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State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



August 15, 2016

Scott Taylor
Strattec Security Corporation
3333 W Good Hope Road
Glendale, WI 53209

Subject: Welcome to Green Tier – Tier 1

Dear Mr. Taylor:

Congratulations! We are glad to welcome you into Tier 1 of the Green Tier Program. You join a group of companies who are not only committed to superior environmental performance but also to superior economic performance.

In recognizing your past accomplishments and future commitments, we promise to work towards promoting and recognizing your facility for taking the lead in environmental performance while assuring economic stability and growth. We are committed to publicizing Strattec Security Corporation as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to bring attention to your accomplishments, and we hope to assist you in doing so as a Green Tier partner.

Craig Stemler has been assigned as your single point of contact. He can be reached at (920) 303-5422 or at craig.stemler@wisconsin.gov. Please contact him with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached Commitment Outline points out your benefits and important dates that affect your participation.

On behalf of the Wisconsin Department of Natural Resources, I am proud to extend this welcome to you. We are committed to working with you to build a customized relationship under the Green Tier program. I am excited to embark on our new relationship and my staff is ready to assist as your business grows.

Sincerely,

/s/ Cathy Stepp

Cathy Stepp
Secretary

Cc: Tom Eggert
Craig Stemler

Attachments: Green Tier Commitment Outline
Green Tier Logo Files and Guidance CD
Green Tier Annual Report Guidance

Green Tier Commitment Outline for STRATTEC Security Corporation – Glendale, WI

Approval Date – August 15, 2016

Commitment Outline Updated: 02/19/2020

The updates since participation started are:

- Change of SPOC to project coordinator
- Change of annual report due date to Aug 31 in 2019
- Change of project coordinator
- Updated general content, format and links

I. Environmental Management Systems (EMS) & Audit Requirements

Your EMS must either be ISO-certified, or you must demonstrate that it is functionally equivalent. For information on how to demonstrate the functional equivalency of your EMS, please see: <https://dnr.wi.gov/files/PDF/pubs/co/CO503.pdf>

You have supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **June 30, 2017** and every year after that, you must perform an environmental management system audit. The department recommends that your first audit be completed by a DNR-approved outside environmental auditor.
- B. On or before, **June 30, 2019** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor. The list of approved auditors can be found at: <https://dnr.wi.gov/topic/GreenTier/Auditors.html>

II. Provide an Annual Report

- A. **Annual Report Due Date** - We have mutually agreed that the deadline for your Green Tier annual report is **August 31st**. (Please feel free to discuss alternative reporting dates with your Project Coordinator, JenniferA.Birkholz@Wisconsin.gov should your needs change.)
- B. **Reporting on Environmental Performance Commitments:** Your first report should follow the annual report instructions provided below and should provide data on your progress toward meeting your environmental performance commitments laid out in your Green Tier application or your previous year's Green Tier annual report.
- C. **Annually**, you will need to report progress on the commitments that you have made. For more details about annual reports and metrics, see the annual report instructions provided on the website; <https://dnr.wi.gov/topic/GreenTier/ReportInstructions.html>
- D. Please submit Green Tier Annual Reports to: GreenTier@Wisconsin.gov and your Single Point of Contact (SPOC).

III. Work toward Superior Environmental Performance

Implement environmental improvements that aim to achieve Superior Environmental Performance as defined in Green Tier law. This means environmental performance that results in measurable or discernible improvement in the quality of the air, water, land, or natural resources, or in the protection of the environment, beyond that which is achieved under environmental requirements. More information on Superior Environmental Performance can be found here:

