

Responsible Care[®] Verification Report

CCC Sulphur Products

April 7 - 8, 2022



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.

Responsible Care[®] is a registered trademark of the Chemistry Industry Association of Canada.

EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of CCC Sulphur Products. The virtual verification was undertaken on April 7th. 2022 and precluded by an in-person visit to Elmira ON manufacturing site by two team members and completion of previsit questionnaires by company management. The verification team also conducted an in-person interview with a Joint Health and Safety Committee member and requested two third-party contacts complete verification related questionnaires.

This was the ninth Responsible Care verification completed for CCC Sulphur Products. The last verification was completed on November 14th. & 15th. 2018.

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 management systems related to the transition to a twenty-three-employee operation since the 2018 sale of the distribution group and the subsequent 2018 verification.

It should be noted that, as described in this report, the management and employees are continuing their tradition demonstrating the Responsible Care Ethic and community outreach by participating in the “Minerva Project” and the production of an industry related television show entitled “EARTH”.

The verification team has listed two findings Requiring Action related to the Operations and Stewardship and Accountability Codes. Three Improvement Opportunities related to the Operations and Accountability codes, and five Successful Practices related to the Operations and Accountability Codes.

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 can respond to the range of 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:  Date: June 21, 2022
Cameron D. Dillabough
Verification Team Leader

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:

Ron Koniuch, President.
Email. ron.koniugh@ccc-group.com.
TEL. 519 669 1332 EXT.120

SUMMARY OF VERIFICATION TEAM OBSERVATIONS

Findings Requiring Action

1. There is a Finding Requiring Action to address gaps in the management system to promote Responsible Care by name. While verbiage supporting the current system does quote the commitment on name recognition, the system should be robust enough to specify specific actions and timelines required in relation to the individual code elements. As an example, the Responsible Care training for employees and contractors should be more “holistic” by including the history of the Responsible care concept and what a company’s commitment to the Responsible Care “Ethic” and 157 code elements entails. (OP81-84), (ST100-102) and (AC132,140,143,146,150&152) (OP Codes. Section 7, preamble).

2. There is a Finding Requiring Action for the company to ensure all aspects of the Stewardship Code are being met. i.e. (Communication Through the Value Chain). While it is important to choose customers and suppliers who ascribe to a professional association credo, such as Responsible Distribution, that alone, does not sufficiently support the Responsible Care Stewardship Code Commitments. As an example, code element ST115 requires that the Company ensure parties with whom they do business are aware and understand the expectations of Responsible Care, and, where practical, establish application of the codes as a contractual obligation.

Improvement Opportunities

1. There is an Improvement Opportunity to modify the Joint Health and Safety Committee inspection check sheet to specifically include security related items are addressed during site inspections. (OP48)

2. There is an Opportunity for Improvement to engage the Joint Health and Safety Committee to aid in developing a committee mandate to:

- a) Encourage new membership from all departments including the site administration office;
- b) Should a work from home requirement occur in the future the JHSC should include work from home offices as part of their purview;
- c) Provide active shooter training to employees and
- d) Include the use of marijuana entables and other products containing THC oil during the drug and alcohol training. (OP codes, Section 4, (i).)

3. There is an Opportunity for Improvement to include more specific instructions, on the company website, on the steps required contact the company in real time or leave a message for future contact. (AC146)

4. There is an Opportunity for Improvement to assess the structure and function of the CCC Sulphur Products Community Advisory Panel. To that end, the Verification Team suggests the following recommendations.

The CCC Sulphur Products CAP has, since its inception, been a shining example to other CIAC member companies. Recently the death of the long-time CAP facilitator and the havoc wreaked by the COVID pandemic has challenged the management of the CAP process in Elmira.

In relation to the 2022 Responsible Care verification, the verification team provides the following guidance, as an Opportunity for Improvement, to revitalize this valued aspect of the Elmira site Responsible Care Management System and to ensure continuation of the past good work. (AC130)

a) Facilitator. Based on our experience it is vital to retain an outside CAP meeting facilitator who has a working knowledge of Responsible Care. Our recommendation would be that the company take this opportunity to direct that education process and provide remuneration for the facilitator to attain this valuable knowledge. Below we have listed the attributes of a (good) meeting facilitator as support for making this recommendation and the link to the CIAC Responsible Care training app. On the Vubis platform: <https://learn.vubiz.com/ciac> or the Vubiz Online Store: <https://vubiz.com/home/responsible-care-initiative-overview>

b) CAP mandate. Direct the facilitator to request the CAP review and develop a new mandate based on the present size of the company, current community issues and considering the good work of the Woolwich CAER group.

c) Membership. We would recommend that the CAP complete a membership review to ensure attendance commitments and develop a plan to increase membership. We would also recommend the recruiting potential of new members from the proposed Hawkridge development and the local high school.

d) Past members. If past members wish to keep in contact, we suggest an email-based newsletter, on maybe a quarterly basis, informing them of site activities including highlights of CAP meetings.

