Environmental Policy – a commitment, direction, or intention that is formally stated by the top management of an organization. An environmental policy makes a commitment to protect the environment, to meet all relevant compliance obligations, and to enhance environmental performance.
- 3.3 Interested Parties – In the context of this ISO 14001 standard, an interested party is any person, group, or organization who can affect, be affected by, or believe that they are affected by the environmental performance of an organization.
- 3.4 Compliance Obligation - A requirement - there are two kinds of compliance obligations: mandatory compliance obligations and voluntary compliance obligations. Mandatory compliance obligations include laws and regulations while voluntary compliance obligations include contractual commitments, community and industry standards, ethical codes of conduct, and good governance guidelines. Once an organization decides to comply with a voluntary obligation, it becomes a mandatory obligation.
- 3.5 Context - An organization’s context is its business environment. It includes all of the issues, factors, and conditions that could influence or be influenced by an organization's environmental management system. The organization must identify and understand the internal and external issues and environmental conditions that could influence the EMS, and the results it intends to achieve.
- 3.6 Environment - an organization’s natural and human surroundings. The environment extends from within the organization itself to the global system, and includes air, water, land, flora, and fauna (including people), and natural resources of all kinds.
- 3.7 Environmental Aspect - an element or characteristic of an activity, product, or service that interacts or can interact with the environment. Environmental aspects can cause environmental impacts. They can have either beneficial impacts or adverse impacts and can have a direct and decisive impact on the environment or contribute only partially or indirectly to a larger environmental change.
- 3.8 Environmental Impact - a change to the environment that is caused either partly or entirely by one or more environmental aspects. An environmental aspect can have either a direct and decisive impact on the environment or contribute only partially or indirectly to a larger environmental change. It could also have either a beneficial environmental impact or an adverse environmental impact.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>7</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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- 3.9 Environmental Objective - an environmental result the organization intends to achieve. Environmental objectives should be based on or derived from the environmental policy, and must be consistent with the policy.
- 3.10 Environmental Performance - the environmental results that are achieved whenever the environmental aspects of activities, processes, products, services, systems, and organizations are managed and controlled, and whenever adverse environmental impacts are reduced and beneficial environmental impacts are produced. Environmental performance can be measured by using indicators to compare environmental results against environmental objectives and environmental policies (or other suitable criteria).
- 3.11 Life Cycle - the consecutive and interlinked stages of a product system from the acquisition of raw materials to end-of-life disposal. The life cycle of a product system includes all associated activities, products, and services and may include procured goods and services as well as end-of-life treatment, decommissioning, and disposal.
- 3.12 Prevention of Pollution - to avoid, reduces, or controls the creation, emission, or discharge of contaminants or waste materials. Pollution must be prevented in order to reduce adverse environmental impacts. Methods, techniques, practices, processes, products, and services to prevent pollution include: the reduction or elimination of pollution at the source; the efficient use of resources, materials, and energy; the reuse, recovery, reclamation, and recycling of resources; the redesign of processes, products, and services; and the substitution of one type of energy source or substance for another cleaner energy source or substance.

4.0 CONTEXT OF THE ORGANIZATION

4.1 Understanding the Organization and its Context

Each Curtis facility determines the external and internal issues that are relevant to its purpose, and that affect its ability to achieve the intended results of the EMS. The issues include the environmental conditions being affected by or capable of affecting the organization. Each facility must consider:

- its direct environmental impact;
- how environmental conditions can affect the business, customers, supply chain and other relevant interested parties;
- external social and economic factors (i.e., beliefs and norms of society and its expectation of the organization, environmental performance of peers and competitors);
- Internal capabilities (i.e., the organization’s ability to implement new technologies and influence behavior changes in its employees).

Each facility monitors and reviews these external and internal issues, and others identified by Curtis Instruments, and use this information to continuously improve its ability to achieve intended results.



CURTIS INSTRUMENTS INC.
200 KISCO AVE
MOUNT KISCO, NY 10549 USA

OPERATING PROCEDURE

NO. EnvOP-00-01

PAGE 8 OF 20

DATE 7/3/2018

REVISION C

4.2 Understanding the Needs and Expectations of Interested Parties

An Interested Party (or stakeholder) is any individual or organization that can affect, be affected by, or perceive it to be affected by the organization's decisions or activities. Each Curtis facility determines:

- a) the interested parties that are relevant to the EMS;
- b) the relevant needs and expectations of these interested parties;
- c) Which of these needs and expectations become compliance obligations.

