# **Responsible Care®** Verification Report

# **Procor Ltd**

SEPTEMBER 28 - SEPTEMBER 29, 2022

A Distantion of the





Responsible Care

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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<sup>®</sup> 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 Procor Ltd. (Procor). The verification was undertaken on September 28 and 29, 2022, at the company's facility in Sarnia Ontario. This was the sixth Responsible Care verification completed for Procor. The last verification was completed in August of 2018.

The verification team was very impressed with how the company has embraced its overall commitment to Responsible Care; and, how it has implemented the Responsible Care components relevant to its business as a Transportation Partner. As a result of the review activities that were conducted, the verification team is of the opinion that, overall, 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.

As the result of our investigations there were no Findings Requiring Action and four (4) Opportunities for Improvement.

The verification is considered to be complete and no further involvement is required by the verification team.

Signed: Gerry Whitcombe Verification Team Leader Date: November 28, 2022

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:

Wade Osborne Director, Scheduling and Commercial Process | Procor Repair Services Office: 905-465-8542 Osborne@procor.com

# SUMMARY OF VERIFICATION TEAM OBSERVATIONS EXECUTIVE SUMMARY

#### **Findings Requiring Action**

There are no findings requiring action.

#### **Improvement Opportunities**

There is an opportunity for improvement to restructure the company's Responsible Care model to replace the TransCAER section with Emergency Response and Public awareness sections. The company may further choose, for those applicable areas, to simply adopt the structure presented in the Codes of Practice.

Over time, there is an opportunity for improvement to revise the cross-reference document to specifically identify the CIAC codes of practice which inform the company's standards and procedures. There is a Community Dialogue opportunity for improvement to review and update of Procor Standard Procedure PSP-R-14 particularly to anticipate information needs of host communities when planning capital expansion works or following significant incidents where there is the potential for offsite impacts (e.g., noise, odour, air emissions).

There is an opportunity for improvement for Procor's senior leadership team to annually set corporate targets, goals and plans specifically aligned with the CIAC's eight Principles for Sustainability.

### 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 Procor 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<sup>®</sup> 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, Procor 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; Responsible Care Verification Report – Procor Ltd.

- 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 (<u>www.canadianchemistry.ca</u>). Procor 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 <u>www.canadianchemistry.ca</u>, or by contacting CIAC Responsible Care at

Jeff Stevens Director, Responsible Care Chemistry Industry Association of Canada Office: 613 -237- 6215 Ext. 227 Cell: 613-858-8715 jstevens@canadianchemistry.ca

#### **1.2 About Procor Ltd.**

Procor Limited (PROX) is the Canadian affiliate of Union Tank Car Company (UTLX) which has its headquarters in Chicago Illinois. Procor Limited head office is located in Oakville, ON. Both companies are owned by the Marmon Group, a Berkshire Hathaway company. The Marmon Group is a global diversified investment company consisting of 13 diverse stand-alone business sectors and 100 independent manufacturing and service businesses.

Procor's main business consists of rail car leasing and repairs. In late 2015, UTLX and PROX acquired the GE rail car division (USA and Canada). Procor is a full-service leasing company managing the largest tank car fleet in Canada. Procor manages a fleet of more than 31,000 conventional and special purpose tank and freight cars. They operate a rail car repair network including 5 main service centers and 22 on-site or mobile Field Services locations, all registered with the Association of American Railroads (AAR) and Transport Canada (TCC).

The network provides a full range of services including rebuilding damaged/wreck cars, routine preventive maintenance, recertification, emergency repairs, retrofit work and special conversion programs. Procor also has direct access to their US affiliate (UTLX) facilities for repair services and the construction of new rail cars.

PROCOR and UTLX continues to further integrate the management of their key common business activities (leasing and repairs) to improve their operations effectiveness and customer services under the Marmon Rail umbrella. As a result, there have been several senior management position changes since the last RC verification in 2015. All Procor Limited business activities are guided by the Responsible Care principles.

Additional information is available on the Procor Limited web site (<u>https://www.procor.com</u>) or the Marmon Holdings, Inc. website (<u>https://www.marmon.com</u>)

#### **1.3 About This Verification**

The verification was undertaken on August 29, 2022 (virtual planning meeting) and September 28 and 29, 2022 (in person on-site visits).

