

Corporate Environmental Policy Document



Document Title	New Chemical and Material Approval	Revision Date	10/12/18
Document Control #	CORP-ENV-200	Authored by	T. Saunders
Division	Mohawk Industries, Inc. & Dal-Tile	Approved by	D. Wood

I. Purpose

The purpose of this policy is to provide Mohawk Industries' employees with the Corporate Environmental requirements regarding acquisition and use of new chemicals or materials within the Company.

II. Background

The proper management of chemicals and materials, whether as samples, raw materials, mixtures, or products involves numerous legal and regulatory requirements for the Company and the facilities where chemicals or materials will be used. Mohawk Industries is responsible for the proper management of all chemicals on its properties and ensuring compliance with various safety, environmental, import and transportation regulations.

III. Scope

This policy applies to all new chemical or material products that are imported, purchased, or obtained as a sample by any person for use internally at any Mohawk Industries or Dal-Tile facility located in the United States. This includes chemicals or materials shipped from Mohawk Industries' operations outside the U.S. to any U.S. location, and products intended for resale, including direct resale.

This policy applies to chemical or material products used in or by:

- Manufacturing operations
- Maintenance and Housekeeping operations
- Engineering
- Purchasing
- Research and Development (R&D)
- Sales & Marketing
- Transportation and Logistics Personnel, and
- Third Party Contractors

IV. Definitions

- Chemicals or Materials – raw materials, chemical mixtures, consumer products, and lab samples whether liquid, solid, or gas. Includes, but not limited to, paints, cleaners, janitorial chemicals, lubricants, spray adhesives, and products brought on-site and used by third party contractors. Excludes office supplies.
- Facility – a location where a chemical or material will be used, including individual departments within a plant or any other business unit.
- EHS – Extremely Hazardous Substance
- GHS – Globally Harmonized System
- HAP – Hazardous Air Pollutants
- ORM-D – Otherwise Regulated Material
- SARA – Superfund Amendments Reauthorization Act
- VOC – Volatile Organic Compounds

V. Procedure

All new chemical or material products described in sections III and IV above must be reviewed and approved by the Corporate Environmental department prior to import, purchase, request for a sample, or bringing on-site. The Mohawk employee seeking approval of new chemical or material should submit the documentation described in the table below to Corporate Environmental for review.

Document	Required	Instructions
1. A product safety data sheet or SDS from the manufacturer or supplier	For all new approvals	<ul style="list-style-type: none"> • Be in English and meet OSHA, GHS requirements • Be less than three years old • Clearly indicate the concentration of any SARA 313 chemicals, EHS, VOC, HAP as defined by the EPA or other regulatory authority, California Proposition 65 chemicals, or the presence of formaldehyde above 1 part per million.
2. New Chemical Product Approval Request Form	For all new approvals	<ul style="list-style-type: none"> • Should be filled out by the Mohawk employee requesting the approval.
3. Chemicals of Concern Evaluation Sheet	For chemicals or materials used in the manufacture or production of a Mohawk product or for any consumer product that is private labelled by Mohawk	<ul style="list-style-type: none"> • This form should be completed by the manufacturer or supplier of the new chemical or material being requested. • This form does not have to be completed and submitted for new chemicals or materials that will only be used in maintenance and housekeeping activities or on a trial basis.
4. TSCA Checklist	If the material is imported from outside the U.S.	<ul style="list-style-type: none"> • The manufacturer or supplier shall complete the TSCA Checklist for the material for which approval is being requested or provide other evidence that all components are listed on the TSCA inventory. Corporate Environmental will review the data provided and approve or reject. • If necessary, a completed TSCA letter will be issued by Corporate Environmental for the records of the requestor or for use with the U.S. Custom documents.

The Approval Request, Chemicals of Concern Evaluation, and TSCA Checklist forms can be found on the mymohawk.com home page, employee links, Environmental at this [link](#).

For each new chemical or material approval request, the documentation referenced in the table above should be submitted to Corporate Environmental for review.

1. Documents should be emailed to environmental_approvals@mohawkind.com.
2. Each document should be submitted as an individual digital file and not scanned.
3. Once the Approval Form is completed, click the email button on the form. This will open an email to environmental_approvals@mohawkind.com and attach the completed Form. The other supporting documents should be attached to this same email as individual files.
4. Please only submit a single product approval request per email. This helps the review and processing of requests to be quicker and more efficient.

Corporate Environmental will review the documents and attempt to respond to the requestor with an approval decision, or request for additional information, within 2 business days. Please note that a request that is incomplete, submitted incorrectly, or submitted with outdated forms will not be processed and will be sent back to the requestor. Figure 1 provides the intended flow of this process.