<https://dnr.wi.gov/topic/GreenTier/SuperiorEnvironmentalPerformance.html>

IV. Green Tier - Tier 1 – DNR Commitments

- A. **Single Point of Contact (SPOC):** Your single point of contact or SPOC is your liaison to the department, answering your questions or making connections within DNR or with other experts. Your SPOC is: *Vacant currently, please contact your Project Coordinator*
- B. **Green Tier Logo:** Green Tier participants may use the Green Tier logo on stationery, promotional and educational materials related to your facility. Logo files as well as the Green Tier Style Guide with additional guidelines and information are available online at: <https://wi-dnr.widencollective.com/portals/nkc57xuv/GreenTierBranding>. Your Project Coordinator can provide you with the current access code.
- C. **Recognition:** Along with the certificate of recognition, the department will host a [participant web page](#) for easy reference. Participants should provide information and pictures on their environmental efforts to populate the webpage. We will also promote your successes throughout your tenure in Green Tier using a variety of DNR communication channels.
- D. **Project Coordinators:** You should also feel free to contact your Project Coordinator for Green Tier specific information. Project Coordinators provide support to SPOCs and participants providing reminders on Green Tier requirement dates and by promoting a participant's successes. Your project coordinator is: Jenni Birkholz, Phone 608-266-8226, Cell 608-514-2182, JenniferA.Birkholz@Wisconsin.gov.
- E. **Minimum Inspection Frequency:** Because you have implemented an EMS, you are entitled to inspections at the lowest frequency permitted by the programs under law. The department will work with you to determine how this will work for you.
- F. **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). If you discover a violation of an existing environmental requirement, you are entitled to protection from any civil penalties that the department might otherwise impose if you:
 - 1. Notify the department
 - 2. Provide a corrective action plan and documentation of your Environmental Management System (EMS) adjustments that ensure the violation will not happen again, and
 - 3. Correct the violations within 90 days

Notice: Collection of this information is authorized under s. 299.83 Wis. Stat. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public Records Law (ss. 19.32 – 19.39, Wis. Stats.). If you need to request confidential treatment of any information in order to protect a trade secret, please contact a DNR representative *prior* to submitting this form. Applications must be considered complete by the DNR in order to be processed. For complete application instructions, see "Green Tier Application Instructions," publication number CO-501.

This application is for... (check one): **Tier 1** **Tier 2 (attach Letter of Intent to this form)**

I. Applicant Information

| | | | |
|---|---|--|-------------------|
| Contact Name Scott Taylor | Title Environmental & Safety Manager | | |
| Street Address 3333 W. Good Hope Rd. | City Glendale | State WI | ZIP Code 53209 |
| Telephone Number 414-247-3465 | Fax Number 414-247-4056 | E-mail Address staylor@strattec.com | |

II. Facility Information

| | | | |
|--|------------------|---------------------|-------------------|
| Facility Name Strattec Security Corporation | | County Milwaukee | |
| Street Address 3333 W. Good Hope Rd. | City Glendale | State WI | ZIP Code 53209 |
| Mailing Address | City | State | ZIP Code |

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.

FID 241006810

III. Scope of Green Tier Participation (check one)

- This application covers all activities at the facility listed in Section II.
- This application covers all activities at more than one facility. For each facility to be covered under this application provide the information from Section II on a separate page labeled **Attachment 1**.
- This application **does not** cover all activities at every covered facility. Please describe the exact scope of activities and facilities to be covered in the program on a separate page labeled **Attachment 1**.

IV. Environmental Performance

Please provide the following information on a separate page labeled **Attachment 2**. Refer to the *Application Instructions* for definitions of environmental performance and superior environmental performance.

Tier 1 Applicants:

- Describe your past and current environmental performance with respect to each covered facility or activity included in this application. Within this attachment establish a baseline date against which future progress can be measured.
- Describe your future plans for enhancing the environment with respect to the same facilities/activities.

Tier 2 Applicants:

- Provide information demonstrating your record of superior environmental performance. Within this attachment establish a baseline date against which future progress can be measured.
- Describe the measures you propose to take to maintain and improve your superior environmental performance.

V. Environmental Management System (EMS)

- a. Have you implemented an EMS that is certified to the ISO 14001 standard? Yes No (circle one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001? Yes No (circle one)

If you circled "No" for both questions, you are not eligible for Tier 2. Please proceed to Section VI only if you are applying for Tier 1.

If you circled "Yes" for either question, please provide a copy of the following documents labeled as **Attachment 3**:

- Proof of ISO 14001 certification OR functional equivalence (refer to *Application Instructions* for details)
- Environmental policy statement and scope statement
- Documented objectives and targets for the covered facilities/activities

VI. Public Involvement

Please provide in a separate document labeled **Attachment 4** a list of interested persons whom you know or expect will have a strong interest in your Green Tier application. Tier 2 applicants must provide additional information about interested person involvement in a Letter of Intent. Refer to *Application Instructions* for details.

