



Contractor Compliance Training

OTTO Contractor Agreement

OTTO is required by various government regulatory agencies to have contractors that do business with OTTO comply with current regulations and requirements. Please be advised that your compliance with these regulations and requirements is necessary in order for you to do business with OTTO.

Please make sure you fill out and sign/return the OTTO Contractor Agreement to:

OTTO
10 West Main Street
Carpentersville, IL 60110
Attn: Contractor Agreement

This agreement will be valid indefinitely or until the training materials are updated. You will need to provide a signed agreement form prior to commencing your services and all signed agreements will be kept on file at OTTO indefinitely.

If you are unsure of which requirements you must comply with, or have another question, please contact the Human Resources Department at OTTO, 847-654-8401.

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Safety Training, Contractors

All contractors who perform a service at OTTO facilities will receive OSHA Safety Training: When new substances, procedures, processes, equipment, or facilities are introduced and represent a new hazard. All contractors who work in the buildings are expected to learn the material and be able to recite it if asked later during safety audits. So pay attention during this training. **YOU NEED TO KNOW THIS INFORMATION.** This applies to any safety training topic you may be required to attend. It is also the responsibility of the contractor to convey this to all their employees and/or subcontractors as well. Evidence of this training will be documented by a signature on the OTTO Contractor Agreement.

Why is Safety so Important?

The Occupational Safety and Health Administration was created by Congress in 1970 to ensure that every working man and woman in the nation has a safe and healthful place to work. OSHA has focused on this goal by implementing workplace standards, setting exposure limits, developing voluntary guidelines, and offering safety and health compliance. Please report all emergencies or safety concerns to the OTTO manager that contracted with you.

Your Role in Safety

OTTO's goal is an accident-free workplace.

Your role includes:

- Participate in safety training and drills
- Report hazards, incidents, and near misses
- Maintain safety attitude
- Ask for help

Plan Review and Update

The OTTO Safety Plan will be reviewed annually and updated whenever:

- New hazards are identified or existing hazards change
- There are changes to the facility layout or infrastructure
- There are changes to emergency action and evacuation procedures
- Each contractor who is covered by the plan will be notified when:
- A contractor is initially hired.
- When the contractor's responsibilities under the plan change
- When the plan is changed

Emergency Preparedness Response

OTTO participates in ISO 14001 Environmental Management System; which is a management system that empowers an organization to address the environmental impact of its activities, services, products and people.

OTTO must:

- Comply with environmental, safety and quality requirements.
- Continually improve our product quality, workplace safety and environmental performance.

The purpose of this policy is to identify potential emergency situations and potential accidents that can have an impact on the environment and to prepare the Emergency Response Team how to respond to them.

Emergency Response Team

The Emergency Response Team is responsible for responding to all types of emergencies which include:

- Hazardous material handling, storage, spills, releases and other exposures
- Fires and explosions
- Tornadoes and other weather emergencies
- Floods
- Accidents and injuries requiring first aid and CPR
- Evacuations

The Emergency Response Team is comprised of active employees who have shown an interest in becoming a team member and were approved by HR. The Emergency Response Team members are certified every two years on Blood borne pathogens, CPR and first aid. Blood borne pathogens are microorganisms that are present in human bodily fluids that can cause diseases. It is important contractors report any instances (ex: blood) to HR so it can be properly cleaned.

The entire team is also trained on Hazardous Communication, SDS, Personal Protective Equipment, Safe Chemical Handling and Accident Investigation. Members of the Emergency Response Team who are also members of the Facilities Maintenance group will be the only members trained and authorized to respond to Lock-out Tag-out and Hazardous Spills and Leaks situations. Anyone can call 911 for immediate emergency response. In addition, employees and contractors should also call the Emergency Response Team or manager that contracted with you when they witness an emergency or unsafe condition. The Emergency Response Team will assess and remedy the situation in a quick and efficient manner.

Bloodborne Pathogens

Bloodborne pathogens are pathogenic microorganisms that are transmitted via human blood and cause disease in humans. They include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV). Although a number of pathogens can be transmitted percutaneously, HIV-1 remains the most common. What constitutes as an exposure incident? It's an exposure to or contact with blood or other potentially infectious material (OPIM) through broken skin, through the eyes, nose, or mouth; or by means of a wound such as a needle stick.

