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YOKOGAWA NORTH AMERICA ENVIRONMENTAL POLICY

The management team and employees of Yokogawa, along with our valued partners, pledge their commitment to the prevention of pollution and protecting and conserving the natural environment. We will demonstrate this commitment by incorporating environmental consciousness in our daily activities and complying with all statutory, regulatory requirements and recognized standards.

The Yokogawa Environmental Management System is designed to continually improve our environmental performance and encompasses activities from "design to delivery" of product to recycling of resources. We offer our expertise in environmental protection to our customers assisting them with "green" solutions in the fields of test, measurement and process control.

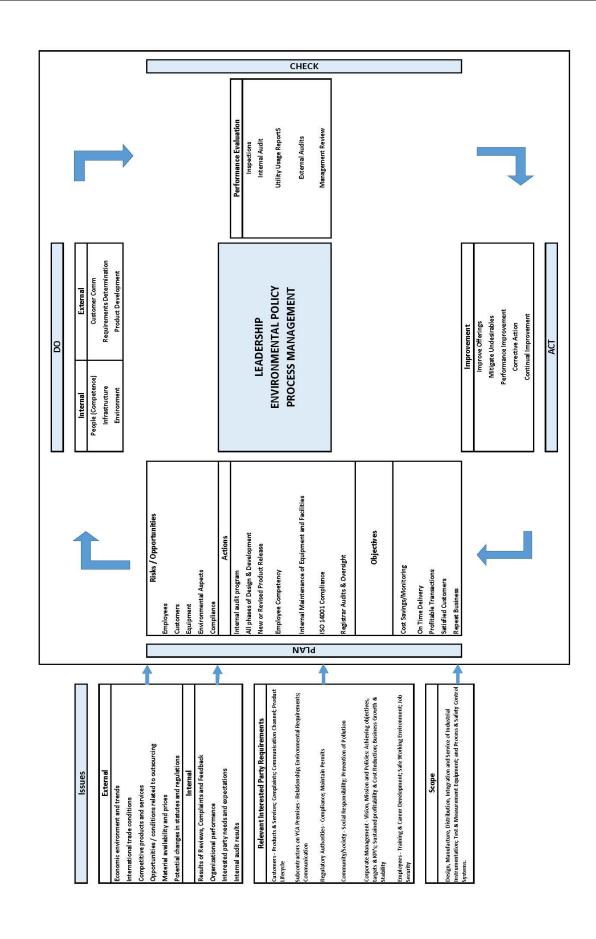


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1.0 Scope

The management of Yokogawa North America has approved issue of the "Environmental Management Manual" to provide a documented description of our Environmental Management System. The Manual will be used as a reference by employees for environmental management activities.

The contents of this Manual are binding on all employees within and any subcontractors (apart from the organization) inside all active facilities in North America. It is intended that this Manual will provide the basic structure upon which we will implement specific environmental policies and procedures and create environmental work standards.

Further, management has committed that the Environmental Management System be certified by an accredited third party to the applicable environmental management standard ISO 14001.

2.0 Normative References

This environmental management manual was created based on the international standard ISO 14001:2015 Environmental Management Systems requirements.

If the international standards are modified the environmental management manual will be revised accordingly.

3.0 Terms and Definitions

For definitions of terms used in this document please reference ISO 14000

4.0 Context of the Organization

4.1 Understanding the Organization and its Context

The context of Yokogawa is defined in our scope of registration:

Design, Manufacture, Distribution, Integration and Service of Industrial Instrumentation; Test & Measurement Equipment; and Process & Safety Control Systems.

Yokogawa has determined external and internal issues that are relevant to our purpose and strategic direction and that affect our ability to achieve the intended result(s) of our Environmental Management System.

The external issues that affect our organization include:

- a) Economic environment and trends;
- b) International trade conditions;
- c) Competitive products and services;
- d) Opportunities and conditions related to outsourcing;
- e) Material availability and prices;
- f) Potential changes in statutes and regulations.

