



## Key Chemical, Risk and Environmental Management Systems Policies

The UNICOR Office Furniture Group, hereinafter referred to as OFG, is committed to implementing Federal Bureau of Prisons (FBOP) policies related to managing chemicals, reducing environmental risk and implementing environmental management systems (EMS). We go above and beyond these policies as a furniture manufacturing entity in pursuit of optimal sustainable manufacturing practices, such as life cycle thinking, that apply to our business group.

OFG is committed to the prevention of pollution, continuous improvement and compliance with applicable regulations and obligations<sup>1</sup>. We fully subscribe the FBOP EMS at all OFG facilities that contains these commitments.<sup>2</sup>

OFG complies with FBOP chemical risk management policies. Chemicals are assessed for human and ecosystem health impact by the BOP facility Environmental Safety and Compliance Administrator as a standard routine practice for all OFG facilities and this is documented and has been in place for years.<sup>3</sup> OFG will also take additional steps to identify reduce, and eliminate chemicals of concern.

OFG as an organization incorporates life-cycle thinking into its company policy via our Design for the Environment (DfE) process procedure for its furniture lines at the Milan facility. Our DfE process examines renewable materials; recycled materials; recyclable and biodegradable materials; end of life management; water management and energy efficiency.<sup>4</sup> Our Milan facility is the pilot for DfE and our committed organizational intent is to expand and use this process, or versions of it adapted to our other factories specific needs as changes to products or new products are developed.

Signed:   
Dennis Merrion  
General Manager, Office Furniture Group

  
Date

<sup>1</sup> PS 16009.09 Occupational Safety, Environmental Compliance, and Fire Protection

<sup>2</sup> PS 1600.10 Environmental Management System <https://www.bop.gov/PublicInfo/execute/policysearch#>

<sup>3</sup> Institutional Plan: Flammable Liquids, Hazardous Chemicals, Toxic and Caustic Materials, April 3, 2017

<sup>4</sup> Reference DfE process for 5.1 Prerequisite