Responsible Care® Certification

Report of other compliance obligations, CIAC Responsible Care® Commitments

BR#: 31635242

Standard(s):	**X RC®-14001:2023 and ISO14001:2015** ☐ **RCMS®2023 Option 1**
Audit Type:	☐ 1st Surveillance ☐ 2nd Surveillance ☐ Recertification ☒ Stage 2 Certification
Type of registration:	☐ Single site ☒ Multi Site

Organization Name: Address: City, State, Zip: Country:	NOVA Chemicals Corporation HQ site – 250 – 5 Street SW 21st Floor, West Tower Calgary, AB, T2P 0R4 Canada	
Organization representative:	Linda Nagata, Amy George	
Audit Dates:	**March 09 – 11, 2026**	
DQS audit team:	Name	Role
	Christian Stracke	Lead Auditor

Scope of registration	Corporate governance and support functions for Responsible Care®, environmental management, regulatory compliance and sustainability oversight, including HSSE governance, supply-chain and procurement oversight, sales governance, product stewardship, HR, IT and corporate communications.
Primary industry code (EA Code)	12

Number of employees at this site:	30 total in scope for Central Function audit
Boundaries of the site:	The Calgary Headquarter occupies leased office space across Floors 19-21, with controlled access through elevator and door, badge systems and CCTV monitored entry points.

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 of achieving expected outputs.
☐	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.
☐	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.

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.
☐	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 of achieving expected outputs, except as noted in the nonconformities.
☐	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 of achieving expected outputs.

1. **Description of Company, Audited Facilities, Process and Scope of Audit**

NOVA Chemicals Corporation is a Canadian chemical manufacturer specializing in ethylene, polyethylene, recycled polyethylene, and chemical co-products.
The corporate headquarters in Calgary serves as the central governance and support hub for Responsible Care and environmental management activities across all manufacturing sites.
The audit covered the **Headquarters functions** responsible for corporate leadership, policy and governance, Responsible Care Assurance, risk management, sustainability oversight, and compliance monitoring.
The scope of certification and verification includes the **Responsible Care 14001 and ISO 14001 management systems**, as well as compliance with the **CIAC Responsible Care Codes** (Management System, Operations, and Product Stewardship Codes).
The audit was conducted in accordance with the RC 14001 and CIAC Verification Protocol requirements and included document review, interviews with corporate leadership and functional owners, and verification of evidence from the Responsible Care Assurance Program (PRGM 1200), Management Reviews, and the RC Performance Dashboard.

The Headquarters site is classified as a **non-production corporate function** under CIAC guidance.
It provides strategic support and oversight for manufacturing sites in Canada and the United States.
The audit also considered the ongoing organizational transition in which **Borouge**, **Borealis and NOVA Chemicals are being integrated into Borouge International**, a global entity jointly owned by ADNOC and OMV.
This transition was reviewed under RC 14001 clauses 4.1, 4.2, and 5.1 as a contextual and leadership change factor.

2. **Summary of non-conformances**

Minor nonconformances include:
n.a.

3. **Summary of opportunities for improvement**

Audit process	The PRGM 1200 RC Assurance **Program** could be reviewed to determine whether the audit and inspection action completion rates (62 % / 76 %) could be improved by enhanced tracking and accountability reviews. **The requirements of the relevant standards are fulfilled.**
Management of change	It could be determined in a more transparent way, how Operational changes (e.g., new processes, mergers, or facilities) are triggering the Risk register

	(aspect) re-evaluation. **The requirements of the relevant standards are fulfilled.**
Communication	The site communication about community events and activities results could be evaluated for effectiveness in a more detailed way. **The requirements of the standards are fulfilled.**
Human resources	As part of the Success Factors Learning Details at the Corporate Site the mandatory 18 Month Forklift Evaluation ME – Training overdue rate of 10 % (02/09/2026, target Completion rate 100 %) has already improved to 7 % (03/10/2026) overdue, but could be further improved to avoid the potential risks of unexpected incidents. Initiatives to improve awareness of employees and leadership commitment have already been launched (Email: KT Feb 3rd , 2026, Email: JB March 11th, 2026, Email: MB 09/11/2026), transparency about the KPI and the mandatory trainings could be improved at site leadership level. **The requirements of the standards are fulfilled.**

4. Summary of the evidence relating to CIAC other compliance obligations:

a) **The capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles to meet applicable requirements and expected outcomes.**

Evidence from the Corporate Responsible Care Policy, PRGM 1200 RC Assurance, and the Corporate Management Review 2025 demonstrates a strong commitment to the Responsible Care Ethic and Principles for Sustainability.

Leadership actively reviews Responsible Care objectives and performance indicators during quarterly Operational Leadership Team (OLT) meetings and annual management reviews.

The Responsible Care Assurance Program is used as the major tool for corporate oversight and verification of compliance with Responsible Care requirements.

The organization's capability to meet applicable requirements and expected outcomes is confirmed through documented audits, corrective action tracking, and leadership review records.