Yokogawa uses the SWOT analysis framework for identifying and analyzing the external issues that can have an impact on the company.

| | | External issues: | | | | | |
|------------|---|-------------------------------------|-----------------------------------|---------------------------------------|--|--------------------------------------|--------------------|
| | Context | Economic Environment & Trends | International Trade Conditions | Competitive Products & Services | Outsourcing Conditions & Opportunities | Material Availability & Prices | Statute Changes |
| | Reputation in Marketplace | | | x | | | |
| reng | Member of Global Yokogawa network | | x | × | x | х | |
| | Access to Capital | х | | | | х | |
| | Disciplines: J-Ethic, 4-ISO, FSM | | | | | | x |
| | Customer Satisfaction | | | x | | | |
| Weaknesses | Lack of Marketshare - New to US | | | x | | | |
| | Aging Workforce - Knowledge Management | Х | | | | | |
| | Competition Entrenched | | | X | | | |
| | Product Delivery - Competitior Stocking | Х | | x | | | |
| | Narrow Portfolio - Energy Focus | Х | | X | | | |
| Opportui | Territory (USA) is a strong market | Х | | | | | |
| | Major Energy Accounts in Territory | Х | | | | | |
| | Potential for Growth - Increase marketshare | | | X | | | |
| | Many GMA's are in Territory | | Х | X | | | |
| | EPA Mandates May Increase | Х | | | | | Х |
| Threats | Volatility of Energy Market | Х | | X | | Х | |
| | Competitive pressure at Key Customers | Х | | X | | | |
| | Competitors / Retaining Key Personnel | Х | | | | | |
| | Reglatory Changes | Х | | | | | Х |
| | Aging Workforce - Knowledge Management | Х | | | | | |

The internal issues that affect our organization include:

- a) Results of reviews, complaints and feedback;
- b) Organizational performance;
- c) Interested party needs and expectations;
- d) Internal audit results.

4.2 Understanding the Needs and Expectations of Interested Parties

Due to their effect or potential effect on Yokogawa's ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, we determined:

- a) The interested parties that are relevant to the Environmental Management System;
- b) The requirements of these interested parties that are relevant to the Environmental Management System.

Relevant interested parties include:

| Relevant Interested Parties | Classification | Requirements | | |
|-----------------------------------|----------------|--|--|--|
| | External | Supply of Products & Services to Environmental Standards | | |
| Customers | | 2) Response to Complaints | | |
| | | 3) Proper Communication Channel | | |
| | | 4) Product Lifecycle Perspective | | |
| Subcontractors | External | 1) Long Term Relationship | | |
| working on YCA | | 2) Environmental Requirements | | |
| Premises | | 3) Open Communication Channel | | |
| Regulatory | External | 1) Comply to Regulations | | |
| Authorities | | 2) Maintain Permits | | |

| Community / | External | 1) Corporate Social Responsibility | | |
|-------------|----------|--|--|--|
| Society | LAGIIIAI | 2) Prevention of Pollution | | |
| | Internal | 1) Meeting corporate Vision, Mission and Policies. | | |
| Corporate | | 2) Achieving corporate objectives, targets & KPIs | | |
| Management | | 3) Sustained profitability & Cost Reduction | | |
| | | 4) Business Growth & Stability | | |
| | Internal | 1) Training & Career Development | | |
| Employees | | 2) Safe Working Environment | | |
| | | 3) Job Security | | |

Yokogawa monitors and reviews the information about these interested parties and their relevant requirements.

4.3 Determining the Scope of the Environmental Management System

Yokogawa has established an Environmental Management System based on the requirements of the ISO14001 standard.

Yokogawa has determined the boundaries and applicability of the Environmental Management System to establish its scope.

When determining this scope, we considered:

- a) The external and internal issues referred to in 4.1;
- b) The compliance obligations referred to in 4.2;
- c) The organizational unit(s), function(s), and physical boundaries;
- d) The products and services we offer;
- e) The authority and ability to exercise control and influence over outsourced processes.

Yokogawa applies all the requirements of this International Standard as they are applicable within the determined scope of our Environmental Management System.

Design, Manufacture, Distribution, Integration and Service of Industrial Instrumentation; Test & Measurement Equipment; and Process & Safety Control Systems.

The scope of our Environmental Management System is available and maintained as documented information.

4.4 Environmental Management System

Yokogawa has established, implemented, maintains, and continually improves an Environmental Management System, including the processes needed and their interactions, in accordance with the requirements of ISO 14001.