VII. Enforcement Record

Please review the Enforcement Record requirements described in the *Application Instructions* very carefully, and then check the appropriate box:

- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

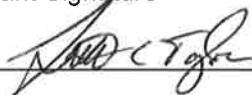
VIII. Tier 1 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Implement, within one year of the date of this application, an EMS for each covered facility or activity that is certified to the ISO 14001 standard or is functionally equivalent to ISO 14001 as determined by DNR.
- Conduct annual EMS audits, with every 3rd EMS audit performed by a DNR-approved outside environmental auditor.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on progress towards meeting objectives related to improved environmental performance for aspects regulated under chs. 29 to 31, 160, or 280 to 299, Wis. Stats., unregulated environmental aspects, or voluntary actions to restore, enhance, or preserve natural resources.

Applicant Signature

Date Signed



4-11-16

IX. Tier 2 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Conduct annual EMS audits performed by a DNR-approved outside environmental auditor.
- Conduct or have another person conduct an annual audit of compliance with environmental requirements that are applicable to the facilities and activities covered under Green Tier.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on each compliance audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.

Applicant Signature

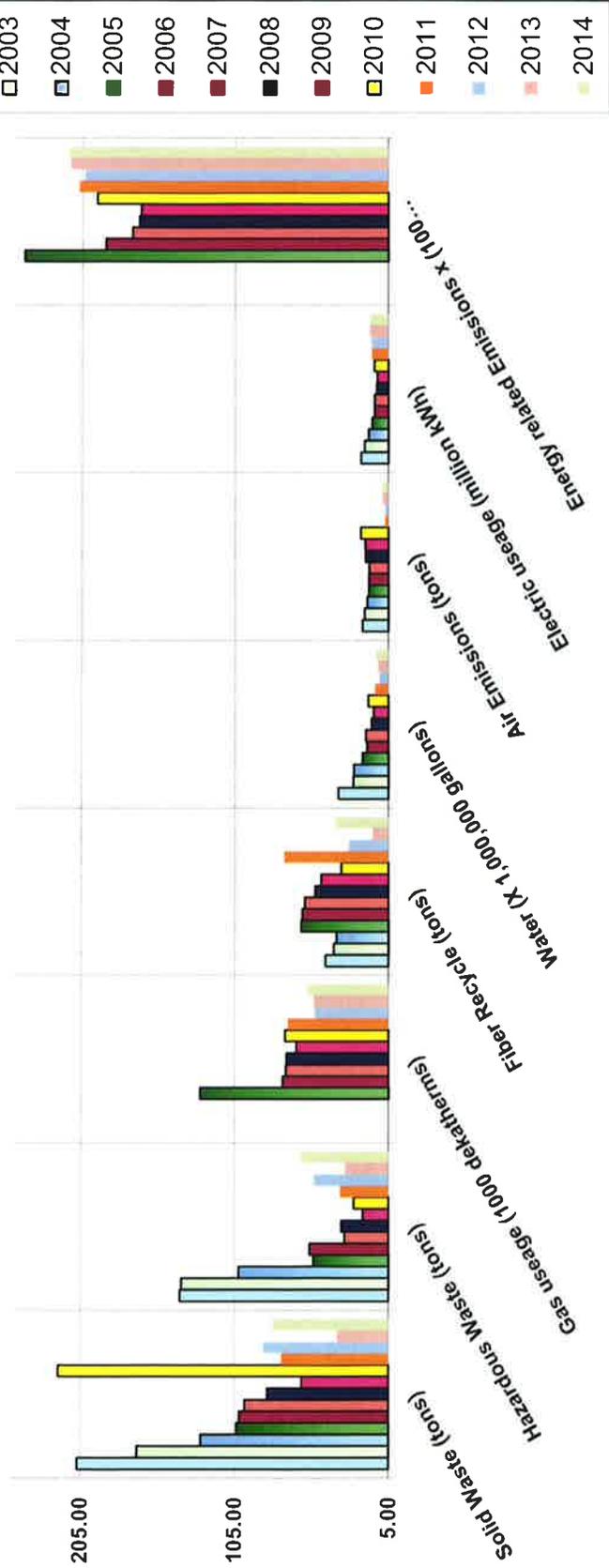
Date Signed

X. For Department Use Only

| Date Received | Initials of Reviewer | Status | Date Returned to Applicant for Additional Information | Date Denied | Date Approved |
|---------------|----------------------|--------|---|-------------|---------------|
| | | | | | |

| | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 |
|---------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Solid Waste (tons) | 207.26 | 168.69 | 127.39 | 103.90 | 102.00 | 98.54 | 83.87 | 61.44 | 219.82 | 74.74 | 86.61 | 38.5 | 80.99 |
| Hazardous Waste (tons) | 140.96 | 140.03 | 102.55 | 53.82 | 56.28 | 33.41 | 35.66 | 21.53 | 27.67 | 36.39 | 53.81 | 33.32 | 62.55 |
| Gas usage (1000 dekatherms) | 45.89 | 40.60 | 38.82 | 61.94 | 61.00 | 59.40 | 52.56 | 48.78 | 35.64 | 73.06 | 31.00 | 15.45 | 39.54 |
| Fiber Recycle (tons) | 37.63 | 27.98 | 27.62 | 21.82 | 18.80 | 19.67 | 15.86 | 14.57 | 18.04 | 13.62 | 11.14 | 11.64 | 13.40 |
| Water (X 1,000,000 gallons) | 21.72 | 20.50 | 18.80 | 17.75 | 17.69 | 17.52 | 19.87 | 19.88 | 22.86 | 7.22 | 7.44 | 8.73 | 9.07 |
| Air Emissions (tons) | 22.76 | 20.54 | 17.90 | 15.62 | 13.84 | 13.98 | 12.57 | 12.14 | 14.06 | 15.69 | 16.31 | 17.15 | 17.10 |
| Electric usage (million kWh) | | | | | | | | | | | | | |
| Energy related Emissions x (100 tons) | | | | 242.88 | 189.74 | 172.24 | 167.88 | 166.58 | 195.43 | 207.39 | 203.88 | 213.15 | 214.80 |

Environmental Performance (MKE)



Completed

Completed EMS OBJECTIVES & TARGETS

DEPARTMENT(S): Environmental Management System-Milw
PREPARED BY: S. Taylor
DATE: 8/26/2014

| ACTIVITY | ASPECT | OBJECTIVE | TARGET | MEASURE | TIME FRAME | REPORTING |
|--|-------------------------------------|---|--|-------------------------|----------------------|-----------------------|
| Wastewater Treatment | Batch Acid | Waste treatment improvements: Oxidize/Reduced hexavalent chrome, neutralize and remove heavy metals | <2.63 mg/l max, <1.62 mg/l avg, pH 8 - 9 | lab analysis | 12/1/2001- complete | T.Drews |
| | Batch Alkaline/Cyanide | Waste treatment improvements: Oxidize cyanide, reduce / neutralize heavy metals | <1.20 mm/l daily, <0.65 mg/l monthly | lab analysis | 12/1/2001- complete | T.Drews |
| Cyclemaster Plater | Copper Strike/Cyanide | Eliminate copper cyanide chemistry | remove cyclemaster, outsource decorative chrome | eliminate chemistry | 6/30/2003- complete | T.Drews, S. Taylor |
| Conv D/C Machines | Zinc Die Release | Reduce die lube overspray | Study application techniques | Not applicable | 7/1/2003-complete | G. Minue |
| Barrel Zinc Plating Line | Cyanide and Caustic | Eliminate Zinc Cyanide chemistry | Replace w/Chloride Zinc | eliminate chemistry | 7/1/2003-complete | T.Drews, S. Taylor |
| Die Cast and Zinc plated parts | Hexavalent Chrome | Develop hex-free process for die cast & zinc plated parts | Hexavalent Chrome elimination | 419K developed electric | 11/01/2004- complete | T. Yatso, T. Drews |
| Buildings and Grounds energy consumption | Electrical consumption | Install efficient lighting | 1 million kW annual reduction | electric consumption | 12/1/2004-complete | S. Taylor, J. Valenti |
| | | Investigate use of HVLS fans | improved HVAC efficiency & comfort | observation | 12/1/2004-complete | S. Taylor |
| Barrel Copper Cyanide plating | Copper cyanide plating | Eliminate copper cyanide chemistry | Outsourced work | eliminate chemistry | 2/05/2005 - complete | T. Drews, T. Yatso |
| Oil Spinner Line | Solvent / Oil | Reduce VOC emissions | replace with aqueous wax topcoat on die cast cases | 419K developed | 04/10/2005-complete | T. Drews, S. Taylor |
| Conventional die heat up system | Energy consumption (electric & gas) | Develop and implement a more efficient system | \$60,000 annual savings | utility reductions | 3/4/2005-complete | J. Valenti, S. Taylor |
| Compressed air system | Electrical Consumption | Compressed air conservation | develop air leak detection and repair program | PM implementation | 10/5/2005 - complete | M. Kendall |
| Conventional die cooling | water waste | Develop / implement die maintenance program | eliminate water leaks | water reduction | 12/1/2005 - complete | S. Pollnow |
| TCE remediation | Groundwater contamination | Develop / implement an impervious cap | reduce surface water infiltration | cap installation | 10/13/2006 -complete | S. Taylor |
| Water use | water waste | Investigate water use on weekends / shut down | develop program for water reductions | water bill | 12/01/06 -complete | S. Taylor |
| Building water use | Plating rinse waters | Investigate water reduction and re-use opportunities in Plating | Reduce water use | water bill | 12/01/06 -complete | S. Taylor |
| Energy consumption | HVAC utility consumption | Investigate HVAC efficiency improvements | direct fire gas heat / boiler improvements | natural gas bill | 12/01/06 -complete | S. Taylor |

