

CERTIFICATE OF REGISTRATION

This is to certify that

INEOS Styrolution Canada Ltd.

Main Site: 872 Tashmoo Avenue, Sarnia, Ontario, N7T 8A3, Canada

operates a

Responsible Care Management System

which complies with the requirements of:

RC14001[®]:2015

*This Responsible Care Management System is also in compliance with ISO 14001:2015

for the following scope of certification

Production of Styrene Monomer

Certificate Number:

0157345

Initial Certification Date:

28 September 2023

Date of Certification Decision:

28 September 2023

Issuing Date:

28 September 2023

Valid Until:

27 September 2026



intertek



Calin Moldovean

President Business Assurance

Intertek Testing Services NA, Inc. dba Intertek
900 Chelmsford Street, Lowell, MA, USA



AUDIT REPORT

American Chemistry Council – Chemistry
Industry Association of Canada

Responsible Care[®] Certification /
Verification Report on

“Other Responsible Care[®] Commitments”

**This report and all its content is confidential and
remains the property of Intertek.**

Document # F103-20-RC
Release Date: 18-MAR-2022





Section 1 – Basic Audit Data

Section 2 – Team observations concerning the company’s CIAC Responsible Care commitments



Section 1: Basic audit data

Client/Address	Client ID#
Ineos Styrolution Canada Limited	CMPY-176404
872 Tashmoo Avenue	Audit Criteria
Sarnia, Ontario, N7T 8A3, Canada	RC14001 RCMS - CIAC COMMITMENTS
	Date(s) of audit
	June 22 – 30, 2023

Audit Team

Lead Auditor Jack Poon

Scope of certification

Production of Styrene Monomer.



Section 2: Team observations concerning the company's CIAC Responsible Care commitments

Element #1 - TransCAER®;

Evidence of participation in TransCAER® activities by the company where it has operations

Auditor Notes:

- Attendance or presentation at a scheduled TransCAER event:
 - TransCAER meeting Jun 19 2020 attended by Mike Garvey
 - TransACER safety train donation (Ref # 1215-0540-000)
- Participation in national or regional TransCAER meeting, call, webinar
 - TransCAER meeting Jun 19 2020 attended by Mike Garvey
- Review and comment of TransCAER document(s), email(s), etc.,
 - Communication with CIAC representative (Kara Edwards) Jun 1 2023 at the RC Conference / Work shop
- Distribution of TransCAER documentation to key stakeholders
 - TransCAER Safety Train Donor recognition plan
 - Ineos Styrolution is on the list of donors and recognition list
 - Responsible care commitments (Accountability code AC145) received Jan 21 2022
- Other actions identified by the company
 - None

Element #2 - Community

Evidence of the development and communication of a worst-case scenario and other community engagement requirements

Auditor Notes:

Environmental Emergency Plan Rev 03 Jan 30 2023

Environmental Emergency Community notification

- Reasonably expected worst-case impacts – Ineos Styrolution utilized an independent third party to conduct modelling of their regulated chemicals to determine scenarios that could be reasonably expected to occur with the farthest-reaching offsite impact as defined by the E2 regulation:
E2 Hazard / E2 Risk definition / E2 regulated chemicals
Combustible hazards / Combustible material can be ignited and sustain burning in ambient conditions / Benzene, the Responsible Care Ethyl-benzene



Explosive hazard (E) / Explosive chemicals are capable of damaging the surroundings / Styrene

- BASES web site and hotline phone number is listed for easy reference

Newsletter handed out to the public during the Arlanxeo Fire Hall Open House on May 30 2023

Bluewater Community Advisory panel – hosted the panel on Mar 23 2023 (annual event) which included the Responsible Care certification and the 8 CIAC elements

Presentation to MP Sarnia (Marilyn Gladu), MPP (Bob Bailey), Sarnia Mayor (Mike Bradley)

- Tour of the facility
- Principles of Responsible Care

Member of the Sarnia Lambton Environmental Association SLEA

- May 16 2023 meeting notes
- Clean Air Sarnia and Area CASA meeting Mar 30 2023 including the First Nations

Element #3 - Participation

Evidence of participation by company leadership in CIAC Responsible Care activities, committees and submission of an annual Responsible Care recommitment letter

