

# Environmental Health and Safety Management Plan

## Introduction

In today's highly competitive industry, the advancement of technology and processes has brought about an increased concern for environmental, health and safety issues facing the business community. Because of these issues, the Knoll management team has made a commitment to move from compliance - driven by reactionary concerns to the development of a central strategic management plan. At the heart of the environmental, health and safety strategy lies the ability to measure performance and relate EHS programs to financial success. Knoll must therefore integrate the management of environmental, health and safety issues as early as possible in the business and financial planning cycle.

Knoll's team strongly believes that competitive advantages can be derived from such programs and that the greatest opportunities exist in providing environmentally sound and safe products to differentiate itself from competitors. In order to facilitate the integration of environmental, health and safety issues into the business activities, Knoll has developed an Environmental, Health and Safety (EHS) Management Plan by which it embraces the challenges necessary to proactively manage environmental, health and safety issues and obligations.

The EHS Management Plan encompasses the combined areas of environmental, health, safety and transportation of hazardous materials due to the often overlapping activities and agency regulations. This plan identifies the important issues currently facing Knoll, establishes goals designed to actively address these issues, sets forth a framework in which to operate and establishes a mechanism to monitor progress and assure continual improvement.

## Mission

Our mission has been and continues to be to manufacture affordable, well designed office furnishings in the most environmentally responsible way.

*Knoll is committed to being proactive and responsible for environmental, health and safety issues at our facilities and in our communities, and will:*

- + Manage all our activities in a manner that meets or exceeds compliance with all applicable regulations.
- + Protect and enhance the environment and assure the health and safety of our associates, customers and our communities.
- + Manage and minimize potential liability exposure in environmental, health and safety areas.
- + Develop team players who share a positive global view with the skills and willingness to perform all necessary tasks and who assume responsibility for their actions regarding EHS matters.

## Vision

*Our vision is to establish Knoll as a world class quality office furniture supplier.*

- + Establish Knoll as a model in our industry for sound environmental, health and safety practices and performance in all operations.
- + Developing an ethic within Knoll such that all associates will assume responsibility for and ownership of environmental, health and safety issues in the workplace and in the community.

## Policies

*Knoll reaffirms its commitment to its Directives and policies regarding environmental, health and safety issues and will:*

- + Maintain a copy of and adhere to the Directives and policies regarding environmental, health and safety issues at each of our facilities.
- + Maintain a copy of the EHS Management Plan at each of our facilities and ensure the communication of and adherence to the plan.
- + Identify a responsible, qualified person (professional or manager) at each facility and equip that person with the authority, tools and support necessary to coordinate and implement the environmental, health and safety program.
- + Measure performance against the Environmental, Health and Safety Management Plan.
- + Provide necessary training programs to associates to equip them with the skills and knowledge required to support the Environmental, Health and Safety Management Plan.
- + Update the Environmental, Health and Safety Management Plan on an annual basis.

## Management Responsibilities

The Management Team, comprised of the chairman and executive staff, endorse and support the principles set forth in the Knoll Environmental, Health and Safety Management Plan. To implement this plan the following responsibilities have been assigned:

### Chairman

Endorse and support the Environmental, Health and Safety Management Plan and communicate Knoll's commitment to the Plan to all associates.

### President and CEO

Emphasize to all Knoll associates that operating in an environmentally friendly and in a safe and healthful manner is an integral function of all operations.

Provide necessary resources to implement the Environmental, Health and Safety Management Plan.

Delegate responsibility to the Plant Manager at each site for implementation of the Environmental, Health and Safety Management Plan.

## **Plant Managers**

Knoll plant managers are responsible and accountable for all facility compliance activities and for regular review of these activities. The plant managers also ensure that sufficient resources and personnel are provided for compliance activities and implementation of the Environmental, Health and Safety Management Plan. They shall appoint, in writing, a qualified Environmental Control Office (ECO) and Health and Safety Office (HSO) for each facility.

