



**Buckman**





OUT THERE, AS FAR AS THE EYE CAN SEE,  
IS THE HORIZON.

It may be where earth meets sky. Or where costs meet budgets. Where new products meet future demand. Or where new processes meet the needs of a healthy planet.

Whether they are timelines, goal lines or bottom lines, they are your horizon lines. And, as a global chemistry company with a presence in 96 countries, Buckman will go to the ends of the earth to help you reach them all.

## Buckman

Commitment makes the best chemistry.

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*The following is our **2014 Sustainability Report**, which adheres to the stringent requirements of the Global Reporting Initiative. By measuring how our operations affect others and the planet as a whole and by striving to be transparent about our sustainability goals and our progress toward meeting them, we believe we can be a better company and build stronger relationships with the industries we serve. Here, we provide detailed information about our progress in six key areas: economics, the environment, labor, human rights, society and product responsibility.*

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ECONOMICS

ENVIRONMENT

LABOR

HUMAN RIGHTS

SOCIETY

PRODUCT RESPONSIBILITY

## 1.1 | Vision from Leadership

## WHERE VALUE MEETS VALUES

A company is always in pursuit of value. For the customer and for the shareholder. At Buckman, we also believe in values. When you uphold corporate values such as environmental stewardship, health and wellness, financial responsibility and social good, you inevitably increase the value of your company, the companies you do business with and the communities you live and work in.

Real success comes from understanding that a supply chain is also a sustainability chain. Each link—upstream and down—affects the others in profound ways. So cooperation and transparency between supplier, company and customer can improve individual footprints and collective performance in all areas of sustainability—financial, social and environmental.

### Our Customers

Our priority at Buckman is understanding what is most meaningful to our customers in terms of sustainability and corporate responsibility. Then we craft solutions to suit, applying advanced technologies that will boost their profitability while reducing their environmental impact and ensuring the highest level of safety.

To better serve our customers, we will continue to streamline our product line and optimize our product manufacturing and supply chain capabilities—from how we source raw materials to how we deliver finished goods. And we continue

to pursue customers in emerging economies that can benefit most dramatically from our greener technologies.

### Our Company

When we began regularly publishing a sustainability report, we set ambitious goals for reducing our carbon emissions, water use, energy consumption and more. Our hope was to reach them all by 2015. So far, we've met many, surpassed some, and found a few others more elusive. We'll continue to pursue them. And we will reassess all our goals as we move forward to make sure we focus our efforts on areas in which we can make the biggest difference.

As the following data will attest, we also are redoubling our efforts to safeguard the safety and health of our associates and our communities. And we are upholding what has become a tradition of training excellence for our people. Presently, we are ranked 16th in the world by *Training Magazine*, for the quantity and quality of our training.

Furthermore, we will continue to expand our BuckmanCares program. It gives our associates and our company the chance to contribute both manpower and financial support to charitable efforts around the world in the areas of the environment, health and human services and education.

### Our Suppliers

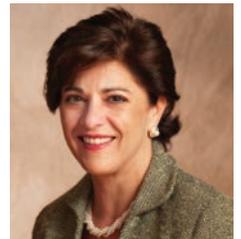
We work very closely with our suppliers to find ways to streamline, conserve and save. Recently, we formalized a process for getting to know them even better, including questionnaires that cover their sustainability goals and their abilities to help us reach ours. The more they understand our expectations, the stronger all of us can become.

### Our Responsibility

As a chemical company deeply involved in the manufacturing processes of a wide range of industries, we have both the obligation to provide more sustainable solutions and the opportunity to effect positive change on a global scale. It's a responsibility we take seriously. And an opportunity we find exciting and inspiring. By keeping the line of communication open with all of our stakeholders, we can ensure the evolution of more sustainable practices and products up and down the supply chain and a more sustainable—and valuable—future for all.



Kathy Buckman Gibson, COO  
Buckman International, Inc.



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1.2 | Description of key impacts, risks, and opportunities

**Risk Descriptions**

The following sets forth definitions of the top ten risks identified for Buckman on a global basis and how they impact the company. These risks are listed in the order of their combined likelihood and severity from highest to lowest.

The following Risk Descriptions were developed by management and then presented, discussed and modified with input from the Risk Management Committee of the Board.

Velocity is the speed at which the occurrence of a risk can impact Buckman. It does not seek to address how long the impact will last. A designation of immediate velocity would impact the Company in less than one month, medium velocity would be from one month to one year, and long term would be longer than one year.

Performance Gap—Performance gap risk is the risk of Buckman failing to manage the business to meet the financial performance expectations of our associates and shareholders. Failure to do so can negatively impact the long-term sustainability of the business by limiting the Company’s ability to make investments needed to grow the business or by being forced into selling the Company at the request of shareholders. Performance gap risks include the following:

- Declining gross margins
- Declining operating margins
- Increasing operating expenses
- Failure to generate sufficient free cash flow

- Failure to stay competitive in the marketplace with existing and new technologies

The velocity of this risk is long term.

Business Interruption—Business interruption risk is the risk that there will be an interruption to Buckman’s critical operations and processes that have a negative material impact on the business. Buckman’s ability to continue its operations within a given geographical region or regions is dependent on:

- Its ability to operate its manufacturing and distribution facilities
- The availability of certain raw materials
- The availability of third party transportation services
- The operation of critical information systems (addressed more comprehensively in the risk area of “information system integrity”)

Business interruption can arise from the following:

- Accidents
- Natural disasters
- Limited availability of raw materials or reliance on one supplier for key raw materials
- Third party work stoppages
- Sabotage
- Political actions taken by a country that impact Buckman’s operations

The velocity of this risk is immediate to medium term.

Competitor—Competitor risk represents the risk that competitors will establish or sustain a competitive advantage over Buckman in such a way that we will not be able to effectively compete in

one of our target markets. The two primary areas in which this risk is the greatest:

- Competitors will enter the market and compete effectively against Buckman in areas where Buckman has had a unique position.
- Buckman’s relatively small size in the water treatment market will not allow it to establish and maintain a competitive advantage against its larger competitors.

The velocity of this risk is long term in nature.

External Economic and Financial—External economic and financial risk is the risk that circumstances and events outside the control of Buckman will have a material negative impact on our ability to do business in certain locations and on our financial results. Possible circumstances and events that would be included in this type of risk include the following:

- Economic downturn, recession or depression
- Economic crisis in a specific geographic region
- Political crisis in a specific geographic region
- Fluctuations in currencies relative to the U.S. dollar
- Changing tax regulations
- Changing import/export regulations for a specific geographic region
- Exchange controls imposed by a government that limit Buckman’s ability to transfer funds in or out of the country
- Risk of high inflation in a particular geography
- Bankruptcy or fraud of a financial institution where Buckman has funds invested

The velocity of this risk is medium to long-term.

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Environmental/Safety—As a chemical manufacturer and distributor, Buckman is exposed to various potential environmental and safety-related events that could have a significant impact on our ability to continue operations, our financial results, and/or our reputation and image in the marketplace and the communities in which we operate. These environmental and safety-related risks include the following:

- Damage to Buckman’s associates (bodily injury)
- Damage to Buckman’s property
- Damage to third parties for bodily injury or property damage
- Damage to natural resources
- Liability to governmental entities
- Damage to Buckman’s reputation as a result of any of the above

Environmental and safety risks can arise from:

- The release of unintended emissions to the environment
- Disposal of waste
- Violations of operating permits
- The actions of third parties, such as transportation providers and customers
- Unsafe work practices and processes within Buckman
- Unsafe work practices and processes of our customers
- Human error at Buckman or our customer sites

The velocity of this risk is immediate to long term.

Industry—Over 50 percent of Buckman’s business is in the pulp and paper industry. This market concentration presents potential negative risks to Buckman in light of certain characteristics

associated with this market. These characteristics include the following factors:

- The significant bargaining power many large companies have with suppliers such as Buckman
- Few globally capable suppliers, a situation that from time to time creates intense competitive rivalry
- A significant decline in the printing, writing and newsprint segments of the industry, particularly in North America
- Some weak customers (particularly in the declining segments) presenting the threat of bankruptcy or inability to pay

The velocity of this risk is long term.

Human Resources—Buckman’s competitive advantage is dependent on our ability to:

- Attract the right people
- Develop our associates so they are capable of being in the right positions
- Manage them so that they are placed in the right positions
- Manage them so that they are doing the right things in the right way
- Retain them

Risk related to talent acquisition, development, management and retention can arise from:

- A lack of understanding of the talents and skills needed in certain strategic areas
- A poor reputation in the hiring marketplace
- A poorly defined or ineffective selection process
- An inadequate performance management system
- An inadequate associate development process, poor managers or a poor organizational environment

- Noncompetitive or inappropriate compensation systems
  - An ineffective succession management process
- The velocity of this risk is medium to long term.

Compliance—Buckman has a history and reputation as an ethical organization and a good corporate citizen guided by its Fundamentals. It has also built a reputation as a global organization that does business consistently around the world. Buckman’s image and reputation can be negatively impacted by:

- The failure to create and operate in an environment guided by our Fundamentals
- The failure to consistently honor our Fundamentals through corporate action or inaction
- The failure to operate consistently around the world with global customers
- The failure to maintain and operate in accordance with an adequate system of internal accounting controls
- The failure to operate in accordance with commonly accepted accounting and financial reporting practices
- The failure to operate as a good corporate citizen in the communities in which it does business
- The failure to file required reports and pay appropriate taxes and fees in a timely manner
- The failure to follow appropriate laws and regulations when employing and terminating associates
- The failure to be aware of changes in laws and regulations, and to adopt changes as necessary

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Buckman also operates in a highly regulated environment in most parts of the world. Failure to comply with applicable laws and regulations can have a significant impact on Buckman's ability to continue operating in certain locations and/or can negatively impact its financial results. External compliance failure can result from failure to comply with laws and regulations related to:

- The manufacture of products
- The transportation of products
- The sale of products
- The application of products
- The disposal of waste materials

The velocity of this risk is medium to long term.

Product/Service Failure—Buckman sells products and services that are used in industrial processes. The failure of a product or poor advice to a customer can have a negative financial impact on a customer and can damage the reputation of Buckman. In some cases, products are used directly in the process and can have an immediate impact on the goods being produced. Additionally, some of the services offered by Buckman's associates can impact the customer's production. In all cases, there

is some degree of potential exposure of products to associates and third parties working in a customer facility. Examples of product or service failure include the following:

- Product was not appropriately designed for the application
- Product is not stable until point of application
- Failure of the application equipment
- Unsafe application equipment setup
- Improper advice provided by the Buckman sales associate to the customer
- Failure of sales associate or customer representative to abide by safe handling procedures for the product
- Negative human exposure trend information despite prescribed handling procedures for the product

The velocity of this risk is immediate to medium term.

