

FM Nelkin Environmental Policy

Environmental Management, Legal Compliance, Waste Reduction, Resource Efficiency, Pollution Prevention, Training, Reporting, and Annual Review

Document field	Details
Document owner	Director of Operations, or delegated management representative
Responsible manager	Daniel Moore, Director of Operations, or delegated management representative
Approved by	Senior Management
Effective date	04/10/2026
Review cycle	At least annually, and sooner if laws, operations, facilities, customer requirements, audit findings, incidents, or environmental risks materially change
Applies to	All FM Nelkin employees, managers, temporary workers, contractors, visitors, service providers, facilities, offices, and activities within FM Nelkin's operational and RJC certification scope
Document status	Policy draft for management review and approval

This policy is designed for use in FM Nelkin's RJC compliance program, onboarding materials, management system records, supplier/customer communications, and public policy disclosures where appropriate.

1. Purpose

FM Nelkin is committed to conducting business in a manner that protects the environment, supports responsible business practices, complies with applicable legal and regulatory requirements, and reduces adverse environmental impacts where practicable.

The purpose of this Environmental Policy is to establish FM Nelkin's commitments, responsibilities, controls, training expectations, recordkeeping practices, reporting process, and annual review requirements for managing environmental matters across the company's operations.

This policy supports FM Nelkin's responsible business practices and RJC management system by setting clear expectations for employees, managers, contractors, suppliers, customers, visitors, service providers, and other stakeholders who interact with FM Nelkin.

2. Scope

This policy applies to all FM Nelkin locations, departments, job functions, operational activities, purchasing activities, production and repair work, shipping and receiving, storage areas, waste handling, office activities, contractor activities, and other activities within FM Nelkin's operational and RJC certification scope.

This policy covers environmental topics including, but not limited to:

- Legal and regulatory compliance.
- Responsible use of energy, water, materials, packaging, and other resources.
- Waste prevention, reuse, recycling, segregation, storage, and lawful disposal.
- Chemical, cleaning product, oil, soldering material, wastewater, and hazardous or non-hazardous material management.
- Pollution prevention, spill prevention, housekeeping, and emergency response;
- Land and soil protection.
- Air emissions, dust, fumes, odors, and indoor environmental conditions where relevant.
- Contractor and service provider environmental expectations.
- Training, communication, grievance reporting, monitoring, corrective action, and annual review.

3. Policy Statement

FM Nelkin will make reasonable efforts, appropriate to the size, nature, and risk profile of its business, to prevent pollution, reduce waste, conserve resources, maintain compliant operations, and continuously improve environmental management practices.

FM Nelkin will comply with applicable environmental laws, regulations, permits, lease requirements, customer requirements, and other binding obligations. Where FM Nelkin's internal standards are more protective than minimum legal requirements, the company may apply the higher standard.

FM Nelkin expects employees, managers, contractors, visitors, suppliers, and service providers to follow applicable environmental procedures, use materials responsibly, prevent improper disposal, promptly report concerns, and cooperate with inspections, investigations, corrective actions, training, and recordkeeping requirements.

4. Environmental Commitments

FM Nelkin commits to:

1. **Comply with applicable environmental requirements.** FM Nelkin will identify, monitor, and comply with environmental laws, regulations, permits, lease requirements, customer requirements, and other obligations that apply to its operations.
2. **Prevent pollution.** FM Nelkin will use practical controls to prevent spills, leaks, improper disposal, releases, contamination, dust, fumes, odors, and other environmental impacts where reasonably practicable.
3. **Reduce waste.** FM Nelkin will seek to reduce unnecessary waste through careful purchasing, inventory control, reuse, recycling, proper segregation, and responsible disposal.
4. **Use resources efficiently.** FM Nelkin will encourage efficient use of electricity, water, paper, packaging, office supplies, production materials, and shipping materials.
5. **Manage materials responsibly.** FM Nelkin will store, label, handle, and dispose of chemicals, cleaners, oils, soldering materials, scrap, production waste, and other materials in a safe, organized, and lawful manner.
6. **Protect land and soil resources.** FM Nelkin will maintain controls to prevent contamination, improper disposal, or other avoidable impacts to land and soil resources connected to its operations.
7. **Engage stakeholders where appropriate.** FM Nelkin will communicate with employees, contractors, building management, landlords, waste vendors, customers, suppliers, regulators, and other relevant stakeholders when environmental matters require coordination or disclosure.
8. **Train relevant personnel.** FM Nelkin will provide practical environmental awareness and role-based instruction to employees and contractors whose work may affect environmental performance.