Auditor Notes:

- Active participation is expected, appropriate to each company's circumstances, in CIAC committee work, meetings and outreach activities of the association in support of advancing, managing and continually improving Responsible Care across the industry. CIAC does not prescribe how such participation is to take place.
 - Please see below
- CIAC Committees include: SHARE Network, Process Safety Network, Product Stewardship Network
 - SHARE meeting Feb 15 2023
 - CIAC PSN meeting Jun 22 2023
- Technical Management, Public Affairs and Business and Economics Committees
 - CIAC Ontario Environment Quality Committee Mar 8 2023
 - CIAC Technical Management Committee TMC meeting May 18 2023
- TransCAER®, TEAP III and Transport Committees
 - TransCAER® meeting Jun 19 2020 attended by Mike Garvey
- Responsible Care Leadership Groups
 - CIAC conference May 29-31 2023 attended by the Site Director and the Environment and Quality Coordinator)



Element #4 - Performance

Evidence the company has provided CIAC with benchmarking data and other required data submissions including subcontractor evaluation requirements

Auditor Notes:

- Annual NERM Data survey (emissions, releases, etc.,)
 - NERM and NPRI completed together and submitted online through Single Window Information Manager SWIM to CIAC on May 31 2022
 - NERM survey data completed and submitted on June 28 2023
- Annual CIAC Supplemental survey (injuries, fatalities, energy use, water use, process safety incidents, transport incidents)
 - Annual SHIM submitted to CIAC through the SHARE network on Jun 22 2023
 - Annual Process-Related Incident Metrics PRIM survey submitted on-line to CIAC May 30 2023
 - Process Safety Self Assessment dated Jun 22 20023
- Annual TEAP III survey
 - Not requested by CIAC (e-mail sent to CIAC for clarification)
- Road Carrier Assessment tool (once/year)
 - Not requested by CIAC (e-mail sent to CIAC for clarification)
- Rail Carrier Assessment tool (once/year) – N/A, members only
 - Not requested by CIAC (e-mail sent to CIAC for clarification)
- Marine Carrier Assessment tool (once/year)
 - N/A, Ineos Styrolution does not ship through marine
- Other data collection efforts as directed by CIAC, ACC, ICCA (irregular)
 - Annual Process-Related Incident Metrics PRIM survey submitted on-line to CIAC May 30 2023
 - Process Safety Self Assessment dated Jun 22 20023
- SHARE data – collected for all Canadian sites – Montreal, Moose Jaw, Red Deer. VP Operations collects and submits data by the designated due date. Confirmed submission of SHARE data as noted by CIAC
 - Annual SHIM submitted to CIAC through the SHARE network on Jun 22 2023

Element #5 - Commitments

Evidence the company has reviewed its activities against CIAC's Responsible Care Principles and Ethics and its position on sustainability and corporate responsibility

Auditor Notes:

The review is confirmed by the company's CIAC leadership representative in a required, annual recommitment letter.

- Senior leadership attended the Management review meeting on Jun 6 2023

Refer to the revised 2018 version of the CIAC Responsible Care Ethics and Principles



- Annual re-commitment letter signed by Site Director Mar 22 2023 and submitted to CIAC
- The CIAC Responsible Care commitments – Operations Code, Stewardship Code, Accountability Code (applicability as documented on the Ineos Styrolution responsible Care 14001 management System Mapping Matrix dated Jun 2023).

Element #6 - Dialogue

Evidence of stakeholder/community dialogue, including interviews by auditors with local community representatives

Auditor Notes:

An interview of community representatives (Stan Ouellet, BCAP Community Member) has been conducted on Jun 28 2023 without company personnel present and the following are the results.