Successful Practices

1. The team has listed as a Successful Practice the site achievement on being awarded the CN 2021, Safe Handling Award. This is the twentieth consecutive annual award.

2. The verification team has listed the CCC Sulphur Products Committed to Safety Program as a Successful Practice. As of the verification date the site has logged 3,099 days worked without a lost time accident. The site has also logged 1,036 days worked since the last recordable injury.

3. The verification team has listed, as a successful practice, the design, construction and launch of the co-generation steam turbine at the Elmira site.

4. Although thwarted by Regional and Provincial bureaucracies, the verification team has listed, as a successful practice, the support of the Responsible Care Ethic and diligence associated with efforts to prevent residential encroachment into the site worst case scenario impingement zone.

5. The verification team has noted as a Successful Practice the marking of the twenty-five-year history of the Woolwich CAER Group.

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 CCC Sulphur Product's 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 the Director Responsible Care jstevens@canadianchemistry.cpm or (613) 237-6215 extension 233.

1.2 About CCC Sulphur Products

CCC Sulphur Products is located on a 4-acre site in Elmira, Ontario and employs 23 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 Northeastern United States. Approved outside carriers are used to ship sulphuric acid, oleum, and SBS. A variety of corrosives including, hydrochloric acid, hydrofluosilicic acid, nitric acid, and caustic potash 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 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 9th re-verification of this company.

1.3 About This Verification

The verification of CCC Sulphur Products was conducted on April 7th, 2022 and included a visit to the Elmira manufacturing site by two team members prior to the Orientation and Planning meeting. The verification team also conducted a virtual interview with a member of the JHSC and in addition, obtained verification related questionnaires from external third parties. Attachment #2 contains a list of those individuals interviewed and their affiliations.

This is the ninth verification exercise completed for CCC Sulphur Products. The last verification was completed on February 4th, 2019.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Cam Dillabough	Team Leader	CIAC
Debbie Krukowski	Public Verifier	Public-At-Large
Dr Dan Holt	Local Community Representative	The Elmira Community

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

During the verification of CCC Sulphur Products, the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (157 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 communicating its observations, the verification team will make repeated reference to the following categories of observations: Findings Requiring Action, Improvement Opportunities and Works in Progress.

This member company is committed to Responsible Care and a strong supporter of all CIAC initiatives and readily participates in Association sub-committees including sponsoring TransCAER training events. In addition, Senior site Management have been fully engaged in the CIAC Leadership Group meetings and is currently the Chair of the Ontario East Leadership Group.

2.1 Team Observations Concerning Operations Code

2.1.1 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.

At the time of the verification the site had just completed a one-year operational and reliability demonstration of the on-site steam turbine cogeneration unit which allows the site to generate sufficient electricity to operate off the power grid and without any greenhouse gas emissions.

2.1.2 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.

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 Site Management. The site is also served by a short haul railway owned by Canadian National Railway.

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 nighttime duration to avoid conflict with transit operations.

2.1.3 Safety and Security

Pertaining to the management system for these code elements the Elmira site has an engaged work force that has contributed greatly to the site's superior employee accident-free work record and engagement in the site safety, health, and environmental management systems in general. The verification team has listed as a Successful Practice (#2) the excellent accident-free work record. As of the verification date the site has worked 3,099 days without a lost time injury and 1,036 days since the last recordable injury.

The verification team has listed improvement opportunities, shown below, to aid in further improvements to this process.

The team has listed an Opportunity for Improvement related to OP48. (#1). While site vulnerability assessments, and annual reviews, are required in relation to OP48 the company has elected to link security reviews to a scheduled inspection process. The documentation for these inspections does not specifically list security related issues as part of the inspection process.

The team has listed an Opportunity for improvement (#2) related to making the JHSC mandate more comprehensive and inclusive. OP Code, Section 4, (i).

The team has listed (#1) as a Successful Practice receiving the CN rail Safe Handling Award for the twentieth year.

The verification team has listed, (#2) as a successful practice, the CCC Sulphur Products Committed to Safety Program as a Successful Practice. As of the verification date the site has logged 3,099 days worked without a lost time accident.

