



Corporate Policy No. 005

Title: *Environmental, Health and Safety*

Revision No.: 4

Effective Date: October 3, 2013

This Policy contains the following sections:

- 1.0 [Policy](#)
- 2.0 [Implementation](#)
- 3.0 [Responsibilities](#)
- 4.0 [References](#)

Attachment: [Environmental, Health and Safety Incident Reporting Matrix](#)

Applicability: See “[Applicability Statement](#)” at the front of the Corporate Policy Manual

1.0 Policy

L-3 Corporation is committed to conducting operations and activities in a manner that provides and maintains safe and healthful working conditions, protects the environment and conserves natural resources. In meeting this commitment it is L-3’s policy that no employee shall engage in any conduct that violates any environmental, health or safety law or is otherwise inconsistent with the health and safety needs of our employees and the environmental needs of our communities. L-3 Corporation is also committed to the continual improvement of its environmental management systems, its environmental, health and safety programs and to the prevention of pollution.

2.0 Implementation

Compliance with this Policy requires particular attention to the following:

- 2.1 All L-3 operations will be managed and operated in compliance with all applicable environmental, health and safety laws and regulations.
- 2.2 L-3 will not create unacceptable risks to the environment or to our employees and will minimize risk to the Company, its employees and the environment from previous existing and potential conditions.
- 2.3 L-3 will pursue opportunities to prevent pollution by minimizing the quantity and degree of hazard from chemicals used in or wastes resulting from its operations.

- 2.4 L-3 will incorporate environmental, health and safety considerations into its business decisions. Specifically, L-3 will evaluate any new assembly or production processes, proposed acquisition or lease of any new facilities that are reasonably likely to impact compliance with this policy, or significantly affect environmental, health and safety needs of our employees and the environmental needs of our community. Proposed new facilities where chemicals are expected to be used in significant quantities shall be the subject of a Phase I environmental site assessment. L-3 will consider the use of risk management means, including environmental insurance, to mitigate the financial risks associated with site contamination on new and existing properties.

3.0 Responsibilities

3.1 Corporate

- 3.1.1 Corporate EH&S will coordinate the availability of appropriate and effective environmental, health and safety training and awareness programs and shall arrange for the periodic audit of environmental, health and safety programs at each Division. Corporate EH&S shall also review any environmental, health or safety consultants or contractors proposed to be hired by any operating unit or by the Corporation that do not meet minimum insurance, qualifications and other terms set forth in the [EH&S Consultant Approval Process Guidance](#) document. Corporate EH&S is responsible for reviewing and approving any lease or purchase of any new real property by L-3.
- 3.1.2 Corporate EH&S will coordinate with Division Presidents and other Corporate functions as appropriate with respect to the investigation of incidents involving major environmental, health and safety impacts.

3.2 Division Presidents

- 3.2.1 Develop and implement environmental, health and safety programs to comply with this Policy.
- 3.2.2 Designate a qualified Environmental, Health and Safety Coordinator to manage the Division's environmental, health and safety programs. Each Coordinator will be responsible for designating an appropriately trained individual, located on-site at each of the Division's facilities, who will be responsible for ensuring compliance with this Policy.
- 3.2.3 Assure the availability of adequate funds and time for EH&S training of relevant personnel.
- 3.2.4 Incident Investigation: (a) Determine the facts regarding generation and release of pollutants from Division facilities and responsibly manage Division affairs to minimize any adverse environmental impact; (b) Determine the facts and cause regarding injuries, accidents, and employee chemical and radiation exposure at Division facilities and responsibly manage Division affairs to minimize any adverse health and safety impact.
- 3.2.5 Approve and implement action plans addressing each finding contained in any Corporate environmental, health and safety audit.
- 3.2.6 Comply with the requirements of the attached Environmental, Health and Safety Incident Reporting Matrix.