Categories of interested parties and their needs and expectations, as they pertain to the EMS, are listed in the graphic and table below. Each facility shall maintain documented evidence of their monitoring and reviewing of relevant requirements of interested parties in accordance with section 7.5 of this document.



Examples of Interested Parties	Needs and Expectations
Customers	➤ Business partner with integrity
External Providers (i.e., suppliers)	➤ Business partner with integrity
Society/Community	➤ Environmental protection ➤ Ethical behavior ➤ Compliance with statutory and regulatory requirements
Employees	➤ Healthy, safe work environment ➤ Socially responsible employer ➤ Recognition and reward
Curtis Facilities	➤ Support to meet corporate and interested party requirements

4.3 Determining the Scope of the Environmental Management System

Curtis Instruments facilities are involved to varying degrees, in offering solutions to complex engineering and manufacturing challenges; researching, designing, developing, manufacturing, integrating, testing, servicing and supporting products for customers.

Each Curtis Instruments facility determines the boundaries and applicability of the EMS to establish its scope, considering:

- a) the external and internal elements from 4.1;
- b) the requirements of relevant interested parties from 4.2;
- c) the organizational units, functions and physical boundaries;
- d) the products and services provided;
- e) Its authority and ability to exercise control and influence.

Curtis Instruments facilities apply the requirements of the ISO 14001 standard as they are applicable, and within the determined scope of the EMS.

4.4 Environmental Management System

This document, facility policies, and associated procedures collectively define the Curtis Instruments Environmental Management System. To achieve intended outcomes, and to enhance environmental performance, the organization has established, implemented, maintains, and will continually improve the EMS.

The knowledge gained in 4.1 and 4.2 was considered when establishing the EMS, and will be used to enhance the EMS.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>10</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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LEADERSHIP

5.1 Leadership and Commitment

Top management provides evidence of its leadership and commitment to the development and implementation of the EMS. Each facility continually improves effectiveness by:

- a) taking accountability for the effectiveness of the EMS;
- b) ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organization;
- c) ensuring the integration of the EMS into the organization's business processes;
- d) ensuring that the resources needed for the EMS are available;
- e) communicating the importance of effective environmental management and of conforming to the EMS requirements;
- f) ensuring that the EMS achieves its intended outcomes;
- g) directing and supporting employees to contribute to the effectiveness of the EMS;
- 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

Top management has established, implemented, and maintains an environmental policy that, within the defined scope of the EMS:

- 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 a 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 objectives;
- e) Includes a commitment to continual improvement of the EMS to enhance environmental performance.

The environmental policy is:

- maintained as documented information;
- communicated within the organization;
- Available to interested parties.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>11</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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Environmental Policy

It is the worldwide policy of Curtis to design, manufacture and distribute all its products and to handle and dispose of all materials without creating unacceptable health, safety or environmental risks. The corporation will:

- Establish and maintain programs to assure that laws, regulations, and other requirements, to which the corporation subscribes, and that are applicable to its products and operations, are known and obeyed;
- Conserve resources and energy, minimize the use of hazardous materials and reduce waste. Establish the commitment to the prevention and reduction of pollution to achieve minimal adverse impact on the environment;
- Stop the manufacture or distribution of any product or cease any operation if the health, safety or environmental risks are not acceptable.

To carry out this policy, the corporation will:

1. Operate in a manner which protects the environment, health, and safety of the citizens of the communities where we operate as well as our employees. Support local initiatives to improve community impact on environment.
2. Comply with all international, national, federal, state, and local environmental laws, regulations, and permits in countries in which we operate. Adhere to all codes of practice, and other environmental requirements to which the corporation subscribes. To achieve and maintain compliance, we will develop and maintain management systems for identifying relevant requirements and for monitoring performance of related activities.
3. Identify and control any health, safety or environmental hazards related to its operations and products.
4. Through the use of continuous improvement processes drive improvement in our environmental performance.
5. Communicate our environmental policy to all employees and to all others involved in or affected by our operations.
6. Respond openly and promptly to public inquiries about environmental issues our operations may create, and initiate communications with others who might be affected.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>12</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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5.3 Organizational Roles, Responsibilities and Authorities

Top management ensures that the responsibilities and authorities for relevant roles are assigned, communicated and understood within the organization. Responsibilities and authorities are defined via organizational charts, which are accessible by all employees.

