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**Figure 1** Management System Processes and Interactions
**Figure 2** Safety Health Environmental Quality Charter

**Table 1** Total Cray Valley ISO and RCMS Registered Sites

**Appendix I** Responsible Care (RCMS) Related documents

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1.0 INTRODUCTION

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**THIS DOCUMENT WILL BE CONSIDERED AN UNCONTROLLED DOCUMENT 24 HOURS AFTER PRINTED DATE AND TIME.**
1.1 Business Description

TOTAL CRAY VALLEY, a division of Total Petrochemicals & Refining USA, Inc. (henceforth referred to as “the company” or TCV) is a leading manufacturer of solid monomers, aliphatic/aromatic hydrocarbon resins, functionalized polybutadiene resins, hydroxy terminated polybutadiene resins and styrene maleic anhydride resins. The industries served by the company’s products include rubber, inks, coatings, adhesives, electronics, impact modifiers, etc.

TOTAL CRAY VALLEY, a division of Total Petrochemicals & Refining USA, Inc. was formed in 2014. Previously the company was known as Cray Valley USA, LLC and was formed in 2010 with the management team from the tackifier and functional additives businesses of Sartomer. The management of the company is committed to the principles of quality and continuous improvement.

The company Corporate Headquarters located in Exton, Pennsylvania includes Quality, Sales, Business Management, and Research & Development (synthesis group only) functions for all U.S. based production facilities.

The company produces solid monomers at its Stratford, Connecticut and Chatom, Alabama locations.

The company produces hydrocarbon resins at its Beaumont, Texas location.

The company produces hydroxy terminated polybutadiene resins and styrene maleic anhydride copolymers at its Channelview, Texas location.

The company produces functionalized polybutadiene at its Grand Junction, Colorado location.

1.2 Scope

The company Management System is described within this manual. ISO 9001 and RCMS registered sites are shown in Table 1 below. The current Cray Valley Responsible Care Management System (RCMS) Certification still applies for Total Cray Valley. The company will be incorporated into the Total Refining & Petrochemicals RCMS certification by the end of 2016.

<table>
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<th>Registered Site</th>
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<td>Channelview, TX - Manufacturing Site</td>
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The product lines included within the scope of the company’s Management System are metallic monomers, hydrocarbon resins, functionalized polybutadiene resins, hydroxy terminated polybutadiene resins, styrene and maleic anhydride resins.

The Channelview, Texas operation does not currently include Responsible Care. The ISO scope includes engineering, the quality control laboratory, purchasing and management for the manufacture of hydroxyl-terminated polybutadiene resins and styrene maleic anhydride resins. Operations, maintenance, scheduling and warehouse processes are out-sourced to Lyondell Basell.

The company sells hydrocarbon specialty chemicals for customer use. Products are sold on specifications which apply directly to the product sold and can be verified by documented testing procedures performed directly on the product. The company makes no specifications or warranties on the performance of the product. It is up to customers to test products for their specific (and often confidential proprietary) end application. The customer validates the products for their use. As a result, R&D applications group work is not included in the scope of ISO 9001:2008. The R&D applications personnel are chartered with teaching customers about potential use of our products, evaluating potential new uses for product and developing first point information for new applications suggestions to customers, etc. In no case, however, does the company make any specifications concerning the application behavior or end performance of polymerized product. The company specifically avoids such specifications. The customer is responsible to test and validate use of the product for their intended application in their systems. The company’s R&D applications group personnel are available as support for customers and as researchers to investigate potential new uses of the company’s products. The group does not engage in the Design and Development of products and is therefore not included in the scope of ISO 9001:2008.

Customer Service, Domestic and International, Logistics, and Purchasing are outsourced through Total Refining & Petrochemicals Americas (TPRI). Processes and procedures to ensure compliance with the ISO standard and controls are defined throughout this manual and in referenced documents, as applicable.

A third party Registrar independently assesses that the requirements of the applicable standards are satisfied within the company’s Management System.

### 1.3 Management System Outline

The company’s Management is committed to quality and its efforts to continue providing quality materials and services is a priority. The company will put resources in place to manage and continuously improve programs and processes. The company will have as a priority meeting and exceeding the needs of our customers. The Management System defined in this manual ensures the effective operation and control of our business processes. The Management System is process-based to ensure customer requirements are understood throughout the organization and met through value added activities that result in and enhance customer satisfaction.
The company has recognized the value and synergy that comes about with compatible management systems. Therefore, the Responsible Care Management System follows a similar structure to the Quality System. The company clearly recognizes that in meeting and enhancing customer requirements it must meet and continually improve its responsibilities to quality, health, safety, security and our environment.

2.0 REFERENCES
2.1 ISO 9000 - Management Systems-Fundamentals and Vocabulary
2.2 ISO 9001 - Management Systems-Requirements
2.3 Responsible Care Management System - Technical Specification

3.0 TERMS AND DEFINITIONS
3.1 ERP: Enterprise Resource Planning
3.2 Key Performance Indicators (KPI): the company’s Quality and EHS&S Objectives
3.3 Management Representative for ISO: Corporate Quality Manager
3.4 Management Representative for RCMS: TPRI EHSS Group Representative
3.5 Top Management: TCV Executive Management Committee
3.6 TMS: Training and Document Management System

4.0 MANAGEMENT SYSTEM

4.1 General Requirements

The company Management System is maintained and continually improved in accordance with the requirements of this Management System Manual, ISO 9001, and the RCMS Technical Specification. The company Management System consists of a series of interrelated processes applied across the organization that ensure customer requirements are met with the aim of enhancing customer satisfaction. Criteria and methods have been identified to make certain that these processes are and remain effective. Resources, including knowledge bases and any other necessary information, have been provided for the proper functioning of the Management System so that its planned results can be obtained.

Ongoing monitoring, measuring and analysis of the Management System processes not only provide verification of planned results but also provide the foundation for their continual improvement.

Additionally, for any outsourced processes that affect product conformity, the company’s Management System ensures that these processes are controlled to the extent necessary to assure conformance to customer requirements. The company ensures control over its outsourced processes and verifies that the outsourcing does not impact the organization’s capability to provide products that conform to requirements. Outsourced processes that are performed by Total Petrochemicals and Refining (TPRI) shared services for all manufacturing locations include Purchasing, Customer Service, and Logistics (carrier and warehouse management). Outsourced processes that are performed by Lyondell Basel for the Channelview, TX manufacturing facility include operations, maintenance, scheduling and warehouse activities. Outsourced processes that are performed by ITI for the Beaumont, TX facility include packaging and warehouse activities.
4.2 Documentation requirements

4.2.1 General

The company Management System is documented through the Safety Health Environment Quality Charter (signed by Phillippe Doligez, 2013), the company Key Performance Indicators (KPI) and this Management System Manual. Key procedures for Management System Awareness, Document Control, Training, Management Review, Internal Auditing, Nonconforming Product, Corrective Action, and Preventive Action are referenced where applicable in this Management System Manual. Additional controlled documents, including procedures, work instructions, lists and forms, have been created to ensure the effective planning, operation and control of the Management System processes at the Corporate and Site levels. Records that support and provide objective evidence for the Management System processes are maintained at both the Corporate and Site levels.