Information System Integrity—Buckman relies on its information system to take an order from a customer; manage production; ship products; invoice a customer; pay suppliers; pay associates; determine the profitability of a product, customer

and industry; and evaluate its financial results. The failure of the system would have a significant impact on Buckman's ability to operate. The ongoing integrity of the system impacts management's ability to make informed business decisions. The integrity of Buckman's information system can be negatively impacted by the following:

- Failure to recover the system within a reasonable period of time
- Inconsistent standards regarding the input of data into the system
- Failure to abide by standards established for the input of data
- Limitations on the design of the system and type of data inputted
- Continued reliance on manual manipulation of data
- A security failure that compromises data in the system

The velocity of this risk is immediate to long term.

Various departments, workgroups and committees are refining the mechanisms and systems to ensure Buckman remains a highly sustainable company.

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THE ECONOMIC HORIZON

# WHERE RESPONSIBILITY MEETS REWARD

The best way to underwrite a sustainable future is to maintain a sustainable fiscal policy. That’s why we, at Buckman, focus on long-term, value-driven growth, investing in the people, assets and technology that will streamline our own operation while improving products and processes for our customers. It’s how we drive sales, increase operating profit and improve cash flow. It’s how we’ve

earned recognition as a Hay Group Insight’s High Performing Company. And it is how we keep ourselves poised to improve sustainability in all the other areas of our operation, from reducing our environmental footprint to improving health and education in communities around the world.

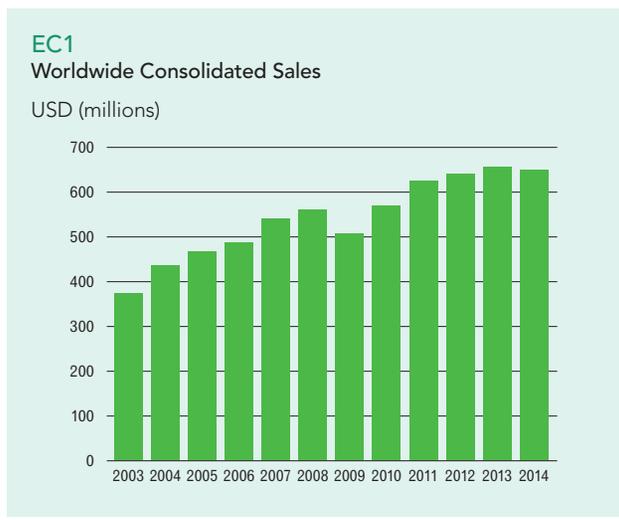
**EC1 | Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments**

**Economic Value 2013**

- 2013 worldwide sales: \$654,969,000 (all dollar amounts shown in USD)
- 2013 total wages and benefits: \$168,218,109
- Value of volunteer time, noncash and cash donations made globally in 2013, totaled 1.6 percent of net profit
- More than 125,200 people were positively impacted by the BuckmanCares program.
- Buckman associates volunteered more than 8,784 hours to support our communities, with an estimated value of \$574,708

**Economic Value 2014**

- 2014 worldwide sales: \$648,867,000
- 2014 total wages and benefits: \$170,114,463
- Value of volunteer time, noncash and cash donations made globally in 2014, totaled 1.8 percent of net profit



- More than 88,300 people were positively impacted by the BuckmanCares program
- Buckman associates volunteered more than 8,932 hours to support our communities, with an estimated value of \$555,050

Volunteer hours represent the total of working and nonworking hours Buckman associates commit to BuckmanCares programs.

As a privately held business, Buckman does not disclose strategic financial data.

**EC4 | Significant financial assistance received from government**

Bulab Holdings, Inc., does not receive any significant financial assistance from government.

**EC5 | Range of ratios of standard entry-level wage**

- Buckman meets or exceeds minimum wage in all of our operating companies and territories
- Where there are no minimum-wage requirements, Buckman uses a salary survey to set salary ranges

**EC7 | Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation**

While Buckman has no formal policy that requires hiring from local communities, we believe in and support our local workforces.

At each operating company, at least 90 percent of senior management is local.

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## THE ENVIRONMENTAL HORIZON

## WHERE REDUCTION MEETS GROWTH

It's one of the greatest discoveries of all time. Reducing your environmental footprint increases your long-term profitability. At Buckman it's a principle we put into practice every day.

We relentlessly pursue our own reduction in waste energy use, and water consumption. And we work to bring greener technologies and new levels of efficiency to a wide variety of industries.

Traditional chemistries, applied more sustainably, play an important role. But we also harness the power of natural enzymes to do some of the work better, at a lower cost and with less impact on the planet.

### EN3 | Direct energy consumption by primary energy source

The direct energy consumed by the company to manufacture products and provide power to our office buildings in 2014 was 186,000 gigajoules. About 86 percent (161,527 GJ) of the direct energy was generated from purchased natural gas and 13 percent from other liquid fuel sources (LPG, petro, kerosene, diesel, fuel oil and ethanol).

The direct energy consumption is reported for all of our major sites, which includes our global headquarters and sites containing manufacturing plants.

### Our progress

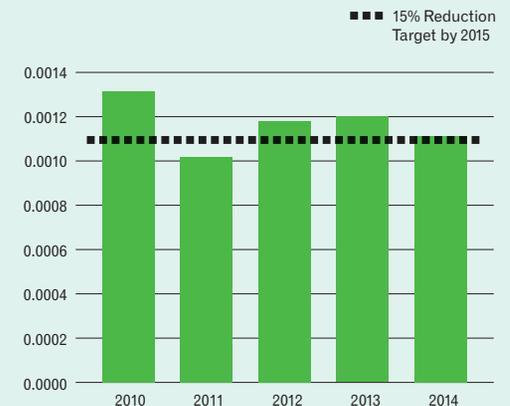
We established a reduction target of 15 percent from the 2010 baseline for nonrenewable direct energy consumption per kilograms of production by 2015. In 2010, the nonrenewable direct energy consumption per kilograms of production was 1.32 MJ/kg. Based on this, the target for 2015 is 1.122 MJ/kg. In 2013 and 2014 production totaled 1.202 and 1.149 MJ/kg, respectively. We have achieved a 14.1% reduction in the consumption of direct energy from our baseline year (2010).

When comparing data representing the same sources of consumption, the 2015 target has almost been achieved. At this time, all direct energy is nonrenewable.

### EN3

#### Direct Energy Consumption

Gigajoules per kilogram of production



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**EN4 | Indirect energy consumption by primary source**

The indirect energy consumption is reported for all of our major sites, which includes our global headquarters and sites containing manufacturing plants. This includes all indirect energy consumption at these sites, which consists of purchased electricity and purchased steam (only in China). Indirect energy consumption at small satellite facilities is not included.

In 2010, the indirect nonrenewable energy intensity was 0.496 MJ/kg. We set a target of 15 percent reduction in indirect nonrenewable energy intensity by 2015. This target is 0.421 MJ/kg. In 2013 and 2014, the indirect nonrenewable energy intensity has been 0.506 and 0.436 MJ/kg, respectively.

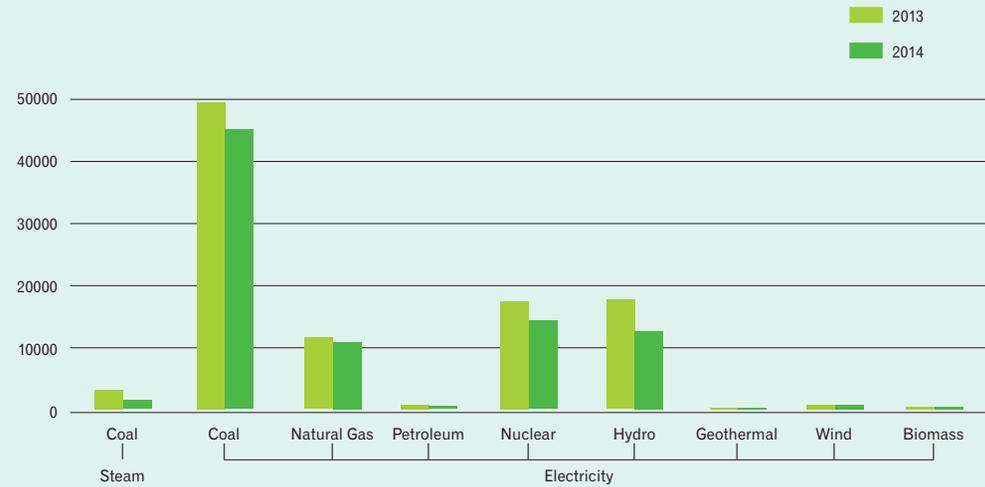
**EN4 Indirect Energy Consumption**

Gigajoules per kilogram of production



**EN4 Primary Fuels to Produce Intermediate Energy**

Gigajoules



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**EN8 | Total water withdrawal by source**

In 2010, Buckman South Africa became our second location to install and use a wastewater distillation unit, which allows for recycling operational process water. We also have been investing in low-flow toilets and showers and utilizing rainwater capture in many of our facilities.

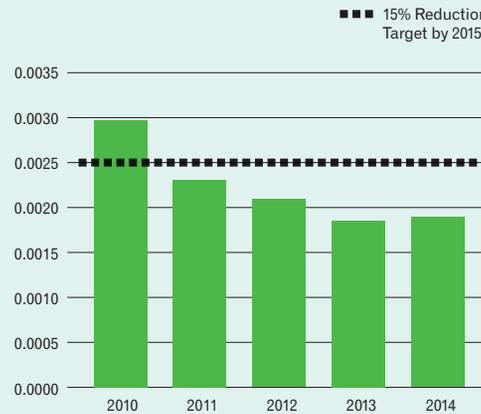
**Our progress**

Based on the 2010 baseline, we set a 15 percent reduction target by 2015 for water consumption per kilogram of production. In 2010, the water consumption per kilogram of production was 0.002982 m<sup>3</sup>/kg. Based on this, the target for 2015 was 0.002535. In 2013 and 2014, the water consumption per kilogram of production totaled 0.001885 and 0.001901, respectively. **The 2015 target has already been achieved.**

**EN8**

**Water Usage**

Meter<sup>3</sup> per kilogram of production



(*Lysiloma sp.*) Casahuate (*Hipomoea sp.*) and Nopales (*Opuntia sp.*). Fauna include three different varieties of fishes, nine different kinds of amphibians and 44 different species of birds. The site is located at geographical coordinates 18° 53' N, 99° 10' W. This land is protected by an official decree dated February 17, 2010.

**EN12 | Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas**

There were no impacts to the protected areas next to Buckman's facilities in Mexico and Brazil.

**EN13 | Habitats protected or restored**

None.

**EN14 | Strategies, current actions, and future plans for managing impacts on biodiversity**

We will maintain current activities, which do not impact the protected areas adjacent to Buckman's facilities in Mexico and Brazil.

**EN15 | Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk**

See EN11.

**EN8**

**Total Water Withdrawn by Source**

Meter<sup>3</sup>



**EN11 | Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas**

Buckman owns a site in Sumaré, Brazil, adjacent to a protected area. The site contains both Buckman's South American offices and our manufacturing plant and is 18.23 hectares in size. The protected biodiversity area is a marshy stream safeguarded by the national law on the protection of native vegetation.

