

RESPONSIBLE CARE[®] Verification Report

CCC Sulphur Products

November 14 - 15, 2018



Chemistry Industry
Association of Canada



Responsible Care[®]
Our commitment to sustainability.

Disclaimer

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EXECUTIVE SUMMARY

The eighth verification of CCC Sulphur Products was conducted on November 14th and 15th, 2018. The focus of the verification was the status of various Responsible Care related management systems and human resources in-place to support the CCC Sulphur Products Responsible Care Commitment post divestiture of the distribution business. The company is well positioned in the short term and is in the planning stage to add human resources when required. Additional staff support, primarily in regulatory affairs, has been provided for one year by the purchaser (Brenntag).

As of the verification Date CCC Sulphur Products were well positioned to fulfill their Responsible Care Commitments.

There were six Improvement Opportunities and one Work in Progress noted in this report.

It should be noted that CCC Sulphur Products fulfilled their commitment to this verification on their anniversary date despite significant company changes related to the sale of the distribution business.

Signed: 

Date: February 4, 2019

For more information on this or a previous 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:

There were not any Findings Requiring Action noted during this verification.

Works in Progress:

With the July 2018 announcement of the sale of the Canada Colors and Chemicals (CCC) distribution business to Brenntag there will be a continual overall “Work in Progress” to align the smaller CCC Sulphur Products entity, including their Responsible Care Commitments, with available resources in 2019 when some Brenntag support services will be withdrawn thereby requiring further alignment of resources as part of that “Work in Progress.”. As of the November 2018 verification good progress in this endeavor has been made by CCC Sulphur Products management. The next verification team will review all the revised management systems and related documentation during the 2021 verification to confirm advancement in areas such as business continuity, contractor training and testing and management of change processes.

Improvement Opportunities

1. There is an Opportunity for Improvement to develop a management system to support the expectations of the CIAC Water Use Metric including annual reporting requirements.
2. There is an Opportunity for Improvement for site management to develop a Management System to require constant interface with public entities; and in particular the Regional Municipality, that could influence site operations. (AC 137)
3. There is an Opportunity for Improvement to develop and maintain (review and update at least annually) a Management System to identify and maintain a listing of organizations and people which represent site community stakeholders. (AC 126)
4. There is an Opportunity for Improvement to develop a management system to monitor social media in the context of ensuring any issues appearing on social media, that could affect the site, are responded to in a timely manner.
5. There is an Opportunity for Improvement to develop a management system to support the C.I.A.C Responsible Care Commitment to “Promote Responsible Care by Name”. Ref: 2013 CIAC document “Promoting Responsible Care Implementation and Guidance”.
6. There is an Opportunity for Improvement to include in all documentation a “nota bene” explaining the short form term CCC, CCC Sulphur Products and Sulco Chemicals are synonymous. review all documentation and replace the “CCC” references with CCC Sulphur products.

Successful Practices:

1. The team noted as a Successful Practice the Elmira sites’ Community advisory Panel (CAP). This CAP well established and managed. The use of an experienced third-party facilitator has contributed significantly to the success of this Panel.
2. The steam turbine electrical energy co-generation project in cooperation with the local utility company.

3. Plans have been finalized for a steam recovery re-use project with a neighbouring CIAC member company. The project includes condensate capture and reuse which will result in a significant reduction in process water requirements.

4. To support community outreach and recruitment activities, the site Compliance Manager (Ryan Draper) teaches a course in Power Engineering Technology at Conestoga College. References to the Responsible Care Ethic are part of the course.

5. To support community outreach the Elmira site President (Ron Koniuch) and the Compliance Manager (Ryan Draper) have made Responsible Care presentations at the University of Waterloo.

INTRODUCTION

About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for CCC Sulphur Products 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, CCC Sulphur Products 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 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). CCC Sulphur Products 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 contacting Gilles Laurin, Director, Responsible Care at glaurin@canadianchemistry.ca or (613) 237-6215 extension 233.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Cameron Dillabough	CIAC	<i>Team Leader</i>
Ron Ormson	CIAC	<i>The Community at Large</i>
Jim Germann	Elmira resident and Community Advisory Panel member	<i>The Elmira Community</i>

About CCC Sulphur Products

CCC Sulphur Products is located on a 4-acre site in Elmira, Ontario and employs approximately 25 people. The site consists of the main sulphuric acid plant, a sodium bisulphite(SBS) plant, a separate corrosives packaging building, and a main office building.