We have determined the processes needed for the Environmental Management System and their application throughout Yokogawa, and:

- a) Determined the inputs required and the outputs expected from these processes;
- b) Determined the sequence and interaction of these processes;

- Determined and applied the criteria and methods (including monitoring, measurements and related performance indicators) needed to ensure the effective operation and control of these processes;
- d) Determined the resources needed for these processes and ensured their availability;
- e) Assigned the responsibilities and authorities for these processes;
- f) Addressed the risks and opportunities as determined in accordance with the requirements of 6.1;
- g) Evaluate these processes and implement any changes needed to ensure that these processes achieve their intended results.
- h) Improve the processes and the Environmental Management System.

Yokogawa manages these processes in accordance with the requirements of this Environmental Management Manual.

To the extent necessary, we:

- a) Maintain documented information to support the operation of our processes;
- b) Retain documented information to have confidence that the processes are being carried out as planned.

5.0 Leadership

5.1 Leadership and Commitment

Top management demonstrates leadership and commitment with respect to the Environmental Management System by:

- a) Taking accountability for the effectiveness of the Environmental Management System;
- b) Ensuring that the environmental policy and environmental objectiveness are established for the Environmental Management System and are compatible with the context and strategic direction of Yokogawa;
- c) Ensuring the integration of the Environmental Management System requirements into our business process;
- d) Ensuring that the resources needed for the Environmental Management System are available;
- e) Communicating the importance of effective environmental management and of conforming to the Environmental Management System requirements;
- f) Ensuring that the Environmental Management System achieves its intended results;
- g) Engaging, directing and supporting persons to contribute to the effectiveness of the Environmental Management System;
- h) Promoting improvement;
- i) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.2 Environmental Policy

Based on corporate objectives and fundamental principles, Yokogawa establishes an appropriate Environmental Policy as part of the annual Environmental Plan. This Environmental Policy includes a commitment both for products and employee behavior to meet statutory and regulatory requirements, as well as customer requirements and a commitment to continual improvement. The Environmental Policy provides a

framework for establishing and reviewing environmental objectives, and is communicated and understood within Yokogawa.

It is endorsed by top management and is reviewed annually for continued suitability by them through the Environmental Management Review process.

Top management has established, implemented and maintains an environmental policy that:

- a) Is appropriate to the purpose and context of Yokogawa and supports our strategic direction:
- b) Provides a framework for setting environmental objectives;
- c) Includes a commitment to satisfy applicable requirements;
- d) Includes a commitment to continual improvement of the Environmental Management System.

The Environmental Policy:

- a) Is available and maintained as documented information;
- b) Is communicated, understood and applied within the organization; and
- c) Is available to relevant interested parties, as appropriate.

Environmental Policy

The management team and employees of Yokogawa, along with our valued partners, pledge their commitment to the prevention of pollution and protecting and conserving the natural environment. We will demonstrate this commitment by incorporating environmental consciousness in our daily activities and complying with all statutory, regulatory requirements and recognized standards.

The Yokogawa Environmental Management System is designed to continually improve our environmental performance and encompasses activities from "design to delivery" of product to recycling of resources. We offer our expertise in environmental protection to our customers assisting them with "green" solutions in the fields of test, measurement and process control.

5.3 Organizational Roles, Responsibilities and Authorities

Top management ensures that the responsibilities and authorities for relevant roles are assigned, communicated and understood. This is typically done through specific job descriptions and an organizational chart.

Top management assigns the responsibility and authority for:

- a) Ensuring that the Environmental Management System conforms to the requirements of ISO 14001;
- b) Ensuring that the processes are delivering their intended outputs;
- c) Reporting on the performance of the Environmental Management System and on opportunities for improvement (10.1), in particular to top management;
- d) Ensuring that the integrity of the Environmental Management System is maintained when changes to the Environmental Management System are planned and implemented.

Yokogawa has appointed the Health, Safety and Environmental Manager as the Management Representative, with the responsibility and authority to ensure:

- a) Processes for the Environmental Management System are established, implemented and maintained,
- b) The performance of the Environmental Management System and any need for improvements are reported to the President and Executive Staff,
- c) Awareness of customer requirements is promoted throughout the company.

The responsibilities of the Management Representative include liaison with external parties on matters relating to the Environmental Management System.

6.0 Planning

6.1 Actions to Address Risks Associated with Threats and Opportunities

6.1.1 General

Yokogawa establishes, implements and maintains the processes needed to meet the requirements in 6.1.1 to 6.1.4.