Buckman Mexico is next to a protected area of 408 hectares called "El Texcal." More than 90 different kinds of plants and trees grow in the area, including Cuajote (*Bursera sp.*), Tepehuaje

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**EN16 | Total direct and indirect greenhouse gas emissions by weight**

Buckman collects data on direct greenhouse gas (GHG) emissions known as Scope 1 GHG emissions from sources owned or controlled by Buckman. We also collect data from indirect GHG emissions (Scope 2) from sources as a consequence of Buckman energy needs but are not owned or controlled by Buckman (e.g., purchased electricity and steam). Data collected is from all manufacturing facilities and the corporate headquarters. CO<sub>2</sub> emissions from these activities were calculated using emission factors. Factors of conversion of energy quantities to equivalent CO<sub>2</sub> are derived from data

published by The American Chemistry Council. Generation efficiencies used for this calculation are derived from U.S. Department of Energy and American Chemistry Council data. The greenhouse gas impact of distribution of products and waste has not been assessed and is not included.

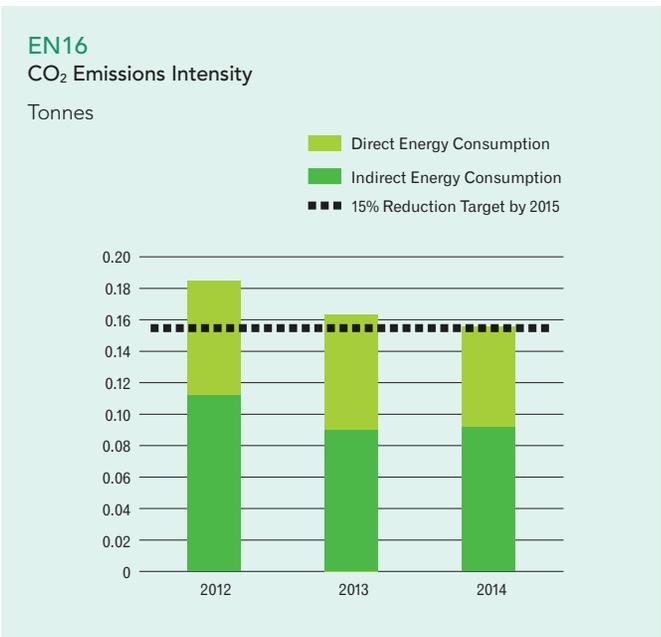
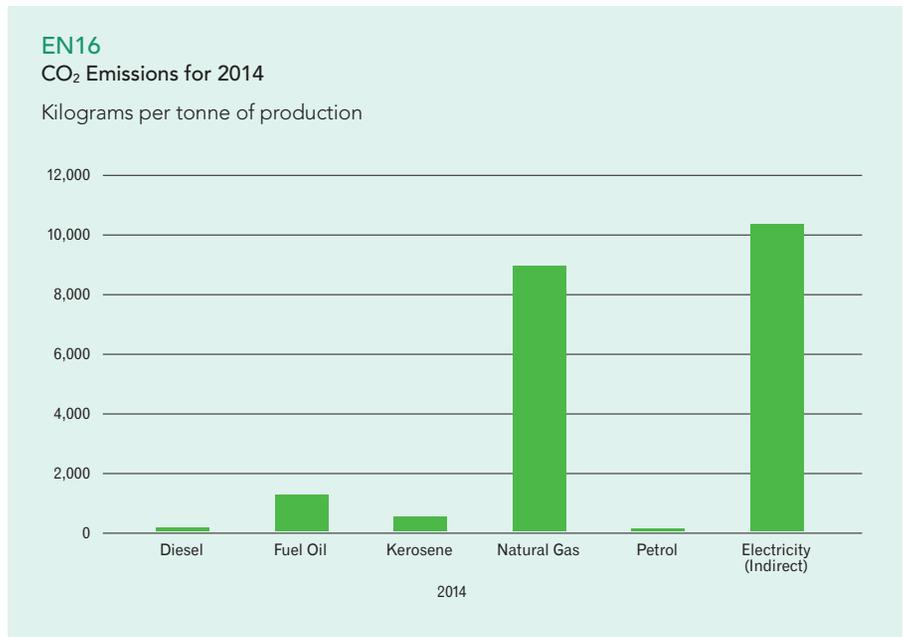
**Our progress**

We began measuring CO<sub>2</sub> emissions in 2010, but only included fleet vehicle emissions since 2012. CO<sub>2</sub> emissions intensity in 2012 was 0.18346 kilogram per tonne of production. Our goal is to reduce this number by 15 percent by 2015. This target is 0.15594 kilogram per tonne of production. In 2013 and 2014, the CO<sub>2</sub> emissions intensity has

been 0.16286 and 0.15780 kilogram per tonne of production, respectively. We're beginning to make progress and we will continue to work to achieve this target by 2015.

**How we did it**

The reduction in CO<sub>2</sub> intensity was the result of the direct energy improvements outlined in indicator EN3.



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**EN19 | Emissions of ozone-depleting substances by weight**

Some Buckman operations emit bromochloromethane (BCM), a potentially ozone-depleting substance. From 2000 to 2009, Buckman reduced BCM emissions by 85.7 percent. This was accomplished by transferring BCM-emitting processes to our most efficient manufacturing locations and improving the efficiency of air pollution control devices at the manufacturing sites reporting BCM emissions.

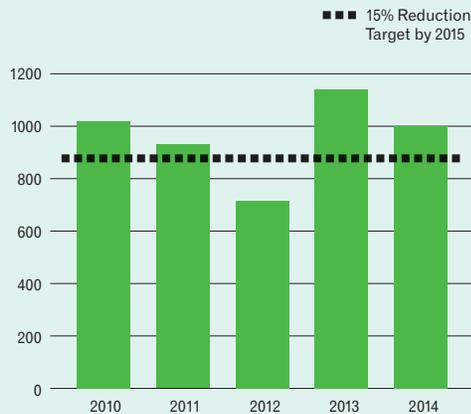
**Our progress**

From 2010 to 2014, Buckman further reduced remaining BCM emissions by an additional 1.26 percent.

**How we did it**

We continue to identify and mitigate leaks of bromochloromethane in piping and equipment.

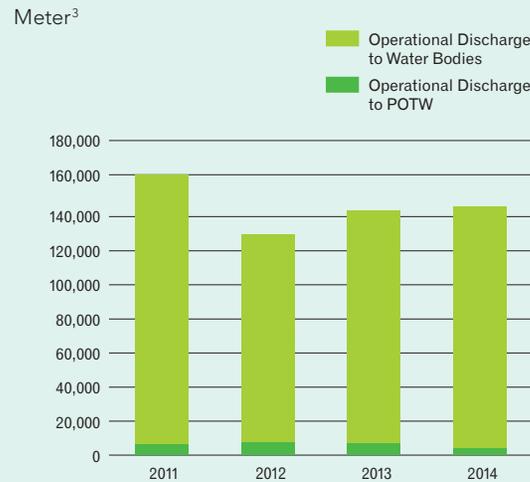
**EN19**  
Total CFC Equivalents



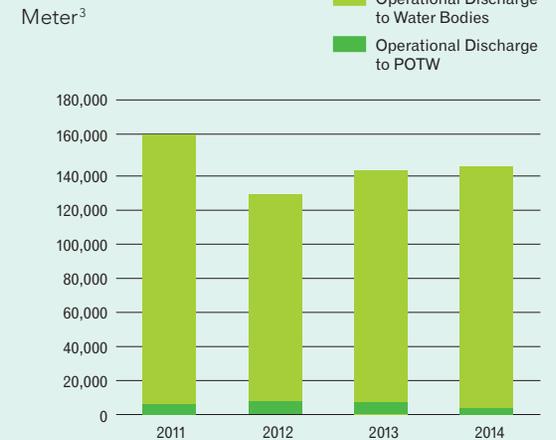
**EN21 | Total water discharge by quality and destination**

From 2010 to 2014, Buckman has reduced total water discharged by 1.74 percent. In the same time period, the total water discharge intensity was reduced 7.39 percent.

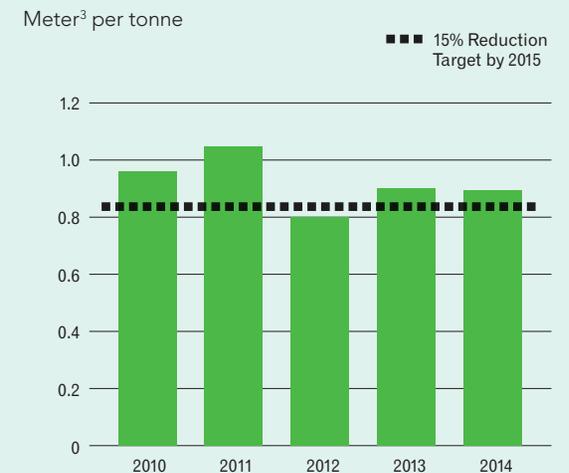
**EN21**  
Total Water Discharge (Operational)



**EN21**  
Total Water Discharge



**EN21**  
Water Discharge Intensity



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**EN22 | Total weight of waste by type and disposal method**

Prior to 2012, Buckman reported only waste to landfill and incineration, which did not include waste reused, recycled or recovered. From 2012 to 2014, Buckman total waste decreased 6.04 percent. Waste intensity decreased 7.44 percent. Buckman set a 15 percent reduction target for total waste generated by 2015 using 2012 as the base year.

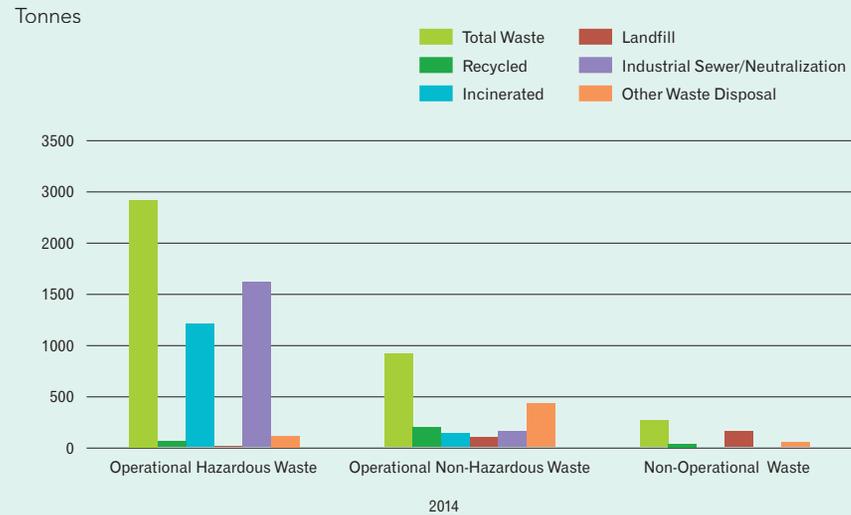
**EN23 | Total number and volume of significant spills**

Buckman did not incur any significant spills in 2013 or 2014.

**EN28 | Monetary value of significant fines and total number of nonmonetary sanctions for noncompliance with environmental laws and regulations**

No fines or nonmonetary sanctions were levied against any Buckman facility in 2013 or 2014.