Potential exposure includes tasks that deal with accidents, post accident exposure, first aid administration, and maintenance work.

Universal Precautions

Use of medical gloves, goggles and face shields are considered Universal Precautions which are ways to minimize or eliminate exposure to humans of Bloodborne pathogens.

If you come into contact with Bloodborne Pathogens, contact Human Resources or the OTTO manager that contracted you.

Safety Committee

OTTO also has a Safety Committee which is comprised of the HR department. The Safety Committee meets monthly to discuss, review, and update safety practices at OTTO which include but not limited to: recent accidents, possible accident trends, accident investigation, recent inspections/walk-through, applicable laws and regulation changes, safety training programs and Safety Plans if necessary. If an accident occurs, The Safety Committee or second shift supervisors will conduct an accident investigation. OTTO maintains a Safety Manual, which is comprised of many Safety Plans. These Plans are guidelines, policies and procedures on workplace safety at OTTO. These plans are reviewed annually and updated as necessary. The plan can be found in HR East, HR West, as well as on OTTO's internal website.

Identify Safety Hazards

Keep your eyes open for safety hazards
Fix what you can
Report what you can't fix
Suggest ideas for safety

General Safety Rules

OBEY all warning signs

FOLLOW all safety procedures

DO NOT take shortcuts

USE common sense

REPORT all injuries immediately to your OTTO manager that contracted with you and/or Human Resources.

Right to Know

You have the right to know about the hazards of substances you use on the job. If you handle hazardous chemicals carefully and following the correct precaution(s), these chemicals can be handled safely. We all use chemicals in our everyday lives. Examples include: bleach, rubbing alcohol, nail polish remover and WD-40. For the most part, OTTO uses very basic and safe chemicals. Some physical risks of chemicals may be the ability to explode, start fires or cause corrosion. Some health risks of chemicals include skin rashes, breathing problems or irritation of the skin, nose, throat and eyes.

Hazardous Communications, Presence of Chemicals

It may be necessary to determine if there is a presence or release of a hazardous chemical in the work area. Some indicators of a chemical may be: strong or unique odors, visually inspecting the air quality, skin irritation or a fire alarm signal. Some symptoms of overexposure are dizziness, nausea, vomiting and burning of the nose or eyes. You should always notify the manager that contacted with you so they can remedy the situation. An individual may need medical attention, which HR and/or member(s) of the emergency response team will facilitate if necessary. The best way to learn about the affects of chemicals is to read the Safety Data Sheet.

Exposure to Chemicals

What to do if you have been exposed to chemicals through:

- Inhalation: remove yourself or others from the area to get some fresh air.
- Eyes: Flush eyes using eye wash station
- Skin: Wash with soap and water
- Swallowing: Get immediate medical assistance

Personal Protective Equipment (PPE)

- Purpose: The purpose of this program is to reduce the likelihood of employee accidents and injuries through the proper selection, provision and use of Personal Protective Equipment.
- Contractors need to provide their own PPE to prevent and reduce exposure to chemicals or hazards. Always use the appropriate PPE in designated areas.

Labeling

- Currently OTTO is using HMIS codes on the Right to Know label.
- The Hazard Communication Standard has adopted new requirements under the GHS or Globally Harmonized System that includes pictograms, signal words, hazard statements, and precautionary statements.
- As of June 1, 2015 all labels must follow the new standard.
- During the transition period, both labels with the HMIS codes and labels that follow the new standard will be found in the workplace, so it is important to understand both methods of labeling.
- Chemicals that are kept in the original manufacturer container do not require an additional Right to Know label to be applied.
- The MTL or MRO number (if available) and common chemical name of the chemical are clearly written or typed on the Right to Know label.
- Waste containers must be identified with the chemical stored in the container.

How to Read Labels, HMIS

- HMIS and other organizations have developed a color/number coded labeling system for quick reference.
- Blue: Health
- Red: Flammability
- Yellow: Reactivity
- White: Personal protection, other hazards or special handling.