## **Knoll Corporate EHS Manager**

The Knoll Corporate EHS Manager chairs the Knoll Environmental, Health and Safety Council. The Environmental, Health and Safety Corporate Manager is responsible to implement and monitor Knoll Environmental, Health and Safety Management policy and programs. The Knoll Corporate EHS Manager shall also interface with regulatory agencies.

## **Knoll Environmental, Health and Safety Council**

The Knoll Environmental, Health and Safety Council, comprised of representatives from each Knoll operation meet during the year to discuss EHS issues, develop policies and procedures to deal with these issues and monitor the EHS activities of Knoll.

## **Environmental Control Officer (ECO) and Health and Safety Officer (HSO)**

The site ECO and HSO are responsible for serving as a focal point for communications with Knoll's management, associates and Corporate EHS concerning facility environmental, health and safety issues and concerns. These individuals are responsible for maintaining compliance with federal, state and local EHS statutes and regulations and prompt resolution of audit findings. In addition, their duties include:

### ***Environmental Control Officer (ECO)***

- + Waste minimization
- + Develop and implement training programs
- + Operate environmental systems
- + Evaluate new plant processes for environmental issues
- + Hazardous material transportation
- + Manage the site sustainable program
- + Develop programs to continuously conserve natural resources such as wood and water

### ***Health and Safety Officer (HSO)***

- + Workers' Compensation case management
- + Evaluate new plant processes for safety issues
- + Develop and implement training programs
- + Develop employee participation and awareness programs
- + Implement the Knoll VPP program

## **Issues Analysis**

We will use a proactive approach to address EHS issues. The issues will be identified through self-evaluation and monitoring of EHS regulations. Once an issue is identified, a plan will be developed to address the issue in the most responsible manner.

## Plan Approach And Actions

Knoll strongly supports sound environmental, health and safety principles and has structured this management plan to accomplish these goals. Knoll will update its practices continuously in light of advances in technology and new understandings in health, safety and environmental science. We intend to make consistent, measurable progress in implementing these principles and to apply them to all aspects of our operations throughout the world to meet these objectives. Knoll has established a set of ambitious standards for guiding and reporting on our progress toward becoming a more sustainable company. They are mandated in a comprehensive Environmental, Health and Safety Plan and are defined under Eight Principles that are the foundation of this report.

### 1. Protection of the Biosphere

*We will strive to make continued progress toward reducing or eliminating the release of any hazardous substance in an effort to safeguard all habitats affected by our operations.*

- + We will continue to reduce the use and/or emissions of hazardous air pollutants and volatile organic compounds from our manufacturing operations through the introduction of clean technologies.
- + We will provide water treatment facilities that meet or exceed discharge criteria.
- + We will monitor storm water, conserve water use and develop processes to efficiently use water and minimize water pollution.

### 2. Sustainable Use of Natural Resources

*We strive to make the best use of renewable resources, such as water, soil and forests, and conserve non-renewable resources.*

- + We will make sustainable use of renewable natural resources through efficient use and careful planning.
- + We will continue to seek opportunities to use wood from sustainable forests in our products.
- + We will minimize the use of wooden pallets.
- + We will attempt to recycle or make beneficial use of wood scrap generated in our manufacturing operations.
- + We will continue to recycle steel, aluminum and other metal components.
- + We will continue to seek recycling opportunities for scrap generated in our manufacturing operations.
- + We will continue to utilize post-consumer and post industrial materials in our products where practical.
- + We will be environmentally responsible in our purchase of materials.

### 3. Waste Reduction and Disposal

*We will reduce, recycle, and where possible, eliminate waste and will dispose of all waste using safe and responsible methods. Our goal will be to eliminate the landfilling of waste.*

- + We will seek opportunities to reduce waste and recycle process scrap from our operations.
- + We will dispose of our waste only in well-operated, permitted facilities.
- + We will develop programs to recycle, reuse, and eliminate land disposal of our products.