While on-site, the verification team met with company leadership, various employees and members of the company JH&SC. Attachment 2 contains a list of those individuals interviewed and their affiliations. This was the sixth Responsible Care verification completed for Procor. The last was completed in August of 2018 The verification team was composed of the following individuals.

Name	Affiliation	Representing
Gerry Whitcombe	CIAC consultant	Industry
Ron Ormson	CIAC consultant	Public at Large
Stan Ouellette	Sarnia	Local Community

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

Procor is a CIAC partner organization and as such has a special responsibility to understand its commitment to Responsible Care in a manner commiserate to the nature of their business. Thus, the team's approach to this verification was to determine the following:

- Is the company sufficiently meeting the expectations communicated in the Responsible Care Commitments (Codes and Benchmark and Collective Expectations)?
- Is an effective and self-healing management system sufficiently in place for setting and meeting all company goals and is it driving continual improvement?
- Is the commitment to the Responsible Care Ethic and Principles for Sustainability tangible and does it sufficiently guide the company's judgement, decisions and actions, internally and externally?

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

- 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 verification 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 verification 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 verification 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 the Responsible Care Codes of Practice

The company operates within a highly regulated industry and has developed guidance, policies, standards and procedures that have allowed it to successfully compete. These past practices and the company's understanding of its commitment to the CIAC's Codes of Practice has resulted in a Responsible Care structure as follows:

- 1. Health and Safety
  - a. Occupational
  - b. Operations
- 2. Environment
- 3. Security
- 4. TransCAER
  - a. Public Awareness
  - b. Emergency Response

Regarding TransCAER (Section 4). While the company deals exclusively with rail tank cars it does not transport hazardous goods, thus codes OP 41-47 do not apply. Procor emergency response relates to facility emergencies, not railway incidents involving Procor tank cars. As a result, emergency response and public awareness efforts are appropriately directed toward Procor repair and maintenance facilities, and typically not to communities along rail corridors. The verification team does believe, however, that the company's association with TransCAER is very appropriate.

There is an opportunity for improvement to restructure the company's Responsible Care model to replace the TransCAER section with Emergency Response and Public awareness sections. The company may further choose, for those applicable areas, to simply adopt the structure presented in the Codes of Practice.

The relationship between CIAC Codes of Practice and Procor procedures is maintained in a cross-reference document. Each of the above four areas is supported by standards and/or procedures and is subject to leadership management, review and control.

An improvement opportunity exists to review the cross-reference document and establish specific references to the Codes of Practice. A regular, frequent review is encouraged to ensure updates to the Codes of Practice have been evaluated and integrated into the current system as necessary. For example, a frequency of a third of all codes reviewed each year would allow for a total review each verification cycle. These formal annual reviews would support the company's CIAC Responsible Care annual attestation review and sign-off.

Such reviews ensure alignment with CIAC direction as well as confirmation that past interpretations of the codes are still valid. CIAC recently adopted new codes in support of equity, diversity and inclusion (OP 81-83 and AC 158-161) as well as codes related to engaging indigenous communities (AC 153-157) and the expectation is that all Responsible Care companies will have reviewed (and documented) these new additions and have acted

accordingly.

The purpose of the cross-reference document is to link specific applicable codes (or portions thereof) to company standards and procedures. It is primarily a document to ensure an understanding of the scope of the company's Responsible Care commitment, but it also serves as the cornerstone of the verification process. The inclusion or exclusion of a code element into the company's management system can form the basis of discussions with the verification team. Although knowledgeable verifiers can glean an understanding of the relation between the current 'Description' in the cross-reference document and an underlying RC code it is not as clear as it could be. 'Description', in our view, should more closely relate to specific CIAC items:

E.g.	
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Model	CIAC Code	Description	Procor Standard/Procedure
4. Safety and Security			
ii) Occupational Health	OP 22	Evaluate Hazards and Implement Controls	PSP-R etc.
and Safety	OP 23	Procedures Developed, Understood,	PSP-R etc.
		Implemented	
	OP nn	That portion relating to	PSP-R etc.
	etc	etc	etc

The starting point for the cross-reference is the RC codes. The codes are then interpreted for applicability; and, following such interpretation, the codes are finally checked against company systems that are in-use or that require development and implementation. Non applicable codes are indicated as such. Please note that this report is aligned with the codes the verifiers reviewed and believe are appropriate to Procor (i.e. not all applicable code were reviewed).

