

GEON[®]

Performance Solutions



Quality Standard Response

Dear Valued Customer:

Thank you for your inquiry regarding GEON Performance Solutions and our collective quality management principles and processes.

GEON Performance Solutions, its subsidiaries and affiliates design, source, manufacture and distribute chemicals and plastic products globally. GEON Performance Solutions creates lasting relationships with our suppliers and customers, which allows GEON Performance Solutions to competitively offer a wide selection of products and solutions to customers within industries across the world.

GEON Performance Solutions has created the quality survey response below to communicate proactively with current and potential customers around our commitment to our customers through quality and maintaining sound and diverse quality management systems. GEON Performance Solutions is committed to continuous improvement and delivering solutions on the foundation of quality focus. We at GEON Performance Solutions are strong advocates of quality with our business partners. Our focus on continual improvement is critical to delivering success in all aspects of our business.

Review the index for particular items of information and location within the response. Unless otherwise noted, the information contained within is applicable to all GEON Performance Solutions facilities.

Thank you again for your inquiry. If any further information beyond the included content is needed, feel free to contact us.

Sincerely,

Paul Meares

Paul Meares
Senior Quality and Technical Services Manager
GEON Performance Solutions

Contents

1.0	GEON Performance Solutions Quality Policy	4
2.0	GEON Performance Solutions Business & QMS Alignment	5
3.0	Customer Focus Process	6
5.0	Company Information.....	8
6.0	IT Security	9
7.0	Environmental Health, Safety & Security	9
8.0	Technology	10
9.0	Regulatory & Statutory Requirements	10
10.0	Quality Management System	11
11.0	Continuous Improvement.....	18
11.1	Figure B. GEON Performance Solutions Lean Six Sigma: Breakdown	18

1.0 GEON Performance Solutions Quality Policy

GEON Performance Solutions collaborates with customers to create specialized, value-added and differentiated solutions. We strive to provide defect-free materials and a portfolio of unique services that are delivered consistently and on-time to our customers. Our commitment to continuous improvement and operational excellence drives our actions and decision making – all with the goal of making GEON Performance Solutions the preferred provider of specialized materials, services and solutions to customers around the globe.

At GEON Performance Solutions, we listen, we do it right, and we deliver.

2.0 GEON Performance Solutions Business & QMS Alignment

At GEON Performance Solutions, our business is structured to provide operations with specialized polymer materials, services and solutions customers need.

GEON Performance Solutions is committed to defining our position in the marketplace and understanding how relevant factors arising from legal, political, economic, social, environmental, and technological issues influence our strategic direction and our organizational context. GEON Performance Solutions identifies, analyzes, monitors and reviews factors, which may affect our ability to satisfy customers and stakeholders, as well as factors, which may adversely affect the stability of processes, or the integrity of the Quality Management System.

