

Control Technology Inc. (CTI) is committed to the protection of the environment through the implementation of an effective environmental management program. At a minimum, the company will comply with all applicable environmental legislation and will make every reasonable effort to exceed its formal obligations for protecting the environment as well as the health safety of all employees and the general public. As part of this commitment CTI will, on an ongoing basis:

- Assess the potential effect of its operations on the environment and prevent or mitigate these effects as much as possible by introducing protective measures into regular operational procedures in the areas of safety and human health, equipment and site inspection and waste management and disposal.
- Comply with the applicable laws of the provincial or federal jurisdiction within which it is operating. Employees will be informed of such laws; their responsibilities and operations will be monitored to ensure compliance.
- Correct or improve procedures as necessary to minimize environmental effects caused by company and contractor-controlled activities.
- Develop emergency response procedures to minimize consequences of environmental accidents and provide adequate training of employees to ensure effective response.

Employee/Contractor Responsibilities

- Environmental protection measures will be incorporated into normal company operational procedures in the areas of health and safety, equipment and site inspection and onsite waste management and disposal.
- Management and workers share responsibility for the incorporation and implementation of these environmental measures into day to day operations.
- CTI will monitor activities under its direct control for potential environmental damage and will utilize accepted procedures to minimize or correct any damage caused promptly and effectively.
- Unique worksite conditions, if encountered, will be discussed with employees to determine what special equipment or procedures may be required to undertake the work in an environmentally acceptable manner.
- CTI will provide environmental awareness information and training to employees, when required, to meet or exceed recommended industry guidelines and practice.
- The President is responsible for the overall implementation and direction of CTI's environmental program and for making environmental training available to employees. The supervisors are responsible for and will facilitate the incorporation of environmental measures into daily operations. Employees are responsible for understanding and carrying out environmental procedures developed.
- CTI shall notify the appropriate regulatory authorities if an environmental hazard approaches Control Technology Inc.'s property boundaries.

Site/Facility Maintenance Guidelines

- CTI will actively reduce worksite environmental cleanup requirements resulting from its activities by efficient equipment maintenance, correct waste management and disposal procedures during operations.
- CTI will endeavor to incorporate the 4R's (ie. Reduce, reuse, recycle and recover) into the day to day procedures to minimize operations impact on the environment
- Spills and other environmental hazards will be reported by employees to the manager and, when required, to the appropriate environmental regulatory agency.
- Employees are responsible for ensuring that company developed policies and procedures for onsite waste disposal, hazardous/non-hazardous waste segregation and disposal and for recyclables and non-recyclable waste segregation are followed.

Environmental Spill Response

- CTI will maintain equipment efficiently and train employees in proper procedures and handling of products in order to recue the occurrence of spills and other releases.
- Spills that generate an immediate public health or safety concern or are of a magnitude that is not possible to contain or which will affect a sensitive area, are to be reported immediately. Reportable spills of lesser severity or degree of threat are to be reported as soon as possible once the severity is known, initial hazards have been eliminated and the spill is contained.
- In all cases, should reportable spills occur, the workers are responsible for taking immediate action to contain and clean up the spill and to report the incident to management. Management will then report to the designated regulatory agency.

Waste Management and Disposal

- It is a priority of CTI, as part of its waste management plan, to minimize the amount of waste generated by its activities. This will be accomplished by using the 4 R's, equipment inspections, maintenance and modification and, where possible, through operational procedure changes.
- Waste that requires disposal will be separated into dangerous and non-dangerous products and transferred to appropriate licensed recycling facilities/suppliers or disposed of in an approved landfill.
- Further separation of the various waste products (in each classification) in their own containers will also be carried out as determined necessary by CTI.

Training

It is the policy of CTI to train employees in the following areas to promote environmental regulation compliance:

- Handling and storage of dangerous goods and hazardous materials at the worksite (WHMIS)
- Maintenance of equipment and the prevention of leaks and spills.
- Spill response procedures and reporting
- Waste minimization, recycling and proper documentation for disposal
- General environmental awareness

Signed: _____



J.A. (Jim) Evans, President,
Control Technology® Inc.

Date: _____

19 NOVEMBER 2019