 Corporate Policy	Procedure Number <p style="text-align: center;">A 11.02</p>	Page <p style="text-align: center;">1 of 7</p>
	Effective Date <p style="text-align: center;">10-23-2020</p>	Superseded Procedure, Dated <p style="text-align: center;">08-01-2001</p>
Organizational Units Affected <p style="text-align: center;">All Alamo Group Companies, their Employees, Directors and Officers</p>	Approved By: <p style="text-align: center;">Approved By: D. Noel: Director EHS</p>	

Environmental Policy and Program


I. Policy

Alamo Group facilities will strive to improve our environmental impact on the Earth. We are committed to:

- (1) Immediately responding to and controlling all spills and releases.
- (2) Complying with all federal, state, providence, and local environmental permits and regulations as they pertain to each facility.
- (3) Training our employees on our environmental programs.
- (4) Empowering our employees to improve their work areas and facilities.
- (5) Reducing our usage of natural resources, such as, natural gas, coal, water, etc., where possible.
- (6) Reducing the waste and/or the toxicity of the waste that we generate.
- (7) Recycling all the waste that we can.

II. Roles and Responsibilities

- 1) Each Alamo Group facility President is accountable for the environmental compliance of that facility. The president will assign a site representative to oversee compliance with the environmental permits and regulations that apply to that facility. This person is responsible for:
 - a) Keeping abreast of site-specific permits and reports,
 - b) Collecting data needed for these and other reports (such as Sustainability Reporting),
 - c) Ensuring that natural resources are used wisely,
 - d) Coordinating waste disposal and recycling efforts, and
 - e) Reporting violations, spills, or releases to the president and corporate safety.
- 2) Each manager and supervisor at an Alamo Group facility will work with the environmental site representative to maintain compliance with the regulations that pertain to their area. Each manager and supervisor is responsible for:
 - a) Ensure initial and periodic training of environmental programs.
 - b) Ensure that all spills and releases are immediately reported and contained.
 - c) Ensure that environmental records are properly completed and maintained.


 Corporate Policy	Procedure Number A 11.02	Page 2 of 7
	Effective Date 10-23-2020	Superseded Procedure, Dated 08-01-2001
Organizational Units Affected All Alamo Group Companies, their Employees, Directors and Officers	Approved By: Approved By: D. Noel: Director EHS	

Environmental Policy and Program

- d) Ensure that new products to be used are approved for use in accordance with the environmental permits and regulations.
 - e) Ensure that natural resources are used wisely.
 - f) Provide observations and feedback to employees to ensure proper waste segregation and handling, including all chemicals, used oils, and aerosol cans are properly handled for disposal.
- 3) Each employee at an Alamo Group facility will work with the environmental site representative and their supervisors to maintain compliance with the regulations that pertain to their area. Each employee is responsible for:
- a) Attending training on environmental programs.
 - b) Responding to spills and releases.
 - c) Recording accurate records for environmental reporting.
 - d) Properly handling and segregating wastes.
 - e) Ensuring that natural resources are used wisely.
- 4) Alamo Group Corporate Safety and Sustainability will provide guidance when needed and will evaluate the environmental programs regularly providing feedback to the site representative and company president. Corporate Safety and Sustainability is responsible for:
- a) Reporting Alamo Group Sustainability Metrics.
 - b) Auditing Alamo Group facilities.
 - c) Providing guidance on environmental issues.

