

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® audit of The Dow Chemical Company

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.
☐	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. 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.
☐	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.
☐	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

Dow Canada is headquartered in Calgary Alberta and has manufacturing facilities in Alberta and Ontario. Dow develops basic chemicals and plastics used to make a broad range of innovative and technology-based products and solutions in the packaging, industrial and infrastructure, and consumer care industries.

Dow chose to follow the Memorandum of Understanding (MOU) that is in place between the Canadian Industry Association of Canada (CIAC) and the American Chemistry Council (ACC). As

such, two auditors audited the Prentiss Alberta Operations Site against RCMS:2023 and against the additional CIAC elements on August 18-20, 2025.

The Prentiss facility, located north of Red Deer Alberta, is a world scale polyethylene plant. Dow's Prentiss site is a positive contributor to the local economy with their operations providing an economic multiplier effect through the purchase of raw materials, products, services, labour and technologies. With more than 200 employees and contractors on site, the Prentiss Site takes advantage of Alberta's natural gas resources and produce value-added products that can be used within the domestic economy or sold internationally.

The scope of the audit is Manufacture of Polyethylene at the Prentiss facility. Dow has developed a management system (ODMS) 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) Responsible Care® codes. There were zero Non-Conformances (NCs) identified during the audit.

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 global, robust, Operating Discipline Management System (ODMS) to be effective in meeting or exceeding the requirements of RCMS and the Canadian Responsible Care® codes. ODMS, which follows a Plan Do Check Act methodology applies to all aspects of operations at the site and to the ethics and principles of Responsible Care®.

The ODMS has several sections, each specific to one element. For example, section 6.0 is titled Responsible Care® (EH&S). Each element of ODMS contains four levels of documents to help the site achieve its goals and objectives. ODMS is an integrated system which supports RC codes, as well as internal and external requirements.

Dow has developed a robust management system audit process. This audit process is comprised of self assessments, done by people at the site against a corporate protocol, and external audits carried out by Dow employees from outside the site. Frequencies, based on risk, have been established for conducting these audits which generate the annual audit program consisting of self assessments, internal assessments (carried out by Dow employees from outside the site) and external assessments. The annual audit schedule plan is on track for the year. Action items are captured in the global EAT (Event & Action Tool) system. Any overdue action items are followed up via a bi-weekly email reminder, which is being well managed by the site.

The site conducts mini MSRs (Management System Reviews) in the various areas of the plant which then get rolled up into the annual plant level MSR. These mini MSRs generate themes for the site under the categories of Strengths, Weaknesses, Opportunities and Threats. Many of the management system continual improvement items come from the review of these themes during the annual MSR.

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 on multiple committees including, Skya Kruithof, Dow Canada President being a CIAC board member, Mike Burt, VP Dow Canada the Chair of CIAC Plastics Division, Graham Aitken with Transcaer®, Kyle Duncan on the Share and PSN networks, Courtenay Boyda on the Western & Ontario Leadership Groups, Technical Management Committee, and Environmental committees. Dow Canada has a plan for staffing CIAC committees across roles and geographies and demonstrated. Dow Canada also submitted the required CIAC annual benchmarking reporting data (SHIM, PRIM, NERM and TIMS) prior to the respective deadlines, which was reviewed during the audit.

The Dow Canada president, Skya Kruithof, has signed the annual recommitment letter on Feb 11, 2025. Before the annual recommitment letter is signed the president reviews a detailed package showing the actions taken by the company towards Responsible Care® Principles and Ethics and its position on sustainability and corporate accountability. There were also numerous examples provided of corporate responsibility with the local community through the many donations to local charities.

The interview with the community advisory panel member, Audrey Herman went very well. She had nothing but positive comments about the company itself, the CAP, the value to the community. This can be attested by her being a member of the CAP since 2007. There are currently 8 CAP members of which 2 other members are also long tenured like Audrey. The company does communicate and seek feedback. As part of its continual improvement process, there was a revision made to the Terms of Reference document. This work, still in the approval stages, will increase members from 8 to a maximum of 14 and will seek a more broad-based representation to ensure all groups can provide input.

There is a worse case scenario which could have a 3 km impact radius. This is communicated to the neighbours within this zone and presented at CAP meetings. Potentially impacted neighbours are provided information face-to-face every three years and emailed the information in the middle years. There is also an annual summer social where neighbours are invited to attend and hear more about the company, Responsible Care® and the CAP.

There are numerous examples of Dow being a good corporate citizen as demonstrated in the many charitable investments and sponsorships to the local area. Some of the 2025 benefactors included United Way of Central Alberta (company was honored with the \$200k lifetime donations recognition), Lacombe and District 4H, Family & Community Support Services (FCSS) Blackfolds and Lacombe, Lacombe Composite High School, Ella Nature Centre, Women Building Futures. In 2023, Dow Canada was the recipient of 5 CIAC Responsible Care® awards. These included Company of the Year, OCS Company of the Year, Jean Belanger Award, Women in Chemistry, and Plastics Contributor of the Year.

A recent best practice has the site donating what the site considers waste plastic to a local

manufacturer of 100% recycled plastic products, Grey is Green. By keeping plastic waste out of the landfill, Grey is Green is able to manufacture items such as Muskoka chairs, planters, patio table and stools, hot tub stairs and plastic lumber.

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.

The closest indigenous community is approximately 61 kms from the site. As such there is not a lot of involvement from the indigenous community. However, the company still supports indigenous communities in areas close to their operations as demonstrated in the Indigenous Community Engagement Plan and have a Dow Canada Indigenous Inclusion Policy. Indigenous communities also are included in the site's stakeholder list. A Terms of Reference document pertaining to the CAP, where CAP members will be increased from 8 to a maximum of 14, specifically states indigenous representation will be sought for membership.

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 2.5 day visit, by two auditors, the Dow Prentiss operating facilities listed previously, and HQ Oversight functions, zero minor or major nonconformity findings were raised on activities sampled in the agreed upon audit recertification/reverification plan.

As a result, the management system at Dow 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
Roberto Garcia

Date: August 18-20, 2025

Statement of Conformity

This is to certify that the Management System of:

The Dow Chemical Company

Highway 597 and Prentiss Road Lacombe County AB T4L 2N4, Canada

has been approved by LRQA to the following standards:

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

Approval number(s): RCMS – 00048985

The scope of this approval is applicable to:
Manufacture of Polyethylene.



David Derrick

Regional Director, UKAM

Issued by: LRQA Limited