The plant produces 25,000 MT (sulphur equivalent) of sulphuric acid, oleum and SBS annually, utilizing a sulphur burning operation. Molten sulphur is stored onsite as a raw material as well as distributed in the merchant market. Products are stored onsite using 4 tanks with a capacity for 1000 MT and 3 tanks with a capacity of 300 MT. Product is shipped via railcars and trucks to customers in Ontario, Quebec, and North Eastern United States. Approved outside carriers are used to ship sulphuric acid, oleum, and SBS.

A variety of corrosives including hydrofluoric acid, hydrochloric acid, hydrofluosilicic acid, nitric acid, and caustic soda are stored for trans loading into trucks or repackaging into intermediate bulk containers, drums, and carboys. CCC Sulphur Products sells by-product steam to a local user via pipeline in an effort to conserve sources of energy. CCC Sulphur Products maintains ISO 9001 and ISO 14001 certification. CCC Sulphur Products was the first company in the world to pilot the Phase 1 verification process with the CCPA. The Phase 1 Responsible Care® verification was completed in September 1996. This will be the 8th re-verification of this company.

About This Verification

The verification of CCC Sulphur Products took place on November 14th and 15th, 2018 while the planning meeting was held on October 5th, 2018. All meetings were held at the Elmira facility.

The verification consisted of a site tour, interviews with senior management, wage roll employees and the Community Advisory Panel which included the District Fire Chief.

The focus of the verification was maintaining the Responsible Care Commitments during the realignment of management systems and management personnel at the Elmira site as a result of the divestiture of the company's chemical distribution business.

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

This member company is exemplary in their commitment to Responsible Care. As Canada Colors and Chemicals Ltd. they were a strong supporter of all CIAC initiatives and Collective Expectations. Company representatives readily participated in Association sub-committees including sponsoring TransCAER training events. Also, Senior site Management have been fully engaged in the CIAC Leadership Group meetings. The post-sale entity, CCC Sulphur Products, plans to continue with this strong commitment with the available resources.

Design and Construction of Facilities and Equipment

CCC Sulphur Products fully meets the requirements of the Operations Code requirements. On-site engineering resources are limited so third-party resources are retained with the appropriate company oversight. The design management system follows a stage and gate type process that adheres to the concept of inherent safety, resource conservation and minimizing the effects on people and the community.

Successful Practices:

The verification team has listed as Successful Practices the steam turbine electrical energy co-generation project in cooperation with the local utility company. (#2) A steam recovery and re-use project with a neighbouring CIAC member company. The project includes condensate capture and reuse which will result in a significant reduction in process water requirements. (#3)

Operations Activities

The appropriate management systems are in place to operate the Elmira facility in a safe manner. Examples of such management systems are providing skilled operations and managerial personnel, (training) periodic process hazard and risk analysis and management of change including changes in personnel. An information technology-based maintenance management system will be implemented in 2019.

The site is certified to the ISO 9001-2015 Standard for Quality Management and ISO14001-2015 Standard for Environmental Management. Document control is included in the ISO9001-2015 certified Management system.

There are three bulk carriers that service the Elmira site. Triennial Motor Carrier Evaluations of these carriers are conducted in-house by the Compliance Manager. The site is also served by a third-party short haul railway. At time of the verification Canadian National Railways had just assumed responsibility for the short haul railway and thus will assume responsibility for the application of the CIAC Responsible Care Commitment. The Elmira site received the Canadian National Railway's "Safe Shipping Award" (no leaks or spills) since 1999.

The rail line is owned by the Regional Municipality of Waterloo. The municipality has placed operational restrictions on the rail corridor for freight service, limiting train movements to reduced night time duration to avoid conflict with transit operations. The company is encouraged to dialogue with the Region to prevent any additional restrictions in the future that could impact the important rail freight service to the Elmira plant.

Safety and Security

Appropriate management systems are in-place to comply with the expectations of these code elements. A base line site vulnerability assessment was conducted in 2005. Joint Health & Safety Committee inspections include a security component and any new project or process hazard reviews also includes an analysis of potential security issues.