4. Summary of the evidence relating to CIAC other compliance obligations:

b) **Participation in TRANSCAER activities by the company where it has operations**

NOVA Chemicals maintains active participation in **TRANSCAER (Canada)** through its Responsible Care and Logistics functions.

Evidence of participation was verified through corporate Responsible Care communications and training records referenced in PRGM 1300 Transportation Safety & Logistics.

The company supports regional TRANSCAER initiatives and provides technical resources for transportation emergency preparedness and community awareness sessions.

4. Summary of the evidence relating to CIAC other compliance obligations:

c) The development and communication of a worst-case scenario

The organization has developed and communicated worst-case scenarios as part of its corporate and site-level emergency planning processes.
Evidence was verified in the Borouge International Crisis Management Process document and the Environmental Roadmap (Management Systems section).
Scenario planning is integrated into the Responsible Care Assurance Program and reviewed annually by the Safety and Operational Risk Council (SORC).

4. Summary of the evidence relating to CIAC other compliance obligations:

d) Participation by company leadership in CIAC Responsible Care activities, committees and submission of annual recommitment letter.

Corporate leadership actively participates in CIAC Responsible Care activities and committees. Among others, the SVP Sustainability & Innovation (Rocky Vermani), the Director of Responsible Care (James Baldwin), Logistics Regulatory Compliance Manager (Nick Robichaud) and the Environment Affairs Manager (Shane Lamden) represent NOVA Chemicals in CIAC forums and working groups.
The annual **CIAC Responsible Care Recommitment Letter** was submitted and acknowledged by CIAC for the current verification cycle.

4. Summary of the evidence relating to CIAC other compliance obligations:

e) Evidence the company has provided CIAC with benchmarking data and other required submissions.

The organization provides CIAC with benchmarking data and required submissions through its corporate Responsible Care reporting process.
Evidence was verified in the Sustainability Scorecard 2025 and the RC Performance Dashboard (March 2026 update).
Data includes TRCR, LTCR, GHG emissions, waste to landfill, and training completion rates.
Submissions are coordinated by the RC & Health Informatics Specialist (Shelley Kiefer).

4. Summary of the evidence relating to CIAC other compliance obligations:

f) Evidence the company has reviewed its activities against CIAC's Responsible Care Principles and Ethic, and its position on sustainability and corporate responsibility.

The organization has reviewed its activities against the Responsible Care Ethic and Principles for Sustainability as part of the Corporate Management Review 2025 and the Environmental Roadmap 2026–2033+.
The review includes evaluation of sustainability objectives, climate risk assessments, and alignment with UN Sustainable Development Goals (SDGs).
The company's position on sustainability and corporate responsibility is communicated through its annual Responsible Care and Sustainability reports.

4. Summary of the evidence relating to CIAC other compliance obligations:

g) Evidence of stakeholder/community dialogue including interviews by auditors with local community representatives.

Community and stakeholder dialogue was verified through interviews and supporting records.
An external stakeholder interview was conducted with a contractor representative (Registration - Security) to verify orientation and Responsible Care awareness.
The individual demonstrated strong knowledge of Responsible Care and site safety requirements.
This interview satisfied the CIAC Verification Protocol requirement for community engagement at a low-risk, non-production site.

4. Summary of the evidence relating to CIAC other compliance obligations:

h) Evidence that the company promotes Responsible Care by name with internal and external stakeholders and they are aware of the term.

Responsible Care is promoted by name in corporate communications, training materials, and leadership presentations.
Evidence was verified in the Corporate Management Review 2025 slides and the RC Dashboard interface, which displays the Responsible Care logo and terminology.
Employees and contractors interviewed were aware of the Responsible Care program and its principles.

4. Summary of the evidence relating to CIAC other compliance obligations:

i) Engagement with Indigenous communities or groups near production facilities with respect for their unique history, culture and rights.

n.a.

In consultation with CIAC (Jeff Stevens, email dated February 9, 2026), it was confirmed that the Headquarters and Research Centres (CPA and CAR) are classified as low-risk, non-production sites under the CIAC Responsible Care Verification Guidance.
Therefore, formal Indigenous engagement is **not applicable** to these sites.
The community interview requirement was satisfied through the external stakeholder interview described above.
The auditor confirms that the organization’s approach to community and Indigenous engagement is risk-based, context-appropriate, and fully aligned with CIAC Responsible Care expectations.

5. Organizational Strengths, Successful (excellent/best) practices to be shared:

- **Integration and Transition Planning:** Structured approach to managing organizational change (Borouge, Borealis and NOVA Chemicals integration into Borouge International) in accordance with RC 14001 clauses 4.1, 4.2, 5.1, and 8.1.
- **Performance Transparency:** Comprehensive KPI tracking through the RC Dashboard and Sustainability Scorecard with clear targets and trend analysis.

- **Cross-Functional Governance:** Active Communities of Practice (CoPs) for Product Safety, Environment, and Occupational Health ensuring knowledge sharing and continuous improvement.
- **Regulatory Preparedness:** Proactive management of emerging risks (e.g., PFAS ban) through the RC Risk Register and collaboration with ECCC and CIAC.