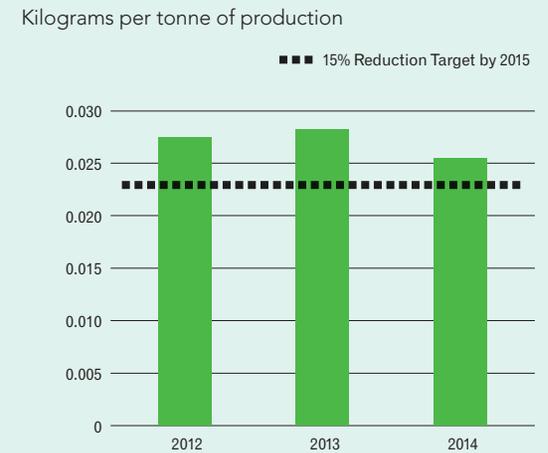
**EN22  
Total Mass of Waste by Type and Disposal**



**EN22  
Total Waste**



**EN22  
Total Waste Intensity**



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## WHERE PEOPLE MEET PURPOSE

At Buckman, work isn't just about making a living. It's about effecting positive change for others. It's about finding fulfillment. And it's about teamwork. As a multidisciplinary company serving industries around the globe, we span many cultures, religions and political systems. But we must work as one. To accomplish

that, we have in place comprehensive workplace strategies and policies that bring everyone together and give every associate the opportunity to thrive, make a significant contribution to company and community and improve personally and professionally.

### Fundamental principles

#### Labor Rights

We are committed to fair wages, good working conditions and effective workplace conflict resolution. All Buckman operating companies are located in countries that are member states of the United Nations International Labor Organization, and we maintain labor standards that align with the eight core conventions of that organization's Declaration of Fundamental Principles and Rights at Work of 1998.

#### Occupational Health and Safety

We believe that all occupational injuries and illnesses can be prevented, that safety education and training is vital to a safe workplace, and that safety always takes precedence over expediency. Our global safety protocols and procedures are comprehensive and effective, yet we're always looking for ways to improve them. The topics covered in written safety standards at Buckman include the following:

- Hot Work
- Training
- Contractor Safety
- Incident Reporting and Investigation
- Emergency Planning and Response
- Compliance Audits
- Industrial Hygiene
- Occupational Medical Health Testing
- Confined Space
- Initial Opening of Process Lines and Equipment
- Safe Work Permit
- Machine Guarding
- Compressed Gas Cylinders
- Personal Protective Equipment
- Respiratory Protection
- Powered Industrial Trucks
- Bloodborne Pathogens
- Control of Hazardous Energy (lockout/tagout)
- Hazard Communications
- Walking and Working Surfaces
- Fleet Safety
- Laboratory Chemical Hygiene
- Electrical Safety
- Associate Participation
- Process Safety Information
- Process Hazard Analysis
- Standard Operating Procedures
- Management of Change
- PreStartup Safety Review
- Mechanical Integrity
- Trade Secret

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## Fundamental principles (continued)

Some of the major initiatives we've implemented to ensure safety in these areas include the following:

Senior Management Safety Scorecard—Managers are ultimately responsible for the safety of their people, their customers and the public. So we created a comprehensive list of Manager's/Supervisor's Responsibilities. And we have implemented a biannual scorecard to measure and communicate each operating company's implementation of our Global Safety Fundamentals. The scorecard measures each operating company's performance as it applies to the following areas:

- Global Audits
- Incident History
- Corrective Action Activities
- Conformance to Management Systems (ISO 14001)

Assessment takes into account the Occupational Injury/Illness Rating (OIR) and the Lost Time Injury Illness Rating (LTIR). From 2013 to 2014, we saw a big improvement in our OIR as our incidents per 100 Buckman Associates fell from 1.44 to .82. Our LTIR has been historically low at .7 for the past five years.

Standard Operating Procedures (SOPs)—These are an essential part of Buckman's efforts to manage risks associated with Buckman Process Safety Management System (BPSMS) chemicals. They contain detailed instructions for manufacturing associates to safely operate the processes. SOPs also contain information regarding safety and health considerations along with process safety to allow manufacturing associates to protect themselves and have the ability to respond appropriately during emergency situations.

Management of Change—Change is one of the leading causes of process safety incidents. Buckman has developed standards to ensure that all changes to plant operations are evaluated and approved before implementation and that all inadvertent or unintended consequences are prevented.

PreStartup Safety Review (PSSR)—These reviews are performed to assist in verifying that process equipment and plant associates are ready to safely start and maintain process operations after new materials are introduced, changes made to standard operating procedure or changes in equipment.

Mechanical Integrity (MI)—Each Buckman site must maintain and enforce a Mechanical Integrity (MI) program to monitor and control activities that can affect the integrity of equipment, thus sustaining the long-term reliability of each operating company's equipment.

Process Hazard Analysis (PHA)—This program systematically identifies, evaluates and controls process hazards such as fires, explosions and spills to help minimize the potential for releases of chemicals that could affect associate or public safety.

Global Safety, Process Safety and Environmental Stewardship Audits—Our single comprehensive audit process system encompasses all three of our key risk-identification processes: associate safety, process safety and environmental stewardship. Audits are scheduled at least every three years for each operating location. Audit teams are comprised of subject matter experts from within our organization and include associates from safety, environmental, plant management, process engineers and others.

This auditing process has continued to provide an opportunity for Buckman associates who have similar jobs to share knowledge and best practices among each other and outside their normal environment.

Quantitative Risk Assessment (QRA)—Buckman employs a QRA process that identifies chemical hazards and security vulnerabilities; facilitates and applies the appropriate risk analysis technique for the risk identified; and recommends, prioritizes and reviews options to manage risk to comply with our global standard. QRAs are scheduled every 10 years for each manufacturing facility.

Global Safety, Health and Environmental (SHE) Community—A cohesive SHE program improves global communications, coordination and implementation of health and safety initiatives among operating companies and corporate departments at multiple levels. Members of the SHE Community meet at least annually to review successes and failures, and to establish the necessary vehicles to continuously improve our safety and environmental stewardship.

Global Process Safety Team—This team helps to reinforce the implementation of the Buckman strategy as it relates to process safety, as well as managing and understanding the hazards to mitigate or lower the risk. The team meets frequently to improve communications, coordination and implementation of the deliverables among operating companies and corporate departments (GSE, Global Product Technology, sales, technical, manufacturing, supply chain, etc.).

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## Fundamental principles (continued)

Hazardous Chemical Application Standardization (HCAS)—A comprehensive checklist is followed to ensure that our chemicals and chemical applications at customer sites are handled in a uniform and safe manner according to agreed-upon global standards. Documentations of these assessments must be maintained for every application and all nonconformances must be addressed.

OHSAS 18001—Buckman has received this Occupational Health and Safety Assessment Series certification for health and safety management systems at the following sites:

- Buckman Asia
- Buckman South Africa
- Buckman China
- Buckman Mexico

We are currently assessing the implementation of this management system globally.

## Associate Development

We are convinced that continuous learning increases the value of an associate. As an organization that employs many scientists and engineers with years of education and experience, teaching and coaching has naturally become deeply embedded in our culture. We constantly train. We use talent forums to make sure we have the right people in the right roles. And we offer ways for associates to progress and grow personally and financially.

In 2013 our ranking in *Training* magazine's top 125 organizations in the world for training rose from a Top 50 company to part of the elite Top 25 companies (at 23rd place). We moved up to 16th in 2014.

When asked in our 2014 Global Associate Engagement Survey, 80 percent of our associates agreed they are provided opportunities for learning and development. This is 14 points higher than Hay Group Insight's High Performing Companies Norm.

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**LA1 | Total workforce by employment type, employment contract, and region**

**Total Buckman workforce:**

1,743 associates as of December 31, 2013  
 1,771 associates as of December 31, 2014  
 (Values include permanent and temporary associates)

**Breakdown by employment contract:**

In 2013 and 2014, 88 percent of all Buckman associates were permanent, and the remaining 12 percent worked under a temporary arrangement.

**Breakdown by employment type:**

In 2013 and 2014, 98 percent of all Buckman permanent associates was full time, and the remaining two percent part time.

**2013 breakdown by region:**

1,548 permanent Buckman employees worldwide,  
 195 temporary workers

**2014 breakdown by region:**

1,561 permanent Buckman employees worldwide,  
 210 temporary workers

**LA2 | Total number of employee turnover by age group, gender, and region**

In reporting attrition rates, the definition of total population is based on the number of associates at the end of the reporting period. This number only includes Buckman associates—no temporary or contract associates. It includes voluntary and involuntary exits.

**2013: 1,548 associates**

Total attrition for 2013: 159 associates or 10.2%

- 109 males
- 50 females
- 26 age < 30
- 84 age 30-50
- 53 age > 50

**2014: 1,561 associates**

Total attrition for 2014: 132 associates or 8.4%

- 100 males
- 32 females
- 19 age < 30
- 77 age 30-50
- 40 age > 50

**LA3 | Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations**

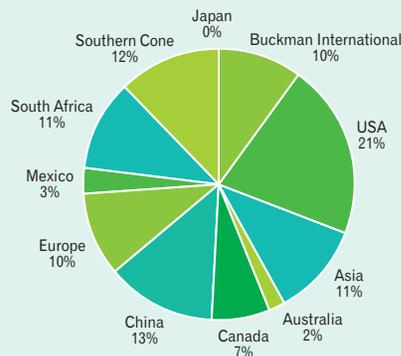
Buckman offers major benefits to full-time associates in the countries where it does business. These benefits may vary by country, but include:

- Medical
- Dental
- Vision
- Flexible spending account
- Life insurance
- Optional life insurance
- Accidental death & dismemberment insurance
- Travel accident insurance
- Long- and short-term disability
- Employee assistance program (EAP)
- Long-term care
- Cancer plan
- Legal plan
- Tuition reimbursement
- 401(k)/profit sharing
- Vacation
- Relocation
- Healthcare survivor benefits

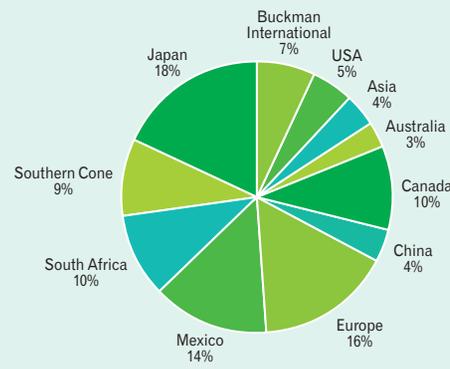
**LA4 | Percentage of employees covered by collective bargaining agreements**

330 Buckman associates (21 percent) are covered by collective bargaining agreements.

**LA1**  
 2014 Headcount by Region



**LA2**  
 2014 Rates of Attrition by Operating Company



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**LA5** | *Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements*

Buckman keeps associates informed of operational changes through a variety of channels:

- One-on-one meetings
- Intranet
- Email
- Global and local workgroups
- Associate meetings
- Calibration/info-sharing sessions

There is no global standard for a minimum-notice period, but Buckman makes every effort to give reasonable notice to all associates for significant operational changes. Buckman remains compliant with legal requirements in each country of operation regarding notice periods. At locations where collective bargaining agreements are in place, minimum notice periods are negotiated and respected in the event of significant operational changes.