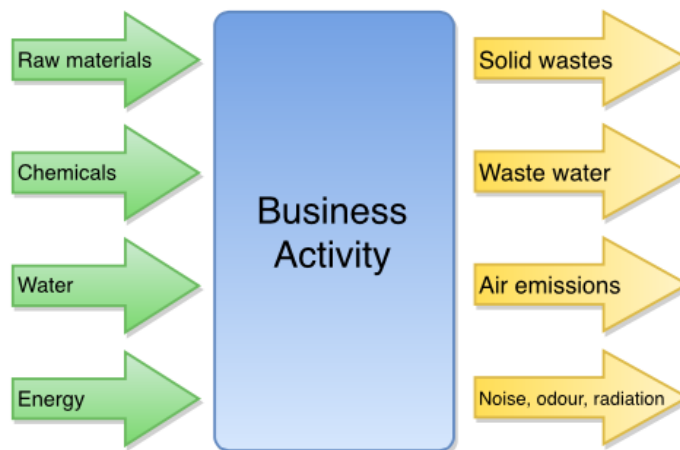
III. Aspects and Impacts

- 1) Each Alamo Group Facility will identify the activities, products or services that interacts with the environment (aspects) and the changes to the environment (impacts) resulting from those activities, products or services.
- a) Alamo Group Corporate Safety and Sustainability has developed a spreadsheet (appendix A) that can be used to help identify the aspects and impacts of the facility and prioritize the impacts that need attention.

 Corporate Policy	Procedure Number A 11.02	Page 3 of 7
	Effective Date 10-23-2020	Superseded Procedure, Dated 08-01-2001
Organizational Units Affected All Alamo Group Companies, their Employees, Directors and Officers	Approved By: Approved By: D. Noel: Director EHS	


Environmental Policy and Program

- b) Starting in each department, the environmental site representative will work with the manager and/or supervisor to list the equipment that are in that department. Then for each piece of equipment, the team will identify the environmental inputs (water, chemicals, electricity, natural gas, propane, welding gases, etc.) that the equipment uses to make its product. Then the team will identify the wastes from the process (much like Lean Enterprise) – the physical wastes/trash, air emissions, wastewaters, used chemicals, etc. This is the impacts on the environment.



IV. Environmental Obligations


- 1) It is Alamo Group Corporate policy to comply with regulations (without citations or penalties), therefore, all permitting, regulatory, and sustainability reports/submissions will be made in a timely manner.
 - a) Late reporting with cause will be explained to the appropriate agency to the extent necessary to establish our positive position before a notice of violation is received.

 Corporate Policy	Procedure Number A 11.02	Page 4 of 7
	Effective Date 10-23-2020	Superseded Procedure, Dated 08-01-2001
Organizational Units Affected All Alamo Group Companies, their Employees, Directors and Officers	Approved By: Approved By: D. Noel: Director EHS	

Environmental Policy and Program

- 2) To facilitate compliance with permits and regulations the Alamo Group facilities will prepare a Compliance Calendar (example in Appendix B) that lists the due dates or deadlines of any reports/submissions. To be included in this Calendar:
 - a) Stormwater Quarterly Sampling Reports
 - b) Wastewater Discharge Monitoring Reports
 - c) Training Certifications deadlines
 - d) Air Emission Reports
 - e) Waste Reports
 - f) Permit renewal deadlines
 - g) Environmental fees
 - h) Tank Registrations and fees
 - i) Sustainability Reporting deadlines

- 3) In general, assigned facility personnel will provide inventories, usages, facility drawings, and such other information that is needed for accurate reporting to the site environmental representative for preparation of the reports/submissions.
 - a) The Site Environmental Representative will prepare the reports/submissions for the Company's President to sign.
 - b) The Company's President is the responsible corporate officer, unless he/she has designated that role (in writing, submitted to the regulatory agency) to another member of the company's management.
 - c) Copies of such site-specific reports will be maintained at the facility for the required retention time as noted in the Records Retention Policy (Section VI).

 Corporate Policy	Procedure Number	Page
	A 11.02	5 of 7
	Effective Date	Superseded Procedure, Dated
	10-23-2020	08-01-2001
Organizational Units Affected	Approved By:	
All Alamo Group Companies, their Employees, Directors and Officers	Approved By: D. Noel: Director EHS	


Environmental Policy and Program

Environmental Objectives

- 1) As a part of the annual budgeting and planning for the next year, the Alamo Group facilities will set environmental objectives/goals. These goals will reinforce the environmental policy to improve the environmental impact of the facility. The goals will include:
 - a) Zero Non-Compliances with permits and regulations.
 - b) Zero Spills and/or Releases.
 - c) Improvements to the Sustainability Metrics
 - d) Other goals as identified by the facility.
- 2) The goals will be reviewed regularly by management and Corporate Safety and Sustainability. Resources will be allocated as needed to meet these goals.