How to Read Labels, GHS

- Under the new standard, chemical manufacturers and importers will be required to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category.
- Labels will require the following elements:
- Pictogram: A symbol plus other graphic elements, such as a border, background pattern, or color that is intended to convey specific information about the hazards of a chemical. Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e. a red diamond). There are nine pictograms under GHS, however, only eight pictograms are required under the HCS.
- Signal Words: A single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are “danger” and “warning.” “Danger” is used for the more severe hazards, while “warning” is used for less severe hazards.
- Hazard Statements: A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- Precautionary Statements: A phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling of a hazardous chemical.

Spills and Leaks

If a large quantity of a chemical spills or leaks (greater than one gallon):

- Evacuate the area
- Tell a supervisor, HR, Emergency Response Team Member or your OTTO manager that contracted with you.
- Stay away
- Remove flammable items if safe to do so
- Facilities Maintenance will take the necessary action to clean spill, as they are fully trained in spill cleanup.

Cleaning Spills

If a small spill occurs (less than one gallon) anyone can clean the spill.

- Make sure you are knowledgeable about the chemical and have all PPE before you begin cleaning a spill.
- OTTO has multiple Spill Kits located throughout both buildings.
- The Spill Kits contain materials to assist with cleaning a spill; such as absorbent pads and other materials.
- A tamper proof seal will be placed over the kit to guarantee all needed materials are in the kit for necessary cleanup.
- The outside of the kit contains instructions on how to replace items in the kit. If you use materials out of the kit, please tell your OTTO manager that contracted with you, so they can take action to replace the used items.

Use of safety and spill response equipment

Absorbent sock/snake

- Place around drains or large spills to prevent further seepage.

Absorbent pads

- Place pad over the spill

Absorbent material

- Place over the spill and sweep up

Safe Chemical Handling

- Follow all procedures and read all labels
- Do not rub or touch eyes while working with or around chemicals
- Close all containers when not in use
- Properly store chemicals
- Use proper personal protective equipment
- No eating or drinking is allowed when working with chemicals
- Never smell or taste a chemical to identify it
- If you have been OVER exposed to chemicals, notify your OTTO manager that contracted with you.

Safe Chemical Handling

- Use approved containers for chemicals
- Store hazardous chemicals away from storm drains
- Put rags soaked with flammable liquids in approved, closed containers
- Avoid mixing flammable and combustible solvents
- Use only approved containers that are properly labeled.
- Store barrels on Spill Containment Pallets.

Toxic Material Release

All employees and contractors from the affected area(s) will be evacuated from the facility in the event of a toxic material release. Here are the general procedures for handling a toxic material release.

- Notify Human Resources or the Director of HR or your OTTO manager that contracted with you.
- Human Resources, in conjunction with the Facilities Maintenance Department will investigate the instance and provide further instructions. Any instructions will be announced over the intercom system.
- Upon evacuation announcement, exit the building and report to the Primary Meeting Areas.

Safety Data Sheet (SDS)

- Under the GHS requirements a Material Safety Data Sheet is now known as a Safety Data Sheet or SDS.
- An SDS is a document that is given to OTTO from the manufacturer of the chemical.
- An SDS contains important information about the chemical and can be easily obtained by all employees and contractors at any time.
- The SDSs are stored in HR and copies can be requested at any time.
- The OTTO manager that contracted with you can also obtain one for you.
- If the contractor brings their own chemicals into OTTO facilities, they must provide an SDS to the OTTO manager who contracted them.

Safety Data Sheet Format

The format of the 16-section SDS should include the following sections:

- Section 1. Identification
- Section 2. Hazard(s) identification
- Section 3. Composition/information on ingredients
- Section 4. First-Aid measures
- Section 5. Fire-fighting measures
- Section 6. Accidental release measures
- Section 7. Handling and storage
- Section 8. Exposure controls/personal protection
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information
- Section 13. Disposal considerations
- Section 14. Transport information
- Section 15. Regulatory information
- Section 16. Other information, including date of preparation or last revision

Conditions for Evacuation

- Emergencies that require an evacuation of the facility include, but are not limited to: fire, flood, toxic material release and workplace violence etc.
- Evacuation Signal:
 - A long and continuous warning bell or
 - Verbal commands will be broadcast throughout OTTO over the intercom system, which will indicate that all people are to exit the building immediately

Communication

- During an emergency, HR, Facilities Maintenance, and the Receptionists will have access to portable 2-way radios.
- Announcements will also be made over the intercom.
- If the power is out, the intercom system will go out. If the intercom system is not available for use, word of mouth will be the main communication form.

