

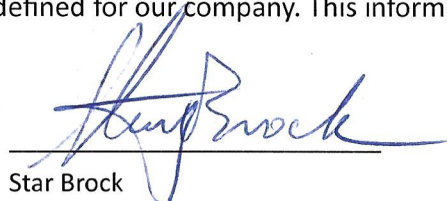
Environmental Management System

The Environmental management system is fully supported and implemented within the Tongrun International organization.

Tongrun International is committed to maintain a safe and clean environment in doing so, We shall strive to continually improve our environmental performance by,


- Conservation of resources like water, electricity etc.
- Compliance with all relevant applicable legislation.
- Incorporate practices of prevention and waste reduction.
- Encouraging employee, and partner participation.

We, shall impart training and standard practices to all our employees to achieve the goals and objectives defined for our company. This information is available to the public through: Tongruninternational.com


Star Brock
Vice President


12/6/23
Date


Brandt Strieby
President


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1 Scope

Tongrun International has developed and implemented this Environmental Management System (EMS) in to improve performance and provide a framework for sustainable initiatives.

The purpose of the EMS is:

- The ability to consistently provide products and services that meet Client and applicable statutory and regulatory requirements:
- Addressing risks and opportunities associated with its context and objectives:
- The ability to demonstrate conformity to specified EMS requirements.
- This EMS complies with the requirements of ISO 14001:2015 standard.

The purpose of the Environmental Management System Manual (manual) is to define and describe the EMS, to define the responsibility and authority of the management personnel involved in the operation of the system, and to provide a general description of the requirements of the standard as they apply to TONGRUN INTERNATIONAL.

The manual is divided into ten sections that correlate to the EMS sections of the ISO 14001:2015 standard.

This manual describes the EMS, delineates authorities, inter relationships and responsibilities of the personnel responsible for performing within the system. The manual also provides procedures or references for all activities comprising the EMS to ensure compliance to the necessary requirements of the standard.

This manual is used internally to guide TONGRUN INTERNATIONAL's employees through the various requirements of the ISO 14001:2015 standard that must be met and maintained in order to ensure interested parties' satisfaction, continuous improvement and provide the necessary instructions that create an empowered work force.

This manual is used externally to introduce our EMS to our Clients and other external organizations or individuals to familiarize them with the controls that have been implemented.

The manual outlines the policies, procedures, and requirements of the EMS for the products and services that TONGRUN INTERNATIONAL provides, as listed below:

- Engineering
- Prototype development
- Sheet metal fabrication
- Welding fabrication
- Powder coating systems
- Integration and assembly


The manual is to help identify and control the external and internal issues that are relevant to the company to reduce any risk associated with the above listed activities while meeting client and statutory requirements. The system shall comply with the requirements of the International Standard ISO 14001:2015. TONGRUN INTERNATIONAL is referred to in this document as either TONGRUN INTERNATIONAL or TRI

The EMS requirements specified in this standard are complimentary (not alternative) to contractual law and regulatory requirements.

2 Normative References

The following documents were used as reference during the preparation of the EMS:

- International Standard ISO 14001:2015 Environmental Management System - requirements
- International Standard ISO 14001:2015 Environmental Management Systems- Fundamentals and vocabulary

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3 Terms and Definitions

Audit – systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

Audit program - set of one or more audits planned for a specific time frame and directed towards a specific purpose.

Audit criteria - set of policies, documented information or requirements used as a reference against which audit evidence is compared.

Approved Suppliers List – a list of suppliers of materials or services which have been audited by TONGRUN INTERNATIONAL as certified to supply on contracts specifying the quality standards within this manual.

Batch (Volume or Lot) – an identifiable collection of products, quantity of material, or a single type, grade, class, size or composition produced in the same facility under essentially the same conditions and at essentially the same time.

Calibration – comparison of two instruments, measuring devices or standards, one of which is known as accuracy. It is carried out to detect, correlate, report, or eliminate by adjustments any variation in accuracy of the instrument or measuring device.

Characteristic – any distinct property or attribute of a product, process or service that can be described or measured to determine conformance or nonconformance to specific requirements.

Competence - ability to apply knowledge and skills to achieve intended results.

Context of the organization - business environment combination of internal and external factors and conditions that can influence an organization's approach to its products, services and investments and interested parties.

Contract – the written covenant and other documents agreed to and legally binding between Client and supplier which specify requirements and conditions that must be met to successfully complete the work.

Conformance - fulfilment of a requirement.

