



CARLISLE COMPANIES INCORPORATED ENVIRONMENTAL SUSTAINABILITY POLICY

CONTENTS

1. PURPOSE 1
2. DEFINITIONS 1-5
3. ENVIRONMENTAL SUSTAINABILITY POLICY 6-8

1. Purpose

- 1.1. The intent of this Policy is to provide guidance and direction to all Company business units.
- 1.2. The Policy provides norms and standards to apply while defining expectations for various businesses and business leaders in meeting the Company's practices regarding environmental sustainability and compliance by the Company, its contractors, sub-contractors, suppliers, and sub-suppliers.
- 1.3. Wherever in this document there is reference to the Company, it shall mean the individual business-unit or location. The Policy shall conform to, be applied by and be the responsibility of the senior business leader at that business-unit location, or function. Regional, functional, and country leaders will ensure compliance in their areas of responsibility.
- 1.4. In all cases where local or national law is more restrictive, the local or national law shall guide conduct.

2. Definitions

- 2.1. *Company*: All Carlisle Companies Incorporated business units.
- 2.2. *Personnel*: All individuals directly employed or contracted by the Company, including directors, executives, managers, supervisors, and hourly employees.
- 2.3. *Supplier / subcontractor*: An organization, which provides the Company with goods and/or services integral to and utilized in or to produce Company goods.
- 2.4. *Sub-supplier*: A business entity in the supply chain which, directly or indirectly, provides the supplier with goods and/or services integral to and utilized in or to produce the supplier's and/or the Company's goods and/or services.
- 2.5. *Corrective and preventive action*: an immediate and continuing remedy to a non-conformance to the Policy.



- 2.6. *Interested party*: An individual or group concerned with or affected by the environmental performance of the Company.
- 2.7. *Environmental Management System*: A process to manage and guide environmental measurement, compliance, and continuous improvement. As a guideline or roadmap ISO 14001 shall be the approved system model.
- 2.8. *Conservation*: The careful utilization of a natural resource to prevent depletion. (Also see reduce.)
- 2.9. *VOC*: “volatile organic compounds” are organic chemical compounds that have high enough vapor pressures under normal conditions to significantly vaporize and enter the atmosphere. A wide range of carbon-based molecules, such as aldehydes, ketones, and other light hydrocarbons are VOCs.
- 2.10. *GHG*: “greenhouse gas” is a gaseous constituent of the atmosphere, both natural and anthropogenic, that absorbs and emits radiation at specific wavelengths within the spectrum of thermal infrared radiation emitted by the Earth’s surface, the atmosphere itself, and by clouds.
- 2.11. *KWH*: “kilowatt hour” (symbol kW·h, kW h or kWh) is a unit of energy. Energy delivered by electric utilities is usually expressed and charged for in kWh.
- 2.12. *NOx*: are oxides of nitrogen. Examples are: NO, NO₂ and N₂O.
- 2.13. *SOx*: are oxides of sulfur. Examples are: SO and SO₂.
- 2.14. *ODC*: ozone depleting compounds. Examples are chlorofluorocarbons, including freon, and sulfur hexafluoride (SF₆).
- 2.15. *MMBTU*: One million BTUs or British thermal units. A BTU is defined as the amount of heat required to raise the temperature of one pound of liquid water by one degree from 60° to 61° Fahrenheit at a constant pressure of one atmosphere. In North America, the term "BTU" is used to describe the heat value (energy content) of fuels, and to describe the power of heating and cooling systems, such as furnaces, stoves, grills, and air conditioners. Also equal to 1055.056 calories (ISO 31-4).



- 2.16. *Short Ton*: Or US ton equal to 2000 pounds.
- 2.17. *Long Ton*: Or metric ton equal to 1000 kilograms or 2240 pounds.
- 2.18. *Environmental Management System - ISO 14001*: ISO 14001 is the international specification for an environmental management system (EMS). It specifies requirements for establishing an environmental policy; determining environmental aspects and impacts of products, activities and services; planning environmental objectives and measurable targets; implementation and operation of programs to meet objectives and targets; checking and corrective action; and management review. ISO 14000 is like the ISO 9000 quality management system. The concept is to establish an organized approach to systematically reduce the impact of the environmental aspects which an organization can control.
- 2.19. *Hazardous Waste*: The term hazardous waste comprises all toxic chemicals, radioactive, and biologic or infectious waste. These materials threaten workers through occupational exposures and the public in their homes, communities, and general environment. Exposure to these materials can occur near the site of generation, along the path of its transportation, and near their ultimate disposal sites. Most hazardous waste results from industrial processes that yield unwanted materials. The generation and disposal of hazardous wastes is controlled through a variety of international and national regulations. For the purposes of this policy the definition shall be the specific national and local regulations for determining whether a waste is hazardous. If not defined or regulated or doubt exists, then US EPA rules and practices shall apply where not contrary to local law.
- 2.20.1. In the USA, this has a specific set of meanings:
- 2.20.1.1. “Listed Wastes” are wastes that EPA has determined are hazardous. The lists include the F-list (wastes from common manufacturing and industrial processes), K-list (wastes from specific industries), and P- and U-lists (wastes from commercial chemical products).
- 2.20.1.2. “Characteristic Wastes” are wastes that do not meet any of the listings above but that exhibit certain unsafe levels of ignitability, corrosivity, reactivity, or toxicity.
- 2.20.1.3. “Universal Wastes” are batteries, pesticides, mercury-containing equipment (e.g., thermostats) and lamps (e.g., fluorescent bulbs).
- 2.20.1.4. “Mixed Wastes” waste that contains both solid or liquid and hazardous waste components.



