

Environmental, Health and Safety Management System (EHS MS) – Context-Risks of the Organization

SMT Corp.'s strategic direction is for leadership to lead by example, to operate with integrity and provide a healthy, safe and empowering work environment while handling materials in an environmentally safe manner. This high level of commitment motivates SMT Corp. and its personnel to meet or exceed environmental/occupational, health and safety management system requirements, complying with state and federal laws while striving for continuous improvement.

Internal (IE) /External Entities (EE)	IP= Interested Parties SH= Stakeholders	Needs and Expectations (NE) Compliance Obligation (CO)	Risks / Opportunities	Mitigation	Follow-Up
EE - Customers	SH	NE/CO - Proper handling and recycling of electronic hazardous waste	Damage to the environment. Non-compliance to relevant new or changed regulatory requirements	Proper handling of HEW; utilizing downstream vendors who responsibly handle and recycle HEW.	Confirm at next Internal Audit; verify vendor approval process is being performed
		NE/CO - Focus Materials derived from HEW is packaged and shipped in a manner to prevent exposure to the environment	Damage to the environment. Non-compliance to relevant new or changed regulatory requirements	Proper packaging of Focus Materials	Confirm at next Internal Audit; verify vendor approval process is being performed
		NE - Shipment of product to customer that meets their expectations	Creation of additional scrapped material that may have been caused by defective product shipped to the customer. Additional carbon footprint due to additional shipping requirements for defective product.	QMS Controls to ensure acceptable product shipped to the customer.	Confirm at next Internal Audit
		NE - Customer RoHS requirements	Hazardous material entering the waste stream at EOL. Additional carbon footprint due to additional shipping requirements for defective product.	Contract review and communication to the supplier requiring RoHS compliance. Internal laboratory testing and confirmation.	Confirm at next Internal Audit

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EE - External Providers	SH	NE - RoHS Compliant materials	Non-compliant materials entering the waste stream at EOL. Additional carbon footprint due to additional shipping requirements for defective product.	Flow down of requirements to the supplier via purchase order; internal laboratory testing and confirmation of conformance to the requirement.	Confirm at next Internal Audit; verify vendor approval process is being performed, monthly evaluations of performance
		NE - Shipment of acceptable materials to the organization	Creation of additional scrapped material that may have been caused by defective product shipped to the customer. Additional carbon footprint due to additional shipping requirements for defective product.	QMS Controls to ensure acceptable product shipped to the customer.	Confirm at next Internal Audit; verify vendor approval process is being performed, monthly evaluations of performance

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IE - Employees	SH	NE/CO - Following internal EHS MS procedures	Non-conformance to lead to potential environmental escapes. Non-compliance to relevant new or changed regulatory requirements.	Proper training / auditing / tracking of EHS MS performance. Effective internal communication regarding EHS requirements.	Confirm at next Internal Audit; discuss during the Management Review Meeting, evaluate resources, and work environment
	SH	NE – Safe working conditions (slips, trips, falls, injuries)	Work Related Injuries	Proper training and effective communication in safety protocols	Confirm at next Internal Audit; discuss during the Management Review Meeting, evaluate resources, and work environment
(IE – Employees Cont.)	SH	NE – Proper PPE for all relevant and required work procedures	Work Related Injuries. Non-compliance to relevant new or changed regulatory requirements	Proper training and effective communication in safety protocols	Confirm at next Internal Audit; discuss during the Management Review Meeting, evaluate resources, and work environment
Internal (IE) /External Entities (EE)	IP= Interested Parties SH= Stakeholders	Needs and Expectations (NE) Compliance Obligation (CO)	Risks / Opportunities	Mitigation	Follow-Up
EE - Regulatory Agencies, national and international	IP	CO - CT DEEP Standards for HW Management 22a-449(c)	Extra regulatory burden placed on the organization by DEEP. Non-compliance to relevant new or	Report mass balance on a quarterly basis as required.	Confirm at next Internal Audit

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			changed regulatory requirements		
		CO - RCRA Waste requirements 22a-449(c)	Extra regulatory burden placed on the organization by DEEP. Non-compliance to relevant new or changed regulatory requirements	Track and dispose of RCRA regulated wastes as required by DEEP.	Confirm at next Internal Audit
EE - Certification Bodies	SH	CO - Maintain conformance to ISO14001, ISO45001, R2	Risk – Loss of certification	Implementation and maintenance of the EHS MS. Continual improvement and verification of compliancy to environmental system certifications	Performing Internal Audits to verify compliance to standards
			Opportunity - Retain current and potential new customers	Implementation and maintenance of the EHS MS. Continual improvement and verification of compliancy to environmental system certifications	Performing Internal Audits to verify compliance to standards
Internal (IE) /External Entities (EE)	IP= Interested Parties SH= Stakeholders	Needs and Expectations (NE) Compliance Obligation (CO)	Risks / Opportunities	Mitigation	Follow-Up
EE - Political Climate	SH	CO - Changing regulatory requirements	Non-compliance to relevant new or changed regulatory requirements	Diligent review of federal, state, and local regulatory agencies.	
		NE - Stable political environment	Increased cost of business or loss of business as a result of the change in	Verifying and reviewing changes to any laws that affect the industry	

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			the political environment		
EE - Utility and Energy Companies	SH	NE - Reduce energy consumption	Increased energy usage increases the organization's carbon footprint	Continual improvement of internal business processes	
EE - Insurance Companies	SH	CO - Reportable spills	Increases expenses related to insurance	Proper spill containment and reporting processes.	Performing Internal Audits and HAZCOM drills
		CO - Safe work environment	Injuries to employees resulting in higher insurance costs	Compliance and continual improvement to the EHS MS	Performing Internal Audits to verify compliance to the EHS Management System
Internal (IE) /External Entities (EE)	IP= Interested Parties SH= Stakeholders	Needs and Expectations (NE) Compliance Obligation (CO)	Risks / Opportunities	Mitigation	Follow-Up
EE - Facility Contractors/Providers	IP	NE/CO - Following internal EHS MS procedures	Potential environmental escapes or injuries to employees	Effective communication regarding EHS requirements.	Performing Internal Audits to verify compliance
		NE – Safe working conditions (slips, trips, falls, injuries)	Work Related Injuries	Effective communication in safety protocols	Performing Internal Audits to verify compliance
		NE – Proper PPE for all relevant and required work	Work Related Injuries	Effective communication in safety protocols	Performing Internal Audits to verify compliance

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REVISION LOG

REVISION LEVEL	REVISION DATE	DESCRIPTION OF CHANGE	APPROVED BY
1	05/12/2017	Initial Creation	KCosta
2	06/29/2020	Reviewed and revised for business activities and added a column to categorize Internal/External entities as IP or SH and to become compliant with the upgraded ISO45001 standard	KCosta
3	06/09/2022	Added evaluation column and notes form Management Review Meeting	KCosta
4	06/21/2023	Updated notes from Management Review Meeting	Kimberly Costa
5	04/24/2024	Defined what was considered a Need & Expectation (NE), Compliance Obligation (CO) or both. Defined what was considered an Internal (IE) and External Entities (EE). Added additional employee hazard and emergencies identified as a risk and the potential of changes to regulations, etc. Added Facility Contractors/Providers as an external entity	Kimberly Costa

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