9. **Maintain records.** FM Nelkin will keep environmental records in an organized and retrievable manner to support compliance, accountability, audit readiness, and continuous improvement.
10. **Review and improve.** FM Nelkin will review this policy and environmental performance at least annually and update controls when needed based on operations, risks, incidents, audit findings, stakeholder feedback, or changes in legal requirements.

5. Governance and Responsibilities

5.1 Senior Management

Senior Management is responsible for:

- Approving this policy and supporting its implementation.
- Providing reasonable resources, oversight, and authority for environmental management.
- Reviewing environmental performance at least annually.
- Ensuring material environmental issues are addressed through corrective and preventive action.
- Supporting a culture where environmental concerns can be raised without retaliation.

5.2 Director of Operations or Designee

The Director of Operations, or delegated management representative, is responsible for:

- Coordinating implementation of this policy.
- Maintaining environmental procedures, records, registers, inspection results, action plans, and annual review materials where applicable.
- Monitoring environmental compliance obligations relevant to FM Nelkin's operations.
- Coordinating communication with employees, contractors, vendors, building management, landlords, customers, suppliers, regulators, and other stakeholders where needed.
- Ensuring relevant employees and contractors understand applicable environmental controls and reporting expectations.

- Reviewing incidents, complaints, audit findings, or identified gaps and assigning corrective actions where needed.

5.3 Managers and Supervisors

Managers and supervisors are responsible for:

- Applying environmental procedures consistently within their areas of responsibility.
- Encouraging good housekeeping, waste segregation, resource efficiency, and pollution prevention.
- Ensuring employees and contractors follow applicable storage, handling, labeling, disposal, and reporting requirements.
- Reporting actual or suspected environmental issues promptly.
- Supporting inspections, investigations, corrective actions, training, and recordkeeping.

5.4 Employees

Employees are responsible for:

- Following applicable environmental procedures and instructions.
- Using materials, energy, water, packaging, and supplies responsibly.
- Placing waste, scrap, recycling, and other materials in the correct containers or designated areas.
- Avoiding improper disposal, unnecessary waste, spills, leaks, or unsafe storage.
- Reporting spills, leaks, damaged containers, improper disposal, unusual odors, environmental concerns, or unsafe conditions promptly.
- Participating in required training and cooperating with reviews or corrective actions.

5.5 Contractors, Visitors, and Service Providers

Contractors, visitors, waste vendors, maintenance providers, cleaners, delivery personnel, and other service providers are expected to:

- Follow FM Nelkin's applicable environmental, safety, security, and facility rules while on site;
- Use only approved storage, handling, work, and disposal methods.

- Avoid activities that may create pollution, contamination, improper disposal, or unnecessary environmental risk.
- Report environmental incidents or concerns promptly to FM Nelkin management.
- Provide required documentation for waste removal, maintenance, cleaning, or other environmentally relevant services where applicable.

6. Environmental Management Requirements

6.1 Legal and Regulatory Compliance

FM Nelkin will maintain practical processes to identify and monitor applicable environmental legal and regulatory requirements. These may include requirements relating to waste disposal, recycling, hazardous or regulated materials, chemical storage, wastewater, air emissions, spill response, fire and building safety, lease obligations, shipping requirements, customer requirements, and other applicable obligations.

FM Nelkin will keep required permits, licenses, registrations, vendor records, inspection records, and compliance documentation where applicable. If FM Nelkin identifies a compliance gap, the company will evaluate the issue, assign corrective action, document the response, and verify completion.

6.2 Environmental Risk Identification

FM Nelkin will periodically identify environmental risks and impacts associated with its operations. The review may consider:

- Production, repair, assembly, polishing, soldering, cleaning, shipping, receiving, storage, and office activities.
- Waste streams, scrap, packaging, paper, electronic waste, chemicals, cleaners, oils, soldering materials, wastewater, and other materials.
- Storage areas, workstations, loading areas, drains, floors, maintenance areas, and shared building areas.
- Contractor activities, cleaning services, waste removal, maintenance, and construction or repair work.
- Stakeholder feedback, grievances, incidents, inspections, audit results, or customer requirements.
- Opportunities to reduce waste, conserve resources, improve controls, or strengthen documentation.

