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## Responsible Care® Management System Policy

Gantrade Corporation is an active supporter of the Responsible Care® Program. Responsible Care® is moving beyond codes of management practices to achieve better EHS&S performance and obtain more business value for our members and Partners. The Responsible Care Management System (RCMS) replaces the current practice of applying six Codes (e.g., community awareness and emergency response, distribution, employee health and safety, pollution prevention, process safety and product stewardship) with a combined 106 management practices. Instead, relevant aspects of the existing Codes are subsumed into a RCMS that is based on benchmarked best practices of leading private sector companies, initiatives developed through the Global Environmental Management Initiative, International Standards Organization and other bodies, and requirements of national regulatory authorities. Gantrade Corporation through its RCMS makes the following commitments:

The basic framework for Gantrade's RCMS includes:

Policy & Leadership

- Leadership Responsibility - Commitment

Planning (PLAN)

- Define Risks/Hazards - Objectives & Targets
- Process/Program Development - Communications

Implementation, Operation & Accountability (DO)

- Training - Documentation
- Procedures - Management of Change and Employee Empowerment

Performance Measurement & Corrective Action (CHECK)

- Self-Assessment - Incident Investigations
- Internal Audits - Records Management
- Corrective/Preventative Action - Measurements

Management Systems Review (ACT)

- Management Systems Review

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