#### 4. Conservation

*We will conserve energy by improving the efficiency of our internal operations and the goods and services we sell. We will make every effort to use environmentally safe and sustainable energy sources.*

- + We will conserve energy and improve energy efficiency.
- + We will implement a program to upgrade existing low-efficiency motors to higher efficiency motors.
- + We will implement a program to upgrade existing lighting, where practical, at each facility.

#### 5. Risk Reduction

*We will strive to minimize the environmental health and safety risks to our associates and the communities in which we operate through safe technologies, sound transportation practices, safe facilities and operating procedures, and preparing for emergencies.*

- + We will design our processes to prevent injury to the health and welfare of Knoll associates, the community and the environment.
- + We will develop and implement health and safety policies and programs to help prevent injury and illnesses to our associates.
- + We will develop and implement health and wellness awareness and illness prevention programs.
- + We will design and develop training programs to provide Knoll associates with the necessary skills and knowledge to fulfill the objectives of the Environmental, Health and Safety Plan.

#### 6. Safe Products and Services

*We will reduce and, where possible, eliminate the use, manufacture or sale of products and services that cause environmental damage or health or safety hazards. We will inform our customers of the environmental impacts of our product or services in an effort to prevent unsafe use.*

- + We will provide independent testing to help assure the safety of our products.

#### 7. Environmental Restoration

*We will comply responsibly with the law to address conditions we have caused that endanger health, safety or the environment.*

#### 8. Informing the Public

*We will comply with the law to inform in a timely manner those who may be affected by conditions caused by our operations that might endanger health, safety or the environment and will encourage associates to report dangerous incidents or conditions to management.*

### Management Commitment

We will implement these principles and sustain a process that ensures that the Chief Executive Officer is fully informed about pertinent environmental issues and ensures that management is fully responsible for and committed to the EHS policy.

## Annual Report

We will conduct an annual self-evaluation of our progress in implementing this plan. We will annually complete a report of our performance against this plan. Elements contained in the annual report will include the following:

- + Recycling and waste minimization activities for the previous year
- + Injury and illness rates for the previous year
- + Toxic emission trends
- + Energy minimization progress
- + Clean technology programs and progress
- + Ergonomic programs and progress

## Marketing Brochures - Documentation

Knoll will document its efforts and accomplishment in Environmental, Health and Safety marketing brochures.

## Communications

Environmental, health and safety statutes and regulations require that certain significant incidents be reported to regulatory agencies. Failure to report such incidents in a timely manner can subject Knoll and its associates to substantial civil and/or criminal penalties. It is important that designated personnel at all Knoll facilities be aware of incident reporting requirements, and that responsibilities and procedures for reporting incidents be clearly communicated and followed.

In addition, environmental, health and safety inspections by regulatory agencies may result in issuance of citations detailing violations of law or regulation, directing corrective action and/or levying a penalty. A citation, which may also be termed a Notice of Violation, Notice of Deficiency or Order to Comply, is a legal proceeding against Knoll. In addition to line management notification, Corporate EHS and the Law Office will be advised and consulted on the appropriate form and content of all citation responses. Since regulations permit a short time in which to respond, prompt and correct action in dealing with citations is extremely important.

The Knoll Corporate EHS Manager is responsible to ensure that all facilities maintain appropriate environmental, health and safety communications procedures to be used in the event of a spill or release of any regulated material, the violation of any permit condition, or the receipt of any citations.

These procedures will include the identification of specific personnel with responsibility for ensuring that the appropriate contacts are made.

To facilitate communications within Knoll, the following contacts have been identified for environmental, health and safety, transportation and legal issues:

### Environmental, Health and Safety Issues

Lou Newett 215 679-1844

### Product Safety

Charlie Lieb 215-679-1218

### Transportation

Rich Cirulli 215 679-1657

### Legal Issues

John Wilson 215 679-1335