Appropriate operations personnel and contractor safety training Management Systems are in-place. In addition, active Industrial Hygiene and Occupational Health Management Systems are in place.

The "Committed to Safety Program" rewards proactive safety activities and focuses on safety management leading indicators to maintain the site's excellent safety performance. As of the verification date the Elmira site had completed 2068 days without a recordable injury.

Environmental Protection

The Elmira site is certified to ISO14001-2015 Standard for Environmental Management. This Management system addresses environmental performance requirements described in the Responsible Care Commitments. The ISO Environmental Standards are structured international standards based on specific areas of environmental management and certified by a third party. Any Responsible Care "Ethical" driven expectations or Management Systems for environmental management, such as communication through the value chain, are also in-place.

Resource Conservation

There are also active plans and Management Systems to conserve resources through reduced electrical draw, (energy efficient lighting and process equipment and control of phantom power) recycling excess steam production, installation of a cogeneration unit (on-site power generation with excess steam) and a reduction of waste through aggressive recycling.

Promotion of Responsible Care by Name

While CCC Sulphur Products actively support the Responsible Care Commitments there is not a formal Management System to promote Responsible Care by Name. (OP81-84)

Improvement Opportunities:

The team has noted an Improvement Opportunity regarding the need for a formal Management System to Promote Responsible Care. (#5) Ref: the CIAC 2013 Implementation and Guidance document.

TEAM OBSERVATIONS CONCERNING STEWARDSHIP CODE**Research and Development (R&D) Expectations**

There are not any research and development activities at the Elmira site.

Expectations Beyond R&D

The customer base of the Elmira facility is relatively small. (twelve customer companies) All expectations of these code elements are met with the current management systems. As an example, a stage and gate and Management of Change Management Systems are applied to manage the risk involved in new product introduction and product or process changes.

Communication Through the Value Chain

The manufactured and trans-loaded products from the Elmira site tend to be mature products used as raw materials by the customer base. Safety and safe handling information, such as material safety data sheets are well established within the industry. However, there are management systems in-place for new product introduction and new customer selection that include such activities as customer site safety and risk analysis and employee education vehicles to aid in safe handling and new product introduction.

Expectations of Companies with Respect to Other Parties

The company conducts self-assessments and site visits/assessments of third-party customers and end-use companies. Most of the CCC Sulphur Products key customers have had long-term relationship with the company. Each are visited by the company's Elmira Site Compliance Manager to assess adherence with Responsible Care expectations.

TEAM OBSERVATIONS CONCERNING ACCOUNTABILITY CODE

It is the team consensus that the CIAC Responsible Care® Accountability Code expectations are, overall and subject to a few areas for improvement, being met by the company.

Operating Site Communities

With recent corporate restructuring, the operating site community is limited to Elmira, Ontario. The company maintains an excellent on-going dialogue with specific individuals at Elmira, primarily via its well-established Community Advisory Panel (CAP). During the verification the team observed a CAP meeting with a two-way dialogue arrangement that included formal agendas and minutes reflecting issues of importance to the community.

The company has defined the impingement area related to the site worst case scenario (WCS) and in September 2018 a reminder notification describing the site WCS and protective actions required was sent to those business and residential neighbours, that might be affected by a site WCS.

Other Stakeholders

The company has maintained a log of its outreach activity with other stakeholders that dates back for more than a decade. Recently, CCC Sulphur Products has been active with the University of Waterloo, Conestoga College, local public schools, the Township of Woolwich and the local Kiwanis Club. Its

outreach activity has included emergency response preparedness planning, presentations on CIAC and Responsible Care, and other topics relevant to the plant site community.

APPENDICES TO CODES: SOCIAL RESPONSIBILITY

Shown below is a Social Responsibility Statement developed prior the sale of the distribution business. Based on the verification visit CCC Sulphur Products (Elmira Location) will continue to fulfill the Social Responsibility commitments described in the statement. The Elmira site has received appreciation awards for supporting various community projects such as local sports teams, a splash pad at Bolender Park and high school science projects.

