ON Semiconductor Environmental, Health, and Safety (EHS) Management System

Purpose
The ON Semiconductor EHS Management system ensures that environmental, health and safety issues are identified, corrected, and communicated to management. Environmental management procedures conform to ISO 14001 and are certified by third-party audit. Health and Safety management procedures conform to OHSAS 18001 and ON Semiconductor maintains self-declaration of conformance by corporate EHS audit.

Implementation and Operation
Each manufacturing facility employs EHS professionals responsible for EHS compliance and for implementing ON Semiconductor’s internal EHS requirements. In order to ensure compliance, site EHS professionals maintain up-to-date information concerning the facility’s legal obligations. ON Semiconductor has developed a documented procedure requiring these professionals to conduct a quarterly (or more frequent) review of any new or revised legal requirements.

Self-Audit Program
At the center of the EHS management system is the site self audit program. This program includes an audit of all portions of the EHS management system, an evaluation of the site’s compliance status, and reporting mechanisms designed to ensure that management is informed of any EHS-related issue. In performing the annual site self audit, EHS professionals examine the following general components of the system:

- General EHS management requirements
- Emergency preparedness and response programs
- Controls designed to address the facility’s impact or potential impact on the environment and on the health and safety of employees
- Monitoring of EHS performance indicators
- Compliance with legal requirements
- Training, awareness and competence

Corrective Action
Self audit results are reported to the site general manager and the EHS Director, as part of the management review activities. The site EHS manager is responsible for submitting the following reports to the EHS Director as well as the site General Manager:

1. Weekly report of EHS issues, including as applicable:
   - Notification of compliance issues
   - Discussion of regulatory agency inspections
   - Discussion of regulatory changes
   - Accident investigations
   - Awards
   - Important events


3. Annual Site EHS Management System Report to site general manager and EHS Director, including as applicable:
   - Facility and regulatory changes
   - Audit results
   - Progress toward EHS objectives and targets
   - EHS metrics (e.g., air emissions, waste generated, injury/illness statistics)
   - Summary of EHS-related communications
Management Review
Using these reports, the EHS Director communicates any significant issues or events to upper management. Further, the EHS Director annually reviews the following topics with executive management:

1. Site self-audit results
2. EHS performance metrics
3. Corporate audit results (see discussion below)
4. Possible changes to the EHS Management System and associated documents and procedures
5. Summary of key regulatory and facility changes affecting the EHS systems
6. Important awards, events, and activities

Continuous Improvement
In order to evaluate the effectiveness of the site EHS systems, Corporate EHS professionals periodically conduct audits of ON Semiconductor manufacturing sites.

The corporate EHS audit protocol focuses on the following:

- Assuring material EHS compliance, where “material” is understood to mean no large -gap between current facility-level practices and the more stringent of either applicable regulatory provisions or existing internal ON Semiconductor corporate EHS standards.
- Reducing significant EHS risks, where “significant” is understood to loss of life; serious personal injury; major environmental impacts; major damage to assets and large associated business interruption costs; and/or potentially serious impairment of the company’s public reputation.
- Promoting continuous improvement in EHS performance and management systems effectiveness, where “performance” is understood to mean actual measured EHS outcomes/results, and “effectiveness” relates to the ability of the local systems to help reduce business operating costs or otherwise improve the quality, speed, and cost of EHS service delivery.