

Responsible Care® Verification Report

***Evonik Corporation
Vancouver Laboratories***

December 3 - 4, 2019



**CHEMISTRY INDUSTRY
ASSOCIATION OF CANADA**



Responsible Care®
Our commitment to sustainability.

Disclaimer

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC), to provide advice to the member-company and assist it in meeting its Responsible Care[®] commitments. The material in this report reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member-company that is the subject of this report to interpret and act on the report's findings and recommendations as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the Association, its member-companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of Evonik Corporation Vancouver Laboratories. The verification was undertaken on September 09 and December 03 & 04, 2019, and included team visits to the company's two laboratories in Burnaby, British Columbia. This was the first Responsible Care verification completed for Evonik Corporation Vancouver Laboratories.

While considering all aspects of the Responsible Care Commitments during this verification the team placed an emphasis on conducting an in-depth examination of company aspects related to:

- Contractor Safety;
- Product Stewardship; and
- Community Awareness

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the Findings Requiring Action identified during the verification - summarized below and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.



Signed: _____
Dave Mack
Verification Team Leader

Date: February 11, 2020

For more information on this Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

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SUMMARY OF VERIFICATION TEAM OBSERVATIONS

Findings Requiring Action

The following relate to instances where the current status is at variance with the requirements of CIAC Responsible Care Commitments.

1. Establish and document an overall management system based on the plan-do-check-act continual performance improvement cycle for operating site community awareness, dialogue, and social responsibility [AC125 – 136].
2. Establish and document an overall management system based on the plan-do-check-act continual performance improvement cycle for stakeholder (beyond operating site communities) awareness, dialogue and social responsibility, as applicable to the size, scope and risk profile of the company. [AC137 – 152].

Works in Progress

The following relate to self-initiated actions in support of continual performance improvement.

1. Developing an enhanced process for mode and route selection and selection and performance monitoring of product transporters, including those selected by customers.
2. Hiring of a dedicated maintenance coordinator.
3. Developing an enhanced data base for equipment tracking and maintenance scheduling.
4. Formalizing the proposed process safety plan.
5. Updating the emergency preparedness and response plan from the former location to the new North Fraser Way facility.
6. Updating the security vulnerability assessment from the former location to the new North Fraser Way facility.
7. Establishing a plan for critical infrastructure and business continuity.
8. Establishing a plan to address residual gaps identified in the Responsible Care versus company programs cross reference.
9. Developing an enhanced training management process that will include testing for knowledge gained.
10. Developing a Responsible Care related self-assessment process.
11. Implementing an enhanced process, referred to as ESTER, for the tracking of all Responsible Care related actions items.

Improvement Opportunities

The following relate to suggested actions that could enhance the effectiveness of current programs.

1. Establish a process to ensure the safe movement of hazardous materials between the Burnaby facilities.
2. Consider improved structural support for drop down electrical receptacles and supplied compressed air at the North Fraser Way facility.
3. Establish a process to ensure that paper documents, observed in a working area and maybe elsewhere at the North Fraser Way facility, are kept up to date with respect to that in the electronic data base.
4. Review the practice for working alone to ensure the safety and security of employees required to work on their own at the facilities.

5. Conduct a monitoring program for welding fumes.
6. Document the industrial hygiene program.
7. Benchmark facility emergency preparedness and response plans to the latest issue of Canadian Standard CAN/CSA-Z731-03 - Emergency Preparedness and Response.
8. Advise CIAC when security vulnerability assessments have been completed.
9. Benchmark the waste management facility assessment process against the CIAC guideline for evaluation of waste management contractors.
10. Develop a company recycling plan.
11. Address energy conservation and waste minimization in the redesign of the Northbrook Court facility.
12. Enhance promotion of Responsible Care by name to stakeholders both internally and externally (e.g., communities, government officials, general public, etc.) and to business partners (e.g., customers suppliers, contractors, carriers, etc.). [Ref. CIAC Promoting Responsible Care Implementation Guidance].

Successful Practices

The following relate to actions that strongly support sustained excellence in performance.

1. The level of focus given to the Responsible Care Commitments across the organization.
2. The work done to develop and document Responsible Care processes, practices and procedures etc., and make these electronically available to all those who need to know.

1. INTRODUCTION

1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for Evonik Corporation Vancouver Laboratories operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability*.

The Responsible Care® Ethic and Principles for Sustainability

We are committed to do the right thing, and be seen to do the right thing.

