

American Chemistry Council – Chemistry Industry Association of Canada
Responsible Care® Certification/Verification Model

Proposed Report Template of
“other Responsible Care® Commitments”

Submitted by Alain Cyr / LRQA Auditor to CIAC

As part of the 2025 RCMS®/RC14001® audit of Imperial Oil – Sarnia Site

Audit team’s conclusions about the effectiveness of the management system:	
X	Based on the results of the audit, the audit team determined that the management system was 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 management system was effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs, except as noted in the nonconformities.
<input type="checkbox"/>	Based on the results of the audit, the audit team determined that the management system was not effectively implemented and maintained per defined requirements nor deemed capable to achieve expected outputs. The audit team recommendation is for “Certification Review”.

Audit team’s conclusions about the effectiveness of the CIAC Other Responsible Care® Requirements and commitment to Responsible Care® Ethic and Principles:	
X	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 nonconformities.
<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. The audit team recommendation is for “Certification Review”.

A- Description of Company, Audited Facilities, Process and Scope of Audit

Imperial Oil Limited has headquarters in Calgary Alberta. It is an integrated, oil and gas company which explores for and produces oil and natural gas and then transports it to refineries, where it is made into products Canadians use every day. The company has a large distribution network in Canada, refineries in Strathcona, Nanticoke and Sarnia, and a chemicals business in Sarnia, among other things.

Leveraging ExxonMobil's expertise, the company is creating a Low Carbon Solutions business. This new business is working to bring lower-emission technologies to market, making them accessible to Canada's hard-to-decarbonize industries. There are four main focus areas which are carbon capture and storage, hydrogen, lithium, and advanced lower emission fuels.

Imperial Oil decided to follow the Memorandum of Understanding (MOU) that is in place between CIAC and ACC. As such, two auditors audited the Sarnia Chemicals business against RCMS:2023 and against the additional CIAC elements on July 28-31.

Scope is Manufacture of Polyethylene, Solvents, Olefins and Aromatics. Imperial has developed a management system in accordance with the requirements of the Responsible Care® Management System Technical Specification RC101.07. The management system has been found to be in conformance with Responsible Care® Management System Technical Specification including the Responsible Care Security Code, Product Safety Code and Process Safety Code. and the Canadian Industry Association of Canada (CIAC) RC®. Two Minor Non-Conformances (NCs) were identified during the audit This highlights an opportunity to enhance guidance for consistent application of formal Management of Change (MoC) practices, and to consider independent verification of the effectiveness of risk mitigation actions following closure of action items.

B- Summary of the evidence relating to:

- the capability of the management system to meet applicable requirements and expected outcomes.
- the internal audit and management review process.

The team reviewed many Responsible Care areas and found that the company's Operations Integrity Management System (OIMS) to be effective in meeting or exceeding the requirements of RCMS and the Canadian RC® codes.

For example, the site has effective OIMS processes in place to meet RCMS and ExxonMobil Process Safety requirements for Mechanical Integrity (MI), Management of Change (MOC) and Risk Assessment (HAZOPs). Each is supported by documented processes, data bases, verifications & measurements and dedicated support. Evidence of effective systems is seen through the absence of significant process safety events (Tier 1 and 2) over the last 5 years.

Imperial has a robust management system audit process, informed by best practices shared with its majority shareholder ExxonMobil. This audit process is done in two phases. Phase one is where external (to the site being audited) company auditors come to the site every 3-5 years to audit against the OIMS elements. The auditors spend between one and two weeks conducting this audit of the site's management systems. The second phase of the audit process is when the site itself conducts an internal OIMS audit, midpoint of the external audit process.

Management reviews are done annually and are attended by senior site leaders. The eleven elements of OIMS are reviewed to ensure the intent of the OIMS system is capable of being achieved and that the system is being continually improved. Present at the meeting are each section admin who is

responsible for determining the performance of their section, developing appropriate KPIs and developing and implementing improvements.

C- Summary of the evidence relating to:

- the capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethics and Principles to meet applicable requirements and expected outcomes.
- Observations on public engagement and communication of the Worst-Case Scenario
- Summary and observations of off-site meeting with Community Representatives
- Successful (excellent/Best) Practices to be shared.
- Opportunities for Improvement identified.