Min.Retention: Lif of System
Disposal: Env.Eng.
Template Rev. Unapproved

Return To: N/A
Storage: Livedocs
Archive: N/A

QMS/EMS RECORD
Owner: Env. Eng.
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Completed

Completed EMS OBJECTIVES & TARGETS

DEPARTMENT(S): Environmental Management System-Milw

PREPARED BY: S. Taylor

DATE: 8/26/2014

| ACTIVITY | ASPECT | OBJECTIVE | TARGET | MEASURE | TIME FRAME | REPORTING |
|---|--|--|--|-------------------------------------|--|-----------------------|
| Reduce oily wastewater generation 20% | Waste water | Install oil filters on washers to reduce wash solution dump frequency | 20,000 gallon reduction | MMSD hauled WW report | 6/8/08-complete | S. Taylor |
| Reduce Buildings and Grounds electric consumption, 6.5% | Electrical consumption | Implement variable frequency drives on rotoclones, sensor lighting installed in office areas & restrooms | 1,119,981 kWh monthly average for 2007, 1% reduction obtained. | QOS kWh tracker | 6/8/08-complete | J. Valenti |
| Maintenance parts washing. | Air emissions | Switched to water based cleaners and parts washers in Dept 058, eliminated small parts washers in other depts. | Eliminate naphtha tanks | Annual Air Emission Inventory (DNR) | 4/9/10-complete | S. Taylor |
| Plating water use | Plating rinse waters | Design / install a water recirculation and re-use system in Plating. | Reduce water use | water bill | 1/02/11 -complete | S. Taylor |
| HVAC | Building energy use. | Install new plant heating, boilers, and office air conditioning system. | Reduce gas and electric use. | QOS trackers | 4/20/12-complete | S. Taylor |
| Oily water recycle system | Floor cleaning water | Install a recycling system to reuse floor cleaning water. | Reduce water use and disposal costs | oily wastewater disposal volume | 4/5/12-complete | S. Taylor |
| Product shipping | Energy consumption (fuel), cost. | Increase intermodal (truck & train) shipping. | Target =5 shipments weekly - implemented 3x week shipments. | Freight records | 6/30/12 - partial completion | B. Arneman |
| Operations | Electrical consumption | Maintain target average consumption | 1,392,413 kWh monthly average | QOS trackers | Goal met 6/1/2013 | J. Valenti |
| Operations | Paper use | Implement electronic method sheets & SPC charts. <i>CSS, Audit, and EPC complete.</i> | New Process | Implementation | Process created and implemented 7/1/2013 | M. Maio, S. Tolfa |
| Operations | Paper use | Implement electronic method sheets & SPC charts. | New Process | Implementation | CSS, Audit, and EPC complete. 6/30/2014 | M. Maio, S. Tolfa |
| Conventional Die Cast Heat Recovery Investigation | Air emissions | Implement water soluble die lube on applicable new programs. | Installed and in use on 3 conventional machines | Implementation | Complete 6/1/2014 | M. Maio, S. Tolfa |
| | Investigate feasibility of heat recovery on Die Cast furnace and chillers. | | Develop project and payback analysis | Project | Jun-15 | M. Maio, A. Chouinard |

