



Chemistry Industry Association of Canada **Association canadienne de l'industrie de la chimie**

RESPONSIBLE CARE®

VERIFICATION REPORT

MEGLOBAL CANADA ULC

July 08, 2019 and November 18, 19 & 20, 2019

Disclaimer

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC) to provide advice to the above company and assist it in meeting its Responsible Care commitments as a member of the Association. The material in it reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member company which is the subject of this report to interpret and act on the findings and recommendations in this guidance document as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the association, its member companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care Verification of MEGlobal Canada ULC. The verification was undertaken on July 08 and November 18, 19 & 20, 2019, and included team visits to company facilities at Fort Saskatchewan and Prentiss, Alberta. This was the fifth Responsible Care verification completed for MEGlobal Canada ULC. The last verification was completed on October 4, 5 & 6, 2016.

While considering all aspects of the Responsible Care Commitments during this verification, the team placed an emphasis on conducting an in-depth examination of company aspects related to changes in the engineering and maintenance delivery and organization.

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The verification is complete and no further involvement is required by the verification team.



Signed:
Dave Mack
Verification Team Leader

January 09, 2020

For more information on this or a previous Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

Andrew Maile
North American EHS & Quality Leader
Fort Saskatchewan Site Leader
780 997 7638
awmaile@meglobal.biz

SUMMARY OF VERIFICATION TEAM OBSERVATIONS

Works in Progress

The following relate to self-initiated actions in support of continual performance improvement.

1. Assessing, with a view to improving, the effectiveness of MEGlobal participation in the Dow Chemical emergency operation centre at the Fort Saskatchewan facility.
2. Developing a terminal assessment protocol in collaboration with service providers.
3. Reviewing the effectiveness of the current community advisory process for possible revitalization.

Improvement Opportunities

The following relate to suggested actions that could enhance the effectiveness of current programs.

1. Benchmark the current business continuity plan against the CIAC Business Continuity/Critical Infrastructure Implementation Aid.
2. Benchmark the promotion of Responsible Care by name activities against the CIAC Promoting Responsible Care Implementation Guide.
3. Establish a more robust process to monitor and assess the Responsible Care related performance of chemical suppliers (e.g., make use of the CIAC self-assessment forms).
4. Involve the Community Advisory Panels in a broader range of company activities (e.g., Life in the Heartland, trade shows etc.)
5. Benchmark the community outreach process against the CIAC guide entitled “Community Outreach Planning and Evaluation”, referred to as SCOPE.
6. For the community grants program, assess the opportunity to assign company volunteers to work with the organizations receiving funding, when it makes sense and is practical to do so.
7. Reach out to a broader community in communicating Responsible Care related performance and the results of Responsible Care Verifications (i.e., beyond on-site and the Community Advisory Panels).

Successful Practices

The following relate to actions that strongly support sustained excellence in performance.

1. The robust Responsible Care related selection and on-going performance monitoring for product carriers at all levels from road trucking to deep sea shipping.
2. The rigour by which the transition from Dow Chemical supported maintenance to in-house responsibility was managed.
3. The posted personal protective equipment grid which provides guidance on where and when said protection is required.
4. The use of custom printed pre-tasks hazard analysis cards focusing on various defined activities (e.g., process, office, travel, etc.)
5. The Responsible Care related top ten list, focusing on performance improvement, that is discussed at weekly meetings.
6. The clearly evident commitment to the CIAC Responsible Care Ethic & Principles for Sustainability as demonstrated by the engagement and morale of those who participated in the verification.
7. The non-supported product application information which accompanies customer contracts.
8. The documented Operating Discipline Management System that ties policies, standards, processes and procedures together, into an effective system that is applicable across various levels of the organization.
9. The overview presentations made to the Responsible Care Verifiers which helped significantly in facilitating a smooth and efficient process.

1. INTRODUCTION

1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for MEGlobal Canada ULC operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability*.

The Responsible Care® Ethic and Principles for Sustainability

We are committed to do the right thing, and be seen to do the right thing.