2.20.1.5. "Waste Identification Process" details about the process for identifying, characterizing, listing, and delisting hazardous wastes.

- 2.20. *Recycling*: Recycling involves processing used materials into new products in order to prevent the waste of potentially useful materials, reduce the consumption of fresh raw materials, reduce energy usage, reduce air pollution (from incineration) and water pollution (from landfilling) by reducing the need for conventional waste disposal, and lower GHG emissions as compared to virgin production. Recycling is a key component of waste management and is the third component of the "Reduce, Reuse, Recycle" waste hierarchy. Recyclable materials include many kinds of glass, paper, metal, plastic, textiles and electronics. In a strict sense, recycling of a material would produce a fresh supply of the same material, for example used office paper to more office paper. However, this is often difficult or too expensive (compared with producing the same product from raw materials or other sources), so recycling of many products or materials involves their reuse in producing different materials instead. Another form of recycling is the salvage of certain materials from complex products, either due to their intrinsic value such as lead from car batteries or due to their hazardous nature. For this policy, in the absence of local or national regulation US EPA rules will apply.
- 2.21. *Reduce*: (Also known as conservation.) A measurable, sustained, and controlled process that for the measured time has used less input or natural resources than the previous state of the process. This may include energy, materials, and fresh water or consider the waste streams generated.
- 2.22. *Reuse*: Like recycling except the conducted on-site and usually using process waste in the same process again. An example of this would be re-melting of aluminum to be cast again. Another would be to use water for another on site purpose. Reuse differs from recycling by the fact that reuse is on site and recycling is offsite.
- 2.23. *Sustainability*: Sustainability, in a general sense, is the capacity to maintain a certain process or state indefinitely. The concept has been applied more specifically to living organisms and systems. As applied to the human community, sustainability has been expressed as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 2.24. *Intensity*: A measure of environmental impact based on the business or business unit's sales, floor space or other scalable measure of production. Typically illustrated as Tons/USD 1,000,000 of external sales or pounds/employee or pounds/foot² (or m²). Intensity normalizes data for changes in volume due to economic growth or decline such as acquisitions or divestitures.



3. ENVIRONMENTAL SUSTAINABILITY POLICY

- 3.1. *Guiding Principles:* As responsible corporate citizens, we are committed to be leaders in protecting the environment and the communities in which we operate. Our 100+ year legacy of stewardship creates value for all stakeholders and preserves opportunities for generations to follow.
- 3.2. *Purpose:* All Company locations shall maximize their efforts to develop and implement environmentally sustainable practices and procedures. These will include:
 - 3.2.1. Meet all legal requirements.
 - 3.2.2. Consider and minimize the environmental impacts (conservation) associated with all activities of the company.
 - 3.2.3. Reduce solid wastes and recycle materials recoverable from solid wastes from our manufacturing processes and construction projects.
 - 3.2.4. Procure goods and services that reduce the negative impact on human health and the environment using the least toxic components.
 - 3.2.5. Promote conservation of the Company's use of energy through using current best practices to reduce waste and inefficient use of energy or natural resources.
 - 3.2.6. Produce products where possible that consider 3.2.1 thru 3.2.5.
 - 3.2.7. To promptly and responsibly correct conditions that hinder environmental sustainability or do not comply with the law or the mission and values of the Company.
- 3.3. *Application:*
 - 3.3.1. Source reduction is best practiced through continuous process improvements. Consideration of environmental impacts of a product and its manufacturing processes during the planning stages of a new product or a significant design update is critical to the Company's long-term environmental sustainability. This policy shall be considered at the earliest stages of any NPD (New Product Development ¹) with the source reduction goal as a CTQ (critical to quality).
 - 3.3.2. To further define impacts the Company shall consider: occupational health, environmental health, ecosystems, air pollution (such as GHG, ozone, particulates PM2.5 and greater, NOx, SOx, ODC), water quality and appropriate use, biodiversity and habitat, conservation of natural resources, climate change, and critical habitats.

¹ The NPD process shall consider the use of natural resources, potential efficiency improvements, generation of emissions, lifecycle (disposal /recycling), including packaging, for products offered for sale and shall be governed by applicable law.