The site is very well represented within CIAC. Robert Ballinger is on the CIAC Board of Directors, Ross Fusher with Transcaer® and Matt Balog on the Share and PSN networks. The site Safety, Security, Health and Environmental Manager, Shawn Zettel, has signed the annual recommitment letter on Feb 12, 2025.

The site has well established community relationships stewarded by its Public & Government Affairs (P&GA) Manager, Kristina Zimmer. Interviews were held with two key members of the community, a city councillor and local business owner, and a member of the Aamjiwnaang First Nation (AFN), both nearby neighbours to the site. Interviews went well and both acknowledged the openness of the site to answer their questions and concerns, and both feel they are being heard by Imperial and were relatively positive in their assessment of the facility. The relationship has developed into a respectful one due in large part to the mutual engagement and open dialogue by the site through its P&GA Manager

The site places a priority on ensuring community members are well versed in how to respond to an emergency or worst-case scenario event, regardless of what the event is. Emphasis has been placed on promoting the Sarnia-Lambton Alert system and defining what a shelter-in-place means. The P&GA Manager also works closely with BASES on materials and events that build community capacity, including an Emergency Preparedness family day and a shelter-in-place video.

From a community involvement perspective, Imperial is active through a number of organizations including the Sarnia-Lambton Chamber of Commerce, Habitat for Humanity, the Lambton-Kent District School Board, the Inn of the Good Shepherd, the United Way, amongst others. In addition to financial grants, Imperial places significant emphasis on employee volunteerism with partner organizations.

In addition to an annual newsletter with a 35,000+ household reach, the Sarnia Facebook page is an effective way to communicate with the community. The page has a following of 8000+ and a high rate of engagement. Imperial recognized the value of this tool during a significant event in 2019 that involved the collapse of a fractionating tower at the Sarnia facility. Feedback from the community at the time was that social media updates were timely and efficient. Since then, it has been used to communicate various occurrences including elevated flaring.

Imperial has industry leading performance on common SHE lagging metrics. Over the last several years Imperial has initiated more sustainability improvements. Evidence of Sarnia supporting these objectives is present.

The site also flew the Responsible Care flag for the month of July in honor of the verification assessment taking place.

D- Note that beginning in 2020, new Indigenous Code Elements apply for those facilities located near indigenous communities or where these companies may be significantly impacted by their operations.

Imperial has four pillars of indigenous engagement. Those are consultation, work force development, business development and community relations. With the Aamjiwnaang First Nation (AFN) band abutting to some fence lines of the production facility, maintaining these four pillars strong is key to continuing to operate in Sarnia. As such the site has developed a very good working relationship and open dialogue with AFN. There are scheduled monthly and impromptu meetings. The interview with Aida from AFN was also very positive of the work Imperial is doing in this space.

Auditor conclusion Statement:

Based on the assessment outcome, the Assessment Team found the site to be compliant with the CIAC elements codes and the RCMS:2023 Technical Specification for the agreed scope.

During the 4-day visit, by two auditors, the Sarnia Chemicals operating facilities listed previously, and HQ Oversight functions, two minor nonconformity findings were raised. There were no major nonconformity findings raised on activities sampled in the agreed upon audit recertification plan.

As a result, the management system at Imperial Oil Canada is recommended for certification to the RCMS:2023 Technical Specification and the additional Canadian CIAC requirements.

The Assessment Team Leader confirms the contractual arrangements for RCMS:2023 are correct.

Auditor(s): Alain Cyr, Lead for CIAC verification
Andrea Bockrath

Date: July 28-31, 2025

Statement of Conformity

This is to certify that the Management System of:

ExxonMobil Chemical Company

1 Esso, Imperial Ave, Sarnia, N7T, Canada

has been approved by LRQA to the following standards:

Responsible Care Management System®: 2023 Technical Specification RC101.07

Approval number(s): RCMS – 00031998

The scope of this approval is applicable to:
Manufacture of Polyethylene, Solvents, Olefins and Aromatics.



David Derrick

Regional Director, UKAM

Issued by: LRQA Limited

