



PRODUCT STEWARDSHIP POLICY

As one of the world's leading carbon black manufacturing companies, Birla Carbon and its affiliate companies create products that contribute to an enhanced standard of living for people throughout the world.

Birla Carbon recognizes that effective Product Stewardship is key to minimizing the health, safety and environmental impacts of our products. We are committed to go beyond legislative obligations: from technology selection, classification and labelling, communication, handling and safe disposal of our products.

Every Birla Carbon site shall endeavor to:

- Comply fully with all laws and regulations applicable to our manufacturing processes and products;
- Implement quality assurance and control systems according to international standards to ensure product and process integrity at all times;
- Identify substances and processes of high risk to health and environment and adhere to the substitution principle, to find safer alternatives;
- Maintain a robust product testing program based on methodologies developed by internationally recognized governing bodies to assure confidence and transparency in our product information and certifications/declarations throughout the supply chain and to all stakeholders;
- Ensure product stewardship is engaged across the life-cycle of our products: sourcing, development, commercialization, improvement and discontinuation of products;
- Respond promptly to requests from customers and other stakeholders about the health, safety and environmental aspects of our products; informing our customers whenever testing indicates any non-conformance that may impact their specifications;
- Monitor the development of emerging laws, regulations, and standards that impact our products and our customers' products in order to guide customers on the appropriate use of our carbon black;
- Provide information and training programs to customers, distributors, suppliers, contractors, employees, and other stakeholders about the environmental, health, and safety aspects of our products to foster the safe use, storage, handling, transport and disposal of our products;
- Actively communicate and make available in local languages all information on safe handling of substances marketed and refrain from advising uses that are deemed to be unsuitable or unsafe to the public or to the environment.



Joseph M Gaynor, Jr.
Chief Legal, Sustainability
and Risk Officer

Date: 12th July 2018