



Committed to Environment, Health and Safety

Environment, Health and Safety Management System and Policy of GCP Applied Technologies Inc.

SEPTEMBER 1, 2017

The GCP Environment, Health, and Safety Management System provides the framework and performance expectations for planning, prioritizing, implementing, measuring, and continually improving our environment, health and safety performance.

1. Establishing a Framework and Context of the Organization

1.1 Framework

The Environment, Health, and Safety Policy and Management System guide the company and our facilities worldwide in systematically managing the environmental, health and safety (EHS) aspects of our operations. It demonstrates and documents how EHS is integrated into GCP business processes and functions including but not limited to Human Resources, Supply Chain Management, Strategic Planning, Manufacturing, Mergers and Acquisitions.

The system sets forth performance expectations that address EHS leadership and commitment, hazards and risks, opportunities, training and communication, operational control, goals and target setting, assurance, compliance management, evaluation of compliance, performance evaluation, and periodic internal review.

This document sets forth the minimum EHS requirements that every GCP location must meet. The requirements are based on the ISO 14001 and OSHAS 18001 international standards for environment and safety management systems, as well as industry best practice and existing internal performance expectations. The EHS Management System enables consistent and reproducible performance across all GCP facilities.

1.2 Context of the Organization

During the planning stages, it is important for the location to determine the internal and external issues that are relevant to its operations. Internal issues might include strategic direction of the business, corporate culture and capabilities of the available resources. External issues may include political, legal and regulatory aspects. The location should also consider environmental conditions, which may include the availability of natural resources, climate and land use.

The location should consider the needs of interested parties in establishing the EHS Management System. The location should identify and document, at a high level, the needs of internal and external stakeholders that are relevant to the EHS Management System. In addition, to the extent the location commits to requirements of a stakeholder, the management system must reflect the commitment in the legal and other requirements section of the system.

Each location must set the scope of its EHS Management System, considering the internal and external issues mentioned above, compliance obligations, the breadth of the operations, its activities, products and services and its ability to exercise control and influence over these items.

The following sections of this document present the technical specification of the GCP EHS Management System. Locations will comply with both the letter and spirit of this document and provide assurance that its management system can achieve its intended outcomes and prevent or reduce undesired effects, including the potential for external environmental conditions to affect the location. The location must document the interactions of the various elements to understand how change affects the system.

This document presents the GCP EHS Policy and performance standards for the GCP EHS Management System.

Included in Appendix A are the roles and responsibilities for GCP management and employees in supporting, developing, implementing and monitoring the EHS Management System at the corporate, operations and facility levels.

Definitions for key terms used in this document are included in Appendix B.

2. Leadership and Commitment

2.1 Leadership and Commitment

Top management shall take accountability for the effectiveness of the Management System by:

- Ensuring that the strategic plans of the organization and the management system objectives are compatible and integrated.
- Ensuring that the appropriate resources are available and that the management system can interact with the existing business processes.
- Delegating, directing and providing leadership to personnel to ensure objectives and targets are met.
- Ensuring that critical objectives, aspects, and performance metrics and results are continually communicated effectively to all stakeholders.

Top management should be able to demonstrate knowledge of the management system objectives and provide an overview of where these sit within the organization's overall vision.

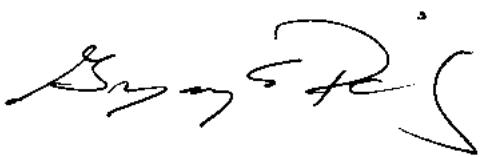
2.2 Environment, Health, and Safety Policy

GCP Applied Technologies Environment, Health and Safety Policy

GCP Applied Technologies is committed to protecting the environment and the health and safety of our employees, customers and communities in which we operate, while fully complying with applicable laws, regulations and our own global standards. We are committed to providing a safe and healthy work environment as a prerequisite of our operations; continuous improvement towards minimizing our environmental impact and the environmental impact of our customers and preventing pollution; and providing world-class products that can be used safely by our customers.