1. Are you aware of Ineos Styrolution? If yes, have you had any dealings with them?
Yes, through regular BCAP meetings
2. Has anyone from the company come to speak with you about what they do? If yes, when was this and do you recall what it was about?
Yes, two individuals – through the Ineos presentation during the BCAP meeting
3. Have you received any written information from the company? If yes, when was this and do you recall what it was, and what information was in it?
Yes, some handouts during the Ineos Styrolution presentations at the MCAP meetings
4. Have you ever been invited to visit the company? If yes, when and did you go?
Yes, visit organized through the BCAP. Cannot remember date but it was done in 2022.
5. Are you aware of what (the company) makes and the kinds of chemicals they handle? If yes, how did you get this information?
Yes, Styrene. Materials were handed out by Ineos Styrolution.
6. Have you been given or heard any information about the kinds of risks or dangers they pose to the community in case of an accident? If yes, how did you get this information and when?
Yes, in the hand-outs during the presentation and the site tour.
7. Do you know what to do if you saw or heard what seems like an emergency or accident at (the company)? If yes, how did you get this information, and what would you do?
Follow the emergency procedures / guides or hosts (as instructed on the orientation prior to entering the facility).
8. Do you know whom to contact in case you have any questions or concerns about (the company)?



Yes, individual is known.

9. Have you taken any questions or concerns to the company? If yes, please explain. What was the issue and how did they respond?

No, no questions or concerns about this company. All general questions raised and answered were discussed during the BCAP meetings.

10. Have you heard anything else about the company in the past few years, such as in the newspaper? If yes, do you recall what this was about?

Yes, all positive comments. Nothing negative.

11. Are you aware of any changes at the company or other issues or community concerns about it over the past few years?

No

12. Have there been any significant changes in the community in the past few years, such as new developments or changes in municipal government structure?

No

13. What is your impression or opinion about the company? Has it changed over the past few years? If it has changed, why?

As a former risk manager for over 20 years, he is very impressed with all the companies in the area. All changes are positive.

Conclusion:

- A member of the BCAP is satisfied the panel is with the CAP process and general community dialogue process and results
- Ineos Styrolution is meeting its dialogue commitments under Responsible Care
- The BCAP is effective in bridging concerns from the community where it operates and whether the BCAP is effective in assisting in resolution of issues raised.

Element #7 – Indigenous Communities

Evidence of engagement with indigenous communities near production facility with respect for their unique history, culture and rights

Auditor Notes:

Identifies and seeks to pro-actively engage with such indigenous communities

- Monthly meeting with neighbours (Jun 8 2023) including Aamjiwnaang First Nation AFN: presenting the monthly news letter on environmental activities, communications throughout the month, the Site



community involvement – internal and external, and update on the Responsible Care audit, and Infographics on cooling tower and communications with BASES.

Seeks to develop and maintain a working relationship to enable effective communications.

- INEOS Styrolution Communication with Aamjiwnaang First Nation includes the following:
 - o Monthly Updates to Environment Department, Chief and Council
 - o Information regarding purpose of increased flaring
 - o Infographic for cooling towers
 - o Regular discussions between Ineos Styrolution Site Director and AFN Environment Coordinator
 - o E-mails regarding site activities (e.g. drills, deluge testing, increased flaring, maintenance outages)
 - o Attending Environment Department Meetings & Committee and other meetings as requested.
 - o Support AFN events (Annual Earth Day & Community Clean-up Celebration, Pow Wow, Athletic Club Youth Empowerment Program, Native Plant Sale).
 - o Responsible Care Audit Updates

Provides support to allow communities the capacity to engage with the company.

- Ineos Styrolution provides support for environmental capacity by holding regular Responsible Care Industry Communication meeting attended by Neighbours (Arlanxeo, Diamond Petrochemical, Origins, Cabot, TransAlta) once every 2 months. Topics included E2, PCIS, Confidentiality, changes to regulations)
- Ineos Styrolution has provides support to the Aamjiwnaang First Nation AFN and Lambton College for research projects (e.g. develop the ability to reclamation of native plants). Letter support from BASES, Hydro One and Enbridge – application approved.

Reviews the effectiveness of the outreach, communications and engagement process.

- Communication with Aamjiwnaang First Nation AFN (E-mail update on maintenance activities, drills, road closure, fire system testing)
- Aamjiwnaang First Nation AFN external community notification on facebook for sharing SHE information
- Aamjiwnaang First Nation AFN internal communication system
- Responses to complaints (e.g. Odour) or notification

Provides community members equitable access to employment and contracting opportunities.

