



NORTHERN TECHNOLOGIES INTERNATIONAL CORPORATION ENVIRONMENTAL MANAGEMENT SYSTEM (EMS POLICY)

Environmental Policy

- ✓ NTIC will strive to remain the premier supplier of innovative corrosion inhibiting packaging in the world. Maintenance of this position demands that the company supply increasingly effective, high-quality products while engaging in the continual improvement of process efficiency and customer satisfaction, environmental responsibility, and the prevention of pollution by setting and reviewing environmental and quality objectives and targets.
- ✓ NTIC will abide by all applicable laws, regulations and internal standards.

Purpose

It is Northern Technologies International Corporation's (NTIC) policy to comply with environmental laws and regulations applicable to its businesses around the world and to manage its businesses in an environmentally responsible manner. NTIC has an environmental management system (EMS) to establish the operational controls related to the identified significant environmental aspects of NTIC's internal operations and activities; the goods and services used by NTIC and communicating relevant requirements to our suppliers and subcontractors.

Establishment, oversight and enforcement of the EMP policy is the duty of the CEO. The allocation of resources needs to maintain and improve the policy on an annual basis is considered as a part of the annual budgeting process.

NTIC's EMS assists in development and implementation of plans and activities to minimize, avoid and manage impacts of the environment.

- a. NTIC identified which operations and activities associated to the significant environmental aspects and carried out under specified conditions.
- b. Documented procedures are established and maintained to control situations where the absence of them could lead to deviations from the environmental policy, objectives and targets.

- c. Management ensures that procedures are in place for internal operations and activities associated with significant environmental aspects for the employees. Details of operational controls can be found in area manuals.
- d. Suppliers are notified of the EMS and relative requirements to be considered as a supplier to NTIC.

NTIC has determined the following as significant aspects:

- 1) Disposal of scrap film generated by subcontractors
- 2) Recycling and composting internally generated waste
- 3) Electricity, lighting, heating & cooling of building
- 4) Handling, storage & disposal of hazardous material
- 5) Disposal of NTIC product after use

NTIC created a listing of legal requirements. The listing is followed to ensure all legal requirements are met each year. The listing is reviewed annually to ensure that current requirements are up to date and any new requirements are added.

- a. Identify Requirements: A variety of sources are used to identify, track, and evaluate applicable laws and regulations. Sources include but are not limited to: Federal, state and local government and regulatory agencies; Trade associations; Commercial services and/or databases; Customers; Environmental training from outside sources.
- b. Evaluate: The evaluation of the applicable laws, regulations and other requirements and determines what actions are necessary for compliance or implementation. Outside sources, such as county assistance programs, consultants or attorneys may be used to assist in this evaluation or in developing programs in response to requirements.
- c. Communication: Information on applicable laws, regulations and other requirements and their potential impacts on NTIC's activities, products and services to appropriate personnel. This communication may take place during training sessions, employee meetings or management reviews.
- d. The listing includes the following information:
 - Requirement – The citation or title of the requirement.
 - Type – Law, regulation, industry standard, voluntary standard or customer-based requirement.
 - Access – How NTIC accesses the current version of the requirement. Options are maintaining a copy of the requirement on site, ability to obtain from an outside source within a reasonable time period, or access on the Internet.
 - Last Review – The date of the last review of the requirement. This includes reviewing the requirement and how it is addressed at NTIC.
 - Section for Compliance – Specific section(s) the law, regulation or industry standard that NTIC must be in compliance with.
 - Relevant Procedure(s) and Work Instructions – Indicates what NTIC has put into place to ensure compliance.

- Actions Required to Fulfill Compliance – Tasks that are completed on a regular basis to ensure continued compliance with the law, regulation or industry standard.
- To be Completed – When completion of the tasks are due.
- Actual Completion – When Actual completion of the task occurs.