Top management has assigned at each facility, the responsibility and authority for:

- a) ensuring that the EMS conforms to the requirements of ISO 14001;
- b) Reporting on the performance of the EMS, including environmental performance, to top management.

6.0 PLANNING

6.1 Actions to Address Risks and Opportunities

6.1.1 General

When planning for the EMS, Curtis Instruments considers

- a) the context of the organization (see 4.1);
- b) the needs and expectations of interested parties (see 4.2);
- c) The scope of the EMS (see 4.3).

Within the scope of the EMS, the Curtis Instruments determines potential emergency situations, including those that have an environmental impact.

Documented information is maintained of:

- risks and opportunities that need to be addressed;
- Processes needed to the extent necessary, to ensure risks and opportunities are addressed as planned.

6.1.2 Environmental Aspects

Curtis Instruments identifies actual or potential environmental aspects of its activities, products, and services that it can control and influence, and their associated environmental impacts, considering a life cycle perspective. Criteria and guidelines for identifying environmental aspects are provided in procedure *EnvOP-31-01, Environmental Aspects*.

When determining environmental aspect, Curtis Instruments 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.

Curtis Instruments determines those aspects that have or can have a significant environmental impact by using established criteria. Significant environmental aspects are communicated among the various levels and functions of the organization as appropriate.

Documented information is maintained of:

- environmental aspects, and associated environmental impacts;
- criteria used to determine significant environmental aspects;
- Significant environmental aspects.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>13</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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Criteria and guidelines for determining and evaluating significant environmental aspects are provided in procedure *EnvOP-31-02, Significant Environmental Aspects*.

6.1.3 Compliance Obligations

Curtis Instruments:

- a) determines and has access to the compliance obligations related to its environmental aspects;
- b) determines how the compliance obligations apply to the organization;
- c) takes the obligations into account when establishing, implementing, maintaining, and continually improving the EMS;
- d) Maintains documented information of its compliance obligations.

Methods and instructions for identifying obligations are documented in procedure *EnvOP-32-01, Legal and Other Requirements*.

6.1.4 Planning Action

While planning, Curtis Instruments takes action to address its

- 1) significant environmental aspects,
- 2) compliance obligations;
- 3) risks and opportunities identified in 6.1.1;

And how to:

- 1) integrate and implement actions into its EMS processes, or other business processes;
- 2) Evaluate the effectiveness of these actions.

When planning these actions, technological options, and financial, operational, and business requirements are considered.

6.2 Environmental Objectives and Planning to Achieve Them

6.2.1 Environmental Objectives

Curtis Instruments establishes environmental objectives and targets to fulfill the environmental policy and improve environmental performance in areas related to significant environmental aspects, compliance obligations, and considering risks and opportunities.

Environmental objectives are:

- a) consistent with the environmental policy;
- b) measurable (if practicable);
- c) monitored;
- d) communicated;
- e) Updated as appropriate.

Documented information on the environmental objectives is maintained.

Environmental objectives and targets are established in accordance with procedure *EnvOP-33-01, Environmental Objectives and Targets*.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>14</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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6.2.2 Planning Actions to Achieve Environmental Objectives

When planning for achieving environmental objectives, Curtis Instruments determines:

- a) what shall be done;
- b) required resources;
- c) who is responsible;
- d) completion of activities;
- e) Evaluation of results.

The system for establishing management programs to achieve environmental objectives and targets is described in procedure *EnvOP-33-02, Environmental Management Program*.

7.0 SUPPORT

7.1 Resources

The organization determines and provides the resources needed for the establishment, implementation, maintenance and continual improvement of the EMS.

7.2 Competence

Curtis Instruments:

- a) determines the necessary competence of employees doing work that affects its environmental performance and its ability to fulfill compliance obligations;
- b) ensures that competence based on appropriate education, training or experience;
- c) determines training needs associated with its environmental aspects and the EMS;
- d) Takes actions where applicable, to acquire the necessary competence, and evaluate the effectiveness of the actions taken.

