



## POLICIES AND PROCEDURES

Environment, Health & Safety

### **INTENT**

Tyco International Ltd. and its subsidiaries, affiliates, and operating units (collectively, the “Company”) are committed to protecting the health and safety of our employees and protecting the environment. The Company is committed to providing a safe working environment for all our employees, independent contractors, vendors, and customers, and will operate our facilities in a manner that prevents harm to public health and the environment. The Company will seek to conserve energy, water and raw materials, use recycling and reduce waste where appropriate. We will be good neighbors in our communities by insuring that our facilities do not pose unreasonable risks, and by participating in community activities related to Environment, Health & Safety (EHS). In all our activities, we will comply with all applicable laws. The Company will design its products in a manner that eliminates unreasonable risks from the manufacture, use and disposal of the products.

### **RESPONSIBILITY FOR IMPLEMENTATION**

The Presidents of Tyco’s business segments are responsible for the implementing this policy, and developing and maintaining a system designed to ensure compliance with this policy and all applicable environment, health and safety laws and regulations. The Presidents and their delegates shall make all employees aware of this policy and the Company’s commitment to environment, health and safety excellence, and shall provide leadership regarding this policy. They will ensure that quarterly certifications of EHS performance are completed. They will also ensure that an effective EHS management system, which will achieve the intent of this policy, is operating effectively in their business. They will also report annually on the EHS performance of their business segment. Every Tyco employee is also responsible for complying with this Policy. The Tyco International Ltd. Corporate Environment, Health & Safety Department will provide guidance and assistance to the operating units in fulfilling the intent of this policy. Although the Presidents and other management will provide leadership, direction, and resources to support implementation of the policy, compliance with the policy and implementation of its terms is the responsibility of *all employees*.

### **SCOPE**

This policy applies to the Company worldwide, except where compliance with this policy would cause an operating unit or division to violate any applicable law in the country in which it is located.

### **APPLICATION**

Working with the assistance of an EHS representative, the Presidents will ensure that all operations in their businesses have an EHS management system in place that is designed to achieve Tyco’s EHS operational goals. These goals are:

- Provide for a safe working environment for all our employees, independent contractors, vendors, and customers;
- Achieve 100% compliance around the world, both with all applicable laws and with all policies and expectations of Tyco International Ltd.;

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- Be good neighbors in our communities by preventing unreasonable risks to public health and the environment;
- Eliminate unreasonable EHS risks from our products, processes and activities;
- Minimize waste and emissions by using source reduction, recycling and reuse where appropriate
- Seek to continuously improve our EHS performance.

More specifically, Management will:

- Collect EHS performance data, certify it as complete and correct, and report to Tyco International Ltd. Corporate EHS department on a quarterly basis;
- Establish and implement an Environment, Health and Safety Program that meets or exceeds all Tyco EHS program expectations, including the *Tyco Global Safety Standards*, environmental program requirements, and other EHS program expectations as they are published;
- Hold managers and supervisors accountable for the EHS performance of their facilities and departments;
- Ensure that managers, supervisors and employees receive the necessary education and training to understand their EHS responsibilities;
- Maintain an open communication environment, in which employees feel free to raise EHS issues without fear of retribution, and in which managers and supervisors address employees' questions and concerns promptly and thoroughly;
- Provide the necessary resources and support to achieve these objectives.

Employees are responsible for:

- Working safely in accordance with regulations, standards, and procedures;
- Working in accordance with regulations, standards and procedures and in a manner that eliminates unreasonable risk to public health and the environment;
- Notifying management of unsafe conditions or practices, unlawful activities and activities that present unreasonable risks to public health or the environment;
- Reporting accidents, occupational illnesses, and safety and environmental incidents to management.

Any employee with an EHS concern should raise the concern initially with her/his supervisor and/or site or area EHS representative. Concerns may also be communicated to the Business Segment EHS department, Tyco International EHS department, or any Tyco lawyer. An employee may, of course, also or alternatively express her/his concern with the Tyco Ombudsman, either by e-mail ([directors@tyco.com](mailto:directors@tyco.com)) or by phone (877-232-4121).

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