Contractors

- As a contractor, you will be required to participate in evacuations or shelter procedures.
- You will report to the Primary Meeting area so you can be accounted for following an evacuation.
- The hosts of contractors, evacuation monitors, and designated assistants in the area where are located at the time of an evacuation will help contractors safely evacuate.

Discovery of Emergency

Employees are to report all injuries, some of which include:

- Medical
- Fire
- Severe weather
- Bomb threat
- Chemical spill
- Extended power loss

Evacuation Route Maps and Assembly Areas

- Evacuation route maps will be clearly posted in each work area. The following information is marked on evacuation maps:
 - Emergency exits
 - Evacuation routes
 - Primary meeting area

Evacuation and Flood Evacuation

- The primary meeting area for employees of the East building will be east of the power house which gradually becomes higher ground. The primary meeting area for employees of the West building will be between Lincoln Avenue and the parking lot.
- In the event of a flood, Human Resources will instruct employees to take the correct course of action depending upon the severity of the flood. If necessary, announcements or instructions would be made over the intercom system.
- If extreme flooding occurs, the primary and secondary meeting areas may be under water. If this happens, the secondary meeting area for employees of East would be the OTTO school. The secondary meeting area for West would be the northwest corner of Lincoln and Main Street.

Escape Procedure

Any person who discovers a fire or other emergency will follow these reporting and escape procedures:

- When a fire is seen, or another emergency condition becomes known, walk to a safe area and warn others along the way.
- Immediately activate the nearest emergency alarm pull box and/or dial 911, from an OTTO land line phone. The caller will state his or her name, location, type of help needed, and stay on the telephone until released by the dispatcher.
- After activating the alarm, proceed to the Primary Meeting area.

General Escape Procedure

- When the alarm sounds, evacuate according to the designated primary routes or secondary routes to the primary meeting areas. All designated primary and secondary routes are posted in work areas. Maps of escape routes and fire extinguishers are mounted on the walls throughout the buildings.
- After personnel are evacuated and have reached the assembly areas, the designated supervisors will conduct a thorough head count of all personnel. Supervisor and/or managers will determine an accurate headcount. The name(s) of any missing persons and suspected locations of unaccounted or injured people will be immediately communicated to their supervisors, who will contact Human Resources. Human Resources will then notify police/fire department of people who are missing and the location within the building in which they usually work.
- Remain in the primary meeting areas until the “all clear” signal has been given by the President or the Director of Human Resources. Do not go to personal vehicles or leave the primary meeting area.

Bomb Threat

All employees will be evacuated from the facility in the event of a bomb threat. Following are the general procedures for handling a bomb threat:

- Notify Human Resources or the Director of HR or the OTTO manager that contracted you.
- Human Resources will investigate the instance and provide further instructions, which will be announced over the intercom system.
- Upon evacuation announcement, exit the building and report to the Primary Meeting Areas.
- 2nd shift employees shall follow the directions given by 2nd shift supervisor, in the absence of HR presence.

Fire or Explosion Emergency

If contractor discovers a fire or sees an explosion:

- Immediately sound the fire alarm by activating nearest fire alarm pull station. The pull devices will notify the fire department.
- Only trained and authorized employees (Emergency Response Team Members) are permitted to extinguish incipient fires. They may attempt to extinguish the incipient fire if the employee determines it is safe to do so.
- If unable or untrained to extinguish the fire, close—but DO NOT lock—the door and go to the evacuation assembly area.

Fire Response, Fire Extinguishers

- Only employees trained and authorized are permitted to operate fire extinguishers.
- Employees on the Emergency Response Team will be trained in a Fire Extinguisher course.
- Do not operate fire extinguishers if you are not trained and certified by OTTO.