**LA6** | *Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs*

100 percent of the Buckman workforce is represented in the chartered Global Safety, Health and Environmental committee. This committee holds bimonthly virtual meetings as well as a face-to-face meeting every 12–18 months.

Many operational companies have additional local health/safety committees. These include:

- Committee for Prevention, Health and Safety in the Workplace
- Ergonomic Committee
- SAFE Group
- First Aid Brigade
- Fire Brigade
- Evacuation Brigade
- Internal Commission for Accident Prevention
- Field Safety Committees

Safety protocols and safety training are in place for all areas of the company:

- Manufacturing
- Sales/Marketing
- Administration
- Laboratory/Research

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**LA7 | Rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities by region**

Buckman's safety record continues to improve and is consistently better than the industry averages. Safety is a fundamental tenet of our organization.

**Occupational Health and Safety Data**

2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015 Target
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**Total Recordable Injuries and Illnesses\***

Buckman Incident Rating	1.9	1.2	1.4	1.5	1.3	1.0	1.3	0.7	1.2	1.12	1.11	1.44	0.87	0.75
U.S. Chemical Industry Average		3.4	3.5	3.2	2.9	3.1	2.7	2.3	2.4	2.4	2.3	2.0		
U.S. Manufacturing Industry Average		6.8	6.6	6.3	6.0	5.6	5.0	4.3	4.4	4.4	3.0	2.8		

**Lost Workday Cases\*\***

Buckman Incident Rating	0.7	0.5	0.3	0.5	0.7	0.3	0.1	0.3	0.4	0.6	0.4	0.5	0.43	0
U.S. Chemical Industry Average		0.9	0.9	0.8	0.8	0.8	0.8	0.6	0.7	0.7	0.7	0.5		
U.S. Manufacturing Industry Average		1.6	1.6	1.5	1.4	1.3	1.2	1.0	1.1	1.1	0.8	0.8		

**Off-Job Injuries**

Buckman Incident Rating	Buckman does not currently measure off-job injuries.
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**Fatalities**

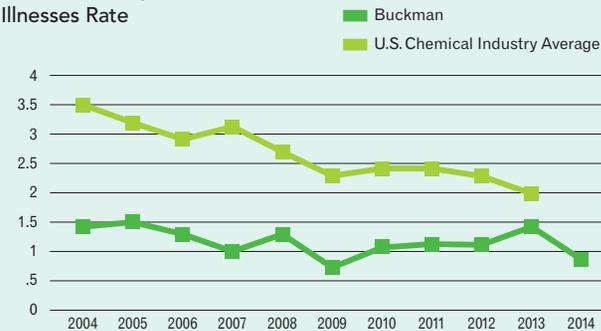
Buckman Incident Rating	0	0	0	0	0	0	0	0	0	0.06***	0			0
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\* Represented by the occupational incident rating (OIR) calculated by the total number of occupational injuries/illnesses resulting in medical treatment, lost time or fatality multiplied by 200,000 then divided by the number of man-hours worked.

\*\* Represented by a lost-time injury rate (LTIR), calculated by the total number of occupational injuries/illnesses resulting in medical treatment, lost time or fatality multiplied by 200,000 then divided by the number of man-hours worked.

\*\*\* Buckman suffered a fatal accident of a non-Buckman service representative working at a customer site in China.

**LA7**  
Total Recordable Injuries and Illnesses Rate



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**LA8** | *Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases*

Buckman provides:

- Education and training for workers
- Counseling for workers and their families
- Prevention/risk control for workers and their families
- Treatment assistance for workers and their families

Buckman USA and Buckman International offer online health assessments to all associates to assist them and their qualified dependents in evaluating the genetic and lifestyle factors that increase individual risk of contracting serious illness. Associates have access to educational materials and are offered access to a healthy lifestyle coaching program. Participants receive telephone coaching sessions with a professional wellness coach at no cost to the associates. Through Buckman's health insurance offerings, associates and their families may receive treatment assistance.

**LA9** | *Health and safety topics covered by formal agreements with trade unions*

At Buckman, we understand the inherent risks of our industry. That's why our Global Safety & Environmental Department engages in a disciplined program of risk analysis and planning that includes:

- Setting and following strict protocols for the safe operation of our plants and the safe handling of our products.
- Performing site vulnerability analyses to ensure security, and reduce the potential for harm to people and the communities we share.
- Focusing on employee health, implementing a global medical- and health-testing standard to reduce serious illness in the workplace and the related healthcare costs.

In the regions where we have formal agreements with trade unions (Southern Cone, South Africa and Mexico), we cover health and safety in those agreements. The health and safety topics covered in all local level agreements include:

- SHERQ representatives safety inspection report
- First-aid box
- Suggestion box
- Emergency response plan
- Workplace safety

- Modified policies and procedures
- Audit results of ISO 9000 and 14000
- Occupational health reports
- Hygiene reports
- Personal protective equipment
- Nonconformances
- Outstanding actions
- Consultation
- Joint management-employee health and safety committees
- Training and education
- Participation of worker representatives in health and safety inspections, audits and accident investigations
- Complaints mechanism
- Right to refuse unsafe work

Additional health and safety topics that are covered in these agreements but are specific to certain countries include:

- Compliance with the International Labor Organization (ILO)
- Arrangements or structures for resolving problems
- Commitments regarding target performance standards

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**LA10** | Average hours of training per year per employee by employee category

At Buckman, we place great emphasis on employee development, the exchange of knowledge and information, and the fostering of transformational leadership skills. Only when our associates grow better and stronger can we expect our Company to do the same.

**2013**

- 1,743 associates
- 63,566 total training hours
- 36 hours (average) training/associate globally

**2014**

- 1,771 associates
- 58,561 total training hours
- 33 hours (average) training/associate globally

**LA12** | Percentage of employees receiving regular performance and career-development reviews

Managers and associates (contractors not included) have a formal performance review annually (at a minimum) to review the prior period performance and set goals for the next period.

In 2013, approximately 88 percent of employees received performance reviews.

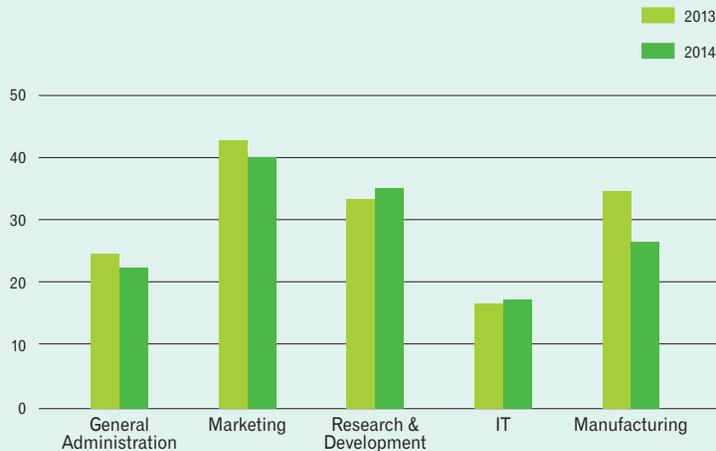
In 2014, approximately 95 percent of employees received performance reviews.

Success doesn't come from working in a vacuum. Key leaders and managers participate in annual talent forum events to discuss every associate's performance and potential and desire to move into higher levels of leadership. These forums are a key piece of our sustainability effort, as it will be

our people who will enable us to remain viable 10, 20 and 30 years down the road. It's all about having the right people in the right roles, and it is a continuing self-renewal process that keeps us positioned to meet the changing needs of both our customers and our shareholders.

**LA10**  
Employee Training by Employee Category

Average hours per year



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## THE HUMAN RIGHTS HORIZON

## WHERE DIVERSITY MEETS RESPECT

**At Buckman, we believe the best employee is an empowered one.**

Empowerment starts with respecting the dignity of every individual, giving people a voice, and building a network of support that ensures concerns are heard and conflicts resolved. Every two years,

Buckman associates are asked to share their views of our company through our confidential Global Associate Engagement Survey, which helps us identify areas of organizational strength and areas that can be improved.

In 2014 all permanent Buckman associates were invited to participate in the survey, which was delivered in 14 languages. Approximately 94 percent of associates completed the survey and shared their individual opinions about the work environment at Buckman. Approximately 90 percent indicated that they felt proud to work for Buckman and 83 percent would recommend Buckman to family and friends as a place to work.

Those numbers are no accident. Buckman is committed to treating our associates with respect, dignity and fairness. Buckman strives to create an environment where associates choose to work and grow professionally. And we operate according to the Buckman Fundamentals, our Code of Ethics and basic principles that ensure:

- Recognition and respect for the individual and his or her human dignity, capabilities and potential
- Recognition and reward for contributions and accomplishments
- Effective teamwork
- Ongoing learning and personal growth
- Sound decision-making and planning for the future
- Creativity
- Responsibility, both personal and corporate

Buckman has zero tolerance for human rights violations or abuses.

### Our Discrimination and Harassment Policy

Buckman will ensure that no associate aids, abets, compels, coerces or conspires to discipline or discharge, or causes another associate to resign, because of race, color, religion, creed, age, sex, national origin, disability or any other prohibited basis under state or federal law. The Company expects all associates to accomplish their work in a business-like manner with a concern for the well-being of their co-associates. Any harassment of associates by fellow associates is not permitted, regardless of their working relationship.

### Reporting and remedy

All associates are given access to EthicsPoint, a reporting system that serves as an alternative to approaching their manager, human resources or senior management about activities or conduct believed to be unethical, illegal or in violation of our Code of Ethics. EthicsPoint reports can be made anonymously and confidentially, and associates can feel confident that there will be no negative consequence for reporting or inquiring about potential violations in good faith. Training on the

Buckman Code of Ethics and EthicsPoint is part of the New Associate Orientation process at each operating company.

### HR4 | Total number of incidents of discrimination and actions taken

There were no incidents of discrimination in 2013 or 2014.

### HR6 | Operations identified as having significant risk for incidents of child labor and measures taken to contribute to the elimination of child labor

Child labor is not tolerated at Buckman.

### HR7 | Operations identified as having significant risk of forced or compulsory labor and measures taken to contribute to the elimination of forced or compulsory labor

Forced labor is not tolerated at Buckman.

### HR9 | Total number of incidents of violations involving rights of indigenous people and actions taken

None.

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## THE SOCIAL HORIZON

## WHERE INDIVIDUALS MEET COMMUNITY NEEDS

At Buckman, we strive to add real and lasting value to our communities. Not only by investing money there and hiring people, but also by using our resources to create change. Strengthening ties that bind people together. Fostering goodwill through good works and promoting a higher standard of living. In 2014, through BuckmanCares, our global community engagement initiative, we

contributed more than 8,900 hours of volunteer service in support of programs and initiatives focused on education, health and human services, and environmental stewardship. Add in monetary contributions, and the value of our support totaled 1.8 percent of our net profit.

