

Environmental, Health & Safety Management System Overview

A. INTRODUCTION

The Acuity Brands Environmental, Health & Safety Management System (“EHS-MS” or the “System”) helps ensure that all facilities comply with the company’s Code of Ethics and Business Conduct, Environmental Health & Safety Policy and applicable laws and regulations in a way that is relevant to individual facility needs. The **aspiration** of the System is adherence to the four pillars of world class safety: a passion for people; a focus on exposures; resource and systems alignment; and embracing change. The **expectation** is commitment from every associate, in every location, every day.

Compliance with the EHS-MS will be verified through:

- Annual Self-Evaluations conducted by each Facility,
- Periodic Validation directed by the Regional Environmental Health and Safety (EHS) staff, and
- The global audit program conducted by the company’s contracted external independent EHS consultant.

The System provides a common framework for all operating locations, regardless of their specific activities and environmental footprint. The System contains elements specified by the International Organization for Standardization (ISO) standard 14001 and by the company’s lean operating system. Together they provide a common framework for operating locations to understand how their activities interact with the environment and to improve management of these activities in an ongoing cycle.

B. Applicability

The System applies to all company associates and operating locations worldwide, including all manufacturing facilities, distribution centers, warehouses, field service locations, and offices (“facilities”) of the company and its subsidiaries and joint ventures (in which Acuity Brands exercises decision-making control over operations). Legal requirements may vary in different countries in which company facilities are located.

C. Elements of the System

1. EHS Management System Policy. Acuity Brands is fully committed to EHS excellence. To achieve this standard of excellence, we have instituted an EHS Management System Plan based on the goals and guidelines of the International Standards of Operation for Environmental Management (ISO 14001), International Standards for Occupational Health and Safety Management (ISO 45001) and company guiding principles. These include the identification and control of hazardous exposures for the prevention of injuries, the prevention of pollution, and compliance with all relevant legal and other requirements. Further, to enhance the quality of our facility and surrounding communities, Acuity Brands is committed to continual improvement with respect to its EHS performance and to share with our community, suppliers and customers our results and the best practices we learn.

2. Roles, responsibilities, authority, and accountability clearly defined and understood. Every facility must have a designated EHS Coordinator who is responsible for implementation of the EHS-MS. Leaders at each facility are accountable for the implementation and results of the EHS-MS at the facilities under their control. Within each facility, support and resources are provided by management for facility-wide EHS efforts including financial and human resources.
3. Assessment, Prevention & Control. Each facility will identify the environmental aspects associated with its activities, products and services. The facility must also identify the environmental impacts associated with these aspects and the significance of these impacts on the environment. The facility will rank the aspects for use in setting objectives, targets, and programs and establishing necessary operational controls.
4. Objectives, Targets & Programs. The Director of EHS and the Director of the EarthLIGHT program will recommend 1- and 3-year goals, subject to approval by the company senior leadership, designed to mitigate risks and improve product sustainability and social responsibility. Each facility will develop an annual action plan to address the most serious of their identified aspects, ensure compliance with relevant laws and regulations, and support the company-wide goals.
 - a. Each Operating facility will develop and implement a Sustainable Corrective Action program, with identified roles and responsibilities for each action.
 - b. Incidents or events that require post review have corrective actions assigned
 - c. A review schedule must be established based on a list of all the high and medium energy events or regulatory non-conformances where corrective actions were assigned.
 - d. Manufacturing and Distribution facilities will conduct Session Find & Eliminate activities annually to address key safety initiatives, share best practices and improve site sustainability.
5. Compliance. Routine facility inspections will be supplemented by periodic, formal compliance assessments by outside consultants or lawyers pursuant to our Compliance Assurance Program ("CAP"), based on pre-determined risk.
 - a. Facility managers will certify that their facility is in full compliance with EHS laws and regulations and the company's policies and procedures or that appropriate actions will be taken to correct non-compliance.
6. Training and Education. Specific EHS training and education initiatives are required to address inherent risks present at each facility. Orientation to the facility and its EHS program are required for new associates, and job-specific training is required each time an associate starts a new role. Temporary workers, contractors and full-time associates alike all require training on EHS processes and procedures.
7. Operational Controls. Facilities are responsible to identify how employees and contractors are to meet the requirements of EHS laws, regulations, applicable permits, enforceable agreements or other sources of legal obligation. Development, implementation and maintenance of compliance procedures, manuals or other materials appropriate are required in areas related to significant environmental aspects and health and safety risks where their absence could lead to deviations, or where necessary to maintain equipment and ensure effective operations.

8. Performance Measurement and Monitoring. Each facility's Acuity Environmental Safety Scorecard (AESS) is used to provide visibility of qualitative and quantitative results by facility. A variety of different metrics are averaged to determine a facility's final score, which is used to rank each facility against other facilities and industry benchmarks. The AESS Scorecard measures each facility's performance against the annually established, prioritized and quantitative site objectives developed from previous year organizational EHS trends.
9. Management of Change. To ensure that negative EHS impacts and risks will not result from changes in processes, raw materials, equipment or facilities, an assessment is required to give consideration to these changes at the planning state.
10. Facility Commissioning or Decommissioning.
 - a. All new ABL facilities must become compliant with the EHS-MS within 12 months after the start of operation or the date of acquisition.
 - b. The Corporate EHS Manager and senior facility manager will assemble a facility deactivation binder to document environmental site conditions at the time of transfer or closure. The binder serves as the consolidated reference of all deactivation information.

Executive in Charge:

Senior Vice President & General Counsel

Responsible:

Director of Environmental Health & Safety

Director of Corporate Sustainability & Communications