1.0 INTRODUCTION AND BACKGROUND

1.1 Overview

This document details the structure and procedures of Environamics, Inc. Environmental Management System (EMS).

1.2 Purpose of the Environmental Management System

The Environamics EMS represents a comprehensive, systematic, planned, and documented management system to improve the environmental performance of Environamics’ operations. Environamics will maintain an EMS that at a minimum consists of the following elements for all their facilities:

- Environmental Policies
- Environmental Aspects
- Legal or Other Requirements
- Environmental Objectives & Targets
- Implementation of the EMS
- Management Review of the EMS

1.3 Scope of the Environmental Management System

The EMS covers all operations occurring at the Environamics Charlotte, North Carolina manufacturing location from the point of entry of incoming raw materials, components, water and energy to the shipping of final products. In addition to movable walls manufacturing operations, all on-site ancillary operations fall within the scope of the EMS, including the administrative offices. Excluded from the scope of the EMS are aspects or impacts of products and services to the extent that Environamics does not have influence over the design and use.

Applicable facilities and operations include:

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Location</th>
<th>Major Operations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environamics, Inc.</td>
<td>13935 South Point Blvd. Charlotte, NC 28273</td>
<td>Manufacturing, Final Assembly, Warehousing, Administrative Offices</td>
</tr>
</tbody>
</table>
1.4 Responsibilities

Management of the EMS is to be carried out through regularly scheduled EMS meetings. A history of meeting minutes from each meeting are to be recorded within the Environamics EMS Meeting electronic folder.

The Environamics EMS management structure is depicted in the EMS Management Chart. The team members, mission, responsibilities, and meeting frequency of the EMS Team are summarized therein.

1.5 Document Control

Active and historic documents pertaining to the activity of the EMS are to be retained within a designated electronic folder. All EMS documents are to be stored in shared folder as specified below:

- "EMS" subfolder in the "BIFMA" folder on the shared drive

For each EMS document/worksheet, all housed in the Environamics EMS Meeting folder, both a current copy and historic records are to be saved. The active copy should be clearly designated within the filename for the most current date the workbook has been used. Each time that changes are made to the active workbook, the last dated file is to be saved to the subfolder named with the same date in the EMS Meeting Minutes folder.

1.6 Related documents

- Environamics EMS Meeting folder
2.0 SUSTAINABILITY POLICY

2.1 Purpose

To establish a sustainability policy that guides the actions of Environamics through its EMS and supports Environamics’ business strategy.

2.2 Scope

Environamics’ Sustainability Policy will address the company's commitment to continuous improvement of its environmental approach to sustainability, compliance with relevant environmental, health and safety laws and regulations, and pollution prevention. It will serve as the framework for managing its Environmental Management System, identifying significant aspects, setting objectives and targets, and communicating its performance to relevant stakeholders.

2.3 Procedures

The Environamics Sustainability Policy will be evaluated for modifications as a result of changes in the company's business, mission, internal and/or external audits, evaluations, and feedback from stakeholders at regular intervals.

2.4 Related Documents

- Environamics Sustainability Policy.doc
3.0 LEGAL AND OTHER REQUIREMENTS

3.1 Purpose

To identify, track and provide access to the legal and voluntary requirements as they pertain to Environamics.

3.2 Scope

The scope of assessment shall include all of the legal and voluntary requirements that pertain to Environamics and its facilities, activities, products, or services.

3.3 Procedures

Applicable legal and voluntary requirements to which the organization subscribes will be evaluated on a regular basis (at minimum once every 3 years). The Facility Assessment Checklist will be used as a guide to complete the assessment. Operational changes, both positive and negative, that have the potential to affect legal and other requirements shall necessitate a legal review and be incorporated into the EMS. All employees with significant responsibility for their interpretation or implementation shall have access to this information.

3.4 Related Documents

- Environamics Statement of Regulatory Compliance.pdf
- Facility Assessment Checklist.pdf
- Compliance Library MASTER.xls
- Operations Compliance Library MASTER.xls
4.0 ENVIRONMENTAL ASPECTS/IMPACTS IDENTIFICATION

4.1 Purpose

To identify the environmental aspects of activities and manufacturing processes in order to determine those which may, a) have a significant impact on environmental systems, b) affect compliance of facilities, and c) affect the on-going operations of Environamics facility.