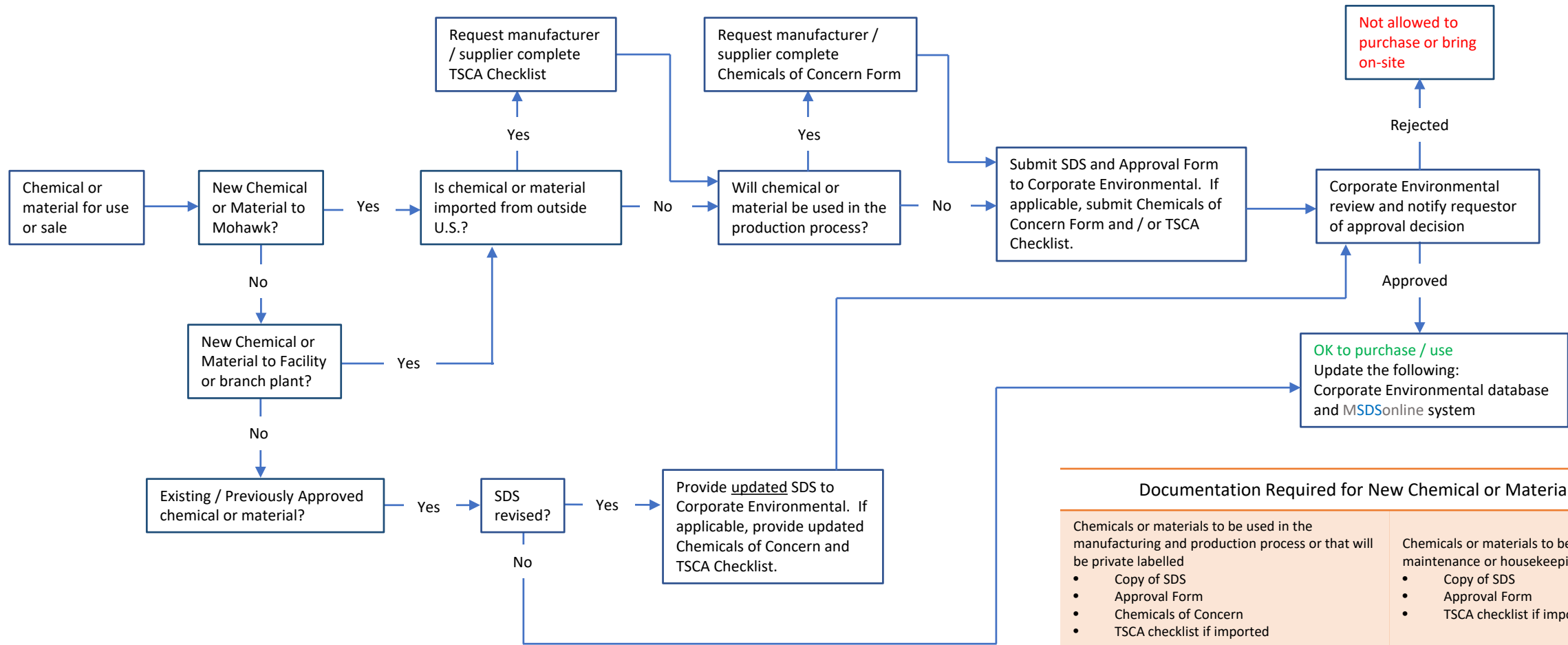
VI. Expectations

1. Employees will not bring in a chemical or material without prior Corporate Environmental approval.
2. Chemicals and materials will not be purchased using a P-card unless granted a one-time exception by Corporate Environmental that is documented.
3. Upon approval of a new material, the requestor will provide a copy of the SDS to the site safety contact at the physical location where the new chemical or material will be handled or used.
4. Corporate Environmental will upload a copy of the safety data sheet into the **MSDSonline** management system, linking it to the facility(s) for which it has been fully approved.
 - If a facility desires to use a chemical or material already approved for use at a different facility, the facility will submit the required documentation to request approval from Corporate Environmental.
5. The employee requesting approval of a new chemical or material is responsible for maintaining copies of approved requests and supporting documents.
6. Corporate Environmental, in cooperation with Corporate Safety, will work to maintain an online library of safety data sheets.
7. A list of approved materials within Mohawk Industries U.S. locations, is maintained by Mohawk's Master Data Management Department. Corporate Environmental will assist Master Data Management as needed by providing environmental approval documentation.
8. All labels of distributed products, commonly called sundry products, must be reviewed and approved for regulatory completeness prior to the shipment of the first sample, lot, batch or order. This review will be facilitated by Corporate Environmental.
 - Any time a label changes, it shall be submitted for review. This is intended to ensure that specific labeling requirements are addressed and that all claims made on labels are substantiated with data.
9. A copy of the SDS in English and meeting the OSHA – GHS requirements should accompany the first shipment in the U.S. annually to all customers of any chemical products sold or distributed by Mohawk. This includes 3rd party manufactured consumer goods.
10. A copy of the SDS for any hazardous material as defined by U.S. Department of Transportation, including a material classified as ORM-D, must accompany every shipment, whether by Mohawk transportation or by common carrier. This is the responsibility of the shipping entity.
 - It is the responsibility of the organization shipping materials classified by the Department of Transportation as hazardous to obtain all required training and certifications.

VII. Document Review

This document will be reviewed annually by Corporate Environmental.

Figure 1
New Chemical / Material
Approval Flow Diagram



Documentation Required for New Chemical or Material Request	
Chemicals or materials to be used in the manufacturing and production process or that will be private labelled <ul style="list-style-type: none"> • Copy of SDS • Approval Form • Chemicals of Concern • TSCA checklist if imported 	Chemicals or materials to be used as a maintenance or housekeeping product <ul style="list-style-type: none"> • Copy of SDS • Approval Form • TSCA checklist if imported
Existing chemicals or materials already approved and that have been reformulated <ul style="list-style-type: none"> • Copy of revised SDS • Updated Chemicals of Concern • Updated TSCA checklist 	Chemicals or materials to be trialed only <ul style="list-style-type: none"> • Copy of SDS • Approval Form • TSCA checklist if imported