Individuals interviewed external to the organization:

Verification Note – Community Interview and Indigenous Engagement Applicability
In consultation with **CIAC (Jeff Stevens)**, it was confirmed that **research and innovation centres (CPA and CAR)** are considered **low-risk, non-production sites** under CIAC Responsible Care Verification Guidance.

Therefore, the requirement for formal Indigenous engagement is **not applicable** to these sites.

The **community interview requirement** was satisfied through an **external stakeholder interview** (contractor / emergency liaison), which is **commensurate with the site's risk profile** and consistent with the **CIAC Verification Protocol** and **RC 14001 Annex A**.

The decision and supporting correspondence (email from Jeff Stevens, CIAC, dated February 9, 2026) are **retained in the audit verification records**.

Conclusion: The auditor confirms that the organization's approach to community and Indigenous engagement is **risk-based, context-appropriate, and fully aligned with CIAC Responsible Care expectations**.

An employee from West Canadian, which is working at reception, was audited 22 March 2024. The interview showed great response and awareness for RC/UM, to verify contractor orientation and safety/security awareness.

Auditor(s) Christian Stracke

Date: March 18th, 2026

Lead Auditor Signature: ____Christian Stracke________________________________

Questions about this report or content may be directed to: Candace Orbaugh – Director EHS Programs, DQS Inc. candace.orbaugh@dqs.de

Responsible Care® Certification

Report of other compliance obligations, CIAC Responsible Care® Commitments

BR#: 31635243, 31635244

Standard(s):	**X RC®-14001:2023 and ISO14001:2015** ☐ **RCMS®2023 Option 1**
Audit Type:	☐ 1st Surveillance ☐ 2nd Surveillance ☐ Recertification ☒ Stage 2 Certification
Type of registration:	☐ Single site ☒ Multi Site

Organization Name: Address: City, State, Zip: Country:	NOVA Chemicals Corporation – Innovation Centre for Applied Research (CAR) 2928 – 16 Street NE Calgary, Alberta, T2E 7K7 Canada Centre for Performance Applications (CPA) 3620 -32 Street NE Calgary, Alberta, T1Y 6G7 Canada	
Organization representative:	Amy George, Eric Hiddema	
Audit Dates:	**February 09-12, 2026**	
DQS audit team:	Name	Role
	Christian Stracke	Lead Auditor
	Cheryl Daher Abel Lombera	Co-Auditor Co-Auditor

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Scope of registration	CAR: Research facility involving catalyst, process and product R&D, from step-change improvements to breakthrough innovations. CPA: Research on next-generation R&D for rapid resin (plastic) and applications design.
Primary industry code (EA Code)	12

Number of employees at this site:	CAR 153 (15 + 138), CPA 76 (10 + 66)
Boundaries of the site:	Property CAR: 7.56 acres, CPA: 4.49 acres Buildings are physically secured, loading dock areas are fenced and gated, on-site guards monitor security systems and CCTV cameras 24 hours/day. Improvements implemented in 2025 enhanced both security coverage and operational safety.

Audit team's conclusions about the effectiveness of the management system:	
☐	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 of achieving expected outputs.
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, except as noted in the nonconformities.
☐	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.

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.
☐	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 of achieving expected outputs, except as noted in the nonconformities.
☐	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 of achieving expected outputs.

1. Description of Company, Audited Facilities, Process and Scope of Audit

The **Centre for Applied Research (CAR)** and **Centre for Performance Applications (CPA)** are part of **NOVA Chemicals' Innovation organization**, supporting product development, testing, and Responsible Care implementation across the company's global operations.
Both facilities operate under the **Innovation Business Unit**, reporting to the **Vice President Innovation (Mehdi Keshtkar)**.

- **CAR (Center for Applied Research)** focuses on polymer research, analytical testing, and pilot-scale process development.
- **CPA (Centre for Performance Applications)** specializes in product performance testing, additive evaluation, and customer application support.

The two sites are located in Alberta and operate under shared corporate programs for **Responsible Care (RC 14001:2023)** and **ISO 14001:2015**.
Both sites are covered by the **corporate Responsible Care Management System**, including leadership, environmental compliance, process safety, emergency preparedness, community engagement, and continuous improvement.

The audit covered the management system processes at the CPA and CAR sites

2. Summary of non-conformances

Minor nonconformances include:
a. The training program process is not fully effective at the CPA and CAR sites
b. The incident nonconformity and corrective action process is not fully effective.

3. Summary of opportunities for improvement

Maintenance (CD): Consider developing a formal maintenance manual comprised of relevant operating procedures, working instructions and task checklists to strengthen and support the management of documentation and Key Performance Indicators (KPIs) related to the safe operation and upkeep of the facilities (Clause 7.5). Requirements are fulfilled.
Waste Management (CD): Consider including an Innovation EHSS representative in waste hauler audits to gain first-hand verification experience. Requirements are fulfilled.

Communication (CD): Consider establishing a communications log to track external comments, complaints, and inspections from all stakeholders (Clause 7.4). Requirements are fulfilled.