V. Environmental Documentation to include Records Retention Policy

- 1) A major portion of environmental compliance is maintaining the documentation that the facility is in compliance with the permits and regulations. This documentation includes, but is not limited to:
 - a) Air Permit (exclusion) required documentation of chemical uses, air emissions, etc.
 - b) Wastewater Permit required documentation of discharges, sampling, discharge monitoring reports, fee payments, etc.
 - c) Spills and/or Releases incident investigations and corrective action tracking.
 - d) Sustainability Metrics
 - e) Waste Manifests and Bills of Lading,
 - f) Waste Determinations and Profiles
 - g) Stormwater Pollution Prevention permit required plans, sampling, reports, fees, inspections, etc.
 - h) Spill Prevention Control and Countermeasures requirements such as tank inspections and spill reports.
 - i) Emergency Planning Reports (Tier II and Toxic Release Inventory) Submissions or documentation of why the facility is exempt from reporting
 - j) Other records for state or local requirements.

 Corporate Policy	Procedure Number	Page
	A 11.02	6 of 7
	Effective Date	Superseded Procedure, Dated
	10-23-2020	08-01-2001
Organizational Units Affected	Approved By:	
All Alamo Group Companies, their Employees, Directors and Officers	Approved By: D. Noel: Director EHS	

Environmental Policy and Program


- 2) Each facility will determine what documentation is required for each applicable permit and/or regulation and how long that documentation must be maintained. Most environmental documentation must be maintained for 3 years, but each facility needed to identify what the requirement is for each regulation and permit. A table (See Figure 1) documenting the requirements will help to maintain the appropriate records.
- 3) Alamo Corporate Safety and Sustainability recommends keeping the current year and the number of required years of records on file. For example, Hazardous Waste Manifests must be maintained for 3 years. Alamo Corporate would keep the current year plus the 3 previous years at the facility.

Environmental Documentation and Retention Times	
Environmental Documentation	Records Retention
Air Emissions Tracking	Current year + 3 years*
Hazardous Waste Manifests	Current year + 3 years*
Spill Report and Investigations	Current year + 7 years*
Tier II Reports	Current year + 5 years*

Figure 1 – *Examples – Not necessarily correct

VI. Operational Controls and Emergency Preparedness

- 1) The Alamo Group facilities will develop operational procedures and emergency plans to comply with permits and regulations and manage any unexpected events or incidents. These procedures and plans include, but are not limited to:
 - a) Waste Handling and Segregation Procedures
 - b) Hazardous Waste Contingency Plan
 - c) Gathering of EPCRA reporting data (Tier II and Form R reports)
 - d) Operational Procedures for Emission Control Equipment
 - e) Gathering of Air Emission Tracking Data
 - f) Emergency Action Plan
 - g) Spill Prevention Control and Countermeasures Plan
 - h) Incident Reporting and Incident Investigation Procedures

 Corporate Policy	Procedure Number	Page
	A 11.02	7 of 7
	Effective Date	Superseded Procedure, Dated
	10-23-2020	08-01-2001
Organizational Units Affected	Approved By:	
All Alamo Group Companies, their Employees, Directors and Officers	Approved By: D. Noel: Director EHS	

Environmental Policy and Program

- i) Operational Procedures for the Industrial Wastewater Treatment Systems
 - j) Operational Procedures to control the use of natural resources
- 2) Employees will be trained on the procedures and plans that apply to them.
 - 3) Reviews and Updates of the procedures and plans will occur as identified needing update, or as required by the regulations, or every 2 years, whichever comes first.

VII. Monitoring, Measuring and Auditing

- 1) The Alamo Group facilities will continually monitor environmental compliance. If they find that there has been a deviation from being in compliance, the president with the site representative will work with the regulatory agency to get back into compliance. Any deviations must be reported to the Corporate Safety and Sustainability Department immediately upon discovery.
- 2) The Corporate Safety and Sustainability Department will conduct environmental audits regularly. Most facilities will be audited annually, but at the discretion of the Director, facilities that have solid compliance histories and strong safety programs can be scheduled every 2 years.
- 3) Management reviews of the environmental programs and sustainability will be completed annually.

Appendix A – Aspects and Impacts Worksheet (Excel File)