Correction - action to eliminate a detected nonconformity.

Corrective action – action to eliminate the cause of a detected nonconformity or other undesirable situation.

Client – the organization or its representative issuing a contract for procuring products or services.

Client Representative – The people appointed by the Client to survey and verify the quality of the supplier's work.

Client owned property – any type of part, sub-assembly, fixture, accessories, manuals, drawings, computers, software, shipping containers that belong to a client.

Client satisfaction - Client's perception of the degree to which the Client's expectations have been fulfilled.

Defect - nonconformity related to an intended or specified use.


Disposition – an action to determine whether the production process and quality assurance programs are capable of producing a quality product or providing a quality service and generating evidence that supports decisions of acceptability.

Documented information - information required to be controlled and maintained by an organization and the medium on which it is contained.

Effectiveness - extent to which planned activities are realized and planned results achieved.

Improvement - activity to enhance performance.

Inspection – the examination, measurement and testing of characteristics of the products or services to determine acceptability and record the inspection area.

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Inspection and Test Point – a location or stage in the production cycle where inspection and testing are performed by personnel whose responsibility is to determine the acceptability of products or services and to record inspection and test data.

Involvement - engagement in, and contribution to, shared objectives.

Interested party - person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity.

Infrastructure - system of facilities, equipment and services needed for the operation of an organization.

Management - coordinated activities to direct and control an organization.

Measurement - process to determine a value.

Monitoring - determining the status of a system, a process or an activity.

Non-conformance – a deficiency in any characteristics, documentation or procedure which renders the quality of a product or service unacceptable or indeterminate or not according to specified requirements.

Examples of non-conformance are physical defects, test failures, inadequate documentation, and deviations from prescribed processing or from any other part of program.

Outsource – Arranging an external organization to perform part of an organization's function or process.

Performance - measurable result.

Process - set of interrelated or interacting activities which transforms inputs into outputs.

Production – all activities involved in the fabrication, assembly, construction, and erection of products to specified requirements.

Strategy - planned activities to achieve an objective.

Supplier provider - person or organization that provides a product or a service.

Validation - confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled.

Verification - confirmation, through the provision of objective evidence, which specified requirements have been fulfilled.

Quality - degree to which a set of inherent characteristics of an object fulfils requirements.

Quality Assurance – all those planned and systematic actions needed to provide adequate confidence to the Client that the products or services will satisfy specified requirements.

Quality policy – overall intentions and direction of an organization related to quality as formally expressed by top management.

Quality Systems Procedure (QSP) – the section of the quality assurance manual pertaining to a specific requirement of the quality standard to which it has been written.

EMS – Environmental Management System.


QMP – Quality Management Procedure.

Requirement - need or expectation that is stated, generally implied or obligatory.

Regulatory Authority – the Federal, State, Territorial or Municipal agency having the lawful right and power to interrupt the law and exercise authority.

Repair – processing of non-conforming products so that they can function reliably and safely although the parts still do not conform to the original specified requirement.

Risk - effect of uncertainty on an expected result.

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4 Context of the Organization

4.1 Understanding the Organization and its context

Established in 2016, TONGRUN INTERNATIONAL has developed a sustainable scope of services within sheet metal fabrication industry. These services Engineering, Proto-type, Project Management, Sheetmetal Fabrication, powder coating, and assembly and integration.

Company Name	TONGRUN INTERNATIONAL
Business Address	2501 Pecan St. Bonham, Tx. 75418
Registered Address	2501 Pecan St. Bonham, Tx. 75418
Phone	903-486-6059
Email	randys@tongruninternational.com
Website	Tongruninternational.com
Certifications	ISO 9001:2015

TONGRUN INTERNATIONAL has determined external and internal issues relevant to TONGRUN INTERNATIONAL's purpose and strategic direction that may affect our ability to achieve the intended results of EMS. This information will be reviewed annually during the Management Review. See the below table for details.

4.2 Understanding the needs and expectations of workers and other interested parties

TONGRUN INTERNATIONAL determines the interested parties, including workers, their needs and expectations that are relevant to the EMS. Monitoring and analysis are carried out in the EMS processes in accordance with the diagram, represented in the QMS FOLDER EMS Interested Parties

4.3 Determining the scope of the Environmental Management System

TONGRUN INTERNATIONAL has determined the boundaries and applicability of the OH&S Management System to establish its scope. As depicted in *Fig 4.3*, the scope has been defined using the external and internal issues defined in *Fig 4.1*, the requirements of the interested parties defined in *Fig 4.2* and the below products and services.