We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

As an element of this commitment to Responsible Care, Evonik Corporation Vancouver Laboratories must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
2. Identify Opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is generally conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel); and
- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website (www.canadianchemistry.ca). Evonik Corporation Vancouver Laboratories is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website www.canadianchemistry.ca, or by CIAC at glaurin@canadianchemistry.ca or (613) 237-6215 extension 233.

1.2 About Evonik Corporation Vancouver Laboratories

Evonik Corporation is a diversified specialty chemicals company with headquarters in Essen, Germany. Evonik has over 150 facilities world-wide and over 30 facility locations in North America. There are two Vancouver Laboratories facilities, in Burnaby, British Columbia, referred to as Northbrook Court and a new North Fraser Way site, which replaced a former nearby location. These are part of the company's Health Care business line, providing special formulation technology for the production of sterile and injectable pharmaceutical medicines that are in the clinical trial phase of their development. The facilities were acquired in 2016, and with over fifty employees, are one of the most culturally diverse sites in Evonik.

1.3 About This Verification

The verification of Evonik Corporation Vancouver Laboratories was conducted on September 09 and December 03 & 04, 2019, and included team visits to the company's two laboratories in Burnaby, British Columbia. During the course of the verification, the team had the opportunity to interact with a wide range of company personnel. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This is the first verification exercise completed for Evonik Corporation Vancouver Laboratories.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Dave Mack	CIAC	<i>Team Leader</i>
Phil Byer	CIAC	<i>Public-At-Large Verifier</i>
Bobby Sidhu	British Columbia Institute of Technology	<i>Community Representative</i>

2. TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)

During the verification of Evonik Corporation Vancouver Laboratories, the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (152 code elements plus 28 benchmark and collective expectations). While considering all aspects of the Responsible Care Commitments, the team placed an emphasis on conducting a more in-depth examination of certain company aspects identified by the company or the team related to:

- Contractor Safety;
- Product Stewardship; and
- Community Awareness

In communicating its observations, the verification team will make repeated reference to the following categories of observations:

1. **Findings Requiring Action;** document instances where the verification team observes specific company actions (or the absence of company actions) which are inconsistent with the detailed codes and benchmark and collective expectations contained in the Responsible Care Commitments. Where possible, the team will communicate, based on their experience and judgment, why it is inconsistent and how the observation relates back to a possible gap in the expected management system and / or the ethic and principles underpinning company actions. The team may also provide advice on how the situation might be responded to.
2. **Works in Progress;** document instances where the team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement Opportunities.
3. **Successful Practices;** document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.
4. **Improvement Opportunities;** identify instances where the team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care Commitments, but for which the team is of the opinion that the company could support further improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.

The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:

2.1 Team Observations Concerning Operations Code

The Operations Code defines environment, health and safety expectations regarding all company operational aspects including product manufacturing, transportation and distribution.

2.1.1 Design and Construction of Facilities and Equipment

There is a defined project management process in place which includes steps to address safety and environmental aspects. Management of change is specifically addressed, as well as hazardous material

handling risk assessment and pre-start up hazard analysis. Design and construction work is contracted out.

2.1.2 Operations Activities

Hazard analyses are routinely applied to company operations with any control actions being built into defined operating procedures, which are reviewed every two years. Basic processes are in place for the Responsible Care related selection and performance monitoring of product transporters, including mode and route selection. In many cases shipping is handled by the customer. Critical operations equipment has been identified. Defined maintenance procedures are in place, and preventive maintenance is carried out on a scheduled basis.

Works in Progress

- i. Developing an enhanced process for mode and route selection and selection and performance monitoring of product transporters, including those selected by customers.
- ii. Hiring of a dedicated maintenance coordinator.
- iii. Developing an enhanced data base for equipment tracking and maintenance scheduling.

Improvement Opportunities

- i. Establish a process to ensure the safe movement of hazardous materials between the Burnaby facilities.