We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

As an element of this commitment to Responsible Care MEGlobal Canada ULC must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
2. Identify Opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association’s members and others, including several critics of the chemical industry. The verification is generally conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC’s National Advisory Panel), and
- One or more representatives of the local communities where the company’s facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website (www.canadianchemistry.ca). MEGlobal Canada ULC is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website www.canadianchemistry.ca, or by CIAC at glaurin@canadianchemistry.ca or (613)292-8663 extension 233.

1.2 About MEGlobal Canada ULC

MEGlobal Canada ULC is part of the Equate Petrochemical Company based in Kuwait. MEGlobal has four world scale ethylene glycol production facilities. One in Fort Saskatchewan, Alberta, two in Prentiss, Alberta and one in Texas . Carbon dioxide gas is also produced for sale at Fort Saskatchewan and Prentiss. There are also marketing offices around the world. The focus of this CIAC Verification was the Fort Saskatchewan and Prentiss facilities. Originally, engineering and maintenance services were provided to these facilities by Dow Chemical. This has been discontinued and the company is now operating stand alone in these areas.

1.3 About This Verification

The verification of MEGlobal Canada ULC was conducted on July 08 and November 18, 19 & 20, 2019, and included team visits to company facilities at Fort Saskatchewan and Prentiss, Alberta.

During the course of the verification, the team had the opportunity to interact with a wide range of company personnel, as well as stakeholders external to the company. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This was the fifth Responsible Care verification completed for MEGlobal Canada ULC. The last verification was completed on October 4, 5 & 6, 2016.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Dave Mack	CIAC	<i>Team Leader</i>
Keith Purvis	CIAC	<i>Public-At-Large Verifier</i>
Nadine Blaney	CIAC	<i>Observer</i>
Barb Gamble	Fort Saskatchewan	<i>Community Representative</i>
Sandra Baudry	Prentiss	<i>Community Representative</i>

2. TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)

During the verification of MEGlobal Canada ULC, the verification team looked for evidence that the company was addressing the expectations documented in the Responsible Care Commitments (152 code elements plus 28 benchmark and collective expectations). While considering all aspects of the Responsible Care

Commitments, the team placed an emphasis on conducting a more in-depth examination of certain company aspects identified by the company or the team related to changes in the engineering and maintenance delivery and organization.

In communicating its observations, the verification team will make repeated reference to the following categories of observations:

1. **Findings Requiring Action;** document instances where the verification team observes specific company actions (or the absence of company actions) which are inconsistent with the detailed codes and benchmark and collective expectations contained in the Responsible Care Commitments. Where possible, the team will communicate, based on their experience and judgment, why it is inconsistent and how the observation relates back to a possible gap in the expected management system and / or the ethic and principles underpinning company actions. The team may also provide advice on how the situation might be responded to.
2. **Works in Progress;** document instances where the team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement Opportunities.
3. **Successful Practices;** document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.
4. **Improvement Opportunities;** identify instances where the team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care Commitments, but for which the team is of the opinion that the company could support further improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.

The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:

2.1 Team Observations Concerning Operations Code

The Operations Code defines environment, health and safety expectations regarding all company operational aspects including product manufacturing, transportation and distribution.

2.1.1 Design and Construction of Facilities and Equipment

There are written policies, standards and procedures in place for selection, design, construction and commissioning of new or modified facilities and equipment, including management of change. Consistent project management is ensured through the use of a defined methodology, execution process and file structure. Recognized industry standards and risk assessment processes are applied to design work. Both in-house and contracted service providers are utilized for engineering and design work, as well as construction activities.