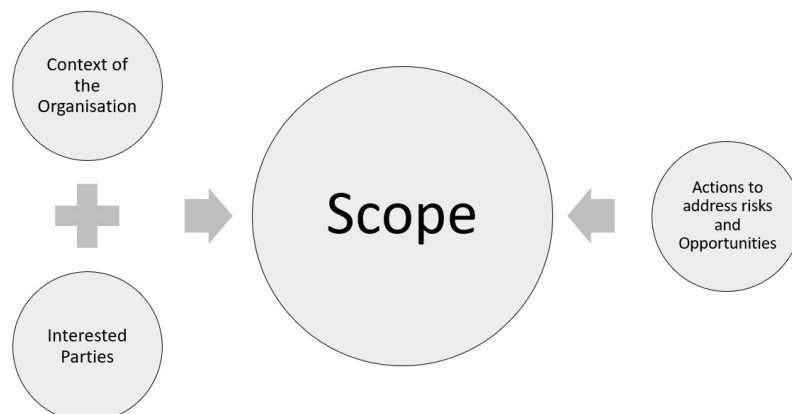



Fig.4.3. Establishing of Scope of the EMS. Diagram

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The scope of the organization's environmental management system is maintained as part of the Management Review and annual audit requirements of the standard ISO 14001:2015

5 Leadership

5.1 Leadership and Commitment

TONGRUN INTERNATIONAL Management Team has been actively involved in implementing the EMS and taken accountability for its effectiveness for the prevention of impacts on the environment through our workplace activities.

TONGRUN INTERNATIONAL Management have provided the vision and strategic direction for the growth of the EMS and established environmental objectives and the Environmental policy.

TONGRUN INTERNATIONAL Management are committed to the development and implementation of the EMS and continually improving its effectiveness, by communicating to the organization the importance of environmental awareness in the workplace. By integrating the measures within our day-to-day activities and communicating the Environmental policy to all involved within the EMS we increase the effectiveness of the decisions and systems.

TONGRUN INTERNATIONAL Management actively encourage worker participation from in the creation of its business processes, promoting the use of risk-based thinking, engagement, and motivation of the workers to contribute to the effectiveness of the EMS.

5.2 Environmental Policy

Our environmental policy is a statement of commitment from the Management Team and reflects the values and ethos of the organization. The policy is reviewed every year by the Management Team for its appropriateness and legitimacy. It is signed and dated after every review.

The policy is communicated to people working for or on behalf of the organization through staff and contractor inductions, is displayed in the buildings that we operate from and made available at www.TongrunInternational.com. This policy is filed electronically under TONGRUN INTERNATIONAL's document control.

5.3 Organization Roles & Responsibilities and authorities

Subcontractor workers must comply with minimum environmental legislative requirements and any TONGRUN INTERNATIONAL environment site requirements. The list of organizational roles and responsibilities is located in: Quality Management system EMS 14001 folder

Workers will be selected to participate in workplace inspections and work together with TONGRUN INTERNATIONAL to maintain a safe workplace.

6 Planning

6.1 Actions to address risks and opportunities.

6.1.1 General

By using the information defined in [Section 4.1](#) and [Section 4.3](#), TONGRUN INTERNATIONAL addresses the risks and opportunities and integrated into EMS processes. Below are identified key risks and opportunities.

Interested Party	Concern	Risk	Opportunity
Suppliers	Their reputation and quality/delivery/price influences	<ul style="list-style-type: none"> Nonconformance Noncompetitive pricing 	<ul style="list-style-type: none"> Superior performance
Employees	<ul style="list-style-type: none"> Do they have pride of workmanship? Loss of key personnel 	<ul style="list-style-type: none"> Controls service quality 	<ul style="list-style-type: none"> Source of innovation Build company culture
Customers	<ul style="list-style-type: none"> Failure to meet customer expectations. Increased competition 	<ul style="list-style-type: none"> Loss of reputation Loss of future work Loss of market share 	<ul style="list-style-type: none"> Identify gaps and build service to meet or exceed expectations
Directors/Senior Management	Lack of focus on company direction	<ul style="list-style-type: none"> Looking for short term return on investment Focus on short term goals, no long-term planning 	<ul style="list-style-type: none"> Supports re-investing. Effective Business planning
Community	Impact on our reputation and ability to deliver services	<ul style="list-style-type: none"> Demands which reduce profits 	<ul style="list-style-type: none"> Promotes development. Creates opportunities


Actions taken to address risks and opportunities are proportionate to the potential impact on the conformity of products and services.