When planning for the Environmental Management System, Yokogawa considered:

- a) The issues referred to in 4.1;
- b) The requirements referred to in 4.2;
- c) The scope of its Environmental Management System and determine the risks and opportunities related to:
 - Environmental aspects, 6.1.2;
 - Compliance obligations, 6.1.3
- d) Other issues and requirements identified in 4.1 and 4.2 that need to be addressed to:
 - Gave assurance that the Environmental Management System can achieve its intended outcomes
 - Prevent or reduce undesired effects including the potential of external environmental conditions to affect Yokogawa
 - Achieve continual improvement.

Within the scope of the Environmental Management System, Yokogawa determined potential emergency situations including those that can have an environmental impact.

Yokogawa maintains documented information of:

- a) Risk and opportunities that need to be considered;
- b) Processes needed in 6.1.1 to 6.1.4 to the extent necessary to have confidence they are carried out as planned.

6.1.2 Environmental Aspects

Yokogawa determined the environmental aspects of its activities, products and services that it can control and those that it can influence and their associated environmental impacts, considering a life cycle perspective.

Yokogawa in determining environmental aspects take into account:

- a) Change including planned or new developments and new or modified activities, products and services;
- b) Abnormal conditions and reasonably foreseeable emergency situations.

Yokogawa determined those aspects that have or can have a significate environmental impact, i.e. significant environmental aspects by using established criteria.

Yokogawa maintains documented information of:

- a) Environmental aspects and associated environmental impacts;
- b) Criteria used to determine its significant environmental aspects;
- c) Significant environmental aspects.

6.1.3 Compliance Obligations

Yokogawa:

- a) Determine and have access to the compliance obligations related to the environmental aspects;
- b) Determine how these compliance obligations apply to Yokogawa
- Take these compliance obligations into account when establishing, implementing, maintaining and continually improving the Environmental Management System.

The legal and other requirements that may be relevant to our environmental impacts address:

- a) Air Pollution
- b) Water Pollution
- c) Soil Contamination
- d) Hazardous Substances

Yokogawa maintains documented information of its compliance obligations.

6.1.4 Planning Action

When planning actions, Yokogawa will consider technological options, financial, operational and business requirements.

Yokogawa:

- a) To take actions to address:
 - Significant environmental aspects, 6.1.2;
 - Compliance obligations, 6.1.3;
- b) Risk and opportunities identified in 6.1.1 how to:
 - Integrate and implement the actions into the Environmental Management System processes or other business processes;
 - Evaluate the effectiveness of these actions.

Actions taken to address risks and opportunities are proportionate to the potential impact on the conformity of products and services (see Threats and Opportunities Consideration Spreadsheet—YCA).

6.2 Environmental Objectives and Planning to Achieve Them

6.2.1 Environmental Objectives

Yokogawa establishes environmental objectives at relevant functions and levels, taking into account the significant environmental aspects and associated compliance obligations and considering the risks and opportunities.

The environmental objectives are:

- a) Consistent with the environmental policy;
- b) Measurable (if practicable);
- c) Monitored:
- d) Communicated:
- e) Updated as appropriate.

Yokogawa maintains documented information on the environmental objectives.

6.2.2 Planning Actions to Achieve Environmental Objectives

When planning how to achieve the environmental objectives, Yokogawa determines:

- a) What will be done:
- b) What resources will be required;
- c) Who will be responsible;
- d) When it will be completed;
- e) How the results will be evaluated, including indicators for monitoring progress toward achievement of measurable environmental objectives.

Yokogawa considers how actions to achieve the environmental objectives can be integrated into the organizations business processes.

7.0 Support

7.1 Resources

Yokogawa determines and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the Environmental Management System.

Yokogawa considers:

- a) The capabilities of, and constraints on, existing internal resources;
- b) What needs to be obtained from the external provides.

7.2 Competence

Yokogawa shall

a) Determines the necessary competence of person(s) doing work under our control that affect the performance and ability to fulfil Yokogawa's compliance obligations;

- b) Ensures that these persons are competent on the basis of appropriate education, training, or experience;
- c) Determine training needs associated with the environmental aspects and the Environmental Management System;
- d) Where applicable, take action to acquire the necessary competence and evaluate the effectiveness of the actions taken.

Yokogawa retains appropriate documented information as evidence of competence.

7.3 Awareness

Yokogawa ensures the persons doing the work under the organizations control are aware of:

- a) The environmental policy;
- b) The significate environmental aspects and related actual or potential environmental impacts associated with their work;
- c) Their contribution to the effectiveness of the Environmental Management System, including the benefits of enhanced environmental performance;
- d) The implications of not conforming to the Environmental Management System requirements, including not fulfilling the organizations compliance obligations.