Controlled documentation (with the exception of records) for the Management System is managed and administered in TMS, the company’s electronic document control and training system.

4.2.2 The company Management System Quality Manual

This Management System Manual, authorized by the company’s Executive Management Committee, is established and maintained by the Quality Manager. It includes the scope of the company’s Management System; the scope of the Key Performance Indicators; and descriptions of the processes and their interactions that make up the Management System. References to core Quality procedures are included where applicable within this Management System manual. References to RCMS procedures can be found within the manual and in Appendix 1. For an overview of the interaction of the Management System processes please refer to Figure 1.
4.2.3 Control of Documents

Documents required by the Management System shall be controlled in accordance with the specified Corporate procedures. The Corporate document control procedures include the following:

- CR-DC-PR-0002 - Preparation and Control of the SHEQ Charter, Key Performance Indicators, and Management System Manual
- CR-DC-PR-0003 - Preparation and Control of Documentation in TMS
- CR-DC-PR-0004 - Controlled Document Training in TMS

These procedures, as a minimum, ensure that the Management System documentation is approved for adequacy prior to being issued and used. Documentation is reviewed, updated and re-approved as necessary with any changes and the current revision status clearly identified. Through the use of TMS, the Management System documentation is legible and readily identifiable. Only relevant documents are available for use. Non-current revisions and obsolete documentation are archived in a controlled manner to provide retention and prevent unintended use. Additionally, where applicable in the Management System, documents of external origin are clearly identified and their distribution controlled.
4.2.4 Control of Records

Records required by the Management System are controlled in accordance with the corporate procedure governing control of records, CR-DC-PR-0003 - Preparation and Control of Documentation in TMS. Records have been established and are maintained to provide evidence of product conformity to requirements and the effective operation of the Management System. All records remain legible, readily identifiable and retrievable. In addition to the corporate procedure, Site and/or Department specific procedures have been established which define the controls needed for the identification, storage, protection, retrieval, retention and disposition of records at all relevant functions of the Management System. The company’s record procedures also comply with the TPRI Records Management Program and Records Retention Schedule.

5.0 MANAGEMENT RESPONSIBILITY

5.1 Management Commitment

The company through the activities of the Executive Management Committee ensures that the Management System is developed and implemented, and that its effectiveness is continually improved.

These activities include:

Communicating commitment to meeting our customer requirements including any statutory and regulatory obligations throughout the organization via the Safety Health Environment Quality Charter.

Measuring and communicating organizational performance through the establishment of the company Key Performance Indicators.

Conducting Management Reviews of the Management System at the Corporate level and ensuring that they are performed at the Site level.

Ensuring that adequate resources are planned and provided for assures the continuing effectiveness of the Management System and its continual improvement.

5.2 Customer Focus

The Company’s Executive Management Committee is committed to meeting our customers' requirements and enhancing our customers’ satisfaction. This commitment is realized by the establishment of processes that clearly determine our customer's needs and expectations then translating them into product that fulfill requirements. These processes include awareness and training for the company personnel on the importance of fulfilling customer requirements and expectations. Careful analysis of these processes, their subsequent outputs, and multiple feedback systems provide the foundation for their continual improvement.

5.3 Safety Health Environment Quality Charter.
Total’s Refining & Petrochemicals Americas Management has established the following Safety Health Environment Quality Charter. The Executive Management Committee ensures that the Safety Health Environment Quality Charter is communicated and understood by all company personnel and that the policy is implemented throughout the company. The policy is reviewed for continuing suitability annually during the Corporate Management Review.
5.4 Planning

5.4.1 Management Objectives (Key Performance Indicators)

The company’s Executive Management Committee has developed the highest level Objectives for the organization. These are known as Key Performance Indicators (KPI). The KPI are aligned with and support the Safety Health Environment Quality Charter and the Operating Philosophy.

The KPI consist of multiple measurable targets or goals in the areas of quality, environmental, health and safety. These KPI are based on risk and are indicators of not only actual performance but also continual improvement for the organization.

The Executive Management Committee conducts results versus target analysis for the KPI periodically throughout each year. During the Corporate Management Review, the KPI are reviewed for continuing suitability and adequacy.

KPI performance is communicated to the company personnel by the Management Representative through periodic updates via e-mail.

The KPI also form the basis for the Site specific goals and objectives that are established and maintained by the Plant/Site Managers. Site specific goals and objectives performance is communicated to the Site personnel through Site management processes.

5.4.2 Management System Planning

For the company, Management System planning is a hierarchical process that starts with commitment by the company’s Executive Management Committee to our stakeholders as expressed in the Safety Health Environment Quality Charter. Developed from this policy are the risk based Key Performance Indicators that provide measurable objectives for organizational performance and continual improvement. To obtain these objectives and support their continual improvement, resources have been provided for the development, implementation, and deployment of the processes described in this Management System Manual. These processes and their interactions provide the fundamental planning for the company Management System.

Changes or modifications to the company Management System, typically as a result of altering business conditions, are handled in a planned, controlled manner such that the integrity of the Management System is not compromised. Such changes are managed through Corporate and Site Management Reviews as well as a proactive review of Management System documentation. In addition, each manufacturing facility has implemented management of change processes to meet and comply with requirements for health, safety, and environmental. These processes maintain the integrity of the Management System and ensure its compliance with ISO 9001, and the RCMS – Technical Specification.
5.4.3 Risk Management

The company has implemented various systems for identifying and evaluating health, safety, security and environmental hazards and assessing and prioritizing risks with new and existing products and processes, as well as changes to existing products and processes. These systems include the distribution, transportation and use of raw materials and products, and activities associated with the company's operations.

Hazards and risks for new products are assessed in accordance with the Product Evaluation/Risk Assessment Procedure, CR-PD-PR-0011 in coordination with the TPRI EHSS Group. In addition, each manufacturing site has process trial procedures in place that also include risk assessment.