- Equal opportunity employment policy (posted in the HR web page)
- Contract issued to Planet Stitch (owned and operated by the Aamjiwnaang First Nation AFN) on embroidery services on Ineos Styrolution branded promotional products In Balance Committee and apparel



Element #8 – Promotion/Awareness

Evidence that the company promotes Responsible Care by name and employees are aware of the term.

Auditor Notes:

Ineos Styrolution demonstrates promotion of Responsible Care through various mechanisms, such as:

- References on company website (TBD after certification)
- Regular Responsible Care updates sent out to all employees (Jun 22 2023) including a CIAC video and providing a link to the RC Policy
- The morning RC kickoff meeting (attended by Leadership Team, Operations, Maintenance, Reliability, SHE). Topics include: Process Safety and KMS (incident system), SHE alerts and SHE Team updates, Responsible Care RC14001, Site visits, Production reports, Maintenance schedule, inspection and reliability, Operations update, 1TK8 Themo Oxidizer, and Special Topics including Abnormal Situation Management ASM)
- Responsible Care Industry Communication meeting attended by Neighbours (Arlanxeo, Diamond Petrochemical, Origins, Cabot, TransAlta) once every 2 months. Topics included E2, PCIS, Confidentiality, changes to regulations)
- Regular Site Directors meetings with immediate Neighbours
- During the audit, all employees interviewed were able to demonstrate awareness of term “Responsible Care”.

Logo on trucks, facilities, letterhead, promotional documents, business cards

- (TBD after certification)

Successful (“excellent”/ “best”) practices identified on the audit

Effective identification of applicable Environmental Acts and Regulations are listed on SHE-WD-005 Legislative review and applicability Rev 4 Jun 7 2023.

Holds regular Responsible Care Industry Communication meeting attended by Neighbours. Topics included E2, PCIS, Confidentiality, changes to regulations.

Proactive communication with the Aamjiwnaang First Nation.

Disciplined implementation of operational controls was observed.



Non-conformities related to “Other Responsible Care® Commitments”

NCR No.	Level	Clause	Description	Final CAR Due Date:
None				

Opportunities for improvement

Compliance evaluation process to be conducted by site personnel together with the consultant.

Observations concerning the presence of a “Self-Healing” (effective) management system

Multiple types of audits are conducted:

- Internal audits
- Compliance audit
- 2022 Behaviour Safety Principles (BSP) Audit
- 2022 Asset Care Audit
- Process Safety Audit
- Customs Trade Partnership Against Terrorism (CTPAT) Audit

Strong senior management support as evident by multiple CI projects being implemented:

- LIMS System Upgrade
- Document Control
- Corporate SOP Review timelines
- Retention Times for documents
- Training Documents/Presentations
- Master Customer Specification List

Active participation in various Committees:

- Ont Env Quality Committee meetings
- Chemical Management Plan Committee meetings
- TCM Committee meetings
- Leadership meetings
- Transcaer Committee meetings and Safety Train Project



Observations Concerning the Role of the Responsible Care Ethic and Principles for Sustainability

The INEOS Styrolution Management Board has established a global SHEQ policy that is consistent with the company's environmental, health & safety, quality and sustainability goals

Industry Associations / Drive high and well-designed sustainability standards in their industry / Contribute to constructive dialogue with professionals from business, science, government and the public sector. For example Chemistry Industry Association of Canada (CIAC), Sarnia Lambton Environmental Association (SLEA), Industrial Education Co-operative (IEC), CAER (Community Awareness Emergency Response), Bluewater Association for Safety, Environment, and Sustainability (BASES).

SER00106 Mutual aid agreement with CVECO (Chemical Valley Emergency Coordination Organization) (now changed to BASES Ble Water Association for Safety Environment and Sustainability)

Audit Team Conclusions

The audit team conclusions related to the full management system audit are available upon request from «P81».

Audit team's conclusions about the effectiveness of the CIAC Other Responsible Care® Requirements and commitment to Responsible Care® Ethic and Principles:

<input checked="" type="checkbox"/>	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs.
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs, except as noted in the minor nonconformity report(s).
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were not effectively implemented and maintained per defined requirements nor deemed capable to achieve expected outputs, as noted in the major nonconformity report(s).

Audit recommendations are always subject to ratification by Intertek certification authority.