2.1.2 Operations Activities

A range of hazard analysis and risk assessment processes are applied to company operations. This includes a process, referred to as Layers of Protection Analysis, used to identify potential Responsible Care related adverse effects and establish mitigating controls. Operating and maintenance procedures are in place with some defined as critical, meaning those procedures with tasks that if not followed properly could result in a

significant unplanned event. Procedures are regularly reviewed at a frequency depending on their criticality. Laboratory work addresses quality control and routine analysis. Safety information is available on line for laboratory chemicals, and specific laboratory procedures address safety aspects including exposure limiting controls. Equipment calibration and maintenance procedures are in place. Approximately two-thirds of the company's production is shipped by railcar to contracted terminals in Vancouver, for off shore export. The remainder is shipped by rail, with some road trucking, direct to customers, or via US terminals in Chicago and Houston. Some product rail loading occurs at Blackfalds, Alberta, connected by an underground pipeline from the Prentiss facility. Some loading occurs at Prentiss itself, and the remainder, including road trucking, occurs at the Fort Saskatchewan facility. Processes, utilizing contracted service providers, are in place for carrier Responsible Care related selection and on-going performance monitoring. Formerly, maintenance services were provided by Dow Chemical Canada. This service was recently discontinued and MEGlobal took over the management of all maintenance activities independently. As a result, the number of the company's maintenance personnel increased significantly. A change in the company's major service providers also occurred. Maintenance strategies are developed at a business level and cascaded down to the equipment level. Critical equipment has been identified, and processes and procedures are in place to ensure the integrity and reliability of all equipment is continually maintained. Assessments are regularly completed to ensure that any ongoing reliability concerns are being addressed.

Successful Practices

- i. The robust Responsible Care related selection and on-going performance monitoring for product carriers at all levels from road trucking to deep sea shipping.
- ii. The rigour by which the transition from Dow Chemical supported maintenance to in-house responsibility was managed.

2.1.3 Safety and Security

A broad range of occupational health and safety practices and procedures are in place including a process for hazard assessment elimination and control. All practices and procedures apply to contractors as well as company personnel. Specifically assigned company personnel oversee all work being carried out by contractors. There is a defined process safety management program in place, based upon recognized regulatory and industry standards. This includes a comprehensive process hazard assessment and risk analysis program. Related reviews are carried out on a 5 year cycle for all facilities. An operational readiness review is also carried out prior to introducing hazardous materials into a facility (e.g., following a turnaround). Worst case incident scenarios have been established with potential for off-site impacts identified. Emergency preparedness and response plans are in place for fixed facilities and transportation activities. On-site equipment and trained response personnel are supplemented by municipal resources and industry mutual aid organizations. Contracted emergency response expertise is available to support product transportation emergencies. A security vulnerability assessment has been done. This is repeated every 5 years. A security management program is in place to address identified vulnerabilities. A business continuity plan is in place addressing various scenarios, above beyond typical operational emergencies, and the ability to maintain operations should these circumstances occur. There is a defined incident reporting and investigation process in place that includes establishing root cause, identifying actions to prevent recurrence and assignment of responsibilities to ensure completion of actions.

Works in Progress

- i. Assessing, with a view to improving, the effectiveness of MEGlobal participation in the Dow Chemical emergency operation centre at the Fort Saskatchewan facility.

Successful Practices

- i. The posted personal protective equipment grid which provides guidance on where and when said protection is required.
- ii. The use of custom printed pre-tasks hazard analysis cards focusing on various defined activities (e.g., process, office, travel, etc.)
- iii. The Responsible Care related top ten list, focusing on performance improvement, that is discussed at weekly meetings.

Improvement Opportunities

- i. Benchmark the current business continuity plan against the CIAC Business Continuity/Critical Infrastructure Implementation Aid.

2.1.4 Environmental Protection

Chemical and greenhouse gas emissions are tracked, quantified and controlled, with reduction targets established and monitored. Hazardous wastes have been characterized, and a contracted service provider is utilized for disposal. Responsible Care related performance of the waste contractor is routinely monitored through audits which are done every three years.

2.1.5 Resource Conservation

Energy, raw material and water usage are tracked, quantified and controlled, with reduction targets established and monitored.

2.1.6 Promotion of Responsible Care by Name

MEGlobal's formal commitment to sustainability, referred to as FOCUS 2020, is publicly displayed on Internal & external websites. E-mails, business cards and the company website all contain the Responsible Care logo. A presentation template, posters and banners all contain the logo. Responsible Care is also featured at open houses.