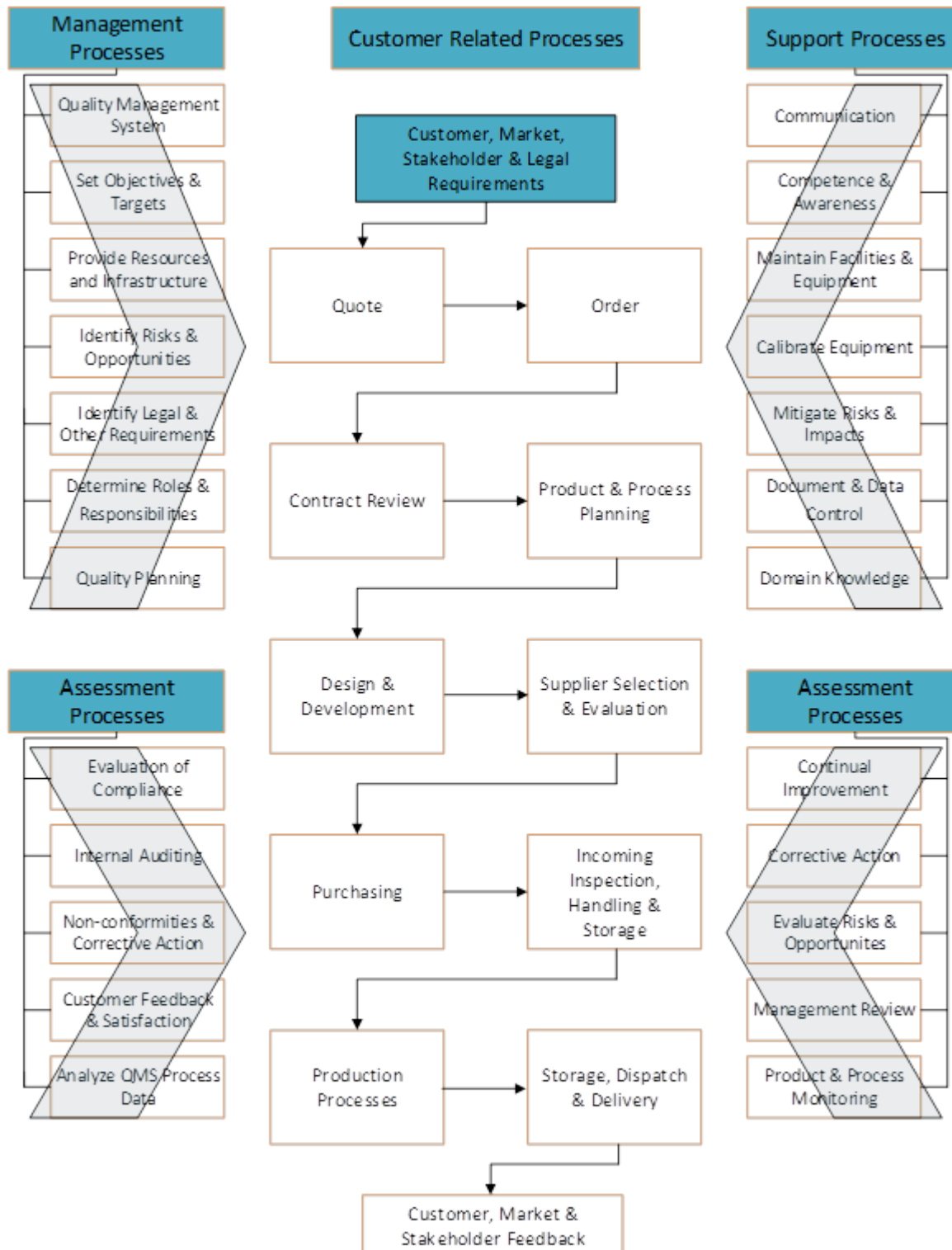


To ensure the QMS is aligned with our strategy, and taking into account the internal and external issues, we analyze pertinent information in order to determine potential impact on our context and subsequent customer/organizational success. GEON Performance Solutions will monitor and review information from inside and outside the organization to ensure

Internal Issues	External Issues
Market share	Customers & suppliers
Employees	Markets & competition
Performance	Regulatory & statutory
Capacity	Economic backdrop
Values & culture	Technological
Innovation & knowledge	Cultural & social

that continual understanding of each groups' requirements is established and maintained. To facilitate the understanding of the context of various stakeholders, we regularly consider pertinent issues during Management Review, Business Meetings, Customer and Supplier Meetings, Performance and Cultural Improvement.

3.0 Customer Focus Process



4.0 Scope of Quality Standard Response Document

GEON Performance Solutions; Corporate Headquarters & Technology With a headquarters in Westlake, Ohio, GEON® operates at 10 locations in North America and in our facilities in Dongguan and Nantong China. All of our sites are aligned with key demand centers. These flexible manufacturing facilities can produce multiple products and an industry-leading safety record.	Facility Address 25777 Detroit Road, Suite 202 Westlake, Ohio 44145
GEON Performance Solutions GEON® Performance Solutions is a global leader in the formulation, development and manufacture of performance polymer solutions. In 2019, GEON Performance Solutions was formed combining three powerful traditions into a single, customer-focused business with a portfolio of highly adaptable vinyl and polyolefin polymer technologies as well as a full-service manufacturing business. The new GEON is a leading innovator in the development of performance material solutions for a broad range of markets including appliances, building & construction, electronics, healthcare, transportation, wire & cable and more.	Facility Locations & Businesses Avon Lake, OH Clinton, TN Croydon, PA Dyersburg, TN Orangeville, Ontario Pasadena, TX Ramos, MX Seabrook, TX St. Remi, Quebec Terre Haute, IN Dongguan, China Nantong, China