Return To: N/A
Storage: Livedocs
Archive: N/A

QMS/EMS RECORD
Owner: Env. Eng.
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Min.Retention: Lif of System
Disposal: Env.Eng.
Template Rev. Unapproved

Certificate of Registration



This is to certify that the environmental management system of

Strattec Security Corporation

Main Site: 3333 West Good Hope Road, Milwaukee, Wisconsin, 53209, USA

has been assessed and registered by Intertek as conforming to the requirements of

ISO 14001:2004

The environmental management system is applicable to the management of the environmental aspects related to:

Design, development and manufacture of mechanical locks, electro-mechanical locks, keys, latches and related security / access control products for global automotive manufacturers. Manufacturing processes include precision die castings, punch press, plating, machining, assembly, and packaging.

Certificate Number: 01-191c
Initial Certification Date: 21 December 2001
Certificate Issue Date: 06 January 2014
Certificate Expiry Date: 05 January 2017



Calin Moldovean, President
Intertek Testing Services NA, Inc.
70 Codman Hill Road - Boxborough, MA, USA



In the issuance of this certificate, Intertek assumes no liability to any party other than to the Client, and then only in accordance with the agreed upon Certification Agreement. This certificate's validity is subject to the organization maintaining their system in accordance with Intertek's requirements for systems certification. Validity may be confirmed via email at certificate.validation@intertek.com or by scanning the code to the right with a smartphone.

The certificate remains the property of Intertek, to whom it must be returned upon request.

CT-ISO14001:2004-ANAB-EN-LT-L-04.jan.12



STRATTEC Security Corporation Environmental Policy

STRATTEC is committed to our Environmental Management System which provides for continuous improvement of our organization's efforts toward the following:

- Preventing Pollution
- Complying with relevant environmental legislation and regulations; and
- Complying with customer-based environmental requirements.

STRATTEC's Environmental Management System was developed and is maintained specific to our activities, products, and services.

President & Chief Executive Officer – Frank Krejci

Senior Vice President - Chief Financial Officer - Pat Hansen

Vice President - Security Products - Brian Reetz

Vice President – VAST – STRATTEC - Richard Messina

Vice President - Mexican Operations – Rolando Gullot

ISO 14001 Management Representative
Milwaukee Operations – Scott Taylor

ISO 14001 Management Representative
Mexican Operations – Eduardo Avila

EMS OBJECTIVES & TARGETS MATRIX

FY 2016

DEPARTMENT(S): Environmental Management System-Milw
 PREPARED BY: EMS Mgmt. Team
 DATE: 8/24/2015

| OBJECTIVE | PROJECT | TARGET | MEASURE | TIME FRAME | REPORTING | STATUS |
|--|---|--|--------------------------------|------------|-----------------------|--------|
| Maintain target average electric consumption | Implement conservation procedures. | 1,484,772 kWh monthly average | QOS kWh tracker | Jun-16 | J. Valenti | |
| Reduce die cast reclaim rate | Part quality improvements, gross reduction, zinc reclaim segregation improvements | over previous year, <1.75% | vs purchase tonnage. | Jun-16 | A. Gerstmeier | |
| Product shipping | Increase product shipped intermodal (truck & rail). | Increase from 3x week to 5x week | Implementation | Jun-16 | G. Gallenberg | |
| | Reduce premium freight | reduction over previous year | KPI review | Jun-16 | A. Gerstmeier | |
| Water Soluble die lube | Implement on new conventional programs. | Increase usage 2% over 2015 baseline. | Corporate Cost savings tracker | Jun-16 | M. Maio, A. Gerstmier | |
| Compressed air conservation | Implement nozzles, shut down, etc. | over 6 mo. baseline. | Implementation | Jun-16 | J. Valenti | |
| Oily wastewater reduction | Develop soap solution, restrict soap access, utilize recycle system | Wastewater reduction over previous year. | Wastewater tracker | Jun-16 | S. Taylor | |
| Communication | Communicate EMS benefits and cost savings from projects. | in quarterly plant | Implementation | Jun-16 | A. Gerstmeier | |
| | | | | | | |
| | | | | | | |