Improvement Opportunities

- i. Benchmark the promotion of Responsible Care by name activities against the CIAC Promoting Responsible Care Implementation Guide.

2.2 Team Observations Concerning Stewardship Code

The Stewardship Code addresses all company raw materials, products and services and defines expectations for the care and control of same throughout their life cycle.

2.2.1 Expectations of Companies

MEGlobal does not do any in house product research and development. Their manufacturing technology is licensed from Dow Chemical, who obtain and provide current information on product hazards and associated risks. Communications with customers and suppliers reference Responsible Care, as does commercial advertising. Control on the use of company product in the marketplace is addressed through what is referred to as a non-supported application statement which accompanies customer contracts. Regularly updated safety data sheets, explaining the properties of company products, are prepared in English and local customer languages, and made available to users. Records are available on previously used waste management facilities since start-up of company operations, including the nature and quantity of disposed materials.

Successful Practices

- i. The clearly evident commitment to the CIAC Responsible Care Ethic & Principles for Sustainability as demonstrated by the engagement and morale of those who participated in the verification.
- ii. The non-supported product application information which accompanies customer contracts.

2.2.2 Expectations with Respect to Other Parties

Processes are in place for contracted terminal storage facilities and product distributors Responsible Care related selection and on-going performance monitoring. Terminals are expected to conform to a guide for bulk handling requirements for their operations. Contract laboratories are certified to recognized industry standards, and their Responsible Care related performance is reviewed every three years. There is a defined process for the selection and performance monitoring of onsite contractors. There is an informal process used for the selection and performance monitoring of chemical suppliers. Customer applications are assessed to ensure they meet company expectations. Expectations with respect to contracted product carriers and hazardous waste management contractors are addressed in the Operations Code section of this report.

Works in Progress

- i. Developing a terminal assessment protocol in collaboration with service providers.

Improvement Opportunities

- i. Establish a more robust process to monitor and assess the Responsible Care related performance of chemical suppliers (e.g., make use of the CIAC self-assessment forms).

2.3 Team Observations Concerning Accountability Code

The Accountability Code defines expectations for communication and dialogue with communities local to company manufacturing and distribution operations and transportation corridors, as well as other stakeholders with an interest in company activities.

2.3.1 Operating Site Communities

Communities around the Fort Saskatchewan and Prentiss facilities have been defined and community advisory panels have been established for communications, and to engage in two way dialogue. The company also participates in various community events and is represented on some local community organizations. Information on worst case incident scenarios have been presented to the advisory panels. A call-out system has been established to advise community members who may be impacted if action needs to be taken in case of an incident. Information has been provided on what to do in an emergency situation. The company participates in and collaborates with emergency mutual aid organizations local to both facilities.

Works in Progress

- i. Reviewing the effectiveness of the current community advisory process for possible revitalization.

Improvement Opportunities

- i. Involve the Community Advisory Panels in a broader range of company activities (e.g., Life in the Heartland, trade shows etc.)
- ii. Benchmark the community outreach process against the CIAC guide entitled “Community Outreach Planning and Evaluation” referred to as SCOPE.
- iii. For the community grants program, assess the opportunity to assign company volunteers to work with the organizations receiving funding, when it makes sense and is practical to do so.

2.3.2 Other Stakeholders

Interface takes place with other stakeholders, such as government officials and the general public, on an as needed basis. The company participates in the CIAC TransCAER program which, in collaboration with those responsible for municipal response, addresses community awareness and emergency response as they relate to the transportation of chemicals through communities.

3. TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments.

The verification team studied the MEGlobal Canada ULC management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Management System Guide. The verification team's related observations to the company management system(s) are as follows:

3.1 Observations on the PLAN Step

During the 'PLAN' Step of the management system, the company is required to decide what the goals of the company are and how they will be met. In determining those goals, it is expected the company will look inward, across its operations, but will also look outward, considering the expectations of: stakeholders; regulatory requirements; relevant CIAC Responsible Care Commitments and supporting tools; and other industry benchmarks.