Existing products hazards and risks have been assessed by TPRI Product Safety in accordance with the requirements of the product safety code of Responsible Care. As a part of this system, product distribution, employee health and safety, environmental, security, and community risks are also evaluated.

Process hazards and risks are evaluated as a part of the Process Safety Management protocol for performing process hazard analysis and as a part of the management of change process. Each manufacturing facility has procedures in place to identify and prioritize hazards and risks associated with their processes.

The evaluation of risks associated with the use and distribution of raw materials is performed by the TPRI EHSS Group and is incorporated into the company's Purchasing procedure for assessing suppliers of new raw materials or alternate suppliers for existing raw materials, CR-PU-PR-0034 Material/Supplier Approval.

5.5 Responsibility, Authority and Communication

5.5.1 Responsibility and Authority

All authorities and responsibilities reside with the company's Executive Management Committee and are delegated to functions, departments, teams and/or individual personnel within their control as appropriate.

The authorities and responsibilities for the company Management System are clearly defined and well communicated within the organization. Overall responsibility and reporting functions are documented in the company's organizational charts. These organizational charts are located at: http://nic.pch.chem.corp.local/OrgCharts/OrgPublisher/OrgUnit.htm. Detailed responsibilities and specific authorities are contained within the controlled documentation for the Management System. Training on these documents ensures that affected personnel clearly understand these responsibilities and authorities. Changes in responsibilities and/or authorities are communicated in a timely manner to all company personnel by TRPI HR personnel. This allows any changes that may affect the Management System to be handled in a planned, controlled manner such that its integrity is not compromised.
The company personnel who manage, perform and/or verify work are responsible for the quality of the work. All personnel are authorized to identify and record problems relating to products and processes including Environmental, Health, Safety, and Security issues as well as Quality issues. All personnel have the responsibility to assure that processes are in a state of control and that the tasks are completed in a responsible manner. All personnel are also responsible for identifying nonconforming product, segregating such product as being nonconforming, notifying management, and controlling further processing until the problem has been corrected. To prevent nonconformities, they may also initiate, recommend, or provide solutions through designated channels, such as the Corrective and Preventive Action system.

5.5.2 Management Representative

ISO Corporate Management Representative

The company’s Executive Management Committee has appointed the Corporate Quality Manager, as the Corporate Management Representative, with the authority and responsibility to ensure that processes needed for the Management System are established, implemented, maintained and continually improved across the organization. The Quality Manager is responsible for evaluating the effectiveness of the Management System organizational wide and reports on its effectiveness and improvements to the Executive Management Committee during the Corporate Management Review. Also, the Quality Manager is responsible for the promotion of awareness of customer requirements throughout the organization and acts as a corporate liaison with external parties on matters relating to the Management System.

Site ISO Management Representative

Site ISO Coordinators assist the Corporate Quality Manager in executing these duties at each of the ISO 9001 registered Manufacturing Sites. The Site ISO Coordinators are responsible for coordinating the Quality Assurance activities at their respective manufacturing Sites. These individuals, irrespective of other duties, have the authority and responsibility to ensure that the requirements of the Management System are established and implemented at their respective locations. The Site ISO Coordinators are responsible for evaluating the effectiveness of the Management System processes at their respective locations and reporting on it to the Site Management during the Site Management Reviews. The Site ISO Coordinator is responsible for reporting the results of the Site Management Review Meetings to the Corporate Quality Manager who will communicate the results to the Executive Management Committee. Any issues or concerns will be reviewed at the EMC meetings as needed. The Site ISO Coordinator is responsible for the promotion of awareness of customer requirements throughout their respective Site and acts as the Site liaison with external parties on matters relating to the Management System. In the absence of the Site ISO Coordinator, the Corporate Quality Manager will assume these responsibilities until a new site coordinator is assigned.

Responsible Care (RCMS) Coordinator
The Responsible Care Coordinator (TPRI HSSE Assurance Manager) serves as the corporate representative within the company for the Responsible Care Management System implementation activities as well as the liaison between the American Chemistry Council and the company. The Responsible Care Coordinator has the responsibility and accountability for the overall RCMS implementation and certification plan, implementation of Responsible Care code requirements (i.e. product safety, process safety, security, etc.), reporting Responsible Care performance data and other RCMS related requirements. Each manufacturing facility has appointed a site representative to work with the TPRI Assurance Group to comply with all Responsible Care and RCMS requirements.

5.5.3 Internal Communication

Internal communication processes are an essential component of the company Management System and are recognized as such by the Executive Management Committee. Objectives, performance, and changes for the Management System are communicated within the organization through both formal and informal mechanisms.

Effectiveness of the Management System is communicated to various levels and functions throughout the organization through the use of periodic KPI Updates, Corporate and Site Management Reviews, Internal and External Audits, Corrective and Preventive Action Systems, Training and Awareness Programs on the company intranet. The company maintains and encourages numerous Teams that are focused not only on resolving issues and problems but are also working on continual improvement projects. Records of these teams' activities are maintained through meeting minutes. Augmenting the formal processes that are in place is a variety of information communicated through the e-mail system and on the TPRI company intranet (Working @ RPA).

Employee Involvement

The company has established processes by which employees can participate in the development, communication, and implementation of Management System processes. Manufacturing facilities have developed employee participation programs in accordance with their site PSM programs to ensure employee involvement in the development and maintenance of the elements of process safety. Employees are encouraged to participate on cross functional team, identify and communicate safety concerns, report and aid in the investigation of accidents/incidents, participate in the identification and implementation of corrective/preventive actions, and participate in community outreach activities.

5.5.4 Public and Stakeholder Communications

The company has established and implemented mechanisms to seek public and stakeholder input regarding products and operations. Information is provided to the public and relevant stakeholders concerning environmental, health, safety, and security risks and feedback is solicited in accordance with the Community Outreach Procedure, CR-SC-PR-0001, and other documents referenced in Appendix 1.

5.6 Management Review
5.6.1 General

Corporate and Site Management Reviews are held to assess and evaluate the Management System to ensure its continued effectiveness and suitability in satisfying the requirements of this Management System and KPI performance.

Corporate Management Reviews are conducted periodically in accordance with CR-QA-PR-0023 - Corporate Management Review. Site Management Reviews are conducted at least annually in accordance with the site-specific procedure.

Topics discussed during the Management Reviews and resulting action plans are recorded in Management Review agendas and meeting minutes, which are maintained as records. The results of the Corporate Management Reviews are communicated to the Site ISO Coordinators for dissemination to Site personnel as appropriate. Results of the Site Management Reviews are communicated to the Management Representative (Quality Manager) for incorporation into the Corporate Management Review Meeting.