6.1.2 Environmental aspects

TONGRUN INTERNATIONAL has reviewed and identified environmental aspects for all activities, products and services that it can control and influence, including planned and new development, new and modified activities, products and services and has identified all environmental aspects. These are listed Risk assessment and log of corrective actions and status located: Quality Management folder EMS14001

Each identified environmental aspect is subject to a qualitative risk analysis based on likelihood and consequences of environmental impact or impact on the organization from environment-related issues, in the context of *existing* measures to control the risk. Both positive and negative impacts can be considered. The risk analysis matrix is as follows:

LIKELIHOOD	CONSEQUENCES			
	Very Likely	Likely	Unlikely	Highly unlikely
Catastrophic	Extreme	Extreme	Extreme	Moderate
Major	Extreme	Extreme	Moderate	Moderate
Minor	Extreme	Moderate	Moderate	Low
Insignificant	Moderate	Moderate	Low	Low

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Likelihood refers to the possibility or frequency of an environmental impact. The organization undertakes many routine activities that have an environmental impact on a daily or relatively frequent basis. Other activities are done less routinely, and environmental incidents can also occur. The following criteria explain the five categories of likelihood:

Very likely: An environmental impact or impact on the organization from an environmental-related issue is expected to occur in most circumstances or will occur on a daily basis.

Likely/weekly: An environmental impact or impact on the organization from an environmental-related issue will probably occur in most circumstances or will occur on a weekly basis.

Unlikely: An environmental impact or impact on the organization from an environmental-related issue could occur or will occur on a monthly basis.

Highly unlikely: An environmental impact or impact on the organization from an environmental-related issue could occur but is not expected or will occur annually.

The following provides criteria for determining consequence to the environment or the agency from an environment-related issue:

Catastrophic: Widespread, irreparable environmental damage; loss of human life or long-term human health effects; national attention; serious litigation; over \$1 million to manage consequences.

Major: Widespread, medium to long term impact; serious human health impacts; state-wide or national attention; major breach of legal requirements; major disruption to operations; agency's reputation badly tarnished; \$100,000 to \$1 million to manage consequences.

Minor: Localized short to medium term impact; minor contribution to climate change; minor and reversible human health impacts treatable with first aid; negative publicity from local media; minor breach of legal requirements; \$1000 to \$10,000 to manage consequences.


Insignificant: Limited impact to a local area but no long-term effects; concern or complaints from neighbors; no injury to people; minor technical nonconformity but no legal nonconformity; less than \$1000 cost to the agency to manage consequences.

Conducting a risk analysis results in the allocating of a risk level of *extreme, high, moderate* or *low* for each environmental aspect. Environmental aspects with an *extreme* or *high* risk are considered to be *significant*, that is, they have or can have a significant environmental impact.

Environmental aspects associated with a legal requirement, or another requirement to which the organization subscribes, such as an State/Federal policy, are also considered to be significant, regardless of the outcome of the risk analysis.

Significant environmental aspects of TONGRUN INTERNATIONAL are flagged in the EMS Risk assessment. These are given priority for the Executive Team, and are taken into account in establishing, implementing and maintaining the environmental management system.

The EMS Risk assessment is reviewed annually to ensure that is kept up to date. It is also reviewed when there are any changes to activities, products or services of the company.

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6.1.3 Compliance obligations

TONGRUN INTERNATIONAL is subject to several legal requirements regarding its environmental aspects. TONGRUN INTERNATIONAL's Management Team monitors our legal obligations and keeps them up to date. The organization is also subject to several other non-legal requirements regarding its environmental aspects.

The EMS Risk assessment form details the specific requirements applicable to the organization and shows how the requirements apply to the TONGRUN INTERNATIONAL's environmental aspects. It is maintained by the Management Team. The Management Team are also responsible for reporting on changing legal and contractual requirements related to TONGRUN INTERNATIONAL's environmental aspects in management reviews.

Our legal and other requirements are taken into account in establishing, implementing and maintaining the environmental management system.

6.1.4 Planning action

Consistent with our environmental policy, measurable objectives and targets are set each year for our significant environmental aspects and recorded in our HSE Objectives Register. The register also lists action plans, improvement programs and controls for achieving those objectives and targets, as well as key performance indicators (KPIs) to monitor progress in achieving the objectives and targets. The register is revised each year in the management review in the item on the extent to which objectives and targets have been met.