Based upon previous performance and other relevant data, what is referred to as the Managing Improvement Plan is created. This focusses on various aspects of the organization, including objectives for performance improvement in Responsible Care related activity. These form a basis for the personal goals of employees. Every 3 years an industry wide benchmarking process takes place, through what is referred to as the Townsend Study. This provides a comparison to other similar operations identifying strengths as well as opportunities for improvement.

3.2 Observations on the DO Step

During the 'DO' Step in the management system, the company is required to convert the decisions of the 'PLAN' Step into action and ensure awareness and understanding by all involved. It is expected that the company will implement an organizational structure, assign responsibilities to appropriate personnel, supply sufficient training and resources to execute planned actions and develop and document standards, procedures and programs, as applicable.

What is referred to as the Operating Discipline Management System has been established. This covers various aspects of the organization, including Responsible Care related activity. Responsible Care code expectations have been cross referenced to the relevant management system elements, and supporting standards, processes and procedures. Each element of the previously mentioned Managing Improvement Plan is assigned to a focal point in the organization, charged with responsibility for the outcome of that element. There is a detailed training program in place for employees. Course completion is tracked using a system referred to as Success Factor.

Successful Practices

- i. The documented Operating Discipline Management System that ties policies, standards, processes and procedures together, into an effective system that is applicable across various levels of the organization.

3.3 Observations on the CHECK Step

During the 'CHECK' Step in the management system, actions carried out in the 'DO' Step are required to be assessed to determine if they are actually being carried out according to plan, and whether they are achieving the desired outcomes and delivering continual improvement. Here, the overall management system and components should be reviewed along with employee competences for assigned responsibilities, internal and external audits should be undertaken, incidents should be assessed to identify root causes, and performance measurement should be conducted and reviewed.

In addition to routine checking on key metrics, elements of the previously mentioned Managing Improvement Plan are reviewed bi-monthly. Progress on each element is reported, and an assessment is made as to the likelihood of achieving the desired outcome. Changes may be made in the action plan if success looks to be unlikely. A series of audits are routinely carried out. This includes a detailed integrated environment, health and safety audit which is carried out every 5 years. Self-assessments on the previously mentioned Operating Discipline Management System are done every 1 to 3 years. Important metrics in the Operating Discipline Management System are reviewed annually, including the results of the self assessments. Expectations with respect to incident reporting and investigation are addressed in the Operations Code section of this report.

Successful Practices

- i. The overview presentations made to the Responsible Care Verifiers which helped significantly in facilitating a smooth and efficient process.

3.4 Observations on the ACT Step

During the 'ACT' Step in the management system, the company is required to translate the results of the 'CHECK' Step into corrective actions for improvement. This includes revisiting the 'PLAN' Step to decide whether changes are needed to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the 'ACT' Step should include whether and how: audit and review findings are responded to; performance is communicated internally and externally; employee and contractor performance is rewarded or corrected, etc.

Follow up actions from the various performance checking processes are tracked in a process referred to as the Action Item Tracking System. Responsibilities for addressing these actions are assigned and target completion dates established. Gaps identified from these performance checking processes are reviewed and may be included in a subsequent Managing Improvement Plan. There is an employee bonus system in place based on company results, manufacturing results and success in achieving personal goals. Company performance is communicated to employees through what is referred to as the Every Day Focus on Responsible Care Newsletter.

Improvement Opportunities

- i. Reach out to a broader community in communicating Responsible Care related performance and the results of Responsible Care Verifications (i.e., beyond on-site and the Community Advisory Panels).

4. TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY

Each CIAC member company is formally committed to the ethic of “*Doing the right thing, and being seen to do the right thing.*” This ethic, along with the principles for sustainability is expected to guide the company’s decision making and practices. In conducting the verification, the team is looking to understand how well the ethic is understood and adopted within the company, and the degree to which the principles inform the manner in which the company does its business.