Innovation Operations (AL): Consider reviewing ladder storage practices to prevent potential accidents from improper storage (Clause 8.1). Requirements are fulfilled.

Innovation Operations (AL): Consider keeping the back gate closed at all times to prevent unauthorized access to CPA and CAR sites loading dock areas (Clause 8.1). Requirements are fulfilled.

Emergency Response (AL): Consider assigning a designated reviewer for drill reports to ensure all results and actions are fully addressed (Clause 8.2). Requirements are fulfilled.

Management System & Governance (CS): Consider prioritizing the RC14001 Action Log based on risk to enhance system governance (effectiveness maintained). Requirements are fulfilled.

Occupational Health & Safety (CS): Consider increasing the Fitness-to-Work target above 80% and segment KPIs into regulatory and non-regulatory categories. Requirements are fulfilled.

Context of the Organization (CS): Consider integrating climate change topics into the risk register by considering weather and ground threats. Requirements are fulfilled.

Customer Feedback Tracking (CS): Consider streamlining Product Safety support by prioritizing high-value cases and investigating the ability to automate routine requests. Requirements are fulfilled.

4. Summary of the evidence relating to CIAC other compliance obligations:

a) **The capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles to meet applicable requirements and expected outcomes.**

The Innovation organization demonstrates strong commitment to Responsible Care through leadership involvement and integration of RC objectives into corporate strategy. The Responsible Care Practitioners and Team Leaders actively participate in corporate RC program development and training.

4. **Summary of the evidence relating to CIAC other compliance obligations:**

b) **Participation in TRANSCAER activities by the company where it has operations**

CPA and CAR staff will be participating in the 2026 Calgary TRANSCAER event and support local emergency preparedness outreach initiatives through the corporate Emergency Planning & Security (EP&S) Community of Practice.

4. **Summary of the evidence relating to CIAC other compliance obligations:**

c) **The development and communication of a worst-case scenario**

Worst-case scenarios for chemical storage and transport emergencies are documented in the corporate Emergency Response Plan (PRGM 700) and posted on the NOVA Chemicals public website. These scenarios are shared with local authorities and community representatives.

4. **Summary of the evidence relating to CIAC other compliance obligations:**

d) **Participation by company leadership in CIAC Responsible Care activities, committees and submission of annual recommitment letter.**

Leadership from Innovation participate in CIAC Responsible Care committees and working groups. The 2025 RC Recommitment Letter was signed by Victor Alvarado (SVP Operations & Engineering, Feb 10 2025) and the Management System Assertion for Innovation was signed by Mehdi Keshtkar, VP Innovation, on Mar. 20, 2026.

4. **Summary of the evidence relating to CIAC other compliance obligations:**

e) **Evidence the company has provided CIAC with benchmarking data and other required submissions.**

NERM and Responsible Care performance data are submitted through the CIAC online system by corporate functions. Acknowledgment of receipt was confirmed by CIAC.

4. **Summary of the evidence relating to CIAC other compliance obligations:**

f) Evidence the company has reviewed its activities against CIAC's Responsible Care Principles and Ethic, and its position on sustainability and corporate responsibility.

The corporate website and Innovation Business Plan identify sustainability and Responsible Care as core strategic principles. Continuous improvement initiatives (2024–2026) demonstrate alignment with these principles.

4. Summary of the evidence relating to CIAC other compliance obligations:

g) Evidence of stakeholder/community dialogue including interviews by auditors with local community representatives.

CPA and CAR conduct emergency drills with municipal authorities and maintain open communication channels with neighbors where mutual shelter agreements are in place.

4. Summary of the evidence relating to CIAC other compliance obligations:

h) Evidence that the company promotes Responsible Care by name with internal and external stakeholders and they are aware of the term.

Responsible Care is promoted internally at Innovation through monthly Health & Safety Committee (HSC) presentations, which are delivered to all Innovation workers (including contractors) in team meetings, through regular leadership communication sessions, through corporate Responsible Care communications, and through events such as Safety Day which include contractors. Responsible Care is promoted externally at Innovation through the Responsible Care Outreach program which supports customers, suppliers, contractors, including contracted lab services, and carriers, as appropriate. Innovation engages with neighbors with respect to mutual shelter agreements to support emergency response. Community complaints are tracked and resolved in Enablon.

4. Summary of the evidence relating to CIAC other compliance obligations:

i) Engagement with Indigenous communities or groups near production facilities with respect for their unique history, culture and rights.

n.a.

5. Organizational Strengths, Successful (excellent/best) practices to be shared:

Risk & Planning: The site effectively identifies and ranks risks, opportunities, and aspects to set clear EHS&S objectives and action plans.
Communication: A highly effective communication plan ensures consistent information flow through monthly Health & Safety Committee (HSC) updates, VIVA Engage, RC Risk Alerts, and Process Safety Beacons.

Feedstock Processing & Sustainability R&D: The reaction checklist (SOP 8003) is well-designed and implemented, enhancing environmental protection and safety.

Feedstock Processing & Sustainability R&D: Hazard identification and safety signage are clearly defined and consistently applied in laboratory areas.