6.2 Environmental objectives and planning to achieve them.

6.2.1 Environmental objectives

EMS objectives Appendix 6.2 are located in the TRI QMS directory: EMS 14001 folder


7 Support

7.1 Resources

Various positions in TONGRUN INTERNATIONAL have roles, responsibilities and authorities for managing environmental aspects, action plans, programs and controls. All of these roles, responsibilities and authorities are documented in a position description.

The Vice President has responsibility for overall co-ordination of the environmental management system in accordance with the requirements of ISO 14001:2015 and reporting its performance, including recommendations for improvement, to the Executive Team for review. The specific tasks associated with this role include:

- Maintenance of Environmental Aspects
- Maintenance Legal and Other Requirements
- Maintenance Environmental Objectives and Targets
- Maintenance of the environment training, including records of incumbents in positions and roles, competence requirements, competence possessed, training needs, training plans and training undertaken.
- Assessment of general environmental awareness of staff and contractors
- Control of documents, forms and records required by the EMS.
- Co-ordination of environmental monitoring and measurement
- Evaluation of compliance with legal and other requirements relevant to the EMS

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- Management of the internal audit program
- Co-ordination of corrective and preventive action
- Maintenance of the emergency preparedness and response procedure and management of testing the procedure
- Co-ordination of management review of the EMS

**The Vice President may designate and delegate authority of the above in part or whole the responsibilities at his/her discretion.

7.2 Competence, Training and Awareness

Positions with responsibility for an activity, product or service that has the potential to cause a significant environmental impact are identified in the Position Descriptions, along with competence requirements of each position and role. Competence refers to the knowledge, understanding, skills or abilities required for a person to effectively and efficiently carry out the position or role. Competence can be determined through appropriate education, training, experience and assessment.

The Position Descriptions and organization chart are reviewed each year with changes to positions, roles and employees, and training or other personal development undertaken.

General awareness of the organization's environmental management system is communicated at the beginning of employment, as updated and through the course of activities undertaken. The EMS is available in written form and through the Quality department.

More specific training on the environmental management system is provided on documented operational procedures and emergency preparedness and response as required. Records of such training are made in the Training matrix.

7.3 Communication

7.3.1 General

Communication with the public, including media, will be the responsibility of the TONGRUN INTERNATIONAL Management Team or client (on site). No comment relating to any projects should be released to the public or media by TONGRUN INTERNATIONAL unauthorized employees.


7.3.2 Internal Communication

Information about TONGRUN INTERNATIONAL's environmental aspects and environmental management system is communicated among the levels and functions of the organization through:

- EMS awareness provided during induction.
- Provision of this manual and supporting documentation on TONGRUN INTERNATIONAL's Employee Information Folder and electronic filing.
- Monthly waste reports sent to clients and Project Managers
- Employee meetings.

Communication received from external parties regarding TONGRUN INTERNATIONAL's environmental management is managed in the same way as formal communication received by the organization on all issues. However, it is also tracked in TONGRUN INTERNATIONAL's Non-conformities, suggestions and compliments Register. The Management Team are also responsible for reporting on communication from external interested parties, including complaints, in Management Team meetings.

External communication required during response to emergency situations and accidents is documented in its emergency response plan and/or incident investigation forms.

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7.3.3 External Communication

7.4 Documented Information

7.4.1 General

A Directory of all Documents and Records will lists policies, manuals, procedures, plans, external documents, forms, templates and records relevant to the environmental management system is maintained by the Vice President or designate.

7.4.2 Creating and Updating

When creating and updating documented information TONGRUN INTERNATIONAL ensures the following:

- Identification and description.
- Format and media.
- Review and approval for suitability and adequacy.

7.4.3 Control of Documented Information

All environmental management system documents are filed within the record management system. Each internal document is identified by a unique name and version control is maintained. The Vice President is accountable for this system.

This EMS manual specifies the frequency for which certain documented information is revised. For example, the environmental policy, environmental aspects, legal and other requirements, and objectives and targets must be revised at least annually, while the Position Descriptions also require annual revision.

TONGRUN INTERNATIONAL's environmental management system documents are dynamic pieces of information used to guide what people do. They are kept up to date and relevant to TONGRUN INTERNATIONAL's needs. Changes to the environmental policy, this EMS manual, a documented procedure, an environmental management plan, a form, or any register referenced in this manual require approval from the Vice President. Corrective and preventive action resulting from identification of actual and potential nonconformities often results in recommendations for changes to documents. Suggestions for improvement to documents can also be made directly on the Nonconformities/RCCA or continuous improvement process. Once changes are approved, the latest edition of the document is updated to the correct version name. The Quality Manager emails relevant employees to advise of the changes.