5.0 Company Information

Website	www.geon.com
Federal ID Number	Tax ID is 84-3122624
Certification of Insurance	Certification of Insurance can be obtained from: Lockton Companies Attention: Angela Powers (Angela.Powers@lockton.com) or Jonathan Davis (Jonathan.Davis@lockton.com) 4725 Piedmont Row Drive, 5th Floor Charlotte, NC 28210
SIC/NAICS Codes & Descriptions	3087 / 325991 Customer compounding of purchased resins 2821 / 325211 Plastic material and resin manufacturing
Does GEON Performance Solutions have a Code of Conduct Policy?	Yes.
What year was GEON Performance Solutions created?	GEON Performance Solutions was created in 2019.
Are personnel on site unionized?	We do not provide this information on surveys.
Is GEON Performance Solutions experienced in exporting and importing within the United States?	Yes. GEON Performance Solutions is a global company.
How many years has GEON Performance Solutions been supplying service in these technologies?	Over 100 years through its predecessors starting in 1927. In 2019, SK Capital Partners purchases PVC, polyolefin and contract manufacturing business of PolyOne and GEON[®] Performance Solutions is created.
Is there an organization chart? Can it be shared with customers?	GEON Performance Solutions maintains an organizational chart for internal use only, which is considered confidential and is not shared publicly.

6.0 IT Security

Is there firewall on our network?	Yes.
Does the company have a system to backup critical data?	Yes.
In the event of a disaster or significant disruption, does GEON Performance Solutions have documented plans for business continuity and IT disaster recovery? Does the plan cover some, most, or all locations from which you provide your services?	Yes, GEON Performance Solutions has a documented business continuity plan. The plan covers all locations where services are provided and covers fire, water, storm, and bomb threat failure scenarios.
IT Systems of Use Policy	Yes.

7.0 Environmental Health, Safety & Security

Is there an Emergency Response System?	Yes.
Is there a documented crisis management process covering internal and external communications?	Yes.
Does GEON Performance Solutions have procedures for contingency plans and risk management?	Yes.
Does GEON Performance Solutions have a formal safety program? Does the program cover emergency plan, accidents review, environmental incidents and evacuation measures?	Yes.
Does GEON Performance Solutions have a process for handling hazardous materials?	Yes.
Does GEON Performance Solutions monitor lost-time accidents?	Yes.
Is GEON Performance Solutions certified through ACC Responsible Care?	Yes. Selected sites are certified to RCMS.

8.0 Technology

Is there a review program to control and assure proper development of products from the research state through production?	Yes, planning information captured includes the nature and complexity of the material being designed/formulated, material/formulation requirements, internal and external resources (including the need for Manufacturing and Support Function review, when and where required), and verification and validation activities.
Are revision changes kept for the life of the active material?	Yes.
Are necessary steps taken to assure compliance with statutory and regulatory requirements (including TSCA)?	Design input requirements are required to be clear and unambiguous and include statutory and regulatory requirements.
Can Technical Data Sheets Be Provided?	Yes. Refer to website: www.geon.com

9.0 Regulatory & Statutory Requirements

Are Safety Data Sheets available to customers for all products sold?	Yes. Refer to website: www.geon.com
Are certifications supplied for regulatory requirements (e.g. REACH, ROHS, and CPSIA)?	Yes, inquiries can be sent to your sales or customer service representative.
If products are regulated by FDA, can a letter be provided that the product meets Code of Federal Regulations requirements for the intended use?	Sometimes, inquiries can be sent to your sales or customer service representative.
Do you follow a written Conflict Minerals Policy?	Yes – incorporated into our Sustainability Purchasing Procedure.
Are you willing to provide material content information (e.g., BPA, Phthalates, etc.)?	Usually, inquiries can be sent to your sales or customer service representative.