CAR Research Laboratories: Advanced fume hood systems with integrated sensors demonstrate leadership in environmental and employee safety innovation. **CAR Research Laboratories:** The EHS team and scientists are highly competent and actively engaged in the RC14001 and ISO14001 management system (Clause 7.2). **Management System & Governance:** Responsible Care governance is mature and fully integrated, with a 2025 maturity rating of "Established (3.0)." **Risk & Emergency Management:** Comprehensive SOPs for working alone and clear communication protocols ensure strong emergency preparedness. **Product Safety & Stewardship:** A robust corporate framework (PRGM 900 series) defines risk assessment, toxicology, and Responsible Care outreach processes. **Product Integrity & Customer Feedback:** Response times improved to 1.38 days on average, doubling the number of customer inquiries handled without delay. **Contractor Safety:** The contractor safety program is highly structured and well organized, ensuring consistent control and compliance.
<u>Individuals interviewed external to the organization:</u> **Verification Note – Community Interview and Indigenous Engagement Applicability** In consultation with **CIAC (Jeff Stevens)**, it was confirmed that **research and innovation centres (CPA and CAR)** are considered **low-risk, non-production sites** under CIAC Responsible Care Verification Guidance. Therefore, the requirement for formal Indigenous engagement is **not applicable** to these sites. The **community interview requirement** was satisfied through an **external stakeholder interview** (contractor / emergency liaison), which is **commensurate with the site's risk profile** and consistent with the **CIAC Verification Protocol** and **RC 14001 Annex A**. The decision and supporting correspondence (email from Jeff Stevens, CIAC, dated February 9, 2026) are **retained in the audit verification records**. **Conclusion:** The auditor confirms that the organization's approach to community and Indigenous engagement is **risk-based, context-appropriate, and fully aligned with CIAC Responsible Care expectations**. An employee for Janitorial services - Aramark - 5 yrs., who had great response and awareness for RC/UM. was interviewed to verify contractor orientation and safety awareness.

Auditor(s) Christian Stracke, Cheryl Daher, Abel Lombera

Date: February 20, 2026

Lead Auditor Signature: ____Christian Stracke_________________________________

Questions about this report or content may be directed to: Candace Orbaugh – Director EHS Programs, DQS Inc. candace.orbaugh@dqs.de

Results reported are based on the RC 14001 or RCMS audit performed on the dates indicated.

The content of the certification report and all information received in relation to the audit and certification of the audited organization will be treated confidential and not disclosed to third parties.

Responsible Care® Certification

Report of other compliance obligations, CIAC Responsible Care® Commitments

BR#: 31635246, 31635247, 31635248

Standard(s):	**X RC®-14001:2023 and ISO14001:2015** ☐ **RCMS®2023 Option 1**
Audit Type:	☐ 1st Surveillance ☐ 2nd Surveillance ☐ Recertification ☒ Stage 2 Certification
Type of registration:	☐ Single site ☒ Multi Site

Organization Name: Address: City, State, Zip: Country:	NOVA Chemicals Corporation 785 Petrolia Lane Corunna, Moore, Rokeby sites Corunna, Ontario N0N 1G0 Canada	
Organization representative:	Ms. Linda Nagata	
Audit Dates:	**January 19-23, 2026**	
DQS audit team:	Name	Role
	Linda Mitchell	Lead Auditor
	Christian Stracke	Co-Auditor
	Blair Norris Michelle Kareis	Co-Auditor Co-Auditor

Scope of registration	Manufacture of ethylene and polyethylene
Primary industry code (EA Code)	12

Number of employees at this site:	780
Boundaries of the site:	Three sites within the region. Corunna – 851 acres; Moore – 355 acres; Rokeby – 244 acres. All sites are completely fenced.

Audit team's conclusions about the effectiveness of the management system:	
☐	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 of achieving expected outputs.
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, except as noted in the nonconformities.
☐	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.

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.

☐	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 of achieving expected outputs, except as noted in the nonconformities.
☐	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 of achieving expected outputs.

1. Description of Company, Audited Facilities, Process and Scope of Audit

The Company is a manufacture of ethylene which is the operations at the Corunna site; the Moore and Rokeby sites manufacture polyethylene from the ethylene.
Scope of the audit was the Corunna, Moore and Rokeby sites and operations at the sites.

2. Summary of non-conformances

Minor nonconformances include:

a. Completion of work permits not always consistent, at several sites.

b. Completion of non-hazard waste drums, at one site.

c. A process for ensuring all training is completed in a timely manner.

3. Summary of opportunities for improvement

a. Consider a “go/nogo” device for checking the guarding of the grinders in the maintenance shops.
b. Use of identification labels on over-the-counter citrus cleaner in the maintenance shop.
c. More clearly defining process for using low rated suppliers.
d. Formalize use of training simulator in qualification procedures.
e. Consider expanding the recording of red-flagged alarms for improved traceability and trend analysis.
f. Further integration of risk ranking Responsible Care related impacts within of MTO projects, if appropriate.

