

## **Appendix D – Environmental Management Systems**

Northfleet Mill has an established Environmental Management System (EMS) to ensure that environmental protection is of primary consideration to the activities of the site. The EMS provides a documented environmental management plan written to implement the site's environmental policy, to make certain that all the effects of the activities of the site conform to the site policy and its associated objectives and targets, to continually reduce the impact on the environment and to strive for continuous improvement.

Kimberly-Clark Corporation has developed its own Environmental Health and Safety (EHS) management system that is aligned to, and functionally compatible with, ISO 14001 (Environmental Management Systems) and ISO 45001 (Occupational Health & Safety Management). The site is also has ISO 9001 certification (Quality Management Systems). The alignment to ISO standards should allow Northfleet Mill to gain external certification of their Environmental Management System in 2026.

The Kimberly Clark Corporate EHS MS has been implemented at Northfleet Mill for many years. Successful implementation of the K-C MS is determined by an annual site based self-assessment, periodic internal Corporate EHS audits and, where necessary, third party external audits.

The KC and Northfleet EHS MS is comprised of the following elements:

#### **ELEMENT 1 - POLICY AND ORGANIZATION**

Element 1.1 – EHS Policy

Element 1.2 – Leadership Roles and Responsibilities

Element 1.3 – EHS Steering Committee

Element 1.4 – Employee Involvement

#### **ELEMENT 2 – PLANNING**

Element 2.1 – Identification of EHS Regulatory and Legislative Requirements and K-C Standards

Element 2.2 – EHS Aspects/Hazards and Impacts

Element 2.3 – Critical Task Analysis

Element 2.4 – Critical EHS Equipment

Element 2.5 – EHS Improvement Plan

#### **ELEMENT 3 - IMPLEMENTATION AND OPERATION**

Element 3.1 – Training Awareness and Competence

Element 3.2 – Communication

Element 3.3 – Control of Documents and Records

Element 3.4 – Operational Control

Element 3.5 – Emergency Preparedness and Response

#### **ELEMENT 4 - CHECKING AND CORRECTIVE ACTION**

Element 4.1 – Monitoring and Measurement

Element 4.2 – Evaluation of Regulatory Compliance

Element 4.3 – Incident Investigation

Element 4.4 – Planned Inspections

Element 4.5 – Corrective and Preventive Actions

Element 4.6 – EHS Assessments

## **ELEMENT 5 - MANAGEMENT REVIEW**

Element 5.1 – Management Reviews

A management review to check the effectiveness of the EMS is carried out bi-annually to review EMS performance. Programs, Procedures or Work Instructions are controlled documents forming part of the Site's EMS.

The EHS MS will be reviewed and amended as necessary to accommodate the proposed modifications discussed in the EPR Variation and to ensure continued compliance with the BAT1 requirements.