Severe Weather and Natural Disasters

- In the case of severe weather and natural disasters, OTTO may need to close for the safety of its employees.
- There are multiple methods to find out if OTTO is closed: phone, internet, T.V. and radio.
- OTTO's general phone number will have a recording saying the building is closed.
- A copy of this information can also be requested in HR.
- Register with www.emergencyclosingcenter.com

Shelter-in-Place

The Shelter-in-place area for the 2E building is located in the first floor warehouse. The Shelter-in-place area for the 10W building is located in the first floor facilities maintenance and test lab area. During inclement weather the receptionist or the 2nd Shift designee listens to the Quadcom radio receiver which announces tornado watches and warnings in the area. Employees and other personnel will be notified to take shelter by a verbal announcement over the intercom system.

Prevention and Control

- The following job titles at OTTO are responsible for performing all the maintenance to prevent or control sources of ignition or fires.
 - Maintenance Technicians, Building Mechanics, Custodians
 - Manufacturing Maintenance Technicians
 - Molding Technicians, Molding Machine Operators
 - CNC Operators, CNC Setup
 - Outside contractors
- OTTO maintains a sprinkler system throughout all the buildings designed to assist in controlling a fire as well as fire extinguishers located throughout all the buildings as well.

Medical Emergency

Immediately notify the Emergency Response committee or your manager that contracted with you. The Emergency Response committee will evaluate the situation. If treatment from a physician is needed but is not an emergency, Facilities Maintenance may transport the individual to a healthcare provider that OTTO partners with or the employee's family member is called for transportation. If the situation is an absolute emergency, call 911.

- If 911 is needed to be called, give information as to the nature of the emergency and the exact location of the emergency with 2 East Main Street or 10 West Main Street, Carpentersville, IL 60110.
- If calling 911, stay on the phone with the emergency operator until all the necessary information is obtained and the operator hangs up.
- Have someone else notify the President, Director of HR, Facilities Manager, or HR and give them the same information that was given to the Emergency Response Team or 911. Tell them who has been notified.
- If there is a person who has received first-aid training nearby, contact him or her for immediate assistance. The names of those who have received first-aid training are posted on the bulletin boards outside of the cafeterias throughout OTTO East and OTTO West as well as the internal website.
- Send someone to the chosen entrance to escort the rescue units to the scene of the emergency.
- Stay with the ill/injured person and do what you can to keep him/her comfortable until medical assistance arrives (if safe to do so).

Power Outage

- In the event of a power outage, Human Resources will instruct building occupants to take the correct course of action depending upon the anticipated length of the outage.
- During electrical outages due to severe weather, building occupants will be requested to stay in the building until the weather improves. If the weather is not severe, the President or Director of HR or designee may make the decision to close the building if it appears to be a prolonged outage.
- If personnel are in an unlighted area at the time of the outage, they will proceed cautiously to an area that has emergency lights.
- Do not attempt to use elevators during a power outage. If a power outage occurs while an elevator is occupied, do not attempt to escape if the elevator car stops between floors or doors do not open. Push the emergency button in the elevator. That will enable the speaker which calls and connects to the fire department. A cell phone may also be used to call 911.

Your Role in Security

- Workplace goal is safety
- Follow procedures— keep doors locked, don't lend your I.D., respond to alarms
- Report security concerns— unlocked doors, strangers, suspicious mail
- Cooperate with investigations

Accident Response

- Call Emergency Response Team or OTTO Manager that contracted you.
- Cooperate with the investigation

First Aid

- Contact Emergency Response Team
- Use eyewash stations for chemical exposure to eyes
- First-aid boxes are located near your work area.
- Consult SDS if exposed to spills or releases
- Protect against Blood borne Pathogens

Common Fire Hazards include, (but are not limited to):

- Office equipment and supplies
- Electrical wires, equipment and machinery
- Chemical and paper storage areas
- Turn off heaters, fans, soldering irons and pots before you leave work
- Gas lines
- Temporary Cardboard Disposal Bin areas

Electrical Hazards

Do:

- Use plugs that fit the outlet
- Check wire and cord insulation
- Make sure electrical connections are tight
- Keep flammables away from outlets
- Keep clear access to electrical boxes

Workplace Violence

In workplace violence occurs; notify Human Resources or the OTTO Manager that contracted you. Human Resources will instruct everyone to take the correct course of action depending upon the severity of the instance.

