

QUALITY MANAGEMENT SYSTEMS MANUAL



This manual provides a summary of Olin's Quality Management System. Topics include:

- Company Overview
- · Olin Quality Policy
- Resources and Commitment to Quality
- Overview of the Quality Management System Elements

The manual is a concise reference of the company's standards of quality for employees as well as an easy-to-follow overview of Olin's quality systems for review by customers and other interested audiences.

Company Overview

Olin has a history of supplying quality products and services to our customers while generating value for our shareholders. Every day, we strive to meet customers' evolving needs through innovation and an unwavering commitment to exceed expectations while maintaining the highest ethical standards. Olin's more than 6,500 dedicated employees are also fully committed to being good neighbors and environmental stewards in the communities in which our facilities are located.

Olin Chlor Alkali Products and Vinyls is a world leader in the chlor alkali market, manufacturing and selling chlorine, sodium hydroxide (caustic soda), potassium hydroxide, hydrochloric acid, hydrogen, and bleach products. Backed by more than 100 years of continuing innovation, we offer highquality products and industry-leading customer support worldwide.

Olin Chlorinated Organics is the world's largest supplier of chlorinated organic products and services, including solvents and intermediates. Olin's chlorinated organics offerings help enhance our quality of life, providing the building blocks for thousands of products people use every day.

Olin Epoxy is the leading global supplier of epoxy products. Our technology has been the fundamental building block of robust solutions for diverse applications for more than 50 years. We continue to lead the industry through innovative solutions for ever-changing global demands.

Olin's Quality Policy

Olin is committed to sustainable and continual improvement of the organization and its processes.

Our Olin Values of Integrity, Helping Customers Succeed, Continuous Improvement and Innovation, and Olin people are reflected in this commitment in the following ways:

- We will supply customers with quality products using clearly defined specifications.
- We will enhance customer satisfaction through the implementation of a risk-based management system.
- We will establish objectives and targets that drive continual and sustainable improvement of our processes, products, and Quality Management System.
- We commit to meet or exceed all applicable legal, regulatory, and agreed upon customer requirements.

• We will ensure suppliers and contractors meet quality requirements specified by our management system.

Our Quality Management System is a vital and integral part of our business strategy. Leadership commitment and employee engagement enable our continued success.

Resources and Commitment to Quality

Olin is committed to providing the resources needed for continually improving the quality management system.

We have established a global quality team, responsible for developing and implementing quality processes that address the needs of the industries Olin serves, whether it is in supplying bulk quantities of basic chemicals or small volumes of highly specialized materials. The quality team, in partnership with business management, implements systems, policies, and standards that ensure quality products and services are delivered to Olin's customers.

Continuous Improvement. Olin has embraced a policy of continuous improvement, and we utilize a number of key processes and tools to ensure that continuous improvement is a way of life for our employees. Olin places emphasis on the following foundational elements of continuous improvement:

- · Data-based decision making.
- Identifying and addressing the root cause of problems.
- · Monitoring, measurement, analysis, and evaluation.

Quality Measurement Systems. Olin has established quality measurement systems to evaluate our progress in continuous quality improvement. Some of the tools used to monitor progress in each business include external and internal customer surveys, auditing, organizational self-assessments, performance metrics, and statistical tools.

Employee Involvement/Teamwork. All Olin people play important roles in quality and are a core value to our company. Employees define Olin's future. We respect the diversity of our workforce and treat others as we would want to be treated. We also take and accept responsibility and act as a role model for others.

To foster an environment where involvement, continuous improvement, and teamwork (including cross-functional teamwork) flourish, managers are encouraged to:

- Treat employees as valued team members.
- Actively solicit ideas on problems and solutions from all people in the work group.
- Remove barriers as identified by employees.
- Empower people to make decisions and implement solutions.
- Push decision making down to the lowest possible level.

Responsible Care[®]. Olin has a longstanding commitment to safety, health, and the environment. The company is committed to implementing Responsible Care initiatives – the chemical industry's continuing effort to improve health, safety, and environmental performance.

The Olin Quality Management System

Purpose. Ensuring the continuous quality of Olin's operations is an ongoing, multi-functional process involving:

- The identification and documentation of customer needs.
- The development, manufacture, and delivery of products and services to consistently meet those needs.
- · Feedback from the customer to assess the company's performance.
- · Action on the customer's feedback to improve company performance.