Where risks or impacts are identified, FM Nelkin will determine appropriate controls based on likelihood, severity, legal obligations, stakeholder expectations, business practicality, and the company's ability to influence the activity.

6.3 Waste Management

FM Nelkin will manage waste in a responsible, organized, and lawful manner. Waste management controls may include:

- Reducing unnecessary waste through careful purchasing and inventory control.
- Reusing materials where practical and safe.
- Recycling paper, cardboard, packaging, metals, and other recyclable materials where services are available.
- Segregating hazardous, regulated, recyclable, confidential, electronic, production, and general waste where applicable.
- Labeling and storing waste containers properly.
- Preventing waste accumulation in work areas, walkways, exits, or areas where it could create safety or environmental concern.
- Using qualified waste vendors where appropriate.
- Maintaining waste disposal, recycling, or pickup records where required or useful for audit evidence.

Employees must not dispose of chemicals, oils, soldering materials, regulated waste, electronic waste, or other restricted materials in sinks, drains, regular trash, or recycling containers unless management has confirmed the disposal method is appropriate.

6.4 Recycling and Reuse

FM Nelkin will encourage recycling and reuse where practical. This may include:

- Recycling paper, cardboard, packaging, and office materials.
- Reusing shipping boxes, padded mailers, trays, bins, and packing materials when suitable.
- Recovering or recycling metal scrap and production materials where applicable.
- Using digital documents and electronic records where practical to reduce paper use.

- Encouraging employees to avoid unnecessary printing and dispose of confidential documents securely.

6.5 Energy and Water Conservation

FM Nelkin will encourage efficient use of energy and water through practical workplace habits and operational controls. Employees and managers should:

- Turn off lights, equipment, tools, machines, computers, monitors, fans, and other devices when not in use, where safe and practical;
- Use energy-efficient equipment or lighting where reasonably available;
- Report leaks, running water, malfunctioning equipment, or other avoidable resource losses;
- Avoid unnecessary water use in cleaning or production activities;
- Consider efficiency, durability, and repairability when purchasing equipment, fixtures, or supplies where practical.

6.6 Responsible Purchasing and Packaging

FM Nelkin will consider environmental performance where practical in purchasing and packaging decisions. This may include:

- Buying only what is reasonably needed to reduce excess inventory and waste.
- Choosing durable, reusable, recyclable, repairable, or lower-waste materials where practical.
- Avoiding unnecessary packaging.
- Consolidating shipments where practical to reduce repeated packaging and transportation impacts.
- Considering supplier environmental practices where relevant to significant purchases or customer requirements.

6.7 Chemical and Material Storage

FM Nelkin will store and handle chemicals, cleaners, oils, soldering materials, adhesives, compounds, and other materials in a safe and organized manner. Controls may include:

- Keeping containers closed when not in use.
- Labeling containers clearly.

- Storing incompatible materials separately where required.
- Maintaining secondary containment or protective storage where appropriate.
- Keeping materials away from drains, exits, heat sources, ignition sources, or high-traffic areas where needed.
- Maintaining safety data sheets or equivalent information where applicable.
- Training relevant employees on safe handling, spill prevention, and escalation requirements.

6.8 Spill Prevention and Response

FM Nelkin will maintain practical spill prevention and response procedures appropriate to its operations. Employees and contractors must report spills, leaks, damaged containers, odors, or suspected releases promptly.

Where a spill or release occurs, FM Nelkin will:

- Take immediate steps to protect people and prevent further release where safe to do so.
- Contain and clean up the spill using appropriate materials and methods.
- Escalate to management, building management, landlords, emergency services, regulators, or other parties where required.
- Investigate the cause where appropriate.
- Document the incident, corrective action, and follow-up controls.
- Provide refresher training or process improvements where needed to prevent recurrence.