7.3 Awareness

Curtis Instruments ensures that employees are aware of:

- a) the 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 the EMS, including the benefits of enhanced environmental performance;
- d) The implications of not complying with the requirements of the EMS, including not fulfilling the organization's compliance obligations.

The system for ensuring competence and awareness is described in procedure *HOP-18-01, Competence, Training and Awareness*.

7.4 Communication

7.4.1 General

Curtis Instruments has established, implemented and maintains processes necessary for

	CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA	OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>15</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u>
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internal and external communications that are relevant to the EMS, including:

- a) what is communicated;
- b) when to communicate;
- c) with whom to communicate;
- d) how to communicate

When establishing communication, Curtis Instruments considers its compliance obligations, ensures that the information communicated is consistent with the EMS, and is reliable. Curtis Instruments also responds to relevant communication on its EMS, and when appropriate, retains documentation associated with its communication.

7.4.2 Internal Communication

Curtis Instruments communicates information relevant to the EMS among the various levels and functions of the organization, including changes to the EMS, and ensure that the communication processes enable employees to contribute to continual improvement.

The process is described in procedure *EnvOP-43-01, Internal Communication*.

7.4.3 External Communication

Curtis Instruments communicates information relevant to the EMS as required by compliance obligations.

The process is described in procedure *EnvOP-43-02, External Communication*.

7.5 Documented Information

7.5.1 General

The EMS includes the documented information required of ISO 14001:2015 and necessary for the effectiveness of the EMS.

7.5.2 Creating and Updating

Curtis instruments ensures appropriate identification, description, format, media, and review and approval for suitability and adequacy when creating and updating documentation

7.5.3 Control of Documented Information

Documented information required of ISO 14001:2015 and the EMS are controlled to ensure:

- a) it is available and suitable for use, where and when it is needed;
- b) It is adequately protected.

For the control of documented information, facilities address the following activities, as applicable:

- a) distribution, access, retrieval, and use;
- b) storage, preservation and legibility;
- c) control of changes;
- d) Retention and disposition.

Documented information of external origin determined to be necessary for the planning and operation of the EMS are identified and controlled.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>16</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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8.0 OPERATION

8.1 Operational Planning and Control

Each Curtis Instruments facility has established, controls, and maintains the processes needed to meet the EMS requirements, and has implemented the actions identified in paragraphs 6.1 and 6.2 by:

- establishing operating criteria for the processes;
- Implementing control of the processes, in accordance with the operating criteria.

Each Curtis Instruments facility controls planned changes and reviews consequences of unintended changes, taking action to mitigate and adverse effects, as necessary.

Curtis Instruments ensures that outsourced processes are controlled or influenced. The type and extent of control or influence to be applied to the processes is defined within the EMS.

Consistent with a lifecycle perspective, Curtis Instruments has:

- a) established controls to ensure that environmental requirements are addressed in the design and development process for products, considering each lifecycle stage;
- b) determined its environmental requirements for the procurement of products and services;
- c) communicated its relevant environmental requirements to external providers, including contractors;
- d) Considered the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products.

Documented information is maintained to the extent necessary, to ensure that the processes have been carried out as planned.

The environmental operating procedures that describe the systems in place for the above are:

- *EnvOP-46-01, the procedure for Operational Control*
- *EnvOP-46-02, the procedure for Purchasing and Subcontractor Control*
- *EnvOP-46-03, the procedure for Material and Waste Management*
- *EnvOP-46-04, the procedure for Contractor Requirements*

8.2 Emergency Preparedness and Response

Curtis Instruments has established, implemented and maintains the processes needed to prepare for and respond to the potential emergency situations identified in paragraph 6.1.1. Each facility:

- a) prepares to respond by planning actions to prevent or mitigate adverse environmental impacts 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 the planned response actions, where practicable;

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>17</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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- e) periodically reviews and revises the 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 its control.

Documented information is maintained to the extent necessary to ensure that the processes have been carried out as planned.

The system is described in procedure *EnvOP-47-01, Emergency Preparedness and Response*.