7.4 Communication

7.4.1 General

Yokogawa establishes, implements and maintains the processes needed for internal and external communications relevant to the Environmental Management Systems, including:

- c) On what to communicate;
- d) When to communicate;
- e) With whom to communicate;
- f) How to communicate.

When determining the above communication Yokogawa:

- a) Takes into account its compliance obligations:
- b) Ensures that environmental information is communicated consistently with information generated within the Environmental Management System and is reliable.

Yokogawa responds to relevant communications on its Environmental Management System.

Yokogawa retains documented information as evidence of its communications, as appropriate.

7.4.2 Internal Communication

Yokogawa:

a) Internally communicates information relevant to the Environmental Management System among the various levels and functions of the organization, including changes to the Environmental Management System, as appropriate;

b) Ensures the communication processes enable persons doing under the control of Yokogawa to contribute to continual improvement.

7.4.3 External Communication

Yokogawa externally communicates information relevant to the Environmental Management System on a case by case basis and as required by its compliance obligations.

7.5 Documented Information

7.5.1 General

The Environmental Management System documentation issued by Yokogawa includes:

- a) A Environmental Policy and objectives;
- b) A Environmental Management Manual;
- c) Documented information required by this International Standard;
- d) Documented information necessary for the effectiveness of the Environmental Management System.

7.5.2 Creating and Updating

When creating and updating documented information, Yokogawa ensures appropriate:

- a) Identification and description (e.g. a title, date, author or reference number);
- b) Format (e.g. language, software version, graphics) and media (e.g. paper, electronic);
- c) Review and approval for suitability and adequacy.

7.5.3 Control of Documented Information

Documented information required by the Environmental Management System and by this International Standard are controlled to ensure:

- a) It is available and suitable for use, where and when it is needed;
- b) It is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

Yokogawa, for the control of information, addresses the following activities, as applicable:

- a) Distribution, access, retrieval and use;
- b) Storage and preservation, including preservation of legibility;
- c) Control of changes (e.g. version control)
- d) Retention and disposition.

Documented information of external origin determined by Yokogawa is to be necessary for the planning and operation of the Environmental Management System is identified, as appropriate and controlled.

Documented information retained as evidence of conformity are protected from unintended alterations.

8.0 Operation

8.1 Operational Planning and Control

Yokogawa established, implemented, controls and maintains the processes needed to meet Environmental Management Systems requirements and to implement the actions identified in 6.1 and 6.2 by:

- a) Establishing operating criteria for the processes;
- b) Implementing control of the processes in accordance with the operating criteria.

Controls can include engineering controls and procedures. Controls can be implemented following a hierarchy (e.g. elimination, substitution, administrative) and can be used individually or in combination.

Yokogawa are to control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

Yokogawa ensures that an outsourced process is controlled or influenced. The type and extent of control or influence to be applied to the process is defined within the Environmental Management System.

Consistent with the life cycle perspective, Yokogawa:

- a) Establishes controls as appropriate to ensure that environmental requirements are addressed in the design and development process for the product or service, considering each stage of the life cycle;
- b) Determine the environmental requirement for the procurement of products and services, as appropriate;
- c) Communicate the relevant environmental requirements to external providers, including contractors, as appropriate;
- d) Consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end of life treatment and final disposal of products and services.

Yokogawa maintains documented information to the extent necessary to have confidence that the processes has been carried out as planned.

8.2 Emergency Preparedness and Response

Yokogawa establishes, implements and maintains the processes needed to prepare for and respond to potential emergency situations.

Yokogawa will:

- a) Prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations;
- b) Respond to actual emergency situations;
- c) Take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact:
- d) Periodically test the planned response actions, where practicable;
- e) Periodically review and revise the processes and planned response actions, in particular after the occurrence of emergency situations or tests;

f) Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under Yokogawa's control.

Yokogawa maintains documented information to the extent necessary to have confidence the processes are carried out as planned.

9.0 Performance Evaluation

9.1 Monitoring and Measurement

9.1.1 General

Yokogawa monitors, measures, analyses and evaluates the environmental performance.

Yokogawa determines:

- a) What needs to be monitored and measured;
- b) The methods for monitoring, measurement, analysis and evaluation, as applicable to ensure valid results;
- c) The criteria against which Yokogawa evaluates the environmental performance and appropriate indicators;
- d) When the monitoring and measuring shall be performed;
- e) When the results from monitoring and measurement shall be analyzed and evaluated.