We seek to continually improve our EHS performance by setting objectives around reducing injuries with an ultimate goal of zero injuries, monitoring of our environmental metrics, delivering products that minimize our customer's environmental footprint, providing training to our employees, contractors and customers, and reducing EHS-related risks.

While safety and environmental protection are ultimately the responsibility of each of us, GCP will provide a safe and healthy work environment, and ensure that safety, environmental and ethical policies are incorporated into the planning and execution of our business.



Gregory E. Poling

President and Chief Executive Officer

2.3 Organizational Roles, Responsibilities and Activities

Top management at the facility is responsible for ensuring that management system's organizational roles, responsibilities, and authorities are assigned and communicated within the organization, as well as ensuring the performance of the management system.

The organization shall provide resources and define roles, responsibilities, and authority necessary to establish, implement, maintain, improve, and review EHS compliance and the Management System. EHS roles and responsibilities at all levels must be documented and communicated.

The main management system's organizational roles and responsibilities include:

- Allocation of resources (human, financial, and technological) to meet general EHS Management System requirements, objectives, targets and to maintain EHS compliance.
- Reporting on the performance of the management system to top management.
- Day-to-day operation of the management system.

3. Planning

3.1 Identification of Hazards, Risks and Opportunities

The organization shall maintain programs to identify and manage significant EHS hazards and risks associated with its processes, operations, products and other activities.

Programs shall include:

- Regular assessment of EHS hazards, positive and negative impacts, their probability of occurrence and severity of outcome associated with routine, abnormal and emergency situations (Including those that originate outside the workplace capable of adversely affecting the health and safety of persons in the work place and hazards created in the vicinity of the workplace by work-related activities);
- Hazard identification and risk assessment should take into account infrastructure, contractors and visitors; design of work areas, processes, installations, machinery, equipment, operating procedures, products, human behavior and other human factors;
- Communication of actual and potential EHS hazards and risks to various functions and levels of the organization as appropriate;
- Consideration of hazards identified through Management of Change including temporary changes; and
- Assurance that results of internal prioritization process, existing information, and third party assessments are considered and evaluated when maintaining the EHS Management System.

The methodology for risk and hazard identification shall:

- Be defined with respect to its scope, nature and timing to ensure it is proactive rather than reactive; and
- Provide for the identification, prioritization and documentation of risks, and the application of controls, as appropriate.

3.2 Compliance Obligations

The organization shall identify, access, communicate and comply with up-to-date applicable EHS legal and other requirements, and have programs to:

- Identify, access, understand and communicate applicable EHS laws, regulations, permits, and other requirements;

- Communicate compliance and other EHS obligations to employees and other interested parties;
- Maintain a system to comply with EHS laws, regulations, permits, and other requirements; and
- Maintain appropriate EHS documents and records consistent with applicable legal and other requirements.

3.3 Objectives, Targets and Programs

The organization shall develop objectives, targets and programs to provide for continual improvement in EHS and business performance. Objectives and targets shall:

- Fulfill our EHS Policy;
- Consider significant EHS risks;
- Address legal and other requirements;
- Address EHS risk and opportunity, and continually improve EHS performance;
- Measure EHS and business performance and be tracked and reported to internal and external stakeholders; and
- Consider technological options; financial, operational and business requirements; and input from the business, stakeholders, and other interested parties;

Programs shall:

- Be developed, documented and periodically reviewed to ensure objectives and targets are met and updated as appropriate;
- Identify responsibility and authority for achieving objectives and targets as well as necessary time frames and resources; and
- Consider integration of EHS objectives in GCP business processes.

4. Support and Operation

4.1 Competence, Training and Awareness

The organization shall provide resources and maintain programs for EHS training, awareness, and competency. Programs shall include:

- Identification, documentation, and implementation of individual EHS training needs, including specialized training as appropriate to ensure that individuals have appropriate education, training and/or experience;
- A means to make individuals aware of their role in the management system, including the benefits of improved personal performance;
- A means to make individuals aware of the actual and potential EHS hazards and risks associated with their work;
- A process to review and document the effectiveness of EHS training and competency;
- Training that addresses location-specific management systems, EHS programs, procedures, controls, responsibilities, risk and significant actual or potential EHS risks;
- Communication on the importance of conformance with the EHS Policy and Management System and the consequences of non-conformity; and
- Maintenance of appropriate EHS training records.