The verification team carefully observed the MEGlobal Canada ULC decision making processes and actions and compared and contrasted the attributes of those with the attributes of a company guided by the Responsible Care Ethic and Principles For Sustainability as discussed in the Responsible Care Commitments (Appendix E). The verification team’s related observations on the company’s application of the *Responsible Care Ethic and Principles for Sustainability* are as follows:

Through observation and analysis, and subject to effectively dealing with the ‘Works in Progress’, as identified in this report, the following are general conclusions as to how the company’s decision making and practices are guided by the eight elements of the *Responsible Care Ethic and Principles for Sustainability*. Refer to the explanatory notes following each element:

- *Work for the improvement of people’s lives and the environment, while striving to do no harm.*

Supported by the company’s formal commitment to sustainability, referred to as FOCUS 2020, and the Operating Discipline Management System.

- *Be accountable and responsive to the public especially our local communities, who have the right to know the risks and benefits of what we do.*

Supported by the commitment to the CIAC Responsible Care Accountability Code.

- *Take preventive action to protect health and the environment.*

Supported by a comprehensive slate of related standards, processes and procedures.

- *Innovate for safer products and processes that conserve resources and provide enhanced value.*

Supported by the company’s Product Stewardship Policy statement addressing “fundamental concern for all who make, distribute, and use MEGlobal products and for the environment in which we live”.

- *Engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life cycles.*

Supported by the company’s Product Stewardship Policy statement addressing “a commitment to success for MEGlobal and its customers via responsible management of products throughout their life cycles”.

- *Understand and meet expectations for social responsibility.*

Supported by the company’s commitment to the CIAC Responsible Care Accountability Code.

- *Work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirement and meet or exceed their letter and spirit.*

Supported by the company’s overall commitment to Responsible Care.

- *Promote awareness of Responsible Care, and inspire others to commit to the principles.*

Supported by several communication processes both internal and external to the company.

5. VERIFICATION TEAM CONCLUSION

As a result of the examination conducted, and in consideration of the observations communicated within this report, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement.

COMPANY RESPONSE TO VERIFICATION TEAM REPORT

On behalf of MEGlobal Canada ULC, I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

I would like to thank the verification team for their professionalism and commitment to a thorough review of MEGlobal's operations and our Responsible Care ethic.

MEGlobal Canada ULC will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our operating sites.

We will give consideration to the Improvement Opportunities identified by verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members. Plans will be developed and implemented to respond to those Works in Progress where completion of such is action required to close gaps with respect to requirements, as identified by the verification team. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care, and communicated to the verification team at the time of our next verification.

Andrew Maile
North American EH&S Leader
MEGlobal Canada ULC
January 8, 2020



INTERVIEW LISTS

A: Company Personnel

Name	Position	Location
Abey Idicula	Prentiss 1 Production Leader	Prentiss
Amanda Vanderburg	FS Production Leader	Fort Saskatchewan
Andrew Maile	NA EHS & Quality Leader & Fort Saskatchewan Site Leader	Fort Saskatchewan
Angela Ryan	NA Improvement Manager	Fort Saskatchewan
Darren Berg	Prentiss 2 Production Leader	Prentiss
David Miller	Manufacturing, Maintenance & Prentiss Site Leader	Prentiss
Emily Carling	Chemist	Prentiss
Employee Team Representatives	Various	Fort Saskatchewan
Employee Team Representatives	Various	Prentiss
Eric Hillier	Analytical Technologist	Fort Saskatchewan
Gary Breneman	Product Steward	Sugar Land, Texas
Gopi Venugopal	EH&S Manager	Prentiss
Mitch Colwell	Process Safety Leader	Fort Saskatchewan
Rocco Schurink	VP Global Manufacturing	Fort Saskatchewan
Trish Thompson	NA Public Affairs Leader	Oyster Creek, Texas

B: External Stakeholders

Name	Company / Organization	Position	Location
Community Advisory Panel Representatives	-	-	Fort Saskatchewan
Community Advisory Panel Representatives	-	-	Prentiss