The immediate earlier version of a revised document is archived, to which only the Vice President and the system administrator have access.


8 Operation

8.1 Operational planning and Control

The following documented procedures and work instructions have been devised on the basis of risk to control operations associated with significant environmental aspects, including the significant environmental aspects of goods and services used by TONGRUN INTERNATIONAL:

- Waste Management Plan EMS-001
- Recycling material EMS-002

These procedures and work instructions are also listed in the Document control directory.

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8.2 Emergency preparedness and response

TONGRUN INTERNATIONAL identifies potential emergencies and accidents that can have an environmental impact during the identification of environmental aspects. Environmental emergencies and accidents are therefore subject to risk analysis and determination of environmental significance and handled accordingly in the environmental management system. Objectives and targets are to be set for environmental emergencies and accidents that are regarded as significant environmental aspects and an emergency response plan is established to achieve the objectives and targets.

Environmental emergencies and accidents are regarded as environmental nonconformities. Accordingly, in the event of an occurrence, immediate action is taken to mitigate the environmental impact, followed by corrective action to avoid a recurrence.

The Emergency Management Plan identifies potential emergency situations and the required controls in place to manage emergencies. Emergency Posters will be displayed in prominent locations detailing emergency contact details, location of nearest Medical Centre. This information is communicated to employees at the beginning of employment, as the Plan is updated and is available through the safety coordinator or quality.

The Emergency procedure is reviewed on an annual basis. All emergencies, actual or practice/drill, shall be documented using Emergency Debrief form and any actions taken where identified to ensure preparedness.

9 Performance Evaluation

9.1 Monitoring, measurement, analysis and performance evaluation

9.1.1 General

TONGRUN INTERNATIONAL objects of monitoring, measurement, analysis and evaluation are process criteria, product characteristics, service quotes vs actual costs, performance and effectiveness of the EMS. Statistical techniques, risk management and quality management tools are used for analyzing and evaluation of measurement data in accordance with established Environmental Policy and environmental objectives.

Monitoring and measuring are performed in accordance with process instructions, and methods. Results from monitoring and measurement are analyzed and evaluated by the Management Team. Informational reports are passed to Management Team for general review and making decision on opportunities for improvement, any need for changes to the EMS.

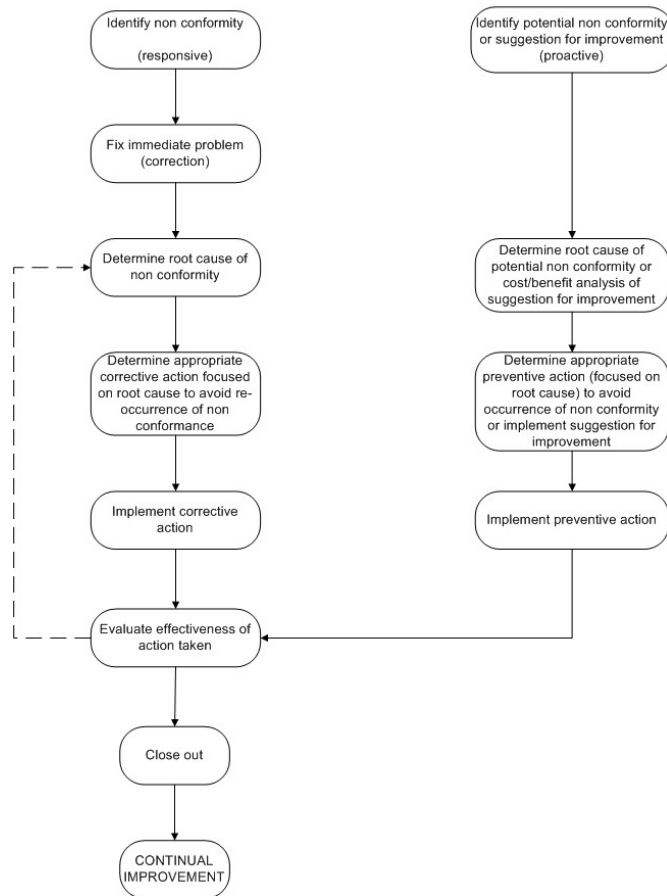
Records of results of monitoring, measurement, analysis and evaluation are maintained in accordance with Control of Documented Information.