The site has also logged 1,036 days worked since the last recordable injury. (OP 22-27)

The verification team has listed, (#3) as a Successful Practice, the design, construction and launch of the co-generation steam turbine at the Elmira site. (OP58)

2.1.4 Environmental Protection

As recorded in the 2018 report the Elmira site has along history of projects to significantly reduce site emissions. Because of the scope of operations additional large-scale projects are not feasible but the site does have in-place predictive maintenance procedures to ensure the efficient operation of those process parameters that are designed to protect the environment.

2.1.5 Resource Conservation

Similarly, to the opening statement in section 2.1.4 conservation projects involving recycling process steam and water use have been completed. The focus at present is on small recycling and reuse projects that involves all site personnel.

2.1.6 Promotion of Responsible Care by Name

Promoting Responsible Care by name has always been an expectation of member companies and part of each of the three sections of Code Commitments. In 2013, in response to a gap in public knowledge concerning responsible Care, the CIAC produced a guidance document to aid member companies in fulfilling this Commitment and expand outside knowledge of Responsible Care. The expectation was that each company would develop a separate management system, requiring definitive actions, to promote Responsible Care by Name.

While CCC Sulphur Products have actively supported this Responsible Care Commitment, the team has identified gaps in the above-mentioned Management System.

The team has noted a Finding Requiring Action (#1) to address this issue. (OP81-84), (ST100-102) and (AC132,140,143,146,150&152) (OP Codes. Section 7, preamble).

2.2 Team Observations Concerning Stewardship Code

Since the company post-sale realignment, new customer interaction has been greatly reduced as the business model focuses on large and medium sized bulk shipments to a limited number of fixed customers with the balance of shipments through Chemical Distribution Partners.

Moving forward, there should be a review of the Product Stewardship Responsible Care Commitments to ensure all code elements of the Stewardship Code are being met. This review should be carried out as part of the long-term planning process for the CCC Sulphur Products Sales and Marketing strategy.

2.3 Team Observations Concerning Accountability Code

2.3.1 Operating Site Communities

During past verifications it has been noted that the Responsible Care Commitments related to section 2.3.1 have been administered by site management in an exemplary manner and rank among the top tier of member company achievements in this area.

Site management have also been instrumental in developing, administering, and providing continual support for the Woolrich CAER group.

The presence and operation of the Elmira site Community Advisory Panel (CAP) has also been recognized as one of the few top tier managed and inclusive CAPs within the CIAC. Since the 2018 report the long-time, third-party, CAP facilitator had passed and the issues related to the pandemic, including member internet access, have devastated the management system supporting commitments relating to section 2.3.1. As a stop gap measure the site has issued informational emails on an in frequent basis.

The team has listed as a successful Practice the long-term effort made (to no avail) by site management to educate the Region of Waterloo and the Province about the hazards of allowing residential development within the site worst case scenario impingement zone.

The team has listed an Opportunity for Improvement (#5) in relation to (AC130).

This OFI relates to the management system for two-way dialogue with the community. Traditionally this process was carried out, very well, through the Elmira site's long standing Community Advisory Panel (CAP). However there has not been a CAP meeting since 2019. There are extenuating circumstances such as the realignment of the CCC Sulphur Products business model, circumstances related to the COVID pandemic and the passing of the long-time CAP external facilitator.

Upon review, the team has made recommendations described, in the Opportunities for Improvement section of the "Summary of team Observations" section of this report, as a methodology for moving forward and revitalizing the CAP and continue the site's long tradition of two-way community dialogue.

The President of CCC Sulphur Products will be making a presentation to Regional Emergency Coordinators on the history of the Woolwich CAER group which was initiated over twenty-five years ago.

2.3.2 Other Stakeholders

In a general sense the company has processes in place to comply with the expectations of this Code element. During the succession planning review CIAC expectations and member commitments pertaining to "other stakeholders" should be reviewed to ensure a structured management system, reflective of company resources, is in-place.

The team has also listed an Improvement Opportunity for Improvement (#4) to include more specific instructions, on the company website, on the steps required contact the company in real time or leave a message for future contact. (AC146)

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.

A cross reference document pertaining to the 157 Responsible Care Code Commitments and company policies and procedures is in place. This cross-reference document is included in the site ISO document control procedure.