4.2 Scope

This procedure covers all major activities, services, and products provided by Environamics. For purposes of evaluation, activities and manufacturing processes with similar characteristics may be grouped together.

4.3 Definitions

*Environmental aspects* – An element of an organization’s activities, products or services that can interact with the environment. *(Source: ANSI/BIFMA e3-2014)*

*Environmental impact* – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the activities, products and services of the organization. *(Source: ISO 14001:2004)*

4.4 Procedures

An evaluation will be conducted on a routine basis for activities and manufacturing processes in order to identify environmental aspects and impacts. Aspects and their associated impacts will be evaluated using the *Environamics Aspects & Impacts Identification Tool* for their impact using the following steps:

- Establish a list of Environmental Aspects and their associated Impacts considered important to the company based upon the company’s core values and sustainability policies.
- The EMS Team will then rank the level of concern for each aspect and impact combination based upon an agreed upon rating scale and formula.
- The top ranking environmental Aspects and Impacts will be considered significant and have priority in setting goals within the organization.

4.5 Related Documents

- *Aspects & Impacts worksheet in the Environamics EMS Meeting folder.*
5.0 SETTING, TRACKING, AND IMPLEMENTATION OF ENVIRONMENTAL & ENERGY OBJECTIVES AND TARGETS

5.1 Purpose

To establish, implement, and document environmental objectives and targets that are appropriate for the organization. The established objectives represent the goals and targets the corresponding actions that drive implementation within the EMS.

5.2 Scope

Determination of objectives will be based on risk, opportunities, legal and other considerations, including Environamics' significant environmental aspects; its technological options; its financial, operational and business requirements; and the views of employees and other interested parties.

5.3 Definitions

Environmental Objective – objective set by the organization consistent with its environmental policy. (Source: ISO 14001:2015)

Energy Objective – Specified outcome or achievement set to meet the organization’s energy policy related to improved energy performance. (Source: ISO 50001:2011e)

Energy Target – Detailed and quantifiable energy performance requirement, applicable to the organization or parts thereof, that arises from the energy objective and that needs to be set and met in order to achieve this objective. (Source: ISO 50001:2011e)

5.4 Procedures

Objectives represent the goals established, which are quantifiable where practical, to address key environmental issues. Objectives are to be recorded in the Objectives worksheet. The EMS Team will establish environmental objectives that are based upon the identified Significant Aspects, the Sustainability Policy, and overall corporate values.

Targets represent the actionable steps established to meet the environmental objectives and drive change within the EMS. The EMS Team will establish reasonable targets, including responsibility and timeframe to achieve each objective. Objectives are to be recorded in the Objectives worksheet in the Environamics EMS Meeting folder.

The EMS Team will then proceed to implement established objectives. Progress and results will be tracked within the Objectives worksheet. Any additional implementation evidence (e.g. study results, performance reports, contractor proposals, etc.) is to be retained within the designated EMS folder structure. Results are to be communicated to upper management, employees, and any other interested party as deemed necessary.

Regardless of the significance ranking, an objective and target for energy performance must be established, and maintained over time, to achieve the company’s energy policy.
5.5 Related Documents

- Objectives & Targets worksheet in the Environamics EMS Meeting folder.
6.0 MANAGEMENT REVIEW

6.1 Purpose

Upper management is to evaluate the progress and ensure future success of the EMS through regularly scheduled management reviews.

6.2 Scope

Review of the EMS will ensure the continuing suitability, adequacy and effectiveness of its sustainability directive, legal review, significant aspects, objectives, and overall progress of the EMS Team. The review will give consideration of major changes to its operations, products, and services in relation to the EMS and ensure that there are adequate financial and human resources allocated to achieve established objectives and targets.

6.3 Procedures

Upper Management representative(s) are to perform a management review of the EMS at least annually. At a minimum the review is to cover the following areas:

- Environamics Sustainability Directive
- Legal review
- Significant Aspects
- Environmental & Energy Objectives
- Overall Progress of EMS Team
- Changes to Operations, Products, and Services Affecting the EMS
- Allocation of EMS Resources

The results of this review shall be documented and communicated to the remaining EMS Team. This review will serve as the basis for making changes to the EMS and its structure going forward in the following year.

6.4 Related Documents

- Operations Compliance Library MASTER.xls