5.6.2 Review Input

As a minimum for the Corporate and the Site Management Reviews the following topics are addressed:

- Results Of Internal And External Audits
- Stakeholder Feedback including customers
- Process Performance And Product Conformity
- Status Of Preventive And Corrective Actions
- KPI and/or Site-Specific Objectives Performance vs. Target
- Follow-Up Actions From Previous Management Reviews
- Changes That Could Affect The Company Management System
- Recommendations For Improvement

Data from both Quality and RCMS processes will be reviewed in these areas. During the Corporate Management Review, the Safety Health Environmental Quality Charter is reviewed for continuing suitability.

5.6.3 Review Output

Outputs from the Corporate and Site Management Reviews include action items regarding the improvement of the Management System, improvement of the product in relation to customer requirements, and the identification of any needed resources to ensure the continuing satisfaction of our stakeholders including customers. The Corporate Management Review output also includes the results of the review of the continuing suitability of the Safety Health Environmental Quality Charter.

6.0 RESOURCE MANAGEMENT
6.1 Provision of Resources

The Executive Management Committee ensures that resource requirements are identified and provided to implement, maintain and continually improve the Management System to meet and enhance customer requirements and satisfaction.

6.2 Human Resources

6.2.1 General

Company personnel performing work affecting product conformity to requirements are competent on the basis of appropriate education, training, skills and experience as evidenced by training records. Training needs are determined and fulfilled according to CR-TR-PR-0001 - Personnel Competence, Training and Awareness for the Management System and jobs setup for training on Management System documents in the TMS document control system. In addition, training on TPRI programs and documents is managed through the Total LMS - TrainingMine application.

6.2.2 Competence, Training and Awareness

The company's Executive Management Committee ensures that staffing and skill levels within the organization are appropriate to ensure the optimal efficiency and effectiveness of our operations.

The company's Executive Management Committee ensures where applicable that training or other actions achieve the necessary competence by evaluating the effectiveness of the training or other actions taken are carried out by departments responsible for the work.

Company personnel receive a Management System orientation in accordance with CR-QA-PR-0018 – Management System Awareness Training. The company’s Safety Health Environment Quality Charter is communicated during this training. This includes conveying the importance of each individual's role and function within the organization, and how they contribute to the achievement of the Key Performance Indicators. Specific requirements for education, skills, training and experience can be found in Department and or Site documentation. Individual Departments and or Sites maintain training records.

6.3 Infrastructure

The company’s Management ensures that facilities are maintained appropriately to achieve conformity of the product, including workspaces, equipment, software and any supporting services related to facilities maintenance.

6.4 Work Environment
The company Management determines and manages the work environment needed to achieve conformity to product requirements. This is done through ensuring that appropriate human and physical factors of the work environment are considered and provided. Consideration of such factors includes; environmental, health and safety conditions; work methods; handling methods, and ambient working conditions.

7.0 PRODUCT REALIZATION

7.1 Planning of Realized Product

The company plans and develops the processes needed for product realization. Planning of product realization is consistent with the requirements of the other processes of the Management System. In planning for product realization, the company's considers the following as appropriate:

a) Specific quality objectives and requirements for the product.
b) Specific processes and documents, infrastructure and resources required for the product.
c) Hazards and risks of products and processes.
d) Verification, validation (if applicable), monitoring, measurement, inspection, test activities and verification and validation activities required for product acceptance.
e) Records to demonstrate achievement of requirements and conformity.

In general the Company's realization process planning includes the following (some of these functions may be the responsibility of TPRI personnel):

a) New Item Setup Plan
b) Contract Review and Acceptance
c) Purchasing Specifications for Critical Raw Materials
d) Inspection of Incoming Materials
e) Process Trials
f) Detailed Procedures and Work Instructions for Product Realization
g) Control of Monitoring and Measuring Equipment
h) In-Process Sampling and Testing
i) Final Product Inspection and Testing
j) Storage and Handling Requirements
k) Preventive Maintenance Programs to Maintain Critical Equipment Conditions
l) Maintenance of Records
m) Competence, Awareness and Training Requirements for Personnel
n) Internal Audit Program
o) Corrective and Preventive Action Systems (Including Customer Complaints)

7.2 Customer Related Processes

7.2.1 Determination of Requirements Related to the Product
The company determines customer requirements at various stages within the process. Business Managers, Sales, Research and Development, and Outsourced TPRI Shared Services for Customer Service and EHSS may all be involved in the determination of these requirements include the following:

a) Requirements specified by the customer, including the requirements for delivery and post-delivery activities. Batch strategies are setup in the ERP System relating to customer requirements that are then used during the inquiry, quotation, and order process.

b) Requirements not stated by the customer but necessary for specified or intended use, where known.

c) Statutory and regulatory requirements applicable to the product.

d) Any additional requirements considered necessary by the company.

7.2.2 Review of Requirements Related to Product

Prior to the submission of a quotation or acceptance of an order, including verbal orders, The Company requires that a review take place to ensure that the customer's requirements for the product have been clearly defined and documented. Various activities within the Customer order and fulfillment process are outsourced to the TPRI Customer Service Group. The TCV Customer Service process flow documents in TMS including CR-CS-PR-0001, Customer Order Review Process, contain detailed descriptions of the process steps, controls identified, interfaces and responsibilities, and records maintained. As a part of this process the TCV manufacturing facilities review orders to ensure that the company has the ability to meet customer requirements. If a received order or contract differs from the associated quotation, the differences are resolved before accepting and processing the order. Contract amendments, notifications, and change orders regarding the product or order are received and reviewed against the original contract and or order and are documented accordingly. Records are maintained in accordance with established procedures. Responsibilities for the maintenance of records are defined within the process flow documents and within TCV and TPRI records procedures.

7.2.3 Customer Communication

The company determines and implements multiple effective communication processes with customers including but not limited to the following areas:

a) Product Information
b) Inquiries, Contracts, or Order Handling Including Amendments (Handled through outsourced TPRI Customer Service)
c) Customer Feedback, Including Customer Complaints

Customer communications are typically routed through Sales, Business Management and/or TPRI Customer Service. Where appropriate Sales, Business Management and/or TPRI Customer Service personnel may contact other company personnel to assist and provide customers with technical information or information related to specific issues. Customers may also communicate directly with Quality Control and Quality Assurance staff on quality issues. Company personnel are empowered to take customer complaints and
enter the complaint information into the corrective action system whereby the complaint is routed to the responsible party in a timely and effective manner. Complaints taken by TPRI Customer Service are communicated to the Quality Manager who will enter them into the Complaint system whereby the complaint is routed to the responsible party in a timely and effective manner. The TPRI Customer Service Group is responsible for investigating causes and developing corrective action plans for any complaints received for activities performed by the outsourced TPRI Customer Service group.