- 3.2.7 Where customer requirements or national security needs pose unique problems, work with the customer to find solutions that will meet both the customer's needs and the objectives of this Policy. However, customer requirements shall never justify the violation of any applicable environmental, health or safety law, and L-3 shall take no action in light of national security needs without appropriate legal authorization.
- 3.2.8 Notify Corporate EH&S when a change in operation or the acquisition or lease of new facilities significantly increases environmental, health or safety risks at the site or within the Division (e.g., when a Division with predominantly office workers develops new business with manufacturing, field service, or engineering activities). Also, in consultation with Corporate EH&S, develop a plan for deploying compliant EH&S programs and training at any newly acquired or leased facility or field service site.
- 3.2.9 Compliance with this Policy is to be well documented. This Policy shall be communicated to all employees.
- 3.3 Environmental, Health and Safety Coordinators
 - 3.3.1 Each Environmental, Health and Safety Coordinator will be responsible for ensuring compliance with the Policy at their specific location(s).
 - 3.3.2 Environmental, Health and Safety Coordinators shall:
 - 3.3.2.1 Ensure that they receive adequate training and resources to remain fully informed of the laws, regulations and best practices applicable to their operations.
 - 3.3.2.2 Provide, or arrange for the provisions of all required environmental, health and safety training at each of their operating location(s).
 - 3.3.2.3 In connection with division management, including Human Resources management, enforce all environmental health and safety policies, practices and work rules.
 - 3.3.2.4 Approve, deny or conditionally approve any new chemical or process equipment proposed for purchase by their operating location(s).
 - 3.3.2.5 Investigate the root cause of any injury, accident, illness or near miss arising in the course of business operations.
 - 3.3.2.6 Ensure that the need for any capital or other improvements are promptly brought to the attention of the Division President, and, if positive response is not received, to the attention of the Corporate Director, Environmental, Health and Safety.
- 3.4 Employees
 - 3.4.1 Compliance with this Policy is the responsibility of every employee including those with supervisory responsibilities.

4.0 References

[EH&S Consultant Approval Process Guidance](#) document – Section 3.1.1



Steven M. Post

Senior Vice President, General Counsel and
Corporate Secretary

ENVIRONMENTAL, HEALTH AND SAFETY INCIDENT REPORTING MATRIX

Reportable Event	Time Frame	* Reporting Method
Advanced notice of a regulatory inspection	Same Day	T, E
Regulatory Inspection for which no notice was provided	24 Hours	T, E
Notice of violation, liability, penalty, directive or compliance requirement	4 Hours	E, F
Accidental spill or release with a reasonable potential of reaching soil or water (any amount), any accidental release of a volatile organic substance or highly toxic compound in excess of one gallon, or any other accidental spill or release of a liquid in excess of five gallons	Immediate	T, E, Written Memorandum. Follow-up within 48 hours
Request for information from any governmental agency or third party about past disposal practices	24 Hours	E, F
Any event requiring reporting to a regulatory agency	Immediate	E, F
Complaint from a neighbor regarding odors, noise or environmental impairment	72 Hours	E, F
Any fatality on the premises (including visitors, contractors, employees, etc.)	Immediate	T, E
Any off-site employee fatality which may be work-related	Immediate	T, E
Any other injury or illness required to be reported to OSHA or to a State OSHA	6 Hours	T, E
Other serious incidents and near misses that had the potential to result in serious injury/illness (e.g., death, dismemberment, incapacitation, unconsciousness, hospitalization) or requiring shut down of an operation for longer than 24 hours including but not limited to: failure of a safety-related monitoring device or of a supplied air breathing apparatus; electrical shock, structural fire, explosions, failure of cranes, hoists and associated fixtures or slings, incidents involving forklifts that could have caused serious injury or property damage; incidents involving aerial /scissor lifts; collapse of building, floor, wall, mezzanine scaffold or similar construction; or accidental generation of a high-ionizing or non-ionizing radiation field in an uncontrolled area where employees may have been exposed	4 Hours	E, F
Any violation of work rules or safety policies resulting in the termination of an employee or the suspension without pay of an employee for a period of three days or more	4 Hours	T, E
Any new operating location (other than strictly office space) or significant operational changes at existing locations that significantly increase EH&S risk	24 Hours	T, E

* T=Telephone, E=Email, F=Fax

All reporting shall be to the Corporate Environmental, Health and Safety Office to Lee Marseglia. In the event that Mr. Marseglia is unavailable for an "Immediate" report, reports may be made to Robin Thomas or Jim Leach. Reporting information follows:

Lee Marseglia	Lee.Marseglia@L-3com.com	(860) 678-7849 Telefax
Robin Thomas	Robin.Thomas@L-3com.com	(717) 618-0516 Telefax
Jim Leach	Jim.Leach@L-3com.com	(646) 468-6757 Tel

Record of Change

<u>REVISION NUMBER</u>	<u>ISSUE DATE</u>	<u>DESCRIPTION OF CHANGE</u>
0	November 4, 1997	New Procedure.
1	April 7, 2000	Expanded Policy Implementation guidelines; clarified Responsibilities of Corporate, Division Presidents and Employees.
2	April 19, 2004	Implemented reporting requirements and methods for reportable events with Attachment of EH&S Incident Reporting Matrix.
3	July 26, 2010	Implemented Record of Change; Added Section 4.0 References; revised Section 3.1.1 to incorporate guidelines of Corporate EH&S Consultant Approval Process; added new Section 3.2.8 notification requirement for any new operating location (other than strictly office space) or when an operation changes in a way that can significantly increase EH&S risks; deleted lost time requirement as a Reportable Event; updated Corporate contact information for Reportable Events.
4	October 3, 2013	Updated Corporate contact information for Reportable Events.