The verification team studied CCC Sulphur Products' management system(s) and compared 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:

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

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

3.1 Observations on the PLAN Step

During the PLAN Step of the management system, the company decides 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. In considering the PLAN Step of CCC Sulphur Products' management system, the verification team observed the following:

CCC Sulphur Products 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

3.2 Observations on the DO Step

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 Implementation Guide, procedure manuals, including those pertaining to Responsible Care®, have been written by Site Management. The manuals are reviewed and updated as required. The contents of the CCC Quality Procedures Manual (ISO9001) are designed to support the clauses of the Quality Management Systems Manual. The manuals are reviewed and updated as required

Internal and external audits are conducted annually to confirm that the operations management systems comprised of the Responsible Care Commitments, ISO9001 and ISO14001 standards are in-place and adequate. Internal audits are conducted annually by the Site Management. External audits are conducted every 3 years by CIAC verification teams (Responsible Care®) and annually by 3rd party registrars (ISO programs).

As a component of the ISO14001 legal standard, and a CCC Board mandated requirement, a third-party legal advisor conducts an annual review any regulatory changes that could potentially impact site operations. Operational site Environmental, Health & Safety performance is recorded, and the subsequent report is submitted annually to the Board.

ISO9001: Is a certified management system to monitor and measure processes and product quality against policies, objectives, and requirements for the product and to report the results

ISO14001: Is a certified management system to monitor and measure processes against environmental policy, objectives, targets, legal and other requirements and to report the results.

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.

On an annual basis senior management sign a “Commitment to Environmental, Health & Safety” and site Management signs a “Commitment to Responsible Care®”.

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.

Director & Officer (D&O) sign off is commissioned by the Board of Directors and is completed annually by the President of CCC Sulphur Products.

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.

3.3 Observations on the ACT Step

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.

The site management group 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®. Performance targets are set for the following calendar year.

The site management group will act upon matters of risk upon recommendation of the CCC Board and, or other external input. Refer to A1.1.

4. TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY WORK FOR THE IMPROVEMENT OF PEOPLE'S LIVES AND THE ENVIRONMENT, WHILE STRIVING TO DO NO HARM:

In 2021 the Elmira site commissioned a co-generation project that utilizes excess process steam to generate "clean" electricity that, during operation, allows the site to operate independently from the electrical grid. The exhaust steam from the turbine is captured in an air-cooled condenser with one hundred percent of the water captured for reuse in the steam generation process.

The process for water capture and reuse was vetted by the Community Advisory Panel as a methodology to choose the best option to satisfy community concerns.

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. Interim relating to the company "E2" plan, as per, federal regulations are distributed during the annual Elmira Emergency Siren and Community Alert Network test.

TAKE PREVENTATIVE ACTION TO PROTECT HEALTH AND THE ENVIRONMENT:

Since 1990 the site has reduced sulphur dioxide emissions by approximately ninety-five percent while doubling plant production and the level of raw Sulphur consumption during that time.

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 and Management of Change Management systems that include resource conservation and operational safety should 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. A future challenge during succession planning will be realignment of this management system to adapted to a much smaller "business partner" base and ensuring all aspects of the Stewardship Code are met.

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 Corporate Social Responsibility 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 Sulphur Products and Responsible Care® brands.

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

The Elmira facility is participating in the “Minerva Project” which educates post graduate students in the Responsible Care Ethic and Commitments as well as management systems relating to Environmental, Health and Safety management.

The site is also participating in the production of a television show entitled “EARTH” with John Holden. The focus of this show is The Chemistry Industry of Canada and its Responsible Care initiative.

The President of CCC Sulphur Products will be making a presentation to Regional Emergency Coordinators on the history of the Woolwich CAER group which was initiated over twenty-five years ago.

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 can respond to the range of 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 CCC Sulphur Products I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

CCC Sulphur Products 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.

We will consider the Improvement Opportunities identified by verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Plans will be developed and implemented to respond to the Findings Requiring Action identified by the verification team. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care and communicated to the verification team at the time of our next verification.

MANINDER SINGH RAI
LEAD PROCESS ENGINEER
CCC SULPHUR PRODUCTS, ELMIRA
2022-06-20

INTERVIEW LISTS

A: Company Personnel

Name	Position	Location
Ron Koniuch	President & Executive Contact	Elmira
Maninder Rai	Process engineer	Elmira
Denton Hunt	JHSC employee representative	Elmira

B: External Stakeholders

Name	Company / Organization	Position	Location



Responsible Care[®]
Our commitment to sustainability.

CHEMISTRY INDUSTRY ASSOCIATION OF CANADA
Suite 1240, 45 O'Connor Street
Ottawa (ON) K1P 1A4
T: 613 237-6215 F: 613 237-4061
www.canadianchemistry.ca