Periodically a cross-functional team consisting of relevant functions may solicit customer feedback through use of customer surveys. The company maintains partnership teams with customers with which information is shared and acted upon. Customer communication processes are documented in multiple procedures and work instructions. Objective evidence is provided through quality records such as corrective action records, meeting minutes, surveys, signed mutually agreed upon specifications and other documents.

7.3 Design and Development

7.3.1 Design and Development Planning

New products intended for commercial development and realization at a company manufacturing facility or an approved external manufacturing facility such as a toller are designed and developed according to planned and controlled arrangements.

These planned and controlled arrangements consist of a detailed plan which includes inputs from Research & Development, Sales, Business Management, Quality, TPRI Environmental, Health & Safety, Production Management, Quality Control and Finance groups. Responsibilities for design and development activities are assigned to qualified personnel. Availability of adequate resources for design and manufacture of the product are also considered.

Transfer from Technology to Commercial Production is maintained and controlled through the use of planned and controlled process trials. To ensure effective communication, process trial plans and controls are documented in applicable manufacturing site procedures which include defined responsibilities and authorities for qualified personnel.

Throughout the design and development phase and the process trial phase, appropriate reviews, and verifications are conducted in accordance with the documented procedures. Validations (if applicable) are conducted in accordance with mutually agreed upon instructions with the customer.

7.3.2 Design and Development Inputs

New product specifications, including formulations, product characteristics, bill of materials, packaging, resource needs including warehousing, and where applicable; performance requirements are communicated to the manufacturing facilities by our Research & Development, Sales, Business Management, Production Management, Quality Control and Finance groups in a planned and controlled manner.
Research and Development coordinates with TPRI Environmental, Health and Safety to ensure that appropriate safety and environmental requirements and considerations are included in design and development inputs. Hazards are identified and risk assessments are performed. This provides for the safe manufacturing and handling of products by all stakeholders and the protection of the environment throughout the design process.

Where applicable design and development information from previous similar products is considered and used during the design and development input phase. This information is documented in the applicable lab reports, and process trial reports, as well as; any other requirements that are necessary for a successful new product introduction.

7.3.3 Design and Development Outputs

The company’s design and development output for a successful new product introduction consists of the following:

a) completed and approved process trial  
b) risk assessment  
c) controlled product specifications, including formulation and bill of materials  
d) MSDS and any other pertinent environmental and safety information required for the safe manufacturing and handling of the new product  
e) identification of the manufacturing site and any additional warehouses required for product realization  
f) identification of any new critical raw materials including the recommended supplier/producer  
g) production manufacturing plan (e.g. production batch packet)  
h) quality control inspection plan for critical raw materials, in-process and final product testing (e.g. qc inspection datasheets)  
i) packaging and labeling requirements  
j) new or modified procedures/work instructions for product realization  
k) training records for any new or modified procedures/work instructions for product realization  
l) costing  

Using the outputs referenced above, the company ensures that new product is not released unless it meets the design and development inputs unless authorized by the internal or external customer.

7.3.4 Design and Development Review

The Company’s design and development reviews involve the analysis by responsible and authorized individuals and process trial at planned intervals. Research & Development, Sales, Business Management, Quality, EH&S, Production Management, Quality Control and Finance groups are involved in these reviews during various stages of the design and development process.
The reviews include a verification that all required inputs and outputs are in place. Product verification and validation (if applicable) are performed in accordance with the applicable quality control and production process trial procedures.

During the course of these reviews, any actions resulting from them are documented accordingly in the applicable record.

7.3.5 Design and Development Verification

Design and development verification for new products is performed according to planned and controlled arrangements primarily using laboratory analysis of product characteristics and a production engineering (or equivalent) analysis of the process requirements. These analyses ensure that the new product has met the desired output criteria. A new product which does not meet design and development criteria is not released unless authorized by the internal or external customer.

Records of these verifications and any actions resulting from these verifications are maintained in the form of the applicable quality control inspection plan, production batch packet or plan, and the process trial documentation for the new product of interest.

7.3.6 Design and Development Validation

The company’s products are designed and developed to be used by a variety of customers in a variety of applications. The company often engages with customers to assist in their formulations and needs through co-operative interactions. However due to the multi-purpose applications and the product transformations that occur as a result of customer formulations, the company typically does not perform formal validations. Customers often will not share validation results with the company due to their proprietary nature. However should a formal validation be required for a new product, it will be conducted according to planned and controlled arrangements as mutually agreed upon with the customer. Records of such validations will be maintained by the appropriate company group responsible for the validation.

7.3.7 Control of Design and Development Changes

Design and development changes are handled in a planned and controlled manner. Changes to product specifications and process are identified, documented, reviewed and approved by authorized personnel prior to implementation. These personnel include representatives from the following groups: Research & Development, Sales, Business Management, Quality, EH&S, Production Management, Quality Control and Finance. In cases where applicable, customers are contacted prior to implementing the design and development change. Records of development changes and necessary actions are maintained by the appropriate company group.

7.4 Purchasing
7.4.1 Purchasing Processes

The company’s Corporate Quality Group and manufacturing site Quality Control and Purchasing functions, in cooperation with outsourced TPRI Purchasing, ensure that purchased goods and/or services conform to the company’s specified purchase requirements through controls documented in this manual, the RPA Purchasing Manual P2P process, TCV Purchasing and Site specific procedures and work instructions.

The company partially outsources its purchasing processes to the TPRI shared services Purchasing and Logistics groups. The following activities are currently being performed by TPRI shared service: the Purchase Order process and the evaluation and re-evaluation of approved packaging material suppliers, carrier, and external warehouse services. The company ensures control over its outsourced processes and verifies that the outsourcing does not impact the company’s ability to provide product that conforms to requirements.

Where applicable, suppliers for goods and/or services including but not limited to critical raw materials\(^1\), resale material (including tolled manufactured material) and containers are selected based on meeting the company’s Quality, Environmental, Health, Safety, Security and business criteria. Quality, Environmental, Health, Safety, Security and business criteria are dependent on the purchased goods and/or services impact on the realization process and/or quality of the final product. The criteria for supplier selection, evaluation, and re-evaluation are documented in the company’s procedures for supplier qualification and approval and referenced TPRI documents. Incoming inspection activities are documented in Site specific procedures and work instructions. In addition to initial evaluation and selection, where applicable, suppliers are re-evaluated through incoming inspection and annual supplier performance evaluations. These records are maintained.