4.2 Communications

The organization shall have EHS communication programs that:

- Include what to communicate, when to communicate, with whom to communicate and how to communicate
- Communicate relevant internal EHS developments, changes and related matters among various levels and functions and external stakeholders as appropriate;
- Ensure employees and others under its control can contribute to the development and implementation of the EHS Management System including opportunities for continual improvement;

- Communicate relevant and reliable EHS information to external stakeholders and other interested parties as established by the organization's communication process(es) and as required by its compliance obligations;
- Consult with relevant external interested parties about EHS matters when appropriate; and
- Include a process to receive, assess, and respond to EHS-related communications and inquiries from external stakeholders and other interested parties;

4.3 Participation and Consultation

The organization shall establish, implement and maintain a procedure(s) for the participation of workers by their:

- Appropriate involvement in hazard identification, risk assessments and determination of controls;
- Appropriate involvement in incident investigation;
- Involvement in the development and review of EHS policies and objectives;
- Consultation where there are any changes that affect their health and safety; and
- Representation on occupational health and safety matters;

The organization shall consult with contractors where there are changes that affect their health and safety. The organization shall ensure that, when appropriate, relevant external interested parties are consulted about pertinent EHS matters.

4.4 Documented Information

The organization shall maintain, or have access to, EHS Management System documented information that includes:

- The Management System policy, objectives, scope, main elements of the system and their interactions, references to related documents, records and other information deemed necessary for the effectiveness of the management system.
- Mechanisms to update the management system including document control, revision tracking and approval authorities.

4.5 Control of Documented Information

The organization shall have programs to control and manage relevant internal and external EHS documents and records including ensuring documents and records are:

- Readily identifiable, legible, dated, retrievable, and periodically reviewed as appropriate;
- Created, modified, and approved by authorized and qualified personnel prior to use;
- Maintained in an appropriate manner, and protected and secured as appropriate; and
- Removed, destroyed or archived when determined to be obsolete.

4.6 Operational Planning and Control

The organization shall have Operational Control Programs to manage identified significant EHS hazards and risks associated with internal and outsourced processes, including:

- Established and effective operating criteria, procedures, and processes addressing actual and potential hazards and risks. When determining or changing controls, consideration shall be given to reducing the risks according to the following hierarchy:
 - a. Eliminator
 - b. Substitution
 - c. Engineering controls
 - d. Signage/warnings and/or administrative controls
 - e. Personal protective equipment.

- Established and effective Management of Change processes applicable to raw materials, products, processes, operations, facilities and equipment;
- A formal product commercialization approval process addressing EHS requirements for all new, modified and existing GCP products throughout their lifecycle; and
- Purchasing and procurement controls that address appropriate EHS requirements.

4.7 Emergency Preparedness and Crisis Response

The organization shall have a documented Emergency Preparedness and Response Plan which includes:

- Identification of the potential for emergency situations;
- Preparations to respond by planning actions to prevent or mitigate adverse EHS impacts from emergency situations while considering the needs of relevant interested parties;
- Responses to actual emergency situations and actions to prevent or mitigate the consequences of emergency situations appropriate to the magnitude of the emergency and the potential EHS impact;
- Relevant information and training related to emergency preparedness and response, made available to relevant interested parties and persons working under its control;
- Periodic testing of the planned response actions to ensure adequacy, preparedness and effectiveness of the plan, involving relevant interested parties as appropriate; and
- Periodic reviewing and revision of the plan and response actions, in particular after periodic testing or the occurrence of emergency situations.