The team observed that included in 'Description' was a reference to WHMIS. This isn't a code requirement but is rather a regulatory requirement that could impact the code requirement. The company might find it useful to include a column identifying similar regulatory requirements, e.g.

Model	CIAC Code	Description	Regulatory Requirement	Procor Standard /Procedure
4. Safety and Security				
ii) Occupational Health and Safety	OP 22	Evaluate Hazards and Implement Controls	WHMIS,etc	PSP-R etc.
	OP 23	Procedures Developed, Understood, Implemented	WHMIS,etc	PSP-R etc.
	OP nn	That portion relating to		PSP-R etc.
	etc	etc	etc	etc

There are many ways to report this information and we have attached an Excel spreadsheet (Procor RC Codes Cross-Reference (RCCCR).xlsx) as an example of what we would envisage as a useful cross-reference document. It incorporates the topics discussed above and we invite you to make use of it as the company may see fit.

Over time, there is an opportunity for improvement to revise the cross-reference document to specifically identify the CIAC codes of practice which inform the company's standards and procedures. Responsible Care Verification Report – Procor Ltd. 10

#### **Operations Code**

#### 3. Operations Activities

#### i) General considerations

Rail car services can involve hazardous mechanical and confined space work. Procor's related critical procedures are well documented, audited frequently, reviewed at least every 3 years; and are contained within the company's 'Life Saving Rules'. This is an excellent system that serves its purpose well.

The team visited various locations around the site. Housekeeping, in general, was excellent and we believe this demonstrates a commitment by management and employees to ensure there is a safe space within which everyone can work.

The team met with members of the Joint Health and Safety Committee JH&SC and observed a commitment to health and safety aligning with company direction. There was excellent recognition of Responsible Care in general and of the company's impact on the community in particular.

The company sufficiently meets Responsible Care expectations for CIAC Partners with respect to operations.

#### 4. Safety and Security

#### i. Occupational Health and Safety

Procor is focused on five (5) fundamental 'People First Cultural Beliefs'. They are: 'Pursue Excellence', 'Own it', 'Safety Always', 'Show Pride' and 'Earn Trust'. Although they relate to overall company culture, they also all relate to or have an impact on safety. The desired safety culture, 'Safety Always', is one of learning, positive reinforcement and not, normally, punitive measures.

Leadership is tasked with ensuring personal visibility and safety accountability. Performance targets, related to safety observations, are set for all. "Lunch with the Leader" sessions are held to share experiences and explore H&S improvement opportunities.

All employees are governed by personal expectations and work procedures, but 10 specific topics are of such importance that they have been identified as 'Life Saving Rules', which if circumvented will trigger a thorough investigation that could lead to termination.

The company has an excellent and visible scorecard comprised of audit completion performance and lagging and leading indicators.

- Data is collected by facility and is rolled up for the entire organization.
- Audits are done on a fixed schedule ranging from weekly through to annual with frequency set by the significance of the item. The monthly safety audits are taking a 'Back to basics' approach looking at each task in its entirety rather than just a snapshot.
- Lagging indicator incidents are collected and analysed resulting in, for 2022, various actions including ergonomic training, glove standardization, PPE standardization, monthly audits and a sealed eyewear program. In one case, ongoing analysis has demonstrated a significant (40%) decrease in hand injuries.
- Leading indicators, generally related to completion of tasks, are set and analysed.

The EH&S team is supported by a 3rd party industrial hygiene consultant.

The company is focused on good quality employees in the right roles and there is an extensive formal newemployee training program that has recently been put in place. Utilizing the company's Learning Management System (LMS) software an onboarding profile has been created guiding the employee through all required training before being allowed to set foot on the shop floor. An added benefit is standardization between the parent company's Canadian and US based companies and the leveraging of best practices. Follow-up meetings are held with new employees one month into their tenure to review what is working and what needs improvement.

#### iii. Emergency Response

Emergency response applies to site facilities and as the company is not a TDG shipper, transportation emergency response does not apply.

Sarnia Fire Services responds to overall plant emergencies. Procor staff is trained in first aid and confined space rescue, marshalling sites were well identified and known.