Developed and endorsed by company management, the Olin Quality Management System is part of an integrated corporate management system, encompassing the requirements of numerous external standards and internal company requirements. Olin's Quality Management System conforms, at minimum, to specified requirements of international standards like ISO 9001.

Product quality is maintained through work process, quality architecture standardization, and process control. Service quality covers all aspects of customer transactions and is ensured by the function that is providing the service. Both product and service quality characteristics are agreed upon by Olin and our customer.

Quality Leadership. Olin leadership takes a visible and leading role in creating and sustaining the Quality Management System through:

- Establishing core values, policies, directions, and performance expectations.
- Communicating quality directions and values.
- · Obtaining feedback on the Quality Management System.
- · Identifying necessary product realization and support processes.
- Creating an environment that encourages the growth and involvement of people by providing the necessary infrastructure and resources.
- · Focusing on customer satisfaction.
- Continuous improvement.

Olin leaders regularly review the Quality Management System with top management to ensure the overall system's continuing suitability, adequacy and effectiveness, and to initiate and/or leverage changes and improvements.

Resource Management. Olin ensures that the resources to achieve our objectives are identified and made available, in part, through Olin's work processes for leading people, planning and allocating resources, and management information. Training and employee development support the company's overall strategy to be a learning and continuously improving organization. Required training is provided and documented to ensure the competence of all employees in the intended roles.

Product Realization Processes. Olin's product realization and support work processes are fully integrated and organized to provide the capability to meet the needs of our stakeholders. Management of Change (MOC) is consistently applied by employees to assure changes to our work processes, procedures, and specifications have appropriate reviews and approvals. Training is conducted, documentation is updated, and necessary communications are applied, including customer notifications as appropriate.

Marketing and Sales. Olin's Marketing and Sales organization operates to meet the needs of Olin customers and businesses through an integrated approach to sales, marketing, and customer service. Communicating effectively with customers, understanding customer needs, and ensuring these expectations are translated into requirements for Olin's product fulfillment processes are essential aspects of what this organization does.

All products and services sold by Olin, as well as raw materials used in manufacturing and product packaging, are defined by specifications. Specifications reflect Olin's commitment to the requirements needed at each stage of manufacture, distribution, and redistribution to meet customers' overall requirements for the final, delivered products.

Design and Development. Our Design and Development organization has implemented processes to respond effectively and efficiently to the needs of our customers. Olin's comprehensive design and development process considers many factors and customer inputs in designing products, including life cycle, safe handling practices, and product disposal.

Purchasing. Olin's purchasing work process ensures that procured services and purchased goods are controlled to conform to specified requirements. Because purchased materials, goods, and services directly affect the quality of Olin's products and services, Olin has a process for developing an appropriate supplier evaluation and development process to help ensure that all purchased materials, goods, and services conform to Olin-specified requirements. Efforts are made to establish a close working relationship and feedback system with suppliers to ensure the highest value in terms of quality.

Manufacturing. Olin's processes for manufacturing products are carried out under controlled conditions. This includes detailed descriptions of the products and process conditions, the means of testing or monitoring a product to ensure that it meets the specified requirements at all stages of manufacture, and the conditions to ensure the product maintains its integrity until delivery to the customer. All Olin packaged products are labeled to ensure clear, unambiguous identification of the product and the party responsible for the manufacture of the product. They also identify appropriate health, safety, and environmental information in compliance with applicable regulatory, product stewardship, and customer requirements.

Measurement, Analysis, and Improvement. Measuring performance, analyzing the resulting data through statistical techniques, and prioritizing and initiating improvements is a process used by Olin to add value to our organization.

Customer input from a number of collection processes is an important data source both in understanding how well we are meeting current needs and in gaining insight into how we can better serve our customers in the future. In assessing our internal performance, each organization conducts periodic audits, management system self-assessments, and process capability studies to verify that processes are consistent with specified requirements and the intent of our management system. Results from customer input analysis and internal performance evaluation are used to identify and prioritize continuous improvement initiatives.

Consistent with our value of Continuous Improvement and Innovation, Olin has created a culture of empowering individuals to identify opportunities for improvement, a system for capturing and evaluating the opportunities, and a means of implementing solutions.



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