9.0 PERFORMANCE EVALUATION

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

Curtis Instruments, monitors, measures, analyzes and evaluates environmental performance. Each facility 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 it will evaluate its environmental performance, and appropriate indicators;
- d) when the monitoring and measuring will be performed;
- e) When the results from monitoring and measurement shall be analyzed and evaluated.

Calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.

Environmental performance and the effectiveness of the EMS are evaluated.

Relevant environmental performance information is communicated both internally and externally, as identified in communication processes and as required by compliance obligations.

Documented information is maintained to the extent necessary to ensure that the processes have been carried out as planned.

The system is described in procedure *EnvOP-51-01, Monitoring of Significant Aspects*.

9.1.2 Evaluation of Compliance

Curtis Instrument has established, implemented and maintains the processes needed to evaluate fulfillment of its compliance obligations. Each facility:

- a) determines the frequency that compliance is evaluated;
- b) evaluates compliance and takes action when needed;
- c) maintains knowledge and understanding of its compliance status;

Documented information is retained as evidence of compliance evaluation results.

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>18</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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The system is described in procedure *EnvOP-52-01, Evaluation of Compliance*.

9.2 Internal Audit

9.2.1 General

Curtis Instruments conducts internal audits at planned intervals to provide information on whether the EMS:

- a) conforms to:
 - 1) the requirements of the EMS;
 - 2) the requirements of ISO 14001:2015;
- b) Is effectively implemented and maintained.

9.2.2 Internal Audit Program

Curtis Instrument has established, implemented and maintains a program that includes the frequency, methods, responsibilities, planning requirements and reporting of internal audits.

Curtis Instruments takes into consideration the environmental importance of the processes concerned, changes affecting the organization, and the results of previous audits.

Each facility:

- 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 the audits are reported to appropriate management.

Documented information is retained as evidence of the implementation of the audit program and the audit results.

The system for planning, scheduling and conducting internal audits is described in procedure *QOP-17-01, Internal Audits*.

9.3 Management Review

Top management reviews the Curtis Instruments EMS at planned intervals to ensure its continuing suitability, adequacy and effectiveness. The management review includes consideration of:

- a) the status of actions from previous management reviews;
- b) changes in:
 - 1) external and internal issues that are relevant to the EMS;
 - 2) the needs and expectations of interested parties, including compliance obligations;
 - 3) significant environmental impacts;
 - 4) risks and opportunities;
- c) the extent to which environmental objectives have been achieved;
- d) information on environmental performance, including trends in:

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>19</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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- 1) nonconformities and corrective actions;
- 2) monitoring and measurement results;
- 3) fulfillment of compliance obligations;
- 4) audits results;
- e) adequacy of resources;
- f) relevant communications from interested parties, including complaints;
- g) Opportunities for continual improvement.

The outputs of management review include:

- conclusions on the continued suitability, adequacy and effectiveness of the EMS;
- decisions related to continual improvement opportunities;
- decisions related to any need for changes to the EMS, including resources;
- actions, if needed, when environmental objectives are not achieved;
- opportunities to improve integration of the EMS with other business processes, if needed;
- Any implications for the strategic direction of the organization.

Documented information is retained as evidence of the results of management review.

The system for scheduling, conducting, and recording management reviews is described in procedure *QOP-01-01, Management Review*.

10.0 IMPROVEMENT

10.1 General

Curtis Instruments determines opportunities for improvement, and implements the necessary actions to achieve the intended outcomes of the EMS

10.2 Nonconformity and Corrective Action

When nonconformity occurs, Curtis Instruments:

- 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 to prevent recurrence or occurrence 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 the EMS, if necessary.

Corrective actions will be appropriate to the significance of the effects of the nonconformities

	<p>CURTIS INSTRUMENTS INC. 200 KISCO AVE MOUNT KISCO, NY 10549 USA</p>	<p>OPERATING PROCEDURE NO. <u>EnvOP-00-01</u> PAGE <u>20</u> OF <u>20</u> DATE <u>7/3/2018</u> REVISION <u>C</u></p>
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encountered, including environmental impacts.

Documented information is retained as evidence of:

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

The corrective and preventive action systems are described in procedure *COP-01-07, Corrective Action*, and *COP-01-08, Preventive Action*.

10.3 **Continual Improvement**

Curtis Instruments continually improves the suitability, adequacy and effectiveness of the EMS to enhance environmental performance.