6.9 Air, Dust, Fumes, Odors, and Indoor Environmental Conditions

FM Nelkin will use reasonable controls to manage dust, fumes, odors, smoke, or indoor environmental concerns associated with production, repair, cleaning, soldering, polishing, storage, or maintenance activities. Controls may include ventilation, housekeeping, equipment maintenance, safe product use, proper storage, and escalation of concerns.

Employees must report unusual odors, fumes, dust, smoke, ventilation problems, or other indoor environmental concerns promptly.

6.10 Land and Soil Protection

FM Nelkin will take practical measures to prevent land and soil contamination connected to its operations. Controls may include proper waste storage, spill prevention, secondary containment, contractor oversight, inspection of storage areas, lawful disposal, and prompt corrective action for spills, leaks, or improper disposal.

Where FM Nelkin identifies known or suspected land or soil contamination within its control or influence, the company will document the issue, evaluate the source and extent where feasible, engage relevant stakeholders where appropriate, implement corrective action, and maintain records of the response.

6.11 Transportation, Shipping, and Receiving

FM Nelkin will encourage responsible shipping and receiving practices where practical. These may include:

- Consolidating shipments where practical.
- Reusing packaging materials where appropriate.
- Avoiding unnecessary packaging.
- Keeping shipping and receiving areas clean and organized.
- Preventing spills, leaks, waste accumulation, or improper storage in receiving and staging areas.
- Using responsible carriers and service providers where commercially reasonable.

6.12 Contractor and Vendor Controls

FM Nelkin will communicate relevant environmental expectations to contractors, service providers, waste vendors, cleaners, maintenance providers, and other business partners whose activities may affect environmental performance.

Where appropriate, FM Nelkin may request evidence of proper licensing, insurance, disposal practices, waste manifests, service records, safety data sheets, inspection records, or other documentation from contractors or vendors.

7. Reporting Concerns and Grievance Mechanism

Employees, contractors, suppliers, customers, visitors, and other stakeholders may raise environmental concerns through management, the Director of Operations, Senior Management, or FM Nelkin's grievance mechanism at www.fmnelkinpolicies.org.

Reports may be made verbally or in writing. Reports should include, where possible:

- Date and time of the concern.
- Location or area involved.
- Description of the issue.
- Materials, equipment, waste, contractors, or activity involved.
- People or departments involved.
- Photographs, documents, communications, or other supporting information.
- Immediate action already taken, if any.

FM Nelkin will review environmental concerns promptly and take action appropriate to the nature, severity, likelihood, and potential impact of the issue.

FM Nelkin prohibits retaliation against any employee or stakeholder who raises an environmental concern in good faith, participates in a review, supports another person's report, or cooperates with corrective action.

8. Incident Investigation and Corrective Action

FM Nelkin will investigate material environmental incidents, spills, improper disposal, contamination concerns, complaints, audit findings, or other significant issues as appropriate.

Investigation steps may include intake, immediate containment or interim controls, document review, site inspection, employee or contractor interviews, review of waste or vendor records, root cause review, corrective action, communication of outcomes where appropriate, and follow-up verification.

Corrective action may include cleaning, containment, repair, vendor escalation, retraining, updated procedures, improved labeling or storage, additional inspections, replacement equipment, disciplinary action, contract remedies, or other action deemed appropriate.

Corrective actions should identify the issue, responsible owner, required action, target completion date, verification method, and closeout evidence.

9. Training and Awareness

FM Nelkin will provide environmental training and awareness appropriate to employees' roles and responsibilities. Training may be included in onboarding, refresher training, toolbox talks, management briefings, contractor briefings, or written communications.

Training may cover:

- Environmental policy expectations.
- Waste handling, recycling, reuse, and segregation.
- Chemical and material storage.
- Spill prevention and response.
- Housekeeping and pollution prevention.
- Energy, water, paper, and packaging conservation.
- Reporting concerns and using the grievance mechanism.
- Role-specific procedures for employees or contractors whose work may create environmental risks.

Training records should include the date, topic, audience, trainer or material used, attendees, and any follow-up needs.