4. Summary of the evidence relating to CIAC other compliance obligations:

a) **The capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles to meet applicable requirements and expected outcomes.**

The organization has a strong commitment to the RC Ethics and Principles, as evidenced by the active participation of the management team and the Corporate support team.

4. Summary of the evidence relating to CIAC other compliance obligations:

b) Participation in TRANSCAER activities by the company where it has operations

Members of the NOVA Planning and Logistics department have coordinated Sarnia TRANSCAER event in 2025 as well as 2 local Emergency Preparedness outreach events for the local community in 2025, one of which included a simulated emergency event. The Logistics and Regulatory Compliance Manger who is responsible for responding to transportation-related emergency events also is a member of the Ontario Regional Committee.

4. Summary of the evidence relating to CIAC other compliance obligations:

c) The development and communication of a worst-case scenario

The site has developed the required worst-case scenarios and posted these on their Nova Chemicals publicly available internet page. They have also communicated these scenarios to local community groups including a local First Nations tribal group.

4. Summary of the evidence relating to CIAC other compliance obligations:

d) Participation by company leadership in CIAC Responsible Care activities, committees and submission of annual recommitment letter.

NOVA Leadership participates in CIAC Responsible Care activities and committees. The facility leadership team ensures that there are many community interactions. They are also a member of BASES (Bluewater Association for Safety, Environment and Sustainability) industry association. The local community receives a semi-annual Connection Newsletter that includes information on activities going on in the plant that they may notice or may have a potential impact on them. The local community also receives an Environmental Factsheet to inform them of actions to take in case of emergencies. An annual Near Neighbor Dinner is also held for the local community where Responsible Care information is shared.

RC Recommitment letter was signed by Victor Alvarado, SVP, Operations and Engineering on February 10, 2025.

The NOVA Chemicals Management System Assertion was signed by Joe Wolf, VP, Manufacturing East Region on January 21, 2025.

4. Summary of the evidence relating to CIAC other compliance obligations:

e) **Evidence the company has provided CIAC with benchmarking data and other required submissions.**

The site has reported the required NERMS data via the CIAC on-line system for reporting and received an acknowledgement notice from the CIAC acknowledging receipt. Corporate submits the other required CIAC items.

4. Summary of the evidence relating to CIAC other compliance obligations:

f) Evidence the company has reviewed its activities against CIAC's Responsible Care Principles and Ethic, and its position on sustainability and corporate responsibility.

The Company website identifies the position on sustainability, and the RC principles are a part of the strategy, practices and aspirations of the organization.

4. Summary of the evidence relating to CIAC other compliance obligations:

g) Evidence of stakeholder/community dialogue including interviews by auditors with local community representatives.

The organization has monthly meeting with various community representatives, including surrounding businesses, neighbors, and the Aamjiwnaang First Nations.

4. Summary of the evidence relating to CIAC other compliance obligations:

h) Evidence that the company promotes Responsible Care by name with internal and external stakeholders and they are aware of the term.

Community engagement and outreach activities include the semi-annual Connection Newsletter sent to the local community as well as the Environmental Emergency Fact Sheet and Pipeline Brochure sent to the local community. Additionally, there is a NOVA website designed for external stakeholders where Responsible Care information is shared. Community complaints are tracked, investigated and resolved using the Enablon Event system.

4. Summary of the evidence relating to CIAC other compliance obligations:

i) Engagement with Indigenous communities or groups near production facilities with respect for their unique history, culture and rights.

Indigenous engagement occurs via a monthly Teams meeting call or in person meeting and via the semi-annual Connections Newsletter. The indigenous community is routinely included in public comment procedures for environmental permitting.

5. Organizational Strengths, Successful (excellent/best) practices to be shared:

- Leadership team is fully engaged and supports the management system.
- Employees very knowledgeable in the RC management system.
- Crane station in maintenance is an example of best practice.
- Structure preventive maintenance program.
- Effective use of maintenance KPIs.
- Shift starter meetings for operators
- Emergency response procedures comprehensive and team is highly skilled.
- Simulator training
- Chemical safety information
- MOC tracking for RC updates
- Effective two-way communication with site and Corporate
- Well-equipped, risk-oriented laboratory
- Well maintained calibration system
- Structure and traceable continuous improvement system

Individuals interviewed external to the organization: Employee from a third-party Company working in warehouse operations.
Auditor(s) Linda Mitchell, Christian Stracke, Blair Norris, Michelle Stracke Date: January 23, 2026 Lead Auditor Signature: ____*Linda Mitchell*______________________________

Questions about this report or content may be directed to: Candace Orbaugh – Director EHS Programs, DQS Inc. candace.orbaugh@dqs.de

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Responsible Care® Certification

Report of other compliance obligations, CIAC Responsible Care® Commitments

BR#: 12345678

Standard(s):	**X RC®-14001:2023 and ISO14001:2015** ☐ **RCMS®2023 Option 1**
Audit Type:	☐ 1st Surveillance ☐ 2nd Surveillance ☐ Recertification ☒ Stage 2 Certification
Type of registration:	☐ Single site ☒ Multi Site