2.1.3 Safety and Security

There is a process in place to identify and control workplace health and safety hazards through defined safe work procedures. Safety committee members routinely walk through the facility to address any observed hazards. Health risk assessment profiles have been prepared for each job family and a health surveillance program has been set up with an occupational health physician. There is a defined process in place to select and monitor site contractors with respect to their Responsible Care related performance. An operational acute risk assessment has been carried out through review of facility physical and processing conditions, with means addressed to mitigate potential risk scenarios. This process identified worst case incident scenarios. A proposed process safety plan has been developed which includes a listing of process safety concepts for application at the facilities. An emergency preparedness and response plan, which has been reviewed with local municipal emergency services, is in place for the Northbrook Court site. The plan includes for annual employee drills, and visits by the emergency services to maintain familiarization with company operations. Roles and responsibilities for site emergency co-ordinators have been defined. There is also a plan in place to address transportation emergencies. Contracts are in place with specialized response services that will mobilize on location in case on a related incident. A security vulnerability assessment has been completed with follow-up actions addressed for the Northbrook Court site. There is a defined incident reporting and investigation process in place addressing causal analysis, establishment of actions necessary to prevent recurrence, and assignment of responsibilities for each action with tracking to ensure completion.

Works in Progress

- i. Formalizing the proposed process safety plan.
- ii. Updating the emergency preparedness and response plan from the former location to the new North Fraser Way facility.
- iii. Updating the security vulnerability assessment from the former location to the new North Fraser Way facility.
- iv. Establishing a plan for critical infrastructure and business continuity.

Improvement Opportunities

- i. Consider improved structural support for drop down electrical receptacles and supplied compressed air at the North Fraser Way facility.
- ii. Establish a process to ensure that paper documents, observed in a working area and maybe elsewhere at the North Fraser Way facility, are kept up to date with respect to that in the electronic data base.
- iii. Review the practice for working alone to ensure the safety and security of employees required to work on their own at the facilities.
- iv. Conduct a monitoring program for welding fumes.
- v. Document the industrial hygiene program.
- vi. Benchmark facility emergency preparedness and response plans to the latest issue of Canadian Standard CAN/CSA-Z731-03 - Emergency Preparedness and Response.
- vii. Advise CIAC when security vulnerability assessments have been completed.

2.1.4 Environmental Protection

Emissions and wastes from the facilities have been specifically identified and established as being minimal, with limited opportunities for reduction. A defined process has been established for the handling and disposal of wastes. Site visits have been carried out at contracted waste management facilities to assess their acceptability with respect to Responsible Care related expectations. Audits are planned to take every five years.

Improvement Opportunities

- i. Benchmark the waste management facility assessment process against the CIAC guideline for evaluation of waste management contractors.
- ii. Develop a company recycling plan.

2.1.5 Resource Conservation

Basic tracking of energy, supplies, and raw material usage is in place.

Improvement Opportunities

- i. Address energy conservation and waste minimization in the redesign of the Northbrook Court facility.

2.1.6 Promotion of Responsible Care by Name

Notwithstanding the company's commitment to Responsible Care and participation in CIAC leadership activity, there is limited engagement in promoting the visible identity of Responsible Care both internally and with external stakeholders (e.g., communities, government officials, general public, etc.)

Improvement Opportunities

- i. Enhance promotion of Responsible Care by name to stakeholders both internally and externally (e.g., communities, government officials, general public, etc.). (Ref. CIAC Promoting Responsible Care Implementation Guidance).

2.2 Team Observations Concerning Stewardship Code

The Stewardship Code addresses all company raw materials, products and services and defines expectations for the care and control of same throughout their life cycle.

2.2.1 Expectations of Companies

A defined process is in place for managing the development of new products. Initially a product feasibility study is carried out. If development of a product is to proceed, health, safety and environmental risks, that need to be addressed during the production phase, are identified. Handover of finished product to the customer includes a technical transfer plan with a risk assessment addressing health, safety and environmental hazards. There is little engagement in promoting the visible identity of Responsible Care with business partners (e.g., customers, suppliers, contractors, carriers, etc.).

Improvement Opportunities

- i. Enhance promotion of Responsible Care by name to business partners (e.g., customers suppliers, contractors, carriers, etc.). [Ref. CIAC Promoting Responsible Care Implementation Guidance].

2.2.2 Expectations with Respect to Other Parties

There is a defined process in place for the selection and on-going Responsible Care related performance monitoring of contracted laboratory operations. This includes completion of a questionnaire prior to hiring, with audits carried out every three years. There is also a defined process in place to select and monitor the Responsible Care related performance of customers who, for the most part, also supply process chemicals for product development. Responsible Care related assessments of site contractors, contract carriers and hazardous waste management contractors are included in the Operations Code section of this report.

2.3 Team Observations Concerning Accountability Code

The Accountability Code defines expectations for communication and dialogue with communities local to company manufacturing and distribution operations and transportation corridors, as well as other stakeholders with an interest in company activities.