At the local level, we planted trees, cleaned up neighborhoods, provided comfort and support to the elderly, collected school supplies for inner-city kids, showed communities how to conserve water, and taught children valuable principles to live by. And we united globally to donate blood needed in our local communities and support the Red Cross/Red Crescent in their disaster relief efforts.

#### SO2 | Percentage and total number of business units analyzed for risks related to corruption

100 percent of our nine operating companies are analyzed for risks related to corruption. We maintain a risk management committee at the board level, and we educate all our associates on our Code of Ethics. External and internal financial audits have uncovered no incidents of corruption.

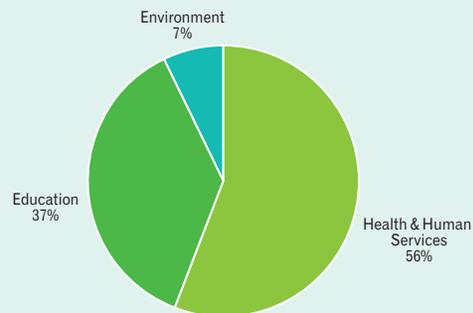
#### SO4 | Actions taken in response to incidents of corruption

There have been no reports of any governmental actions, such as investigations, against any Buckman entity or associate for corrupt activity.

#### SO3 | Percentage of employees trained in organization's anticorruption policies and procedures

All associates at Buckman adhere to the Code of Ethics, which is part of the Buckman Fundamentals. Each associate company worldwide shares the same Code of Ethics. In addition to the EthicsPoint training provided to each newly hired associate, Buckman requires all upper level managers to complete an online Foreign Corrupt Practices Act training course.

2014 Volunteer Hours by Category



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THE PRODUCT RESPONSIBILITY HORIZON

## WHERE EFFICACY MEETS SAFETY

In our quest of continuous improvement, we're always looking for ways to make products work better. And that includes making them safer—for equipment and facilities and, most important of all, the people who run them.

*PR1 | Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures*

Buckman has in place review processes for the development and commercialization of new products. Regulatory changes or new hazard information can also trigger safety reviews of existing products. Buckman completed a product Life Cycle Assessment (LCA) in 2013 for a key global product, and is working to incorporate product Life Cycle tools into product evaluations.

*PR3 | Type of product and service information required by procedures, and percentages of significant products and services subject to such information*

All of Buckman's products must comply with hazard communication laws for the countries in which Buckman sells them. These requirements include product Safety Data Sheets (SDS) and labels. When required by local and national regulations, the content of the SDSs and labels includes information on: the content of substances that might produce an environmental impact, safe use and disposal,

and other information as required for compliance. Information on the sourcing of components is collected but not disclosed to customers via SDSs and labels.

Buckman also provides direct support to customers when additional information is needed regarding safe handling and uses for specific applications. Buckman is making preparations to comply with the global implementation schedules of the Globally Harmonized System for Classification and Labeling.

*PR5 | Practices related to customer satisfaction, including results of surveys measuring customer satisfaction*

It is standard for Buckman to administer a customer satisfaction survey to customers meeting a certain sales threshold for a calendar year. However, the survey is available to all sales associates. We depend on the sales associates to administer the survey.

The main purpose of this survey is to increase customer interaction (engagement)—the numbers are not used to judge anyone. In addition, we administer it to more than one person at each customer location.

Once a survey has been administered, the results are compiled and a report is generated, which is made available to the sales associate, who then reviews the report with the customer at an annual business review.

Once the report has been presented to the customer, the sales associate prepares an action plan based on the findings and the discussion with the customer. The sales associate then reviews the business plan with the customer.

All of these actions are governed by our 8 Business Management Standards:

- Communication
- System knowledge
- Planning
- Safety
- Program manuals
- Service and activity reports
- Business reviews
- Continuous improvement

Continuous improvement is the end goal for every customer, the driving inspiration for everything we do.

### 2.1 | Name of Reporting Organization

Bulab Holdings, Inc.

### 2.2 | Primary brands, products, and/or services. The reporting organization should indicate the nature of its role in providing these products and services, and the degree to which it utilizes outsourcing

Bulab Holdings, Inc., through its principal company, Buckman Laboratories International, Inc., provides advanced chemistries and the application of those chemistries to help a wide variety of industries clean and clarify heating and cooling waters, industrial process waters and wastewaters. We provide specialized technologies that aid in leather processing, such as microorganism control programs. And we provide solutions that enhance production and product quality in the pulp and papermaking industry. For all of these industries, we provide innovative products and services that help save energy, save water, increase production efficiency, increase recycling and reuse opportunities, and reduce environmental impact. Additionally, we provide a variety of freestanding performance chemicals that either enhance the performance of products or the manufacturing of those products. Brands include Bulab®, Busperse®, Busan®, Maximize®, Optimize®, WSCP®, Buckman Onsite® and Oxamine®, among many others.

We, as an organization, strive to maintain patents, registrations, trademarks, trade secrets and confidential information needed to ensure the protection of our intellectual property.

### 2.3 | Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures

Bulab Holdings, Inc., is the parent company of Buckman Laboratories International, Inc. and Buckman Laboratories, Inc. In addition, it is the parent company of Buckman Canada, Buckman Mexico, Buckman Southern Cone, Buckman Europe, Buckman South Africa, Buckman Asia and Buckman China. Buckman Laboratories International, Inc., is the administrative service provider to Bulab Holdings, Inc., and its subsidiaries.

### 2.4 | Location of organization's headquarters

Memphis, Tennessee, U.S.A.

### 2.5 | Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report

As of the end of 2014, Buckman has eight operating companies with manufacturing plants located in the following countries: United States,

Canada, Mexico, Brazil, Belgium, South Africa, China, Singapore, and we operate in more than 90 countries worldwide.

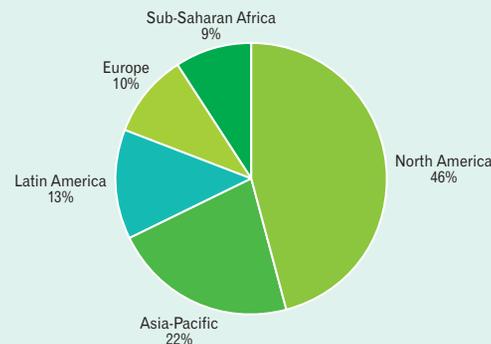
### 2.6 | Nature of ownership and legal form

Bulab Holdings, Inc., is a privately owned corporation organized under the laws of the State of Tennessee, United States.

### 2.7 | Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)

We serve worldwide markets. Our primary global markets include the pulp and paper manufacturing and leather processing industries, as well as providing advanced water treatment technologies for those and other industries. Water treatment encompasses many manufacturing environments, including power generation, mining, steel making, food processing operations, ethanol plants, sugar production and others, as well as other kinds of facilities with cooling towers, such as hospitals. Secondary market industries include paint, coatings and plastics, metalworking, agriculture, lumber and biofuels.

2014 Sales by Geographic Region



2014 Target Market Sales by Industry



## 2.8 | Scale of the reporting organization

Buckman is a global business employing 1,771 associates (including contractors), and which conducts sales activities in more than 90 countries. Buckman's manufacturing operations are located in eight countries: United States, Canada, Mexico, Brazil, Belgium, South Africa, Singapore, China.

### 2013 Results\*

Net Sales	\$ 654,969
Debt	\$ 42,866
Equity**	\$ 205,461

\* In thousands, as of and for the year ending December 31, 2013

\*\* Total Equity per Balance Sheet

### 2014 Results\*

Net Sales	\$ 648,867
Debt	\$ 37,424
Equity**	\$ 207,882

\* In thousands, as of and for the year ending December 31, 2014

\*\* Total Equity per Balance Sheet

Buckman is a privately-owned organization and has been private since its beginning in 1945. The Buckman family continues to own approximately 80 percent of the outstanding shares of capital stock. An Employee Stock Ownership Plan, established for the benefit of associates working in the U.S., owns approximately 11 percent of the stock. Most of the remaining minority share ownership is in the hands of Buckman retirees, current associates and charitable organizations that have received stock as a gift from our shareholders.

## 2.9 | Significant changes during the reporting period regarding size, structure, or ownership

In 2013, Buckman determined the Australian market was best served by supplying goods from other locations and ceased manufacturing activities in Australia. However, we still report consumption and emissions from our administrative facility there.

## 2.10 | Awards received in the reporting period

### United States

- *Training* magazine's Top 125 – global award, ranked 16
- Innovation Award from *Memphis Business Quarterly* in recognition of enzymatic technologies enabling a more sustainable way to produce paper and paper products

### Brazil

- Best Chemical Supplier to the Pulp & Paper Marketing for 2014 – ABTCP (Brazilian Pulp & Paper Technical Association)
- Recognition of Volunteer Hours by Buckman associates for 2014 – Grupo Primavera
- Recognition of Buckman contribution as an "Entrepreneur Friend of Sports" for 2014 – Brazilian Ministry of Sports

### Mexico

- Clean Industry Certification (Industria Limpia) given by PROFEPA (Federal Bureau of Environmental Protection) and SEMARNAT (Secretary of Environment and Natural Resources)
- Reliable Supplier (Proveedor Confiable) certification given by LAPEM-CFE (Federal Electricity Commission)

### Asia

- HALAL certification for sugar product line – Singapore
- Obtained The Productivity and Innovation Credit (PIC) grant SGD 525K under the Inland Revenue Authority of Singapore (IRAS) for investments in innovation and productivity improvements – Singapore
- Certification as ISO 22301:2012 for Business Continuity Management System (BCM) – Singapore

**3.1 | Reporting period for information provided**

Reporting is for the 2013 and 2014 calendar years.

**3.2 | Date of most recent previous report (if any)**

June 2013.

**3.3 | Reporting cycle (annual, biennial, etc.)**

We report results biennially.

**3.4 | Contact point for questions regarding the report or its contents**

Barry Enix, Director, Global Safety & Environment

Christy Sharp, Director, Global Marketing Communications

**3.5 | Process for defining report content**

Buckman began reporting our sustainability performance following the GRI G3 reporting guidelines in 2010. The report was built on several years of environmental, health and safety disclosures and reporting. Much of the data in our 2014 report reflect sustainability results and activities during the 2013–2014 fiscal years. As with our 2012 GRI Report, we continue to follow formal GRI G3 reporting guidelines to provide stakeholders with the data and perspective to understand and evaluate our performance, impacts and opportunities.

Buckman is committed to transparency in our reporting and continuous improvement processes for sustainability management and performance. We are reporting at a level “B” in 2014.

We use a cross-functional Corporate Sustainability Project Team for accountability and overseeing the preparation of this report. We currently use a management software program to track and oversee our progress towards our stated goals. Quantitative data is entered by each operating facility, which allows us to monitor, track and identify opportunities at both the local and global level.

No GRI sector standard exists for our industry—chemicals. However, we attempt to provide the best possible disclosures based on the nature of our global business and the related risks and opportunities. In doing so, we take into consideration the information needs of:

- Our associates and prospective associates through intercompany surveys
- Customers, seeking sustainable products and technology solutions and information about our sustainability policies and practices
- Communities, wanting to understand our sustainability management and engagement efforts as a responsible corporate citizen
- Suppliers, whom we expect to abide by our Code of Conduct and who are critical to our operations
- Other stakeholders, who have an interest in our industry and operations

**3.6 | Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)**

All Buckman entities except BuFIN, a financial service company, are within the scope of the report.