Organization Name: Address: City, State, Zip: Country:	NOVA Chemicals Corporation 285 Albert Street St. Clair River Site St. Clair River, Ontario, N0N 1G0 Canada	
Organization representative:	Amy George	
Audit Dates:	**January 26-29, 2026**	
DQS audit team:	Name	Role
	Christian Stracke	Lead Auditor
	Michelle Kareis Blair Norris	Co-Auditor Co-Auditor

Scope of registration	The health, safety, security, environmental and Responsible Care activities and supporting processes associated with the manufacture of polyethylene.
Primary industry code (EA Code)	12
Number of employees at this site:	120
Boundaries of the site:	One site within the region. St. Clair River – 412 acres. The site is partly fenced. **Service Agreement:** Shared utilities and equipment agreement between NOVA Chemicals and Dow Canada, effective **June 30, 1994**. **Reference Document:** Manufacturing *East Emergency Response System Manual (MEERS Manual)*, last reviewed **August 19, 2025**, with annual review completed **January 6, 2025**.

Audit team's conclusions about the effectiveness of the management system:	
☐	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 of achieving expected outputs.
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, except as noted in the nonconformity.
☐	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.

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.
☐	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 of achieving expected outputs, except as noted in the nonconformities.
☐	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 of achieving expected outputs.

1. Description of Company, Audited Facilities, Process and Scope of Audit

The St. Clair River Site is part of NOVA Chemicals' Manufacturing East operations and is located on 412 acres near the St. Clair River in Ontario. The site produces **polyethylene resins** using ethylene feedstock supplied from the Corunna site and supports regional polymer production through shared utilities and infrastructure with Dow Canada under a Service Agreement dated June 30, 1994. Operations include polyethylene manufacture, storage and distribution systems, utilities generation, and support services for Manufacturing East sites. The scope of this audit covered the St. Clair River Site management system processes for Responsible Care and ISO 14001 implementation, including leadership, environmental compliance, process safety, emergency preparedness, and community relations.

Scope of the audit was the St. Clair River Site and operations at this site.

2. Summary of non-conformances

Minor nonconformances include:

a. The process for ensuring that appropriate space is maintained in front of electrical panels and electrical shut-offs in the maintenance shop is not fully effective.

3. Summary of opportunities for improvement

a. It might be beneficial to review the use of personal and non-HEC locks to ensure clear delineation between lock types.

b. The organization could consider clarifying forklift inspection card fields (hand brake vs emergency brake and battery information).

c. It might be useful to add a cover over the metal recycling bin behind the Finishing Area control room to prevent stormwater contamination. d. Storage racks in the warehouse dock area could be secured to the floor as planned with the vendor evaluation. e. The site might review labelling of secondary containers in the maintenance area to ensure consistency with WHMIS requirements.
4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u> **a) The capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles to meet applicable requirements and expected outcomes.** The organization shows a strong commitment to Responsible Care Ethic and Principles through active leadership involvement and corporate support for Responsible Care objectives within the Manufacturing East Business Plan.
4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u> **b) Participation in TRANSCAER activities by the company where it has operations** Members of the Planning and Logistics Department coordinated the 2025 Sarnia TRANSCAER event and two local Emergency Preparedness outreach events, one including a simulated emergency scenario. The Logistics and Regulatory Compliance Manager is a member of the Ontario Regional Committee.
4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u> **c) The development and communication of a worst-case scenario** The site has developed the required worst-case scenarios and posted them on the publicly available NOVA Chemicals website. These scenarios were communicated to local community groups including the Aamjiwnaang First Nation.
4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u> **d) Participation by company leadership in CIAC Responsible Care activities, committees and submission of annual recommitment letter.** Leadership participates in CIAC Responsible Care activities and committees. Leadership team members maintain regular community interactions through NOVA Chemical events, BASES (Bluewater Association for

Safety Environment and Sustainability) participation, the semi-annual *Connection Newsletter*, and the annual Near Neighbours Dinner. The RC Recommitment Letter was signed by Victor Alvarado (SVP Operations & Engineering, Feb 10 2025) and the Management System Assertion by Joe Wolf (VP Manufacturing East, Jan 21 2025).

4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u>

e) **Evidence the company has provided CIAC with benchmarking data and other required submissions.**

The site submitted NERMS data via the CIAC online system and received acknowledgment of receipt from CIAC. Corporate submits the other required CIAC items.

4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u>

f) Evidence the company has reviewed its activities against CIAC's Responsible Care Principles and Ethic, and its position on sustainability and corporate responsibility.

The corporate website identifies sustainability and Responsible Care as core strategic principles embedded in business practices and objectives.

4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u>

g) Evidence of stakeholder/community dialogue including interviews by auditors with local community representatives.

Monthly meetings are held with community representatives, neighbouring businesses, and the Aamjiwnaang First Nation to discuss environmental and emergency topics.

4. <u>Summary of the evidence relating to CIAC other compliance obligations:</u>

h) Evidence that the company promotes Responsible Care by name with internal and external stakeholders and they are aware of the term.