9.1.2 Evaluation of Compliance

Once a year, a review or compliance audit is conducted to evaluate compliance with legal requirements applicable to the organization and other requirements to which TONGRUN INTERNATIONAL subscribes. This performed during the Annual QMS/EMS management review as well as the registrar's audit for certification in ISO 14001

The review or compliance audit becomes a record of the evaluation of compliance. Where non-compliance is detected, this is followed up with corrective action (see below).

Corrective & Preventive Action




The above flowchart illustrates the organization's process for identifying actual and potential environmental nonconformity, recording suggestions for improvement to environmental management, taking appropriate action to correct nonconformity and mitigate environmental impact, taking corrective action to avoid recurrence of nonconformity and taking preventive action to avoid occurrence of nonconformity or implement a suggestion.

This process has the ultimate goal of driving continual improvement of the environmental management system.

Actual and potential nonconformity is identified and suggestions for improvement are made by the following means:

- Internal audit
- External audit
- Site inspections
- Feedback from external parties
- Complaints or feedback from customers or other stakeholders
- Suggestions for improvement from employees and contractors
- Occurrence of environmental emergencies and accidents
- Testing of emergency preparedness and response
- Management review

The Management Team are responsible for maintaining the Nonconformities, suggestions and compliments. The Corrective and Preventive Action Form provides for the following:

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- The taking of immediate action to correct the nonconformity (i.e., correction) and mitigate environmental impact.
- Root cause analysis of actual nonconformity
- The taking of corrective action addressing the root cause to avoid recurrence of nonconformity, or the taking of preventive action to avoid occurrence of nonconformity or implement a suggestion for improvement.
- Evaluation of the effectiveness of the action taken
- Close out.

Corrective and preventive action often requires changes to environmental system documentation. In such cases, this process feeds into the process for control of documents.

The Management Team is responsible for reporting on the status of corrective and preventive actions.

9.2 Internal Audit

9.2.1 General

TONGRUN INTERNATIONAL plans and conducts internal audits at planned intervals according to Internal Audit for the following purposes:

- To verify whether health and safety activities and related results comply with planned arrangements including customer contractual requirements according to ISO 14001 and any other additional EMS established by TONGRUN INTERNATIONAL.
- To determine if the overall effectiveness of the EMS implemented is maintained.

9.2.2 Internal Audit Programmed

TONGRUN INTERNATIONAL has established and implemented an annual internal audit program with the objective of determining whether the environmental management system conforms to planned arrangements, including the requirements of ISO 14001:2015 and this EMS manual, and has been properly implemented and maintained.

The Quality Manager manages the internal audit program and reports the results of internal audits and the effectiveness of the program to the Management Team.


The internal audit program covers all TONGRUN INTERNATIONAL's functions, environmental management system elements, and the full scope of TONGRUN INTERNATIONAL's environmental management system over the year. Some functions, elements and sites may be audited more than once annually if justified on the basis of environmental risk. The program also provides for additional audits that may be required to follow up scheduled audits. Internal audits are scheduled each month except December, when many employees are on leave.

Audit criteria in the program include the requirements of ISO 14001:2015 for environmental management systems, the requirements of this EMS manual, the requirements of work instructions listed in this manual to control operational activities associated with significant environmental aspects, and legal and other requirements.

One audit each year is devoted to evaluating compliance with legal and other requirements. The Internal audit findings will be used to record the evidence and findings of this audit.

An Internal Audit Checklist is used to record evidence for audits of the requirements of ISO 14001:2015 and this EMS manual. Findings of such audits are reported using an Internal Audit Report Template.

Auditors are selected for audits with a view to ensuring objectivity and impartiality of the audit process. That is, an auditor cannot audit the section in which he or she normally works.

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Nonconformities raised in internal audits are recorded here: [Non Conforming Product Report \(NCP\) TRI-QA-F-0007 REV: 0 E - Jotform Tables](#).

9.3 Management Review

The Executive Team of TONGRUN INTERNATIONAL reviews the environmental management system for its continuing suitability, adequacy and effectiveness annually. Each management review makes decisions on changes to environmental policy, the risk assessment procedure and environmental aspects, objectives and targets, environmental programs/plans, and other elements of the environmental management system.

The Quality Manager compiles information for management review. The outcomes are recorded on the Management Review minutes.