2.3.1 Operating Site Communities

Facility neighbours are commercial operations with no residential or other general public related activities in the immediate area that could be impacted by facility operations. Some visits have taken place with the commercial neighbours to discuss company operations.

Findings Requiring Action

- i. Establish and document an overall management system based on the plan-do-check-act continual performance improvement cycle for operating site community awareness, dialogue, and social responsibility [AC125 – 136].

2.3.2 Other Stakeholders

Interface with other stakeholders may take place on an as need basis.

Findings Requiring Action

- i. Establish and document an overall management system based on the plan-do-check-act continual performance improvement cycle for stakeholder (beyond operating site communities) awareness, dialogue and social responsibility, as applicable to the size, scope and risk profile of the company. [AC137 – 152].

3. TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments.

The verification team studied Evonik Corporation Vancouver Laboratories management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Management System Guide. The verification team's related observations to the company management system(s) are as follows:

3.1 Observations on the PLAN Step

During the 'PLAN' Step of the management system, the company is required to decide what the goals of the company are and how they will be met. In determining those goals, it is expected the company will look inward, across its operations, but will also look outward, considering the expectations of: stakeholders; regulatory requirements; relevant CIAC Responsible Care Commitments and supporting tools; and other industry benchmarks.

Commitments to the principles of Responsible Care have been defined across the organization. Responsible Care related target and goal setting is initiated at the corporate level and subsequently cascades throughout the organization to the site level. Processes are in place to stay abreast of applicable regulations and standards, as well as industry best practices.

Successful Practices

- i. The level of focus given to the Responsible Care Commitments across the organization.

3.2 Observations on the DO Step

During the 'DO' Step in the management system, the company is required to convert the decisions of the 'PLAN' Step into action and ensure awareness and understanding by all involved. It is expected that the company will implement an organizational structure, assign responsibilities to appropriate personnel, supply sufficient training and resources to execute planned actions and develop and document standards, procedures and programs, as applicable.

An overall Responsible Care related management system has been defined with respect to the plan-do-check-act continual performance improvement process. Responsible Care code expectations have been cross referenced to relevant management system elements, supporting standards, processes and procedures, with some gaps identified. Action plans are in place as needed to achieve goals and objectives. A health, safety and environment coordinator role has been created to track the execution of these plans, and also to develop and support their implementation. Job family competency needs have been defined in the form of a training curriculum, and there is a basic process for tracking individual completion of same. There is also a program for new employee training and onboarding. Defined procedures are in place for facility operations and Responsible Care related requirements.

Works in Progress

- i. Establishing a plan to address residual gaps identified in the Responsible Care versus company programs cross reference.

- ii. Developing an enhanced training management process that will include testing for knowledge gained.

Successful Practices

- i. The work done to develop and document Responsible Care processes, practices and procedures etc., and make these electronically available to all those who need to know.

3.3 Observations on the CHECK Step

During the 'CHECK' Step in the management system, actions carried out in the 'DO' Step are required to be assessed to determine if they are actually being carried out according to plan, and whether they are achieving the desired outcomes and delivering continual improvement. Here, the overall management system and components should be reviewed along with employee competences for assigned responsibilities, internal and external audits should be undertaken, incidents should be assessed to identify root causes, and performance measurement should be conducted and reviewed.

Annual management system reviews are carried out at the facility and corporate levels, with a view to identifying issues which might require further action or the setting of new goals and objectives. In addition Responsible Care related compliance audits are carried out at the corporate and facility levels. Annual Occupational Health program reviews are carried out with the occupation medical physician service provider. Also at the facility level the results of ongoing activities such as safety inspections, emergency drills, routine waste management practices, and incident reports/investigation/corrective measures are reviewed by safety committee members. There is also a process for regular site management team review of key performance indices and incident reports. Incident reporting and investigation is included in the Operations section of this report.

Works in Progress

- i. Developing a Responsible Care related self-assessment process.

3.4 Observations on the ACT Step

During the 'ACT' Step in the management system, the company is required to translate the results of the 'CHECK' Step into corrective actions for improvement. This includes revisiting the 'PLAN' Step to decide whether changes are needed to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the 'ACT' Step should include whether and how: audit and review findings are responded to; performance is communicated internally and externally; employee and contractor performance is rewarded or corrected, etc.

There is a basic process in place for the tracking of all Responsible Care related actions items. This includes management system reviews, audits, inspections, incidents, etc. There is a Corporate Responsibility public report produced annually.

Works in Progress

- i. Implementing an enhanced process, referred to as ESTER, for the tracking of all Responsible Care related actions items.

4. TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY

Each CIAC member company is formally committed to the ethic of *“Doing the right thing, and being seen to do the right thing.”* This ethic, along with the principles for sustainability is expected to guide the company’s decision making and practices. In conducting the verification, the team is looking to understand how well the ethic is understood and adopted within the company, and the degree to which the principles inform the manner in which the company does its business.

The verification team carefully observed Evonik Corporation Vancouver Laboratories decision making processes and actions and compared and contrasted the attributes of those with the attributes of a company guided by the Responsible Care Ethic and Principles For Sustainability as discussed in the Responsible Care Commitments (Appendix E). The verification team’s related observations on the company’s application of the *Responsible Care Ethic and Principles for Sustainability* are as follows:

Through observation and analysis, and subject to effectively dealing with the ‘Finding Requiring Action’ and ‘Works in Progress’, as identified in this report, the following are general conclusions as to how the company’s decision making and practices are guided by the eight elements of the *Responsible Care Ethic and Principles for Sustainability*. Refer to the explanatory notes following each element:

- *Work for the improvement of people’s lives and the environment, while striving to do no harm.*

Supported by the company’s dedicated commitment to Responsible Care.

- *Be accountable and responsive to the public especially our local communities, who have the right to know the risks and benefits of what we do.*

Work required here to establish a defined process for community outreach.

- *Take preventive action to protect health and the environment.*

Supported by the company’s focus on environment, health and safety performance excellence.

- *Innovate for safer products and processes that conserve resources and provide enhanced value.*

Supported by the stewardship demonstrated in producing pharmaceutical products.

- *Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.*

Supported by processes to select and monitor business partners with respect to their Responsible Care related performance. Some additional work being done here regarding product carriers.

- *Understand and meet expectations for social responsibility.*

Work required here to establish a defined process for community outreach.

- *Work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirement and meet or exceed their letter and spirit.*

Supported by participation in CIAC leadership activity.

- *Promote awareness of Responsible Care, and inspire others to commit to the principles.*

Supported by processes to select and monitor business partners with respect to their Responsible Care related performance. Additional work required to promote Responsible Care by name.

5. VERIFICATION TEAM CONCLUSION

As a result of the examination conducted, and in consideration of the observations communicated within this report, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the Findings Requiring Action identified during the verification, as summarized in the Executive Summary and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.

COMPANY RESPONSE TO VERIFICATION TEAM REPORT

On behalf of Evonik Corporation Vancouver Laboratories I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

The verification process has provided an excellent opportunity for the team of associates at Evonik Vancouver Laboratories to learn from their interactions with the verification team and to identify valuable ways to improve the ESHS management systems at their facilities. The level of professionalism and courtesy exhibited by all three of the verification team members was outstanding.

Evonik Corporation Vancouver Laboratories will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our operating sites. The site will use the CIAC Western Leadership Group meeting (likely in April 2020) as the forum for sharing the results of the verification exercise.

The Vancouver Laboratories leadership team will give consideration to the Improvement Opportunities identified by the verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Specifically, the site leadership team will review the full set of verification report recommendations during the site's annual ESHQ management system review which will be held during the First Quarter of 2020. Plans will be developed and implemented to respond to the two Findings Requiring Action and those Works in Progress where completion of such is required to close gaps with respect to requirements, as identified by the verification team. Assignment of responsibility, target completion dates, and tracking the status of action plans through their completion will be managed through the master ESH Improvement Plan maintained by the site. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care, and progress will be communicated to the verification team at the time of our next verification.

Dr. Howard Bowman
Director of Operations & Site Head
Business Line Health Care
Evonik Corporation Vancouver Laboratories

February 11, 2020

INTERVIEW LISTS

A: Company Personnel

Name	Position	Location
David Jung	Manager, Process Equipment Design	Burnaby
Doug Woods	Evonik Canada, Inc. President	Burlington
Howard Bowman	Site Head	Burnaby
Jay Natarajan	R&D Director	Burnaby
Joint Health & Safety Committee	Representatives	Burnaby
Judi Chen	ESH Coordinator	Burnaby
Kenny McCleary	Senior International ESH Advisor	Lafayette
Lara Ebert	Senior Research Associate, R&D	Burnaby
Neill Gilchrist	Operations Director	Burnaby
Shirley Qui	Quality Director	Burnaby
Tom Cunningham	Manager, Business Process Improvement	Lafayette
Tony Cheung	Financial Controller	Burnaby



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