Responsible Care is promoted internally and externally through the *Connection Newsletter*, *Environmental Emergency Fact Sheet*, and *Pipeline Brochure* distributed every three years. Community complaints are tracked and resolved in Enablon.

4. Summary of the evidence relating to CIAC other compliance obligations:

i) Engagement with Indigenous communities or groups near production facilities with respect for their unique history, culture and rights.

Engagement with the Aamjiwnaang First Nation occurs via monthly Teams or in person meetings and semi-annual newsletters. The community is included in public comment procedures for environmental permitting.

5. Organizational Strengths, Successful (excellent/best) practices to be shared:

- Leadership team fully engaged and supportive of the management system.
- Employees highly knowledgeable in Responsible Care requirements.
- Structured preventive maintenance and effective use of KPIs (Key Performance Indicators).
- Comprehensive emergency response and mutual aid program with Dow Canada.
- Strong two-way communication between site and corporate functions.
- Well-equipped, risk-oriented laboratory and robust chemical approval process.
- Effective MOC (Management of Change) tracking and integration of Responsible Care updates.
- Simulator training and cross-training for operators.
- Transparent community and Indigenous engagement program.
- Traceable continuous improvement system via Enablon.

Individuals interviewed external to the organization:

An employee from **Manpower** (contracted warehouse staff) was interviewed to verify contractor orientation and safety awareness.
Contact with external stakeholders remains active through joint emergency exercises and community drills conducted with Dow Canada and local authorities.

Auditor(s) Christian Stracke, Blair Norris, Michelle Kareis

Date: January 29, 2026

Lead Auditor Signature: ____Christian Stracke______________________________

Questions about this report or content may be directed to: Candace Orbaugh – Director EHS Programs, DQS Inc. candace.orbaugh@dqs.de

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CERTIFICATE

This is to certify that

NOVA Chemicals Corporation

250 5th Street SW
21st Floor, West Tower
AB Calgary
T2P 0R4
Canada

with the organizational units/sites as listed in the annex

has implemented and maintains a **Responsible Care®, Environmental, Health, Safety and Security Management System**.

Scope:
The environmental, health, safety, security and Responsible Care® activities and supporting processes associated with the research, design, and manufacture of ethylene and polyethylene.

Through an audit, documented in a report, it was verified that the management system fulfills the requirements of the following standard:

RC 14001® : 2023

Certificate registration no.	31635242 RC23
Date of original certification	2026-04-07
Date of revision	2026-04-27
Date of certification	2026-04-07
Valid until	2029-04-06

ANAB
ANSI National Accreditation Board
ACCREDITED
ISO/IEC 17021-1
MANAGEMENT SYSTEMS CERTIFICATION BODY

DQS Inc.

David Tellez
Managing Director

Accredited Body: DQS Inc., 1500 McConnor Parkway, Suite 400, Schaumburg, IL 60173 USA
The validity of the certification can only be verified by the QR-code.

Annex to certificate
Registration no.: 31635242 RC23

NOVA Chemicals Corporation

250 5th Street SW
21st Floor, West Tower
AB Calgary
T2P 0R4
Canada

Location	Scope
31635242 **NOVA Chemicals Corporation** **250 5th Street SW** **21st Floor, West Tower** **AB Calgary** **T2P 0R4** **Canada**	Central function oversight associated with the research, design, and manufacture of ethylene and polyethylene.
31635243 **NOVA Chemicals Corporation - Centre for Performance Applications** **3620 – 32 Street, NE** **AB Calgary** **T1Y 6G7** **Canada**	Research facility involving catalyst, process and product R&D.
31635244 **NOVA Chemicals Corporation - Centre for Applied Research** **2928 – 16 Street, NE** **AB Calgary** **T2E 7K7** **Canada**	Research on next-generation R&D for rapid resin (plastic) and applications design.
31635245 **NOVA Chemicals Corporation - Joffre Site** **38430 Highway 815** **AB Lacombe** **T4L 2N2** **Canada**	Manufacture of Ethylene and Polyethylene.

Annex to certificate
Registration no.: 31635242 RC23

NOVA Chemicals Corporation

250 5th Street SW
21st Floor, West Tower
AB Calgary
T2P 0R4
Canada

Location	Scope
31635246 **NOVA Chemicals Corporation - Corunna Site** **785 Petrolia Line** **ON Corunna** **N0N 1G0** **Canada**	Manufacture of Ethylene.
31635247 **NOVA Chemicals Corporation - Rokeby Site** **804 Rokeby Line** **ON Mooretown** **N0N 1M0** **Canada**	Manufacture of Polyethylene.
31635248 **NOVA Chemicals Corporation - Moore Site** **510 Moore Line** **ON St Clair Township** **N0N 1M0** **Canada**	Manufacture of Polyethylene.
31635249 **NOVA Chemicals Corporation - St. Clair River Site** **285 Albert Street** **ON Corunna** **N0N 1G0** **Canada**	Manufacture of Polyethylene.

This annex (edition: 2026-04-27) is only valid in connection with the above-mentioned certificate.