10 Improvement

10.1 General

10.2 Incident, nonconformity and corrective action

TONGRUN INTERNATIONAL takes action to eliminate the cause of nonconformities in order to prevent recurrence. Corrective actions are appropriate to the effects of the nonconformities encountered.

When a nonconformity occurs, including any arising from complaints, corrective actions are conducted including.

- a) Reaction to the nonconformity and, as applicable:
 - Taking action to control and correct it.
 - Dealing with the consequences
- b) Evaluating the need for action to eliminate the root cause(s) of the nonconformity, in order that it does not recur or occur elsewhere, by.
 - Reviewing and analyzing the nonconformity
 - Identifying the root cause(s) of the nonconformity
 - Determining if similar nonconformities exist or could potentially occur.
- c) Implementation of any action needed.
- d) Review of the effectiveness of any corrective action taken
- e) Updating risks and opportunities determined during planning, if necessary
- f) Making changes to the QMS, if necessary.

Corrective actions appropriate to the effects of the nonconformities encountered. [TRI SOP 115](#) describes taking appropriate corrective actions and provides the mandatory indication of.

- The nature of the nonconformities and any subsequent actions taken.
- The results of any corrective action.

10.3 Continual improvement

TONGRUN INTERNATIONAL continually improves the suitability, adequacy and effectiveness of the EMS at the system level through implementation of small improvement cycles (small steps improvements) and big improvement cycles (Tongrun International breakthrough projects), *fig.10.1 Continual Improvement Model* and the conditions, described in the *section 6.3 Planning of Changes of the QMS* are met.

Small improvement cycles are carried out in every EMS process and include the following:

- a) Actions to address risks and opportunities.
- b) Implementation of process approach in a chain: 'Process criteria definition > Criteria monitoring and measuring > Results review and evaluation, determination of trends and their causes; preventing undesired effects and (or) enhancing desirable effects'. Resources for monitoring and measuring, including the methods, techniques, personnel training, are described in *Section 7.1.5*. For Methods of analysis and evaluation, see *section 9.1.1*.

Small improvement cycles are carried out by brainstorming and using focus groups, etc. If the decision scale of the group making improvements go beyond the power of process-owner, they generate a proposal for management review, see *section 9.3*.

Big improvement cycles are carried out by TONGRUN INTERNATIONAL Executive Team in a chain: 'Context, strategy, quality policy and objectives review > Break through projects implementation > Project Effectiveness Review > Organization wide application; Introduction into the EMS'.

Process-owners could also initiate the breakthrough projects. The breakthrough projects are as follows: modernization, launching of a new product or service, diversification, outsourcing, etc.

Continual improvement is the foundation of TONGRUN INTERNATIONAL sustainable development.

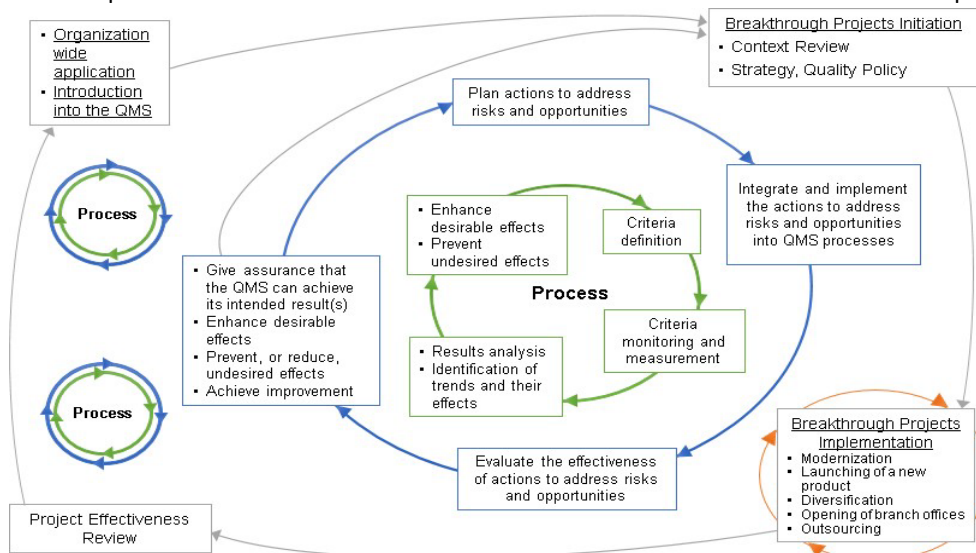


Fig. 10.1 Continual Improvement Model