Social Responsibility:

“At CCC, we take our corporate social responsibilities (“CSR”) seriously and are committed to advancing our policies and systems to ensure we address and monitor all aspects of CSR that are relevant to our business. These include good ethical behavior, concern for employee health and safety, care for the environment and community involvement. We recognize that our social, environmental and ethical conduct has an impact on our reputation. Therefore, we commit to continual improvement in our performance, efficient use of natural resources and aspire to the betterment of society, the environment and the economy.”

APPENDICES TO CODES: INVOLVEMENT IN PUBLIC POLICY PROCESS

The Management of the Elmira site has been very active within the Elmira community in this regard. For example, the company has taken a special interest in buffer zone encroachment as a result of a proposed local housing development.

Also, prior parent company senior executives and CCC Sulphur Products Executives volunteer time to serve on the C.I.A.C Board of Directors. In the new organization there are plans for the Compliance Manager to attend the appropriate CIAC sub-committees.

TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM

There is a mature management system in-place from the previous company, based on the Plan, Do, Check and Act model (See page #14 below). That model is still relevant to the present CCC Sulphur Products entity but will require revisions to the appropriate documentation. The verification team has noted a generalized Works in Progress related to the realignment of CCC Sulphur Products.

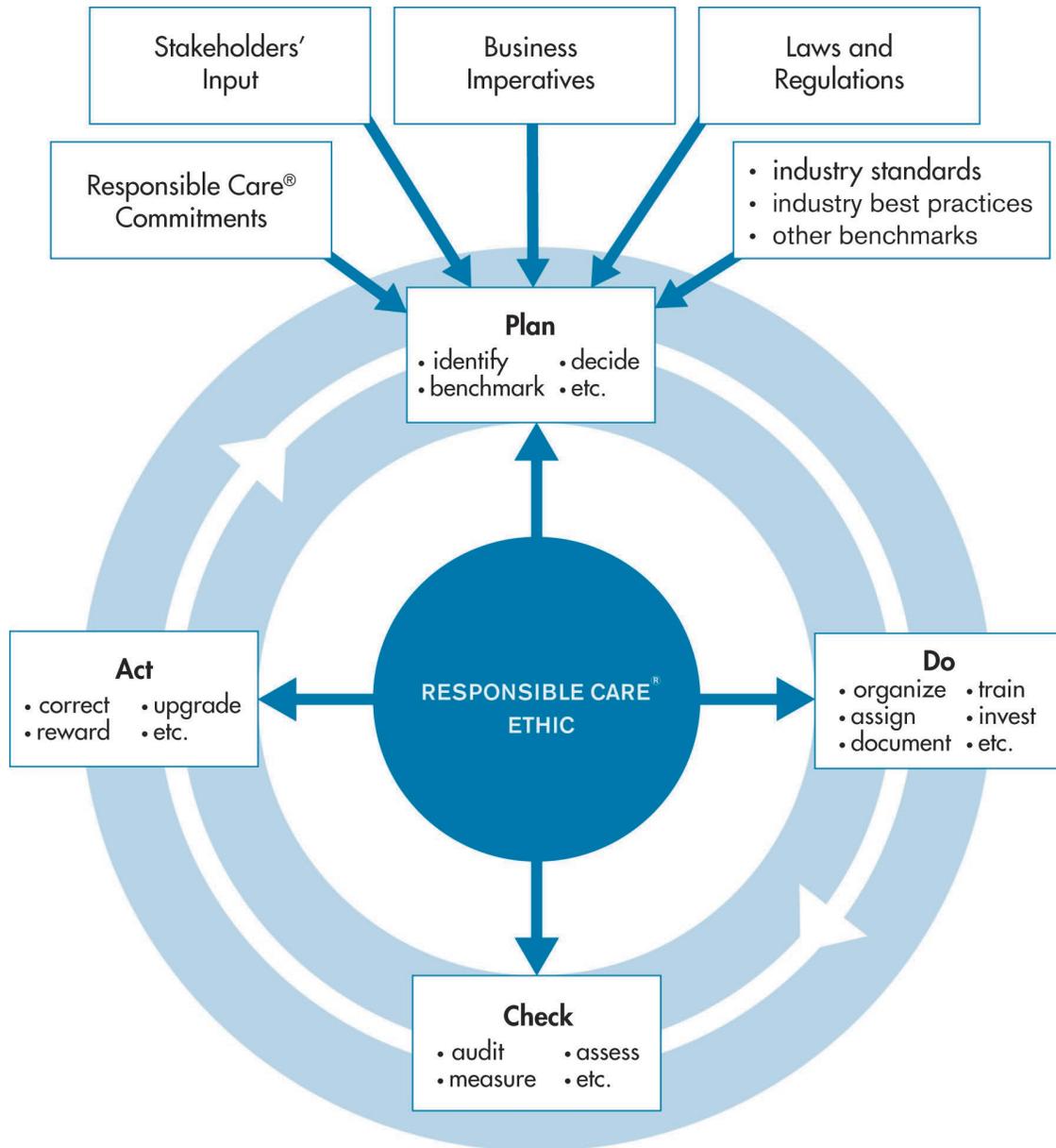
The verbal descriptions of the Company Management System (below, page #15) are verbatim descriptions from Company Responsible Care Management System Edition #3, Revision date august 22nd 2016