5. Performance Evaluation and Improvement

5.1 Monitoring and Measurement

The organization shall establish programs to:

- Determine what needs to be monitored and measured, how and when monitoring and measuring will be conducted and the criteria against which the organization will evaluate its performance;
- Determine when the results from monitoring and measuring will be evaluated;
- Monitor and measure operations, activities and incidents that present significant EHS hazards and risks by both quantitative and qualitative methods as appropriate;
- Maintain and calibrate equipment that control EHS hazards and risks;
- Monitor, measure, and report progress towards achieving EHS objectives and targets;
- Monitor, measure, and maintain effectiveness of operational controls;
- Review and communicate EHS objectives, targets, and performance trends; and
- Document results of monitoring, measurement, analysis, evaluation and equipment calibration.

5.2 Evaluation, Monitoring, and Review of EHS Compliance and EHS Management System Conformance

The organization, as appropriate, shall establish programs to assure EHS compliance and EHS Management System conformance through periodic auditing and assessment. These programs shall:

- Verify compliance with laws and regulations and conformance with the EHS Management System requirements and other requirements as appropriate;
- Establish periodic internal audits of the effectiveness of the EHS Management System;
- Assure and verify timely and effective corrective and preventive actions;
- Ensure audits are performed by objective and impartial auditors;
- Identify the responsibilities, competencies, and requirements for planning and conducting audits,

reporting results and retaining associated records;

- Include communication mechanisms that ensure audit results and follow-up are documented and communicated to management; and
- Include a formal process to establish and communicate audit frequency, schedule and scope.

5.3 Non-Conformity, Corrective Action and Preventive Action

The organization shall establish preventive and correction action programs and processes to identify, document, communicate, and correct EHS non-conformances. These programs and processes shall include:

- Conducting formal incident investigations and root cause analysis of identified EHS non-conformance;
- Implementing timely and effective corrective action, tracking corrective and preventive actions to closure and reviewing the effectiveness of corrective actions taken;
- Identifying opportunities for continual improvement or other changes to the EHS management system as appropriate; and
- Communicating and sharing best practices and lessons learned across facilities.

5.4 Management System Review

The organization shall establish programs to provide for top management review at planned intervals to ensure the continuing suitability, adequacy and effectiveness of the EHS management system. These programs shall ensure a review of:

- The status of actions from previous management reviews;
- The extent to which EHS objectives have been achieved;
- Status of incident investigations, corrective actions and preventive actions;
- The EHS Policy, EHS goals and objectives, and the suitability and performance of the EHS Management System. The performance review will include trends in:
 1. Nonconformities and corrective actions,
 2. Monitoring and measurement results,
 3. Fulfilment of its compliance obligations and
 4. Audit results.
- Status of implementation of the EHS Management System;
- Adequacy of resources;
- Relevant communication(s) from interested parties, including complaints;
- Changes in relevant internal and external EHS issues including needs and expectations of interested parties, compliance obligations, significant EHS hazards, risks and opportunities;
- Opportunities for continual improvement and changes to the EHS Management System;

The outputs of the management review shall include:

- Conclusions on the continuing suitability, adequacy and effectiveness of the EHS Management System;
- Decisions related to the continual improvement opportunities and changes to the EHS Management System;
- Opportunities to improve the integration of the EHS Management System;
- Follow-up actions needed when objectives are not met;
- Any implications for the strategic direction of the organization

The Management Review shall be documented.

Revision History

Version	Date	Summary of Changes
0		
1	September 1, 2017	New GCP EHS Management System
2		
3		
4		
5		

APPENDIX A: Roles and Responsibilities

Board of Directors

Monitor the company's EHS strategic direction and its objectives and targets.

Chief Executive Officer

Establish, reinforce and communicate GCP's commitment to its EHS Policy; review EHS Management System as necessary to achieve the commitments of the EHS Policy, Corporate EHS standards, objectives and targets; promote a culture of continuous improvement in environmental, health, safety, process safety, product safety, and security performance.

Executive Leadership Team

Monitor overall EHS Management System implementation and EHS performance of the company; provide management support for EHS program activities related to development, communication and execution of GCP's EHS Policy, corporate EHS standards, objectives and targets; support a culture of continual improvement in environmental, health, safety, process safety, product safety, and security performance.