7.4.2 Purchasing Information

Resource or purchasing requirements are typically initiated by the company through the creation of a purchase requisition in the ERP System by authorized company personnel. Controls over authorizations to perform any part of the process in the ERP system have been setup so that only authorized personnel may complete the activities. Purchases may only be made from approved Vendors. TPRI Purchasing converts the purchase requisition into a Purchase Order (PO). The PO is then approved by an appropriate TCV individual possessing a sufficient delegation of authority in the ERP System. Once approved the PO is forwarded to the Supplier. All steps in the process follow The RPA Purchasing Manual’s Purchase to Pay (P2P) process and the company’s personnel performing purchasing activities have received training on this process. PO records are maintained in the ERP System.

Where applicable, purchasing documents (PR and PO) will contain information and requirements deemed necessary by Purchasing, and the applicable company Site/Departments. This information contains where appropriate:

a) A Clear Description of the Goods and/or Services

\(^1\) The definition of critical raw materials is site specific and contained in site-specific documentation.
b) Pertinent Specifications

c) A Precise Definition of the Type, Class or Grade of the Goods and/or Services

d) Identification of any Required Management System or Applicable Standards

e) Requirements for Approval or Qualification for the Goods and/or Services, Procedures, Processes or Personnel

Purchasing documents (PR and PO) are reviewed by TPRI Purchasing and authorized TCV personnel for accuracy and completeness prior to being issued to the Supplier.

7.4.3 Verification of Purchased Product

Purchased products are verified upon receipt according to applicable Receiving Inspection and Test procedures. These procedures ensure that purchased product is not used or processed until it has been inspected or otherwise verified to meet specified requirements. The extent of the receiving inspection and testing performed is based on the nature of the purchased product and the history of the Supplier providing the product. Where testing of purchased product is deemed not necessary, Certificates of Analysis or review of manufacturing SPC records may be required.

In the event that incoming purchased product is used prior to verification of meeting specified requirements, the product must be approved for use in accordance with site specific procedures. The Production Department will document the final product batch/lot that the purchased product was used for should it become necessary to reject or recall the final product due to a failure caused by the purchased product not meeting specified requirements. Use of purchased product not meeting specified requirements is procedurally controlled at the individual manufacturing Sites including authorization by responsible qualified personnel.

Should the Company or our customers decide to verify purchased product at our supplier's premises prior to delivery, the arrangements, verification and release of such purchased products will be determined by Sales, Quality Control and Operations and when applicable by our customers. These arrangements and verification/release requirements will be documented on the Purchase Order by Purchasing or on the Contract by Sales and Marketing.

7.5 Production and Service Provision

7.5.1 Control of Production and Service Provision

The production of the company’s product is planned and carried out by qualified and trained personnel according to controlled procedures and work instructions. Groups responsible at the manufacturing Sites include: Production, Production Engineering, Safety, Maintenance, Shipping/Receiving and Quality Control. At the Corporate level the following functions may also be included: Production Planning, Quality Assurance, Marketing, Sales and Business Management, Environment Health and Safety, Process Engineering, and Project Engineering.

The controls in place for production include:
a) Product characteristic information, including quality criteria (critical raw material requirements, in-process product requirements and final product requirements) and frequency of testing.

b) Documented procedures and work instructions, which define proper work practices, equipment, production processes and criteria for use required for product conformity.

c) Availability and use of approved equipment required for product conformity.

d) A preventive maintenance and calibration program to ensure process capability for process equipment and monitoring and measuring equipment.

e) The implementation of monitoring and measurement activities as specified in Production and Quality Control documentation to verify product conformity.

f) Release, delivery and post delivery activities in accordance with contractual requirements, sales order requirements and regulatory requirements.

The Company does not service product. Should servicing become necessary, processes will be established to meet these requirements.

7.5.2 Validation of Processes for Production and Service Provision

Production process outputs at the company are verifiable by subsequent monitoring and measuring typically during in-process and final testing of product. Should any production process whereby the output cannot be verified be included in the company realization processes, they will be validated prior to use to demonstrate the process's ability to meet requirement. Such validation will involve qualifying the process, equipment, and personnel, as well as defining the work methods, procedures, required records for the process and its re-validation.

7.5.3 Identification and Traceability

The Company's manufacturing Sites maintain procedures to assign all final products with a unique identification whether it is manufactured via a batch or continuous process. These identifications are recorded and provide traceability of all batches and continuously produced products from raw material stage to final testing. This identification follows the product through the completion of processing steps. In some instances, a unique lot number in addition to the unique batch number will be assigned. This company lot number and/or batch number will become the company identification used for traceability of all company final products through delivery. These records are maintained at each manufacturing facility.

7.5.4 Customer Property

Customer supplied property shall be handled by the company in accordance with applicable Site controls. These controls include as a minimum, identification, verification, and protection. Customer supplied property will be received in a manner similar to any other materials purchased by the company that are incorporated into product sold by the company. If any customer-supplied property is lost, damaged or found to be unfit for use, the customer will be promptly notified. Records of customer property including notifications of any degradation will be maintained at the applicable site.
7.5.5 Preservation of Product

All materials and products under the company’s control are stored and handled in such a way as to preserve the product (including any constituent parts) in order to maintain conformity to requirements. Such protection is also extended to product being delivered, which is packaged appropriately to preserve product during delivery in order maintain conformity to requirements.

Employees handle items in such a manner as to ensure their own safety and the safety of others. All employees involved in the handling of products take care to handle and store them in such a manner as to prevent damage and deterioration and to maintain product identification. Appropriate handling and transport equipment is used at all times.

Products stored and shipped from off-site contracted warehouses are handled in such a manner as to preserve conformity of the product. The TPRI shared services Logistics Group evaluates potential warehouses and communicates all applicable storage, handling, and shipping requirements to the warehouses. As a minimum, contracted warehouses must have in place the types of storage and shipping controls that are required by the company before they will be used. Records of warehouse evaluations are maintained by the TPRI Logistics Group and made available to the company as necessary.

7.6 Control of Measuring and Monitoring Equipment

Monitoring and measuring equipment that are used to demonstrate product conformity are controlled according to the Manufacturing Site’s production and quality control processes. The appropriate measuring and monitoring equipment are selected based on the parameters to be measured and accuracy required.