**3.7 | State any specific limitations on the scope or boundary of the report. If boundary and scope do not address the full range of material economic, environmental, and social impacts of the organization, state the strategy and projected timeline for providing complete coverage.**

Within the context of the boundary of the report as defined in 3.6, this report encompasses only the operations over which Buckman has direct control. The report does not include sustainability information from our suppliers, customers or contract manufacturers.

As a privately held company, we are unable to disclose certain financial results publicly.

**3.8 | Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations**

Buckman does not have any joint ventures, leased facilities, outsourced operations or other entities that can significantly affect comparability.

*3.9 | Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.*

All the information in this report has been compiled in good faith. Our data collection and information gathering processes have been implemented to cover all strategic departments and business units within the boundary of this report.

In 2012, we implemented a sustainability performance management software program. As a result, Buckman now has a web-based platform that centralizes our data collection, automates calculations of our carbon and energy footprint, delivers point-and-click sustainability reporting, reduces data errors, and incorporates embedded templates for reporting to the GRI. All of this translates into greater operation efficiency and reduced risk for our organization.

This new program allows us to better analyze our sustainability performance using key indicators such as the use of energy, raw materials, water and natural resources, GHG emissions and waste or social impacts concerning labor and health and safety.

*3.10 | Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods)*

None have been identified.

*3.11 | Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report*

None have been identified.

*3.12 | Identify the page numbers or web links where the following can be found.*

See Index beginning on page 34.

*3.13 | Policy and current practice with regard to seeking external assurance for the report. If not included in the assurance report accompanying the sustainability report, explain the scope and basis of any external assurance provided. Also explain the relationship between the reporting organization and the assurance provider(s).*

GRI has confirmed that the report was prepared according to the GRI G3 Guidelines, at Application Level B. We did not seek external assurance for the report.

**4.1 | Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight**

Bulab Holdings, Inc., is governed by an eight-member Board of Directors, a majority of whom are outside directors (not full-time employees). Committees within the board include: Audit, Compensation, Risk Management, Capital Stock and Executive. All except the Executive Committee and Capital Stock Committee are chaired by outside directors.

**4.2 | Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement)**

The Chairman of the Board of Directors of Bulab Holdings, Inc., is not an executive officer.

**4.3 | For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members**

Presently, the Board of Directors of Bulab Holdings, Inc., consists of eight Directors. Presently, six Directors are independent, i.e., not employed by Bulab Holdings, Inc., or any of its subsidiaries in any capacity. Two Directors hold executive positions in Buckman Laboratories International, Inc.: Steve Buckman, CEO; Kathy Buckman Gibson, COO.

**4.4 | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body**

Shareholders can contact the Company and any of its directors through the corporate secretary of the Company at its headquarters. An annual shareholder meeting is held to present information and allow shareholders to ask questions of management and the Board. Shareholders holding at least 10 percent of all the votes entitled to be cast on an issue can call a special meeting of the Shareholders to consider whatever matter may be proposed by those shareholders.

Associates and other stakeholders are encouraged to report any issues of an ethical concern to Buckman's EthicsPoint. EthicsPoint is available globally, with multi-lingual capability, 24 hours a day, seven days a week. Issues can be reported anonymously if desired. The Risk Management Committee of the Board reviews the issues submitted to EthicsPoint at least annually.

Associates are also able to offer their input by participating in the Global Associate Engagement Survey administered by the Company every two years.

**4.5 | Linkage between compensation of members of the highest governance body, senior managers, and executives**

Directors are paid an annual fee plus equity-based compensation.

In 2010 the Board adopted the Global Top Management Incentive Plan to increase the long-term enterprise value of Bulab Holdings, Inc., and its Related Companies (the Company and its Related Companies are referred to collectively as "Holdings"). The Plan furthers this purpose by paying incentive compensation to senior managers and executives who contribute to the financial success of Holdings. The Plan also creates an incentive to retain and attract competent individuals who will continue to increase the long-term value of Holdings.

**4.6 | Processes in place for the highest governance body to ensure conflicts of interest are avoided**

- Conflict of Interest Certification currently in place (Directors, VPs and GMs are required to sign)
- Annual certification executed by top executives, senior managers and directors

*4.7 | Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics*

The Board holds the ultimate authority of the Company, except to the extent our shareholders are granted certain powers under the Company's Bylaws and Certificate of Incorporation. Outside directors (six out of eight) are elected to the board to ensure effective independent governance. Qualifications for the Board of Directors and Committees are laid out in our Bylaws, Proxy Statement and Committee Charters. All additional guidelines are outlined in our Code of Ethics and Buckman Fundamentals.

The Board of Directors:

- Appoints senior management of the Company, who are responsible for conducting business and operations
- Provides oversight of management and offers strategic direction to the Company
- Forms standing Board Committees (Risk Management, Audit, Compensation, Capital Stock and Executive) to assist in fulfilling its obligations

The Committees advise and as appropriate make recommendations to the Board for purposes of overseeing the operations of the company.

*4.8 | Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation*

#### **The Buckman Fundamentals**

Our Buckman Fundamentals explain who we are and what we believe. They are a guide by which we serve all our customers around the world. They support our main goal, which is to build long-term relationships and create sustainable value for our customers. The Buckman Fundamentals also assure every customer that we will act in an ethical, honest and transparent manner to solve their technical problems, safeguard the environment, and maintain safety in the workplace.

These fundamentals include:

- Code of Ethics
- Mission Statement
- Sustainability
- Quality
- Safety
- Community
- Environment
- Our Goal: Zero Negative Environmental Impact

*4.9 | Procedures of the highest governance for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes, and principles*

The Board regularly reviews the financial performance of the Company. The Board also maintains five standing Committees of the Board to assist it in its oversight role: the Audit, Risk Management, Compensation, Capital Stock and Executive Committees. The Audit Committee regularly reviews risks that could have an impact on the financial statements of the Company, and the measures taken by management to mitigate those risks. The Risk Management Committee regularly reviews other areas of risk and opportunities, including the environmental and safety performance of the organization. The Company's Community Relations council regularly reports on community relations efforts to the Compensation Committee. The Audit and Compensation Committees are comprised of independent board members.

#### 4.10 | Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance

- The Board is elected annually by the Shareholders of the Company. Information is provided to Shareholders prior to this election that outlines the economic performance of the Company, as well as the oversight provided by the Board and its Committees during the prior year with regard to environmental and safety performance.
- Board evaluations are conducted annually to evaluate the effectiveness of the Board and its various Committees.
- The Board Committees review their respective Charters periodically.
- A Global Sustainability Team was created to develop, implement and enforce standards to ensure consistency and quality in our sustainability reporting efforts with respect to economic, environmental, and social performance.

#### 4.11 | Explanation of whether and how the precautionary approach or principle is addressed by the organization

Buckman supports the Precautionary Principle as defined in Principle 15 of the Rio Declaration. As a responsible corporate citizen, Buckman uses well-defined processes for assessing and managing risks. Our processes of managing and evaluating risk include hazard identification, exposure assessment and risk assessment of current products as well as those currently being researched and developed.

#### 4.12 | Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses

- ISO 9001
- ISO 14001
- OHSAS 18001 (in many of our operating companies)
- Carbon Disclosure Project (CDP)
- EPA-endorsed "12 Principles of Green Chemistry"

#### 4.13 | Memberships in associations (such as industry associations) and/or national/international advocacy organizations

Buckman and its associates are members of several trade associations and advisory groups in which we either hold a position in governance bodies, participate in projects or committees, or which we consider to be strategic. However, Buckman does not provide funding for these beyond routine membership dues and participation in conferences.

These include:

- American Chemical Society (US)
- American Society for Microbiology (US)
- Belgian Federation for Chemistry and Life Sciences Industries (essencia) – (Europe)
- Brazilian Association of Chemical Industries
- CANACINTRA – Morelos (Mexico)
- Chambers of Commerce (multiple locations)
- Chemical and Allied Industries Association (South Africa)
- Confederation of European Paper Industries
- COPARMEX – Morelos (Mexico)

- Enzyme Technical Association (US)
- European Chemical Industry Council – (CEFIC)
- European Pulp and Paper Chemical Association
- FIDECOMP – Morelos (Mexico)
- French Syndicate of the Water Treatment Companies (Syprodeau) – (Europe)
- Fundación Comunidad – Morelos (Mexico)
- Italian Association of Sugar and Ethanol Producers (ANTZA)
- Plastics and Chemicals Industries Association (Australia)
- Pulp and Paper Technical Association of Canada
- Pulp and Paper Technical Institute of Canada
- Responsible Packaging Management Association of Southern Africa
- Singapore Business Federation
- Society for Industrial Microbiology and Biotechnology
- Society of Ethanol and Sugar Technicians (Brazil)
- Society of General Microbiology
- Society of Leather Technologists and Chemists (South Africa)
- Tannery Industries Center of Brazil
- Technical Association of Leather (Argentina)
- Technical Association of Pulp and Paper (Brazil)
- Technical Association of the Pulp and Paper Industry (US)
- The Leather Working Group (Europe)
- The Portuguese Association for Technicians of the Pulp & Paper Industry (Tecnicepa) – (Europe)
- Water Institute of South Africa

#### 4.14 | *List of stakeholder groups engaged by the organization*

- Associates (employees)
- Communities
- Customers
- Government/regulatory
- Industry trade associations
- Shareholders
- Suppliers/business partners

#### 4.15 | *Basis for identification and selection of stakeholders with whom to engage. This includes the organization's process for defining its stakeholder groups, and for determining the groups with which to engage and not to engage*

Buckman has a long history of engaging and responding to stakeholders through formal and informal channels. We have developed a stakeholder engagement policy and guidelines to enhance the process based on principles that demonstrate our organizational commitment to sustainable growth and development. The guidelines for stakeholder engagement to support Buckman's sustainability efforts are based on the GRI G3 Guidelines, as well as the AA1000SES Stakeholder Standard developed by the AccountAbility Institute for Social and Ethical Accountability.

#### 4.16 | *Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group*

Given the diversity of the Company and the global locations in which we operate, many engagement activities occur at the local level. However, there are a number that are standard across the Company.

#### Customers

Buckman deploys specialized cross-organizational teams to lead and manage our relationships with Global Key Corporate Accounts (GKCAs) and Key Corporate Accounts (KCAs). This focused approach enables us to identify unique interests and needs with our customers. We also utilize the Customer Satisfaction Survey (CSS) as a way to identify needs and develop a plan to address them. (See PR5.)

Buckman also works with key customers to help identify their Customer Sustainability Index (CSI) and Return on Environment (ROE) by utilizing our Sustainability Calculator within our Green Toolbox.

Industry-specific newsletters with topics relating to sustainability are developed and distributed to customers.