10.0 Quality Management System

10.1 General QMS	
Does GEON Performance Solutions have a documented quality management system?	Yes, documentation varies by site, business, and function.
What Quality Certifications do you maintain?	GEON Performance Solutions maintains a multitude of Quality Certifications, which are maintained by site. Refer to our website to view certifications: www.geon.com .
Who is GEON Performance Solutions' assessment body/registrar?	Varies by Site; refer to ISO Cert www.geon.com .
How often are 3 rd party audits conducted?	Annually, with the exception of central certificates—at minimum every 3 years.
Does GEON Performance Solutions have a quality manual?	Yes.
Is GEON Performance Solutions willing to provide a copy of the Quality Manual?	No, GEON Performance Solutions' Quality Manual is considered proprietary and confidential.
Are metrics and systems in place to drive and maintain quality improvements?	Yes.
Does GEON Performance Solutions have integrated quality system software?	Yes – EXP Quality & Safety Management System.
Does GEON Performance Solutions have procedures for contingency plans and risk management?	Yes, defined by business unit and facility.
Are there written policies and procedures covering recall procedures?	Yes, however procedures vary by site and may not be fully documented if not required by quality standard.
Is CAPA integrated into the QMS?	Yes, CAPA is routinely utilized using various problem solving techniques.
Is the same system used for both internal and external corrective actions?	Yes, all CAPA methods are standard using our integrated QMS software and documented procedures.
What is the target response time to corrective action requests?	Target of 60/90 days.

Are quality objectives clearly defined and widely communicated, measured, and understood throughout the company?	Yes, quality objectives are established at business unit and site levels. Objectives are determined upon past and future expected performance. Quality Objectives are recorded and reviewed regularly.
Are Customers informed of delivery dates, late shipments and any other quality issues?	Yes, via Supply Chain & Customer Service.
Are there written policies and procedures covering complaint investigations?	Yes, all customer complaints handled using documented procedures and our integrated QMS software to facilitate requirements.
What is the target response time to customer complaint investigations?	Not greater than 30 days.
Are customer complaints analyzed for possible trends on a routine basis?	Yes, at least on a monthly basis.
Does customer complaint system include Corrective Actions where appropriate?	Yes, CAPA is integrated into our complaint system through documented procedures and our integrated QMS software.
Does an adequate containment action process exist to protect the customer while the Corrective Action is determined?	Yes, all customer complaints and CAPAs include containment action(s).
Is GEON Performance Solutions willing to permit on-site auditing from customers?	Yes, subject to commercially reasonable notice of request, prior approval and a non-disclosure agreement.
Is GEON Performance Solutions willing to review results of 3rd party audits with customers?	This is not a current practice.
Does GEON Performance Solutions monitor and document the cost of Quality?	Yes.
Does GEON Performance Solutions have a periodic management review meeting to review the company's QMS?	Yes, as required by the standard(s).

Are documents required by the QMS controlled by a document control system? Is the system electronic or manual?	Yes, combination of electronic and manual records.
Does GEON Performance Solutions have a system in place for record retention?	Yes, according to internal and external requirements.
Is an effective internal auditing program in place?	Yes, as required by the standard(s).
Does your company have documented procedures and controls in place for the selection, approval, and monitoring of external providers (e.g., suppliers, service providers, contractors, consultants)?	Yes, supplier selection conforms to ISO 9001, IATF 16949 and/or ISO 13485 requirements. Procedures for requirements within ISO 9001 sites defined by business unit and facility. Supplier monitoring executed at corporate level and locally within facilities—dependent and contingent upon risk factors and customer requirements.
Does GEON Performance Solutions have a supplier rating/evaluation program?	Yes, with emphasis on critical supplier quality requirements and specifications. Overall impact to efficiency and effectiveness is assessed and monitored.
Does the company maintain an up-to-date approved supplier list?	Yes, primarily within SAP.
Is there a system that identifies training and refresher requirements for all personnel affecting the quality of the product?	Yes.
Is personnel training documented and records retained?	Yes. Companywide training system along with plant specific training documents.
How is the suitability, adequacy and effectiveness of the QMS determined?	Internal/External Audit Results, Corrective Actions, Management Review Action Items and Opportunities for Improvement are evaluated and assessed to verify/validate the overall health of the quality management system.