Lock-Out Tag-Out

What is lock-out tag-out? This process occurs when machinery or equipment becomes stuck or broken. The machine gets locked and a tag gets put on the machine to notify others it is broken and not to use the equipment.

What gets Lock-out Tag-out? Machines and equipment in which the unexpected energization or start up of the machines or equipment, or release of stored energy could cause injury to employees. If machines or equipment becomes stuck or broken, notify a supervisor, Manufacturing Maintenance or Facilities Maintenance. No employee can use equipment until repair has been made and deemed safe for use.

- Do NOT use this machine until the lock and tag have been removed (fixed).
- Do NOT attempt to fix the machinery yourself!
- Only certified employees or technicians can repair damaged equipment.

Forklift Safety

- Contractors may not use OTTO forklifts unless they have been trained and certified to the same type of forklift and provide evidence of such.
- This ensures safety in the workplace.
- Never use a forklift if you have not been properly trained and certified.
- Perform Daily Inspections of the equipment and don't use if broken.

Overhead Cranes and Lifts

Employees who use an overhead crane or lift will be trained and certified every year. This ensures safety in the workplace. Contractors may never use an overhead crane or lift if you have not been properly trained (unless you are contracted to service it).

Hearing Conservation

- Employees who work in areas that require hearing protection will be trained and certified every year.
- This ensures safety in the workplace.
- Never work in areas that require hearing protection if you have not been trained on the proper use of PPE.

Material Handling

- Assess load and route
- Choose the right equipment
- Hand truck
- Powered vehicles
- Conveyors
- Hoists and derricks
- Load equipment safely
- Push—don't pull
- Wear appropriate PPE

Back Safety

- Stand close to the load with your feet spread shoulder width apart. One foot should be slightly in front of the other for balance.
- Squat down while bending at the knees (not your waist). Tuck your chin while keeping your back as vertical as possible.
- Get a firm grasp of the object before beginning the lift.
- Slowly begin straightening your legs, lifting slowly. Never twist your body during this step.
- Once the lift is complete, keep the object as close to the body as possible. If the load's center of gravity moves away from your body, there is a dramatic increase in stress to the lumbar region of the back.
- If you must turn while carrying the load, turn using your feet, not your torso.
- To place the object below the level of your waist, follow the same procedures in reverse order. Remember to keep your back as vertical as possible, and bend at the knees.

Slip, Trip, and Fall Hazards

- Power cords, ropes, hoses across the floors and walkways
- Open-sided floors and platforms
- Clutter in walkways
- Floors, wall holes, and openings
- Open pits, tanks, vats, and ditches
- Wet floors

Falls

It is the policy of OTTO to prevent injuries to all employees and ensure their safety at work. Employees that are exposed to the possibility of 6 ft. or more potential fall are to be trained in fall prevention safety.

- Facilities Maintenance Department
- Machine Maintenance Department
- If you have not been trained in proper fall prevention, do not use this equipment.

Good Housekeeping

- Keep clear access to evacuation routes, emergency exits, fire-fighting equipment and first-aid stations, and electrical panels
- Keep walkways and stairwells clear
- Close drawers and doors
- Dispose of trash promptly and properly
- Keep workstations organized

Machine Guarding

- The point of operation of machines whose operation exposes an employee to the injury shall be guarded.
- Guards are in place to keep employees safe.
- Never remove protective guards unless instructed to do so.
- Only use machinery if you have been properly trained.

OTTO and the Environment (ISO 14001)

- With our focus on continuous improvement, OTTO developed a quality management system to better satisfy the needs of our customers and to improve the management of the company. The quality system complies with the international standards ANSI/ISO/ASQ Q9001, ISO/IEC 17025-2005, BS EN 13980:2002, ISO 14001, AS9100, and CFR 14 Part 121, 135, and 145, and EASA Part 145.
- ISO 14001 is a management system that empowers an organization to address the environmental impact of its activities, services, products and people. It then provides a framework for companies to take steps to identify issues significant to them, and implement environmental management programs to achieve improved performance. OTTO's Environmental policy states that we are committed to assure that the operations, products and services do not adversely affect the environment.