Senior level management oversight is comprised of regular quarterly meetings between site executives and the CCC Sulphur Products Board. Agenda will items include Responsible Care projects and performance plus the environmental, health and safety performance of the Company.

Works in Progress:

With the July 2018 announcement of the sale of the Canada Colors and Chemicals distribution business to Brenntag there will be a continual “Work in Progress” to align the smaller CCC Sulphur Products entity, including their Responsible Care Commitments with available resources in 2018 and required resources in 2019 when Brenntag withdraws its’ Regulatory Support Services. As of the November 2018 verification

good progress has been made by CCC Sulphur Products management but the 2021 verification team will review all the revised management systems and related documentation during that verification.



Observations on the PLAN Step

1. Plan: This is the step in the PDCA loop of the management system and sub-systems that involves deciding what the goals of the company and its stakeholders are and how they will be met. It is both inward and outward looking, and is repeated as required, either at a predetermined frequency based on the ACT step requirements determined in the CHECK step, or as a result of incident follow-up, verification reports, regulatory changes, complaints, etc.

CCC maintains policies that reflect the Responsible Care® Ethic

- The Responsible Care® Ethic & Principles for Sustainability commitment sign-off document
- Compliance with Government Legislation/Regulation Policy
- Environmental Policy
- Hazardous Waste Management Policy
- Health & Safety Policy
- Training Policy
- Transportation Policy
- Drug & Alcohol Policy
- Security Policy
- And others

CCC has identified safety, health, environmental aspect risks and impacts of operations and activities, using the CIAC Responsible Care® Ethic and Principles for Sustainability and RDC Responsible Distribution® Codes. These are documented in the company's Responsible Care® Implementation Guide (IG). The guide is maintained under the auspices of the Responsible Care® Coordinator and is continually reviewed and updated as required. The IG is composed of 27 sections, which cover all 3 commitments (Operations, Stewardship and Accountability) of Responsible Care® including a self-audit section. See A1.7; Manuals Implementation Process. Social responsibility aspects are currently found in our code of business conduct document.

The company maintains systems under the corporate Compliance with Government Legislation/Regulation Policy to manage requirements imposed by laws, regulations, industry standards, etc. as indicated below;

Observations on the DO Step

2. Do: This is the step in the management system that converts the decisions of the PLAN step into action and ensures awareness and understanding by all involved. CCC has implemented a formal organizational structure that manages all the company functions including Responsible Care. See A1.1: Company Governance and Structure.

The company has assigned responsibility to appropriate people and/or teams for all PLAN-DO-CHECK-ACT aspects of the overall management system and for each sub-system; Reference Org chart for the Reverification Committee in A1.1 Company Governance and Structure

The company will provide resources sufficient to achieve what is planned to be done in the PLAN step (personnel, technical and financial);

Employees, as agreed to in the planning portion, act upon targets. Operations, sales and capital budgets are submitted every fall for the following calendar year. The company maintains the corporate Responsible Care® Implementation Guide. Using the Implantation Guide, procedure manuals, including those pertaining to Responsible Care®, have been written by the site manager. The manuals are reviewed and updated as required.

The contents of the CCC Quality Procedures Manual (ISO 9001) are designed to support the clauses of the Quality Management Systems Manual. The manuals are reviewed and updated as required.