#### iv. Malicious Intent

The Sarnia site is secure with limited general access, a front entrance sign-in process and card access to all site buildings.

#### v. Critical Infrastructure/Business Continuity

The company has processes in place to mitigate IT issues.

#### vi. Incident Reporting and Investigation

EH&S Insight software is used for audits, incident recording and corrective and preventive action. Excellent processes to detect, record, analyze and respond to incidents are in place (see lagging indicator notes above).

The company sufficiently meets Responsible Care expectations for CIAC Partners with respect to Occupational Health and Safety.

#### 5. Environmental Protection

#### Wastes

The company collects waste from heels left in the railcars they service. The handling of this waste is wastespecific and is based on the local situation. They have protocols in place to properly select motor carriers who transport this waste to certified waste handlers.

#### **Complaints at facilities**

There is a general call-in number for interested parties to register a complaint. After hours a direct line to the Canadian VP Operations is used.

Complaints from the community are few but there have been some related to odours. At the Sarnia Facility, an unusual emission, caused by a failure to follow procedure, resulted in multiple complaints, an investigation and charge under the Environmental Protection Act and a subsequent fine. A thorough internal investigation resulted in corrective actions and the company is sure the incident will not be repeated.

Due to the nature of their operation spills can occur. Local procedures have been used, twice this past year, to address the incident. Generally, the amounts are very small and reporting to Ministry of Environment Conservation & Parks (MECP) is not required, however, they did report these two incidents. All incidents are Responsible Care Verification Report – Procor Ltd. 12

shared throughout North America.

The company sufficiently meets Responsible Care expectations for CIAC Partners with respect to its environmental programs.

#### 7. Promotion of Responsible Care by Name

The company promotes Responsible Care widely, in-house in particular but also with its peers, suppliers, customers and in its communities. The verification team found multiple examples whereby Procor showcases and displays Responsible Care on railcars and throughout its operations.

The company sufficiently meets Responsible Care expectations for CIAC Partners with respect to the promotion of Responsible Care.

#### **Accountability Code**

#### 2. Operating Site Communities

Procor standard procedure PSP-R-14 governs activities related to the Accountability Code. The procedure is well structured and provides guidance to fixed facilities on when actions are required. It is based on worst-case scenario communication and the team believes there is an opportunity to modify this structure to align more closely with one of the Principles for Sustainability.

When considering this Principle for Sustainability:

"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;"

and these Codes:

OP 3, for fixed facilities, establish site selection and land use criteria which minimize any potential adverse impact on the community, the environment, neighbours, utilities, and transportation routes, including adequate separation between hazardous and sensitive land uses;

#### AC 125-132, but in particular,

AC 129 e) develop and maintain information for both responsive and proactive communication and dialogue with the community, covering products, processes, services, on-site historical waste sites, social impacts, benefits and hazards and associated risks, up to and including worst case scenarios; and

AC 131 g) provide timely information about plans to modify operations or facilities, and seek and respond to community feedback.

The verification team is of the opinion that there is an opportunity to update PSP-R-14.

The early identification of, in the Sarnia scenario, site modifications requiring community consultations could have, perhaps, lessened community concerns related to the site expansion. We do note the excellent efforts taken by site personnel (including volunteer hourly staff) in responding to community concerns but believe that the company would have benefitted from a pro-active effort.

We note that the PSP-R-14 procedure has a focus on Community Advisory Panels (CAP) and worst-case scenarios. We believe that while CAPs are very useful structures, they are not always the best answer. It is perhaps better to think of the process that would be optimal in terms of community dialogue and what is

necessary to achieve the stated Principles for Sustainability. In the Sarnia case, the team believes that the efforts undertaken by site personnel (e.g., door-to-door, door handle tags, open house) were excellent. The idea behind the webpage was also very good, however, information was difficult to find and search easily. Beyond these efforts we could suggest contacting your local RC peers (e.g., chemical manufacturing customers), who have CAPs, to obtain an invite to be a featured guest speaker.

There is a Community Dialogue opportunity for improvement to review and update PSP-R-14, particularly to anticipate information needs of host communities when planning capital expansion works or following significant incidents where there is the potential for offsite impacts (e.g., noise, odour, air emissions).