10. Monitoring, Inspections, and Metrics

FM Nelkin may monitor environmental implementation through practical indicators appropriate to its size and operations. These may include:

- Waste disposal or recycling records.
- Inspection results.
- Spill or incident records.
- Corrective action status.
- Training completion.
- Grievance or complaint trends.
- Vendor documentation.
- Energy, water, paper, packaging, or waste reduction efforts where data is available.
- Annual management review outcomes.

FM Nelkin may conduct periodic inspections of work areas, storage areas, waste areas, shipping and receiving areas, drains, floors, equipment, and other areas where environmental controls are relevant.

The purpose of monitoring is to identify gaps, prevent incidents, improve practices, support compliance, and confirm that this policy is working in practice.

11. Records and Evidence

FM Nelkin will maintain environmental records in an organized and retrievable manner consistent with company recordkeeping requirements and applicable legal obligations.

Records may include:

- This policy and approvals.
- Environmental risk reviews.
- Legal and regulatory requirement reviews.
- Inspection logs.
- Waste disposal, recycling, or vendor records.
- Incident and spill reports.
- Corrective action records.
- Training materials and attendance records.
- Contractor or vendor documentation.
- Safety data sheets or material information.
- Stakeholder communications.
- Grievance reports and investigation records.
- Annual management review minutes.
- Environmental performance reports or summaries.

Access to records should be limited to authorized personnel with a legitimate business need. Records should be protected from unauthorized alteration, loss, or destruction.

12. Stakeholder Communication and Public Availability

FM Nelkin may communicate this policy internally and externally through employee handbook materials, onboarding documents, policy binders, workplace postings, supplier/customer communications, contractor communications, the company website, or upon request.

Where environmental matters may affect stakeholders, FM Nelkin will communicate in a timely, practical, and respectful manner. Stakeholders may include employees, contractors, customers, suppliers, landlords, building management, neighboring

businesses, waste vendors, environmental consultants, regulators, and other parties with a legitimate interest.

13. Annual Review and Management Oversight

Senior Management and the manager responsible will review this policy and its effectiveness at least annually, and sooner if there are material operational changes, facility changes, legal changes, audit findings, environmental incidents, grievances, customer requirements, or identified gaps.

The annual review should consider:

- Whether the policy has been communicated and understood.
- Whether environmental controls are implemented effectively.
- Training completion and awareness needs.
- Inspection results.
- Waste, recycling, resource use, or packaging data where available.
- Incidents, spills, complaints, grievances, or corrective actions.
- Vendor or contractor performance.
- Changes in legal, regulatory, lease, customer, or RJC requirements.
- Opportunities to reduce waste, conserve resources, prevent pollution, and improve records.

Review outcomes must be documented, including the date, participants, materials reviewed, conclusions, actions assigned, responsible owners, target dates, and completion status.

14. Non-Compliance and Discipline

Failure to follow this policy or related environmental procedures may result in corrective action. Depending on the nature and severity of the issue, corrective action may include coaching, retraining, written warning, change in procedure, vendor escalation, contract remedy, removal from premises, suspension, termination of employment, or other action deemed appropriate.

FM Nelkin will consider the facts, severity, frequency, intent, impact, prior conduct, legal obligations, and need to prevent recurrence when determining corrective action.

15. No Waiver of Legal Rights

Contractors or vendors are following applicable rules

Corrective actions from prior inspections are complete

Appendix B. Environmental Incident Report Template

Field

Date and time identified

Location / area

Reported by

Description of incident or concern

Material, waste, equipment, or activity involved [Insert]

Immediate action taken

Potential impact

Root cause, if known

Corrective action required

Responsible owner

Target completion date

Verification / closeout

Related records or photos

Appendix C. Annual Environmental Review – Minimum Contents

The annual environmental review may be brief, but it should address each of the topics below:

- Sites, departments, or areas covered by the review period.
- Environmental risks and impacts considered.
- Legal, regulatory, customer, lease, or RJC requirement changes.
- Waste, recycling, resource efficiency, and packaging practices.

- Spills, incidents, complaints, grievances, or corrective actions.
- Training and communication completed.
- Contractor or vendor environmental matters.
- Stakeholder communications, if any.
- Actions completed, actions outstanding, and planned improvements.
- Management review date, participants, conclusions, and approver.

Prepared By *Daniel Moore* Date 04/10/2026

Reviewed By *T. Nelkin* Date 04/10/2026