The contents of the CCC Sulphur Products Environmental Procedures Manual (ISO 14001) are designed to support the clauses of the Environmental Management Systems Manual. The manual is reviewed and updated as required.

The company has established ongoing training for people (including awareness of Responsible Care® and its requirements). Refer to: Training Policy and the Training Resource Organization section of A1.1 Company Governance and Structure.

The company maintains a documented Responsible Care® Management System as part of the overall Management system targeted to verifiers and others who need to understand the overall approach of the company to managing its affairs, including Responsible Care®.

Observations on the CHECK Step

3. Check Internal and external audits are conducted annually to confirm that the operations management system comprising of Responsible Care®, ISO9001: and ISO14001: is in-place and adequate. Internal audits are conducted annually by the Compliance Manager. External audits are conducted every 3 years by CIAC verification teams (Responsible Care®) and annually by 3rd party registrars (ISO programs).

Use Environmental, Health and Safety compliance check software at operating sites to assist in auditing against conformance to current laws & regulations.

Environmental, Health & Safety Scorecard tracks site performance and measures key environmental and health and safety areas. The report is distributed to Executive Management Committee members and site managers on a monthly basis and is part of the E.H. & S. report to the Board of Directors.

ISO9001: Monitor and measure processes and product against policies, objectives and requirements for the product and to report the results

- a) ISO14001: Monitor and measure processes against environmental policy, objectives, targets, legal and other requirements and to report the results.
- b) Spot checks occur on an ad-hoc basis throughout the year by various government agencies i.e. federal, provincial and municipal to ensure adherence to applicable laws & regulations and customer supplier audits as captured in the critical issues system.
- c) On an annual basis senior management sign a “Commitment to Environmental, Health & Safety and site managers sign a “Commitment to Responsible Care®”.
- d) Target performance measurements are evaluated in performance reviews conducted annually for all employees.

Summary of all relevant management policies, programs and procedures activities throughout the year submitted annually to the Board for review.

- e) Director & Officer (D&O) sign off is commissioned by the Board of Directors and is completed annually by the Director, Human Resources;

President CCC Sulphur Products; President CCC Plastics Product Stewardship who are responsible for reviewing and ensuring to the best of their knowledge compliance with all applicable legislations with D&O liability as confirmed by our legal counsel.

Observations on the ACT Step

4. Act The relevant manager acts upon findings and or non-conformances arising from both internal & external audits and informs the audit team. Improvements at the site level since the previous audits are noted as well as opportunities for improvement.

- a) The Compliance Manager reviews all audit reports and compiles a summary of the audit reports on an annual basis. This summary is reviewed with the President and Responsible Care® Coordinator. Based on this review and the annual performance results, the President signs the compliance letter confirming that the company is continuing to adhere to the Commitments of Responsible Care®/. Responsible Distribution®.
- b) Performance targets are set for the following calendar year.
- c) The EMC (Environmental Management Committee) will act upon matters of risk upon recommendation of the RMC (Risk Management Committee). Refer to A1.1.

TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY

Below is a published synopsis of the CCC Sulphur Products commitment to sustainability.

Commitment to Voluntary Codes — public commitment to voluntary codes and standards, including Responsible Care, Global Compact, and others
Sustainability Reporting — timely and comprehensive public reporting of sustainability performance
Sustainability Goals and Programs — a comprehensive set of goals and programs that are specific and challenging
Third-Party Ratings — respected agencies’ ratings on company-wide sustainability management and reporting.
General R&D Commitment — corporate commitment to research and development, as <u>evident in the amount of R&D expenditure per net sales</u>

WORK FOR THE IMPROVEMENT OF PEOPLE’S LIVES AND THE ENVIRONMENT, WHILE STRIVING TO DO NO HARM:

The site and now the smaller focused company have traditionally been progressive in this area of Responsible Care Commitment.

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:

The Company fully meets the expectation of this Commitment. In 2018 the Company Issued a community letter outlining the site risks, interaction with local emergency responders and what action to take should a site incident should occur. The Elmira site has a well-managed Community Advisory Panel (CAP). The company employs an experienced third-party facilitator for the CAP meetings.

