Ciba

1. January 2008

POSITION PAPER

ISO 14001: Environmental Management Systems

Ciba fully supports the introduction of formal management systems in all its activities. Ciba has a comprehensive Environmental, Health and Safety (EHS) Management system, which is applied throughout its global operations and consists of:

- Written policy
- Guidelines and guidance notes
- Clear definition of roles and responsibilities
- EHS training at all levels
- Internal expertise, consulting and advice
- EHS audits and follow-up of audit recommendations
- Target setting
- Measurement of EHS performance
- Reporting to stakeholders
- Technology and R&D
- Emergency response and issues management

The management system covers, not only environmental management, but also safety, health protection, product safety and transport of raw materials and products. We are convinced that our EHS management system fulfils all the requirements of ISO 14001; indeed its scope is far wider than the requirements of the standard.

For local market related reasons, some of our sites have had their environmental management system certified to ISO 14001; we do not aim for company- wide certification, as we do not believe that the certification would lead to a further improvement of our environmental performance.

Dr. Günter Fritz

Head of Environment, Health & Safety

Dr. B. Feldmann

Head of Section Environment