Controls for measuring and monitoring equipment include:

a) Calibrating and/or verifying at prescribed intervals against standards or equipment having a known relationship to nationally recognized standards. Where no such standards exist, the basis for calibration or verification is documented.

b) Adjusting or re-adjusting measuring or monitoring equipment as necessary during the calibration and or maintenance process.

c) Measuring and test equipment is suitably identified with an identification tag on the equipment and a calibration record. The calibration status of measuring and test equipment is readily identifiable to preclude the unintended use of equipment out of calibration or under repair/maintenance.

d) The calibration status of measuring and test equipment is documented and records of calibration are maintained.

e) When measurement or test equipment is found to be out of calibration, the need for reassessing the validity of previous results is reviewed and the determination arrived at documented. The company shall then take appropriate action on the equipment and if deemed necessary any product affected.

f) When determined to have an effect on the equipment, environmental conditions are monitored and controlled.
g) The handling, presentation, storage, and environment of measurement and test equipment are controlled to assure that accuracy and fitness for use is maintained.

h) Precautions are taken to ensure adjustments are not made which would invalidate calibrations and/or the measurement results.

i) Computer software when used in the measuring and monitoring process is confirmed for use to satisfy its intended application and is reconfirmed when necessary.

8.0 MEASUREMENT, ANALYSIS AND IMPROVEMENT

8.1 General

The monitoring, measuring, analysis and improvement processes at the company are designed and implemented to ensure that our product requirements meet or exceed our customer requirements, make certain that the Management System performs as intended, and to continually improve the Management System.

Product requirement conformity is demonstrated through the use of quality plans, which define the necessary monitoring and measurement processes for the manufacture and inspection of our product.

Verification of the Management System's effectiveness and continual improvement is performed through the use of Safety Health Environment Quality Charter, Key Performance Indicators, internal and external audit results, analysis of product performance and customer feedback data, corrective and preventive actions, and Management Reviews.

Monitoring, measuring, analysis and improvement processes are determined, authorized, and implemented by the responsible individuals within the company and are documented accordingly in appropriate procedures. Where applicable statistical techniques such as SPC are utilized.

8.2 Monitoring and Measurement

8.2.1 Customer Satisfaction

Customer satisfaction is determined through multiple measurement processes in the company Management System. The company management analyzes these measurements so that performance in meeting and exceeding customer requirements and customer perception of the company is determined.

Customer satisfaction measurements included in the KPI are reviewed on a quarterly basis by the Executive Management Committee. Analysis of this data by the Executive Management Committee may lead to action plans for continual improvement.

These customer satisfaction measurements are released to the entire organization through quarterly updates to each Site's upper management. The customer satisfaction data is also analyzed during the Management Reviews.
Our Sales and Marketing groups stay in contact with customers regularly where issues such as product performance, current and future needs are discussed and handled. Records of these contacts are maintained through Call Reports and sent to Management Representatives throughout the organization.

The company provides opportunities for customer feedback through participation in trade shows throughout the year.

8.2.2 Internal Audit

The company conducts Internal Audits at planned intervals to determine whether or not the Management System conforms to the requirements of this Management System Manual, ISO 9001, Responsible Care® Management System Technical Specification and whether or not the system has been effectively implemented and maintained. Such audits are conducted in accordance with the Internal Audit procedures. The procedures define the requirements for qualification of personnel performing auditing, internal audit scheduling, conduct of audits including identification of nonconformities, opportunities for improvement, and for recording the audit results and reporting them to management. These procedures are listed below:

- CR-QA-PR-0001 - Internal Auditor Qualification and Training
- CR-QA-PR-0002 - Developing the Internal Audit Schedule and Conducting Audits
- CR-QA-PR-0014 - Internal Audit Corrective Action Requests

The Internal Lead Auditor, or designee, is responsible for scheduling and managing regular internal audits. Every area of the company that affects product requirements will be scheduled for internal audits according to the status and importance of the activities being audited.

Selection of Internal Auditors for each audit is based on impartiality and objectivity of the area being audited. Internal Auditors are trained in accordance with CR-QA-PR-0001 and do not audit their own work.

Nonconformities are recorded on Internal Audit Corrective Action Requests and issued to the responsible party. Responsible Area Management ensures that timely and effective corrective action is taken. Auditing personnel verify the adequacy and effectiveness of the corrective action and any preventive action taken. This may be completed by reviewing and verifying any necessary corrections and corrective actions or by inclusion for review in subsequent audits or special follow-up audits. Internal Audit results and subsequent analyses are an integral part of Management Reviews.

8.2.3 Monitoring and Measurement of Processes

The company monitors and measures the Management System processes to demonstrate and verify their ability to achieve planned results and to take correction and corrective action when necessary should planned results not be met. The company applies various monitoring and measuring methods both at the Corporate and Site levels to verify the effectiveness of the Management System.
- Corporate and Site objectives are reviewed during applicable Management Review meetings where action plans are initiated for deficiencies and potential deficiencies.
- Internal and external audit performance and results are considered an essential tool in verifying process behavior and are reviewed regularly.
- Production data and performance including delivery is continuously monitored and when necessary acted upon by applicable corrective and preventive action systems.
- Customer satisfaction is measured and monitored through the use of regular customer surveys, customer complaint processes and additional methods as referenced in section 8.2.1.
- Supplier performance through incoming inspection activities, and regular supplier performance evaluations is measured, monitored against specific objectives and when necessary acted upon.

As indicated above, multiple corrective and preventive action processes are used to act upon deficiencies identified versus planned results and when the potential for a deficiency versus planned results has also been identified.

Where applicable statistical techniques are used by the Management System for monitoring and measuring processes.

8.2.4 Monitoring and Measurement of Product

The company monitors and measures product characteristics to demonstrate and verify that product requirements are met and to take corrective action as necessary when product requirements are not met.

The monitoring and measuring of product characteristics takes place through receipt of critical raw materials, in-process manufacturing, final product processing, packaging and delivery and is performed in accordance with production and quality control plans.

The production and quality control plans contain the necessary information to affect the monitoring and measuring process. This includes but is not limited to instructions, methodology or technique, inspection-test-measurement equipment identification, characteristic identification, specifications with acceptance criteria, as well as any special environmental, health or safety information.

The production and quality control plans indicate the authorized personnel releasing the product to subsequent operations throughout the various manufacturing phases through receipt of critical raw materials to finished goods inventory and delivery.

Product (including critical raw materials) is not released to subsequent operations until all planned arrangements have been satisfactorily completed unless authorized by relevant personnel as detailed in controlled procedures.

Product is not released to the customer until all planned arrangements have been satisfactorily completed unless authorized by the customer.
8.3 Control of Nonconforming Product

Critical raw materials, in-process and final product found to be nonconforming to specified requirements are identified as such and are segregated and assigned a disposition in accordance with manufacturing site procedures for the control of nonconforming products. Site procedures for the handling of Nonconforming product follow the requirements specified in the corporate procedure CR-QA-PR-0019 – Control of Nonconforming Product.