TAKE PREVENTATIVE ACTION TO PROTECT HEALTH AND THE ENVIRONMENT:

Since 1990 the site has reduced sulphur dioxide emissions by approximately three hundred and fifty percent while doubling the level of raw Sulphur consumption during that time period.

INNOVATE FOR SAFER PRODUCTS AND PROCESSES THAT CONSERVE RESOURCES AND PROVIDE ENHANCED VALUE:

Based on the future business model for CCC Sulphur Products opportunities in this area might be limited However, having an integrated Risk Assessment Management System with the Management of Change Management system to include resource conservation and operational safety will provide a venue for addressing potential opportunities.

ENGAGE WITH OUR BUSINESS PARTNERS TO ENSURE THE STEWARDSHIP AND SECURITY OF OUR PRODUCTS, SERVICES AND RAW MATERIALS THROUGHOUT THEIR LIFE CYCLES:

Prior to the sale of the distribution business there was a comprehensive Management System in place to comply with this Responsible Care Expectation. As part of the future “Work in Progress” realignment this management system will be adapted to a much smaller “business partner” base.

UNDERSTAND AND MEET EXPECTATIONS FOR SOCIAL RESPONSIBILITY:

The Company fully meets the expectations of this commitment. The following is a brief excerpt from the Social Responsibility Policy. “We are committed to taking positive steps towards CSR through: Economically viable investments, Technically appropriate operations, Environmentally sound practices and Socially responsible actions”.

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:

The Company fully meets the expectations of this commitment. The following is a brief excerpt from the Sustainability Commitment. Promote safe, healthy and environmentally responsible workplaces, extending into the broader community. Maintain our ‘licence to operate’ within our operating sites’ communities Embed the understanding of the community’s constantly changing concerns, values, expectations and aspirations. Enhance benefit throughout the value chain. Positively promote both the CCC and Responsible Care® brands.

PROMOTE RESPONSIBLE CARE® AND INSPIRE OTHERS TO COMMIT TO THESE PRINCIPLES:

The Elmira facility was the first CIAC company to volunteer for a trial verification in 1985. Since that time the facility has been a strong proponent of the Responsible Care Commitments. However, the verification team did note an Improvement Opportunity to implement a management system to add structure to promoting Responsible Care.

VERIFICATION TEAM CONCLUSION

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 found no Findings Requiring Action and believes that the company is capable of responding to any of the observations identified during this verification and discussed in detail in the report. The re-verification of CCC Sulphur Products has been completed and no further involvement is required by the verification team. The final report will be shared with their respective Leadership Group and the general public at the Elmira location.

COMPANY RESPONSE TO VERIFICATION REPORT

On behalf of CCC (Sulco Chemicals Ltd.) I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

CCC has gone through significant changes over the past year, but one thing still remains and that is our solid foundation of a Responsible Care® guided management system. Keeping in mind that this is the 8th time that CCC has been verified, we continue to be impressed with the value that CIAC and Responsible Care® provides to our management system. We found the verification process to be positive and each verifier/community representative provided insight into the process that was beneficial to our growth. CCC is in agreement with the items noted in the report and will work towards continued improvement with completing these matters before the next re-verification in 2021. CCC will share this report and all details pertaining to this report with the Sulco Chemicals Community Advisory Panel at our next opportunity. CCC will also use this as an opportunity to share any lessons learned with other Responsible Care® companies as well as other companies within our sphere of influence to help them grow and evolve as sustainable corporations.

Many thanks to Cam, Ron and Jim for their efforts and dedication to the Responsible Care® ethics.

Ryan Draper,
Compliance Manager

INTERVIEW LISTS

A: Company Personnel Contacted During Verification Process

NAME	POSITION	LOCATION
Ron Koniuch	President CCC Sulphur Products	Elmira
Ryan Draper	Compliance Manager	Elmira
Denton Hunt	Process Operator, JHSC Member	Elmira

B: External Stakeholders Contacted During Verification Process

NAME	POSITION	LOCATION
Ruby Weber	CAP Member	Elmira
Dan Holt	CAP Member	Elmira
Richard Clausi	CAP Member	Elmira
Kieran Kelly	CAP Member & District Fire Chief	Elmira
John Vincett	CAP Facilitator	Toronto
Denton Hunt	JHSC member	Elmira



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