- 3.3.3. Conservation (reduce) shall be considered the primary and most acceptable form of environmental sustainability followed by reuse and then recycling.
- 3.3.4. Recycling processes must ensure that the waste is truly recycled and provides positive economic value to a buyer or recycler of material that is excess or considered waste to our business operations. Recycling cannot be a sale or donation to a third party to transfer the responsibility for the materials disposal or a method to avoid our ethical responsibilities under this policy.
- 3.4. *Metrics:* All locations will accurately report internally on a quarterly basis metrics related to their environmental and social performance. These metrics may change over time as stakeholders request new or different information. All external communications will be done at the consolidated corporate level only. Current data collection includes: Revenue, number of employees (including temporary and contract), factory and office space (ft²), Injuries, lost time incidents, hazardous waste, solid waste or non-hazardous waste, recycling, VOC emissions, NO_x (oxides of nitrogen), toxic chemical inventory, fresh water consumption, waste water disposal (sewer or other publicly or privately operated treatment works), electricity and or gas. The metrics shall be reported in totals and intensity for goal setting, benchmarking, and internal performance comparison purposes.
- 3.5. *Goal Setting:* The Company will set goals in line with best practices for organizations like the Company's. These shall be multi-year goals based on prior performance.
- 3.6. *Continuous Improvement:* As the Company frequently acquires additional businesses, performance improvement will be based upon intensity of the measured inputs and outputs on a companywide, country, or other segmentation and location basis. Where comparisons can legitimately be made absolute quantities may also be used. Measurements will look at the results of reduce, reuse, and recycle activities as they impact the environment.
- 3.7. *Management Systems:*
 - 3.7.1. *Policy* -The Company's management shall define in writing, in clear language, the Company's policy for environmental sustainability, and display this policy in a prominent, easily viewable place on Company premises, to inform personnel that it has chosen to comply with the requirements of the Policy. Such policy shall clearly include the following commitments:
 - (a) To conform to all requirements of this policy.
 - (b) To comply with national and other applicable laws and other requirements.
 - (c) To review regularly in order to continually improve, taking into consideration changes in legislation and any other company requirements.



(d) To see that the policy is effectively documented, implemented, maintained, communicated, and made accessible in a comprehensible form; and

(e) The Director of Sustainability shall make the policy publicly available in an effective form and manner to interested parties, upon request.

3.7.2. *Process*: The processes applicable to this policy shall follow the ISO 14001 process. Each manufacturing facility of the Company will attain third party ISO 14001 certification or registration. Facilities as part of a business acquisition will have two years from the date of acquisition to attain ISO 14001 certification.

3.7.3. *Management Representative* - The company shall appoint a Sustainability Leader for each Business Unit who, in addition to other responsibilities shall ensure that the requirements of this standard are met at each facility within the Business Unit.

3.7.4. *Management Review* – The ESG Steering Committee will periodically review the adequacy, suitability, and continuing effectiveness of the Company’s environmental sustainability policy. The Sustainability Representative at each location shall periodically review the location’s EMS for adequacy, suitability, and continuing effectiveness focusing on continuous improvement.

3.7.5. *Planning and Implementation* – The Company shall ensure that the requirements of this Policy are understood and implemented at all levels of the organization.

3.7.6. *Suppliers/Subcontractors and Sub-Suppliers*:

3.7.6.1. The Company shall maintain appropriate records of environmental sustainability commitments of suppliers, subcontractors and (where appropriate ²) sub-suppliers, including, but not limited to, contractual agreements and/or the written commitment of those organizations to: (a) Conform to all requirements of this Policy and to require the same of sub-suppliers; (b) Participate in monitoring and reporting activities as requested by the Company; (c) Identify the root cause and promptly implement corrective and preventive action to resolve any identified non-conformance to the requirements of this Policy; (d) Promptly and completely inform the Company of any and all relevant business relationship(s) with other suppliers, subcontractors and sub-suppliers.

². “Where appropriate” shall be defined as whenever a supplier does not manufacture substantially all of the purchased component or raw material. Applicable situations would be when supplier does only conversion, limited assembly or acts as a distributor or sales agent only, where the primary components or raw material can be identified.



3.7.6.2 Carlisle shall establish, maintain, and document in writing appropriate procedures³ to evaluate and select suppliers, subcontractors and (where appropriate⁴) sub-suppliers, considering their performance and commitment to meet the requirements of this policy.

3.7.7. *Addressing Concerns and Taking Corrective Action:*

3.7.7.1. The Company provides confidential means for all personnel to report non-conformances with this or any other policy to Carlisle management. This may be done through the same channels currently available for Code of Business Conduct concerns that include your supervisor, human resources, and the General Counsel, or the Board of Directors. The Company shall investigate, address, and respond to the concerns of personnel and other interested parties about conformance/non-conformance with the Company environmental sustainability policy.

3.8.7.2. The Company shall identify the root cause, promptly implement corrective and preventive action, and allocate adequate resources appropriate to the nature and severity of any identified non-conformance with the Carlisle environmental sustainability policy.

3.7.8. *Outside Communication and Stakeholder Engagement* – The Company shall establish and maintain procedures to communicate regularly to all interested parties data and other information regarding compliance with the requirements of this policy, including, but not limited to, the results of management reviews.

3.7.9. *Records* -The Company shall maintain appropriate records to demonstrate conformance to the requirements of this policy.

³ The procedure may be electronic or manual and may include self-assessments or on site assessments. On site assessments shall carry increased weight in any rating or screening system.

⁴ See footnote #2.