Chief Operating Officer

Support the EHS Management System by providing resources necessary to assure conformance with GCP's EHS Policy and Standards, and to meet applicable EHS objectives and targets.

Regional Commercial Leaders

Reinforce and communicate organizational commitment to GCP's EHS Policy and standards; establish operating segment EHS objectives and targets, and support the management programs necessary to achieve them.

Vice President, Operations

Ensure implementation and maintenance of Management System at the facilities in conformance with GCP's EHS Policy and corporate EHS standards to meet applicable EHS objectives and targets; promote a culture of continual improvement in environmental, health, safety, process safety, and security performance

Regional Operations Leaders

Direct implementation and maintenance of Management System at the facilities to ensure conformance with GCP's EHS Policy and corporate EHS standards to meet applicable EHS objectives and targets; ensure a culture of continual improvement in environmental, health, safety, process safety, and security performance.

Vice President, Environment, Health and Safety

Oversee EHS Management System activities and communicate GCP's EHS performance to appropriate stakeholders; drive cultural change through the company by promoting EHS excellence; provide strategic direction to the company for continued improvement of EHS programs.

Facility Managers

Assure the implementation of Facility EHS Management System and provide the resources necessary for conformance with GCP's EHS Policy and standards to meet operating segment EHS objectives and targets; establish, evaluate, and periodically review annual facility EHS objectives and targets; promote a culture of continual improvement in environmental, health, safety, process safety, and security performance.

GCP Employees

All employees are empowered to recognize, eliminate, or report hazards to management. Each employee is encouraged to embrace a culture of EHS excellence and recognize that compliance is a core value of the organization.

APPENDIX B: Definitions

Contract or Toll Manufacturer: A supplier who manufactures a product to GCP's specification

Contractors: Companies or persons that perform work and/or provide services at GCP facilities

Company: GCP Applied Technologies Inc.

Crisis: An incident that involves a fatality, a life-threatening injury, harm to the public or the environment, the potential for substantial harm to the public or the environment, or any event that results in unsolicited media attention

Documents: Written policies, standards, guidance and procedures in paper or electronic form

Environment, Health, and Safety: Environmental, health, safety, product safety, and security (collectively, "EHS")

Environment, Health, and Safety (EHS) Objectives: Actions to minimize significant EHS hazards and risks

Environment, Health, and Safety (EHS) Risks: Elements, activities or hazards of the company's operations with potential human or environmental exposure; a significant environment, health and safety risk is one that has or could have a significant environment, health or safety impact

Environment, Health, and Safety (EHS) Targets: Goals set to drive continual improvement in EHS performance

Facilities: All corporately owned or leased manufacturing and research and development operations, and any office, warehouse, and other facilities which have potential significant environment, health and safety impacts

Facility EHS Management System: The document used to guide a facility in systematically managing the environmental, health, safety, product safety, and security aspects of its operations, consistent with the minimum EHS performance standards described in GCP's corporate EHS Management System.

Interested Third Parties: Individuals or groups concerned with or affected by the company's safety, health, or environment performance

Legal Requirements: Mandates and prohibitions contained in governmental laws, regulations, ordinances, etc., at all government levels (e.g., supranational, national, regional, provincial, state, and local); also includes obligations prescribed by government permits, judicial and administrative enforcement orders, and non-governmental legally-enforceable contracts

Operations: All company activities, products and services, including maintenance, storage, and transport of materials (including off-site transportation and storage of products) and office activities

Other Requirements: Environment, Health, and Safety obligations provided by the company's Environment, Health, and Safety Policy and its EHS Management System Standards, as well as any additional safety, health, and environment requirements prescribed by or committed to by the company, its operating segments and/or its facility management, including voluntary commitments

Records: Data, reports, completed forms, etc., including those relating to EHS Management System training and EHS Management System audit and review results, which are final and not subject to modification

Transporters: Non-GCP personnel who are responsible for shipping products, raw materials, supplies, and other materials to or from a GCP location