In accordance with ISO 14001; OTTO has developed the following Environmental Objectives:

- Provide the best available products and services, considering the needs of our customers, employees, environment, and all other interested parties;
- Prevent pollution and comply with all environmental, safety and quality requirements to which we subscribe;
- Continually improve our product quality, workplace safety, and environmental performance
- OTTO recognizes and accepts its responsibility for the environment as an integral part of its services and operations. OTTO is committed to excellence and leadership in protecting the environment and will strive to achieve this objective through an effective Environmental Management System which adheres to the following principles:

- **Compliance**
 - We will manage all of our activities to meet or surpass the standards of all relevant environmental laws and regulations and other requirements.
- **Continuous Improvement**
 - We will establish measurable environmental improvement goals and targets and regularly audit and review environmental performance; continually monitor and improve environmental performance in existing and new operations; strive for cost-effectiveness in environmental management by improving operations, and by promoting the reform of ineffective environmental regulations or laws.
- **Pollution Prevention**
 - We will take into account the impact of our environmental aspects when making decisions; ensure that our facility develops and implements a pollution prevention plan.
- **Communication**
 - We will provide training and education to our employees to ensure that they can work safely, efficiently, and in an environmentally sound manner; communicate openly with employees, clients, the public, government, and regulatory agencies concerning the company's environmental performance and improvement plans.
 - In the event of an environmental accident (i.e., chemical spill) ALL CONTRACTORS must notify the OTTO manager that contracted them in order to initiate proper clean up procedures.

- *The scope of the OTTO Environmental Management System includes all employees, contractors, customers, vendors, visitors and other interested parties. Products, activities, processes and services of the Environmental Management System are limited to defined environmental aspects which OTTO can control within the OTTO Campus and manage; compliance to RoHS and REACH directives where applicable and environmental regulations as required by law. OTTO Environmental Management System internal and external issues relevant to its purpose include but are not limited to the use of non-renewable resources and restricted substances.*

International Traffic in Arms Regulations (ITAR)

- International Traffic in Arms Regulations (ITAR) is a set of United States government regulations that control the export and import of defense-related articles and services on the United States Munitions List (USML). These regulations implement the provisions of the Arms Export Control Act (AECA), and are described in Title 22 (Foreign Relations), Chapter I (Department of State), Subchapter M of the Code of Federal Regulations. The Department of State interprets and enforces ITAR. Its goal is to safeguard U.S. national security and further U.S. foreign policy objectives.
- For practical purposes, ITAR regulations dictate that information and material pertaining to defense and military related technologies (for items listed on the U.S. Munitions List) may only be shared with U.S. Persons unless authorization from the Department of State is received or a special exemption is used. U.S. Persons (including organizations) can face heavy fines if they have, without authorization or the use of an exemption, provided foreign (non-US) persons with access to ITAR-protected defense articles, services or technical data.
- OTTO is registered with the Directorate of Defense Trade Controls (DDTC) and as such, we are committed to safeguard OTTO proprietary information, data and products.
- Contractors must attest whether they are a U.S. citizen or lawful permanent resident to be able to fully enter OTTO Facilities.
- Contractors must attest that they will not have access to OTTO's computer systems or access to OTTO's proprietary information or access to OTTO products unless they have a legitimate business purpose that has been authorized by OTTO.
- Contractors must also attest that they will not use a camera, video, voice or any photographic recording equipment, flash drives, hard drives in their possession while at OTTO facilities unless they have a legitimate business purpose that has been authorized by OTTO.
- Contractors who **cannot** attest that they are a U.S. citizen or a lawful permanent resident must acknowledge this fact and be escorted and have limited access while on OTTO properties.

OTTO Dust Free Policy

- Any contractor hired to work at any OTTO facility will have an OTTO staff member walk through the project requirements and receive instructions on which areas are sensitive to dust and contaminants. It will be the contractor's responsibility to take the necessary steps to ensure the work area contamination is contained. OTTO will assist with measures to disable HVAC equipment or move sensitive product or equipment from the area being worked on. Staff members will walk through before and after work has started to make sure our environment meets our standards. Projects may be suspended if there is a failure to meet our criteria and may resume once they have been met.