With Buckman OnSite<sup>®</sup>, our customer portal and data dashboard, Buckman customers and their service representatives have the power to see operations like never before. Customers can use it to access vital, timely intelligence, such as automated controller data, manually entered information and safety data sheets. Buckman representatives can use it to efficiently manage documents and quickly create comprehensive reports for their customers, complete with graphical interpretations. With the insight Buckman OnSite provides, customers can easily monitor their own success and the value Buckman brings to it.

#### Employees

The Associate Engagement Survey, which is administered every two years, is used to measure associate engagement and empowerment. The survey is administered in 14 languages to ensure associates have the opportunity to share their insights and opinions in their first language. The survey results are compared against previous

Buckman associate surveys, external companies within the local geography and a "high performing company" benchmark.

Strengths from the most recent survey conducted in 2014 include:

- Buckman is an ethical and socially responsible company.
- Buckman is living the 7 Principles of Highly Effective Teamwork.
- Buckman's managers are doing a good job managing and developing their teams.
- Buckman has great ability to improve when an area of opportunity is identified.

#### Communities

Buckman has established programs for serving our communities on a global and local level. See the Society section in this document for a description of our community relations activity through our BuckmanCares program.

#### Suppliers/Business Partners

Buckman strongly values our suppliers and believes supplier relationship management is a key aspect in ensuring the sustainability of our business. Governance includes the Buckman Fundamentals and ISO 14001 Environmental/ISO 9001 Quality Management Systems registered sourcing policies and programs. Buckman employs a collaborative model in effectively engaging our suppliers throughout the organization. Strategic supplier relationships are maintained for critical sourcing needs and key technologies. The right sustainable suppliers are selected and maintained according to Buckman's established supplier selection, qualification and performance evaluation processes. Supplier selection is integrated into the earliest phases of the new product/process

development process. Collaborative engagement with our suppliers covers a broad range of activities including customer/market needs management, open innovation, supply/demand planning, make versus-buy, risk management, waste reduction and regulatory compliance. Continual improvement is driven through open collaboration with suppliers on our mutual performance, according to our established practices.

In 2014, evidences of supplier engagement included:

- Development of supplier questionnaire to engage suppliers in our supply chain.
- Buckman Global Procurement Organization chartered with procurement sustainability and supplier engagement as a top priority.
- New globally standardized supplier qualification and performance review process with enhanced sustainability and supplier engagement requirements.
- New green enzymatic technology developed to replace traditional chlorine-based pulp bleaching chemistries. This resulted from a strategic supplier alliance.
- Global supply chain manufacturing optimization initiative launched involving the engagement of and collaboration with contract manufacturers having core competencies in key manufacturing processes utilized by Buckman. This effort is not only optimizing our global supply chain, but is better consolidating production risks into more specialized facilities with better scale and engineering to reduce risks and waste.

#### Government/Regulatory

Local governments and regulatory agencies are engaged via participation on committees or task forces, through written communications to

agencies, or with face-to-face meetings. The level of corporate or local engagement depends on the issue.

#### Industry Trade Associations

Buckman participates in strategic industry trade associations at both the global and local levels.

#### 4.17 | Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting

Issues raised by associates in the Global Associate Engagement Survey are reviewed by executive management and the Global Continuous Improvement Workgroup to identify any actions that need to be taken at the organizational level. The Continuous Improvement Team at each operating company analyses the local results and engages the associates in action planning to address areas for improvement. Each associate has the opportunity to make Buckman a better place to work through this process. Buckman recognizes that engaging and empowering associates to create a stronger organization will make us more sustainable into the future. Based on 2014 survey results, 90 percent of associates feel encouraged to come up with new and better ways of doing things while 86 percent of associates feel they have opportunities to have their ideas adopted and put into use. Associates are a key stakeholder group and their voice in guiding the organization is well respected.

The 2014 survey also reflected the number of associates who feel highly enabled and engaged rose from 58 percent to 63 percent. Specifically, our associates feel:

- They are being coached by their managers and receiving feedback on their work.
- They are receiving recognition for doing a great job.
- They are encouraged to come up with new or better ways of doing things.
- They have opportunities to have their ideas adopted and put into use.
- Cooperation and sharing of ideas and resources across Buckman is encouraged.
- There are opportunities for learning and development.

In the 2014 survey, associates raised concerns about Buckman's knowledge transfer within the organization and the Company's future business prospects. Associates also expressed concern that the number of resources (people) to do the work in their area was challenged. We will remain dedicated to these areas of opportunity and ensure that all communication regarding them is clear.

This report aligns to the Global Reporting Initiative (GRI) G3 guidelines, the internationally recognized standard for sustainability reporting. This table lists

the GRI G3 Sustainability Reporting Guidelines items included in this report. Buckman self-declares this report to GRI G3 Application Level B.



INDICATOR DESCRIPTION (Click on description to navigate)		REPORTING LEVEL	PAGE
<b>Vision &amp; Strategy</b>			3
1.1	<a href="#">Vision from Leadership – Where Value Meets Values</a>	Full	3
1.2	<a href="#">Description of key impacts, risks, and opportunities</a>	Full	4
<b>Economics</b>			7
EC1	<a href="#">Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments</a>	Partial	7
EC4	<a href="#">Significant financial assistance received from government</a>	Full	7
EC5	<a href="#">Range of ratios of standard entry-level wage</a>	Full	7
EC7	<a href="#">Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation</a>	Full	7
<b>Environment</b>			8
EN3	<a href="#">Direct energy consumption by primary energy source</a>	Full	8
EN4	<a href="#">Indirect energy consumption by primary source</a>	Full	9
EN8	<a href="#">Total water withdrawal by source</a>	Full	10
EN11	<a href="#">Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</a>	Full	10
EN12	<a href="#">Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas</a>	Full	10
EN13	<a href="#">Habitats protected or restored</a>	Full	10
EN14	<a href="#">Strategies, current actions, and future plans for managing impacts on biodiversity</a>	Full	10
EN15	<a href="#">Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk</a>	Full	10

	INDICATOR DESCRIPTION (Click on description to navigate)	REPORTING LEVEL	PAGE
EN16	Total direct and indirect greenhouse gas emissions by weight	Full	11
EN19	Emissions of ozone-depleting substances by weight	Full	12
EN21	Total water discharge by quality and destination	Full	12
EN22	Total weight of waste by type and disposal method	Full	13
EN23	Total number and volume of significant spills	Full	13
EN28	Monetary value of significant fines and total number of nonmonetary sanctions for noncompliance with environmental laws and regulations	Full	13
	<b>Labor</b>		14
LA1	Total workforce by employment type, employment contract, and region	Full	17
LA2	Total number of employee turnover by age group, gender, and region	Full	17
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations	Full	17
LA4	Percentage of employees covered by collective bargaining agreements	Full	17
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements	Full	18
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	Full	18
LA7	Rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities by region	Partial	19
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases	Full	20
LA9	Health and safety topics covered by formal agreements with trade unions	Full	20
LA10	Average hours of training per year per employee by employee category	Full	21
LA12	Percentage of employees receiving regular performance and career-development reviews	Full	21

INDICATOR DESCRIPTION (Click on description to navigate)		REPORTING LEVEL	PAGE
<b>Human Rights</b>			22
HR4	Total number of incidents of discrimination and actions taken	Full	22
HR6	Operations identified as having significant risk for incidents of child labor and measures taken to contribute to the elimination of child labor	Full	22
HR7	Operations identified as having significant risk of forced or compulsory labor and measures taken to contribute to the elimination of forced or compulsory labor	Full	22
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken	Full	22
<b>Society</b>			23
SO2	Percentage and total number of business units analyzed for risks related to corruption	Full	23
SO3	Percentage of employees trained in organization's anticorruption policies and procedures	Full	23
SO4	Actions taken in response to incidents of corruption	Full	23
<b>Product Responsibility</b>			24
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures	Full	24
PR3	Type of product and service information required by procedures, and percentages of significant products and services subject to such information	Full	24
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	Full	24
<b>Organizational Profile</b>			25
2.1	Name of Reporting Organization	Full	25
2.2	Primary brands, products, and/or services	Full	25
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures	Full	25
2.4	Location of organization's headquarters	Full	25
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report	Full	25
2.6	Nature of ownership and legal form	Full	25

	INDICATOR DESCRIPTION (Click on description to navigate)	REPORTING LEVEL	PAGE
2.7	<a href="#">Markets served (including geographic breakdown, sectors served, and types of customers/ beneficiaries)</a>	Full	25
2.8	<a href="#">Scale of the reporting organization</a>	Full	26
2.9	<a href="#">Significant changes during the reporting period regarding size, structure, or ownership</a>	Full	26
2.10	<a href="#">Awards received in the reporting period</a>	Full	26
	<b>Report Parameters</b>		27
3.1	<a href="#">Reporting period for information provided</a>	Full	27
3.2	<a href="#">Date of most recent previous report (if any)</a>	Full	27
3.3	<a href="#">Reporting cycle (annual, biennial, etc.)</a>	Full	27
3.4	<a href="#">Contact point for questions regarding the report or its contents</a>	Full	27
3.5	<a href="#">Process for defining report content</a>	Full	27
3.6	<a href="#">Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)</a>	Full	27
3.7	<a href="#">State any specific limitations on the scope or boundary of the report</a>	Full	27
3.8	<a href="#">Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations</a>	Full	27
3.9	<a href="#">Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report</a>	Full	28
3.10	<a href="#">Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/ acquisitions, change of base years/periods, nature of business, measurement methods)</a>	Full	28
3.11	<a href="#">Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report</a>	Full	28
3.12	<a href="#">Identify the page numbers or web links where the following can be found</a>	Full	28
3.13	<a href="#">Policy and current practice with regard to seeking external assurance for the report</a>	Full	28
	<b>Governance, Commitments and Engagement</b>		29
4.1	<a href="#">Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight</a>	Full	29
4.2	<a href="#">Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement)</a>	Full	29

	INDICATOR DESCRIPTION (Click on description to navigate)	REPORTING LEVEL	PAGE
4.3	<a href="#">For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members</a>	Full	29
4.4	<a href="#">Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body</a>	Full	29
4.5	<a href="#">Linkage between compensation of members of the highest governance body, senior managers, and executives</a>	Full	29
4.6	<a href="#">Processes in place for the highest governance body to ensure conflicts of interest are avoided</a>	Full	29
4.7	<a href="#">Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics</a>	Full	30
4.8	<a href="#">Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation</a>	Full	30
4.9	<a href="#">Procedures of the highest governance for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes, and principles</a>	Full	30
4.10	<a href="#">Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance</a>	Full	31
4.11	<a href="#">Explanation of whether and how the precautionary approach or principle is addressed by the organization</a>	Full	31
4.12	<a href="#">Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses</a>	Full	31
4.13	<a href="#">Memberships in associations (such as industry associations) and/or national/international advocacy organizations</a>	Full	31
4.14	<a href="#">List of stakeholder groups engaged by the organization</a>	Full	32
4.15	<a href="#">Basis for identification and selection of stakeholders with whom to engage</a>	Full	32
4.16	<a href="#">Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group</a>	Full	32
4.17	<a href="#">Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting</a>	Full	33