### 3. Team Observations on the Company Management System

The company meets expectations regarding fundamental safety, health and environmental standards and procedures. The corporate leadership team demonstrates, in a number of key procedures and policies, their commitment to Responsible Care. For a Transportation Partner, they exhibit leading edge practices with respect to corporate-wide awareness of Responsible Care and the underlying value that it brings to Procor's operations.

Although Responsible Care is embedded in the day-to-day operations, the company does not appear to have a formalized overall management system specifically centered on Responsible Care. Most Responsible Care items are, however, contained in the systems mentioned above and are handled through the company's existing management system. As a result, there is risk that processes for continuous improvement items related to the Responsible Care Ethic and Principles for Sustainability may not be fully and consistently accounted for.

An improvement to the current management approach would involve the emphasis on Responsible Care by the highest-level company officials who oversee corporate management. Such an arrangement would ensure that Responsible Care is the umbrella under which all safety, health, environmental and many sustainability issues and efforts are undertaken. The company Plan, Do, Check and Act cycle is informed by the commitment to Responsible Care and the direction for continuous improvement can reasonably be provided by CIAC's current 'Principles for Sustainability'.

It is noted that the company has publicly committed to the Ethic and Principles for Sustainability and, therefore, can fairly be asked about their performance in achieving that to which they have committed. The company is well positioned to fully integrate the aspirations contained in Responsible Care and the Ethic and Principles for Sustainability, given below. Developing targets, goals and plans for continuous improvement in all eight areas would then become the prime Responsible Care objective of senior management. 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.

The Verification Team and Procor recognize that there is interdependence between the Principles for Sustainability and the Codes of Practice; and, that the overall Responsible Care codes were written principally for Chemical Industry members. Currently, the codes are not tailored specifically to Transportation Partners. Despite this, the Principles for Sustainability are inherently important for all Responsible Care companies. As such, corporate management systems can be strengthened by extracting and integrating the sustainability principles into formal corporate management systems.

We are also of the opinion that by managing continuous improvement of the Principles for Sustainability the company will have opportunities to enhance CIAC internal reporting and annual attestation as well as opportunities for external (i.e., public) engagement that was not previously routinely available. This approach to Responsible Care implementation would also become an opportunity for the company to succinctly structure future RC Verifications. For example, the company is committed to Responsible Care and the Principles for Sustainability, therefore its management system could explicitly note that:

- The company's RC goals and plans are formally based on the eight 'Principles' and performance is reviewed regularly and
- The company's standards, procedures and practices are developed and managed based on those same principles (and informed by the codes of practice).

There is an opportunity for improvement for Procor's senior leadership team to annually set corporate targets, goals and plans specifically aligned with the eight Principles for Sustainability.

# 4. Team Observations on the Responsible Care Ethic and Principles for Sustainability See above.

### 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, overall, 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 applying the Responsible Care Ethic to the opportunities for improvement identified during the verification - summarized in "Summary of Verification Team Observations" at the beginning of this report and discussed in detail within the report. The verification is complete and no further involvement is required by the verification team.

# APPENDIX 1: COMPANY RESPONSE TO VERIFICATION REPORT

On behalf of Procor, I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

Procor Limited is committed to being transparent with our CIAC peers and stakeholders, including the communities in which we operate. The results of the verification process will be shared with all and posted on our website.

We were grateful to finally meet with the verification team after a long Covid layoff and will consider the Improvement Opportunities that were presented. Procor continuously looks for ways to advance our business practices and the verification team has given us some excellent suggestions. We will also be happy to assist the CIAC in communicating and sharing any of the identified Successful Practices to other CIAC members.

SIGNED BY: Wade Osborne

TITLE: Director, Scheduling and Commercial Processes

DATE: May 18, 2023

# APPENDIX 2: INTERVIEW LISTS

# Company Personnel Contacted During Verification Process

NAME	POSITION	LOCATION
Mike Milford	VP Operations	Oakville
John VanderMeulen	Director, Health, Safety and Environmental	Edmonton
Wade Osborne	Director, Scheduling and Commercial Process   Procor Repair Services	Oakville
Archie Wylie	Sarnia Safety Lead	Sarnia
Tara Kindel	Sarnia JH&SC	Sarnia
Stephen Perry	Sarnia JH&SC	Sarnia
Alessandro Parete	Sarnia JH&SC	Sarnia



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