Suppliers of critical raw materials found to be nonconforming will be issued a corrective action request through the SNN system in ETQ in accordance with CR-PU-PR-0005, Supplier Nonconformance Notice.

Disposition and authorization for use of nonconforming raw materials, in-process and final product is made by authorized individuals in accordance with CR-QA-PR-0019 and Site-specific processes. Nonconforming product that is reworked is re-verified against specifications to ensure product conformity.

Final product that does not conform to specified requirements may be offered to customers for concession. The company’s Business Management makes the decision to sell off-spec material and coordinates the generation and communication of off-spec release waivers to the customer through the appropriate manufacturing site Quality Representative and the TPRI Customer Service Group. Site Quality Control Management ensures accurate reporting of the product nonconformity on the release/waiver document. The TPRI Customer Service group forwards the release/waiver document to the customer for authorization. The controls and responsibilities associated with these activities are defined in the company’s Off-Spec Release/Waiver Process flow document.

If nonconforming product is detected only after delivery or use has started, Marketing and Sales personnel, Business Management, Quality Control and/or Quality Assurance personnel will ensure that all affected parties are aware of the nonconformity, as appropriate to the effects or potential effects of the nonconformity.

8.4 Analysis of Data

Continuing suitability and effectiveness of the company Management System is determined through the collection and analysis of data. The evaluation of this data also includes identifying opportunities for improving the effectiveness of the Management System.

The collection and analysis of data is done at both the Site and Corporate levels through the Management Reviews as indicated in section 5.6 of this Management System Manual. Data presented during these reviews includes multiple sources of information on customer satisfaction, conformity to product requirements, product and process characteristics and trends, opportunities for preventive action, and supplier performance. Records of the analysis of these data sources are maintained in the Management Review meeting minutes.
8.5 Improvement

8.5.1 Continual Improvement

The company continually improves the effectiveness of the Management System through use of the Quality Policy, KPI, internal and external audit results, analysis of data, corrective and preventive actions and Corporate and Site Management Reviews. Provisions for such improvements are found in sections 5.3, 5.4, 5.6, 8.4 and 8.5.

8.5.2 Corrective Action

Corrective actions are taken to eliminate the causes of nonconformities in order to prevent their recurrence. Actions taken are appropriate to the impact of the problems encountered. Corrective Actions may be initiated by anyone in the company according to the corrective action procedure, CR-QA-PR-0020 - Corrective Action Processes. Such actions will be handled and recorded according to the applicable corrective action process. Each of the company corrective action processes includes the following elements:

- Determine and implement the immediate action needed to correct the nonconformity as applicable.
- Determine the most probable cause or causes as applicable.
- Evaluate, determine and implement the action needed to prevent recurrence of the nonconformity as applicable.
- Reviewing the effectiveness of the corrective actions taken.

Accident/Incidents

The organization has established and implemented a system to identify and investigate incidents and accidents in order to identify root causes and implement corrective/preventive actions to mitigate any adverse impacts. Accidents and incidents are investigated and reported in the IMPACT incident investigation software. The TPRI EHS&S Group will assist with accident/incident investigation as needed. Records of accident/incident investigations are maintained and key findings are shared with employees and other relevant stakeholders.

8.5.3 Preventive Action

Preventive actions are taken to eliminate the causes of potential nonconformities in order to prevent their occurrence. Actions taken are appropriate to the potential impact of the problems that may be encountered. Preventive Actions may be initiated by anyone in the company according to the preventive action procedure, CR-QA-PR-0021 - Preventive Action Processes. Such actions will be handled and recorded according to the applicable preventive action process.
Preventive action processes vary significantly in technique and application but all typically include the following elements:

- Preventive action processes are used to identify and determine potential nonconformities and their potential probable cause.
- The need for action to prevent occurrence is evaluated based on the magnitude of the risk for the potential nonconformity.
- If action is deemed necessary, the type of action is determined and implemented again based on the magnitude of the risk for the potential nonconformity.
- Records of the preventive actions taken are recorded according to the applicable preventive action process.
- Reviewing the effectiveness of the preventive actions taken.

Appendix 1
Responsible Care (RCMS) Related Documents

<table>
<thead>
<tr>
<th>Document Code</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>CR-CM-PR-0007</td>
<td>Distribution of Non-Regulatory Environmental, Health, Safety and Risk-Related Information to Customers and Other Direct Product Receiver</td>
</tr>
<tr>
<td>CR-CM-PR-0025</td>
<td>Product Stewardship Procedure for Customers and other Direct Product Receivers</td>
</tr>
<tr>
<td>CR-PS-RR-0004</td>
<td>Employee Participation</td>
</tr>
<tr>
<td>CR-PS-RR-0006</td>
<td>Process Hazard Analysis</td>
</tr>
<tr>
<td>CR-PS-RR-0013</td>
<td>Management of Change</td>
</tr>
<tr>
<td>CR-PS-RR-0014</td>
<td>Incident Investigation</td>
</tr>
<tr>
<td>CR-SC-PR-0001</td>
<td>Community Outreach Procedure</td>
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<tr>
<td>CR-SC-SR-0007</td>
<td>Community Recovery</td>
</tr>
<tr>
<td>CR-SC-PR-0010</td>
<td>Security Vulnerability Assessment Procedure</td>
</tr>
<tr>
<td>CR-SC-PR-0014</td>
<td>Procedure to Minimize Business Disruption</td>
</tr>
<tr>
<td>CR-EC-PR-0001</td>
<td>Regulatory Requirements to Operate</td>
</tr>
<tr>
<td>CR-EC-SR-0004</td>
<td>Waste Service Provider Evaluations</td>
</tr>
<tr>
<td>CR-EC-SR-0005</td>
<td>Compliance Auditing Procedure</td>
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<tr>
<td>CR-EC-LI-0001</td>
<td>Regulatory Compliance Requirements</td>
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<tr>
<td>Various IDs</td>
<td>Crisis Communications Templates in TMS</td>
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<tr>
<td>Various IDs</td>
<td>Fact Sheets – by location in TMS</td>
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<tr>
<td>CR-Responsible Care Guiding Principles</td>
<td>Responsible Care Guiding Principles</td>
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<tr>
<td>Various IDs</td>
<td>Manufacturing Site procedures for Process Hazard Analysis, Management of Change, Employee Participation, Incident Investigation, Crisis Communication, Emergency Response, and Permit to Operate Assessment</td>
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</tbody>
</table>