10.2 Facility & Maintenance	
What is the approximate number of employees at each facility?	We do not provide this information on surveys.
What is the approximate square footage of each facility?	We do not provide this information on surveys.
Total Number of Shifts	We do not provide this information on surveys.
Is a current preventative maintenance program documented addressing facility, grounds, and equipment needs?	Yes, digital records of preventative maintenance are maintained, and personnel are trained and competent in preventative maintenance.
Is there a sanitation program; which includes waste disposal?	Yes, housekeeping programs exists at all facilities.
Are there methods in place to prevent infestation by rodents, birds, insects and other vermin?	Yes, through 3rd party pest control and according to GMP practices (as required).
10.3 Control of Monitoring and Measuring Devices	
Do test methods have documented calibration/standardization procedures for equipment, instrumentation, and measuring devices?	Yes, when not outsourcing from a NIST accredited 3 rd party calibration service.
Are calibration / standardization results documented and retained?	Yes, available through 3 rd party calibration service.
Are certified outside contractors used for calibration of equipment?	Yes, contractors are vetted and approved accordingly.
Does a formal calibration program, including calibration intervals, traceability, calibration method/ equipment, and environment exist with fully documented calibration schedules?	Yes, the schedule is monitored and maintained (methods are determined by 3rd party, sites manage documentation).
Is equipment verified or re-calibrated at appropriate intervals and/or as required by standards?	Yes, additionally, calibration records are maintained and retained. Equipment is stickered by calibration date.
Are Gage Repeatability and Reproducibility Studies (GR&R) conducted to ensure acceptability and fit for use of gages and testequipment?	ISO sites perform as needed; IATF 16949/ISO 13485 sites perform Gage R&R per standard requirements.

10.4 Manufacturing, Production & Process Controls	
Are all manufacturing processes covered with formally written SOP's?	Yes, SOP and work instructions exist for processes that are necessary for production and product quality.
How long are batch history records retained?	Batch history is retained digitally, and /or as hard copy retained 4 years or by customer requirements (if longer)
Does GEON Performance Solutions have monitoring metrics in place, such as Statistical Process Control (SPC)?	For IATF Sites: yes. However, SPC is not implemented at sites that do not require SPC per Quality Standard(s), customer requirement, or deemed unnecessary.
Are critical tooling verified prior to use and maintained appropriately?	Yes, when critical tooling applies to a site it is maintained properly.
Does GEON Performance Solutions conduct an in-process inspection during manufacturing?	Yes.
Are Inspections conducted to ensure requirements are met prior to mass production?	Yes, but this depends on product, customer, and application of material.
10.5 Nonconforming Materials	
Are steps for dealing with nonconformance defined in a documented procedure?	Yes.
Are operators expected to initiate line stoppage when defective material is identified?	Yes.
Is there a procedure to separate or designate nonconforming materials?	Yes.
Are adequate steps taken to prevent reoccurrence of nonconformances?	Yes, use of NC Material Management Process and CAPA require root cause and adequately defined actions to prevent reoccurrence.
Are rejected materials held in quarantine pending disposition?	Yes.
Are customers notified when nonconforming product may have been inadvertently shipped?	Yes, all Sites are required to notify customers as soon as it is determined that nonconforming product may have been inadvertently shipped.

10.6 Materials, Storage, Handling & Traceability	
Are there controls in place to keep traceability of raw materials, components, and finished products?	Yes, SAP controls identification and traceability.
Where traceability is required and applicable, does the company have a procedure to provide unique identification of individual products or batches?	Yes, materials contain a finished good code, lot number, and batch number.
Does GEON Performance Solutions have controlled and monitored finished good storage conditions to ensure packaging is able to withstand environmental extremes and materials are not damaged or deteriorated?	Yes.
Is product identification adequate to clearly identify product to ensure accurate selection of material reaching our facilities?	Yes.
Are there secure storage areas to prevent damage or malicious intervention, pending use or delivery?	Proper precautions are taken to secure areas.
Is First In, First Out (FIFO) inventory management practiced?	Yes.
10.7 Packaging, Shipping & Distribution	
Prior to loading or unloading of in/outbound trucks, are they inspected? Are records maintained?	Yes, inspections are conducted for all transportation modes and records maintained.
Are procedures in place covering packaging and shipping?	Yes.
What information is provided to customers when product is shipped?	Information, including but not limited to a COA, SDS, Batch #, BOL, and Customer Specific Information is provided.