Yokogawa ensures:

- a) To calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate and/or applicable;
- b) Evaluation of the environmental performance and the effectiveness of the Environmental Management System;
- c) To communicate relevant environmental performance information both internally and externally, as identified in the communication processes and as required by the compliance obligations.

Yokogawa retains appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.

9.1.2 Evaluation of Compliance

Yokogawa establish, implements and maintains the processes needed to evaluate fulfilment of the compliance obligations.

Yokogawa:

- a) Determines the frequency that compliance will be evaluated;
- b) Evaluate compliance and take action, if needed;
- c) Maintain knowledge and understanding of the compliance status.

Yokogawa retains documented information as evidence of the compliance evaluation results.

9.2 Internal Audit

9.2.1 General

Yokogawa conducts internal audits at planned intervals to provide information on whether the Environmental Management System:

- a) Conforms to:
 - Yokogawa requirements for Environmental Management System;
 - The requirements of this International Standard
- b) Is effectively implemented and maintained.

9.2.2 Internal Audit Program

Yokogawa has:

- a) Planned, established, implemented and maintains an audit program including the frequency, methods, responsibilities, planning requirements and reporting, which is taken into consideration the importance of the processes concerned, changes affecting Yokogawa, and the results of previous audits;
- b) Defined the audit criteria and scope of each audit;
- Selected auditors and conducts audits to ensure objectively and the impartiality of the audit process;
- d) Ensure that the results of the audits are reported to relevant management;
- e) Take appropriate corrective action

Yokogawa retains documented information as evidence of the implementation of the audit program and the audit results.

9.3 Management Review

Top management reviews Yokogawa's Environmental Management System, at planned intervals, to ensure the continuing suitability, adequacy and effectiveness.

The management review includes consideration of:

- a) The status of actions from previous management reviews;
- b) Changes in:
 - External and internal issues that are relevant to the Environmental Management System;
 - The needs and expectations of interested parties, including compliance obligations;
 - Significant environmental aspects;
 - Risks and opportunities;
- c) The extent to which environmental objectives have been achieved;
- d) Information on the environmental performance, including trends in:
 - Nonconformities and corrective actions:
 - Monitoring and measurement results;
 - Fulfilment of compliance obligations;
 - Audit results:
- e) Adequacy of resources;

- f) Relevant communication from interested parties, including complaints;
- g) Opportunities for continual improvement.

The management review outputs include:

- a) Conclusions on the continuing suitability, adequacy and effectiveness of the Environmental Management System;
- b) Decisions related to continual improvement opportunities;
- c) Decisions related to any need for changes to the Environmental Management System, including resources;
- d) Actions, if needed, when environmental objectives have not been achieved;
- e) Opportunities to improve integration of the Environmental Management System with other business process, if needed;
- f) Any implications for the strategic direction of the organization.

Yokogawa retains documented information as evidence of the results of management reviews.

10.0 Improvement

10.1 General

Yokogawa determines opportunities for improvement and implement necessary actions to achieve the intended outcomes of the Environmental Management System.

10.2 Nonconformity and Corrective Action

When a nonconformity occurs, Yokogawa:

- a) Reacts to the nonconformity and, as applicable:
 - Takes action to control and correct it;
 - Deals with the consequences, including mitigating adverse environmental impacts;
- b) Evaluates the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:
 - Reviewing and analyzing the nonconformity;
 - Determining the causes of the nonconformity;
 - Determining if similar nonconformities exist, or could potentially occur;
- c) Implements any action needed:
- d) Reviews the effectiveness of any corrective action taken;
- e) Makes changes to the Environmental Management System, if necessary:
- f) Updates risks and opportunities determined during planning, if necessary.

Corrective actions are appropriate to the significance of the effects of the nonconformities encountered, including the environmental impacts.

Yokogawa retains documented information as evidence of:

- a) The nature of the nonconformities and any subsequent actions taken;
- b) The results of any corrective action.

10.3 Continual Improvement

Yokogawa continually improves the suitability, adequacy and effectiveness of the Environmental Management System to enhance environmental performance.

Yokogawa considers the results of analysis and evaluations, and the outputs from the management review, to determine if there are needs or opportunities that are addressed as part of the continual improvement.