10.8 Quality Control Testing

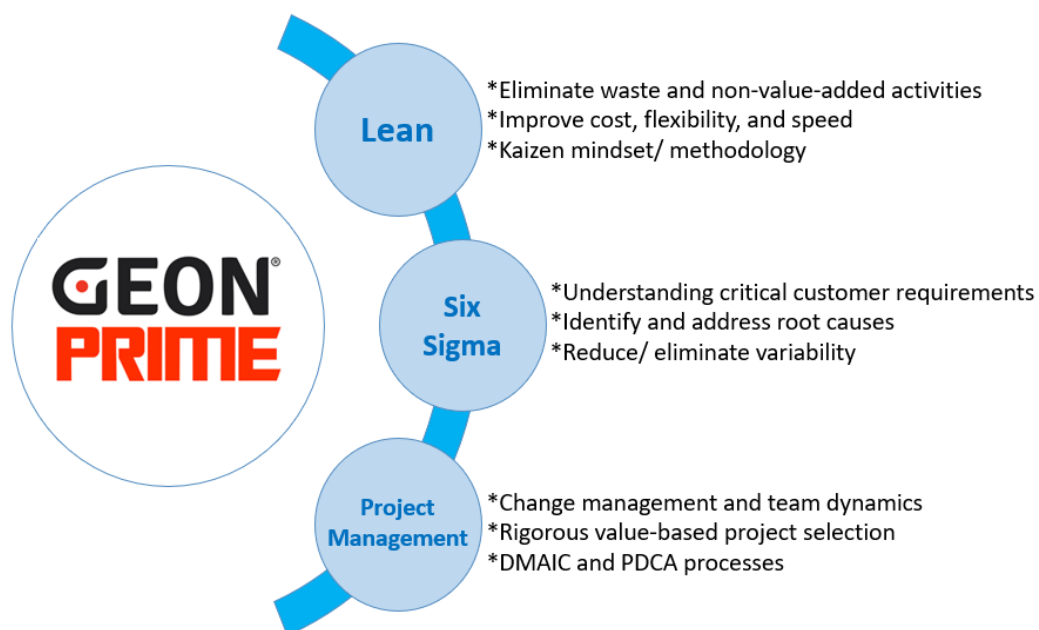
Are all materials tested/inspected and approved by Quality prior to release for shipment or transfer to finished goods inventory?	Yes, deviations may require a waiver from the customer.
Are there written procedures for inspection, testing, and identification of product while the product is in process?	Yes.
How are incoming raw materials controlled for quality?	Incoming raw materials are reviewed for integrity at varying degrees. Incoming raw material inspection criteria is determined by factors such as risk and certification status of site.
Is there a formal documented review and approval procedure for test methods?	Yes, as required.
Are final lot acceptance samples taken?	Yes.
Are final lot test results retained?	Yes, which are retained in accordance with internal and external requirements.
Are certifications supplied for Company Specifications and/or Customer Specifications?	Yes, product properties are verified and certified through the COA.
Does GEON Performance Solutions provide Certificates of Conformity/Analysis with each shipment?	Yes.

11.0 Continuous Improvement

GEON Performance Solutions is a continuous improvement organization. Optimizing Operational Excellence is a deliberate part of the Sustainability in GEON's overall Vision. The value of continuous improvement permeates all departments and functions within GEON Performance Solutions. The ability to improve processes, reduce costs, reduce waste and harmonize operating procedures, measures and methods directly translates to improved satisfaction for both internal and external stakeholders.

Our Continuous Improvement program contains tiers from Basic Lean Understanding to Master Black Belt. The training and certification are centrally controlled—with oversight and focus placed on program success factors.

11.1 Figure B. GEON Performance Solutions Continuous Improvement: Breakdown



GEON Performance Solutions considers the results of analysis and evaluation, and the outputs from Management Review to determine if there are needs or opportunities, which shall be addressed as part of continual improvement. The practice of using standard processes for continuous improvement enhances the uniformity and consistency of our quality management system.