

HENKELS LAW LLC 2020 BENEFIT COMPANY REPORT

INTRODUCTION

On April 3, 2014, Henkels Law LLC (www.henkelslaw.com) became an Oregon benefit company. The information reported below is from 2020. The third-party certifier is Benefit Company for Good and marks from this and from a B-Lab Assessment are included in Appendix 1. Through 2020, Henkels Law LLC continues to support its clients primarily in tribal and federal Indian law, energy and utility matters, juvenile law, and general business and professional licensing.

In 2020, Henkels Law LLC renewed its certification with the Oregon Certification Office for Business Inclusion and Diversity (“COBID”) and is a state-certified Woman-owned Business Enterprise and Emerging Small Business. Henkels Law LLC has also added a Disadvantaged Business Enterprise Status. Diane Henkels, lead counsel at Henkels Law LLC, continues representing Small Business Utility Advocates (www.utilityadvocates.org) in Oregon.

HIGHLIGHTS AND THEMES

Environmental Impact

- Reduced impact of travel by communicating almost exclusively remotely due to the COVID-19 Pandemic
- Reduced interaction, reduced sustainability education with office staff and other attorneys in office-share space

Social Impact

- Increased volunteer hours and financial contribution in supporting Small Business Utility Advocates, a non-profit organization
- Staffing increases through engaging with law students and experts, as well as continued engagement with COBID-certified firms
- Volunteer impact and financial contributions to partner in Madagascar, and supporting refugees from Central African Republic (see “special public benefit”)
- Continued participation and support of personal community ecovillage

Economic Impact

- Increased revenues from 2019
- Increased donations
- Completed payoff of significant business related financial obligation

Throughout 2020, Henkels Law continues to advocate for small commercial utility customers in front of the Oregon Public Utility Commission (PUC) and at PUC Staff workshops. The devastating impacts of COVID-19 on small businesses continues to shape much of our work for SBUA. For SBUA, Henkels continues to provide counsel and explain PUC processes and decisions in an approachable way to the SBUA constituency while leading a coalition of small businesses and allies to voice small commercial concerns with the PUC and other stakeholders.

Henkels Law also represents tribal member and non-tribal member clients in tribal administrative fora and tribal courts — working towards dispute resolution. These matters are ongoing in 2021.

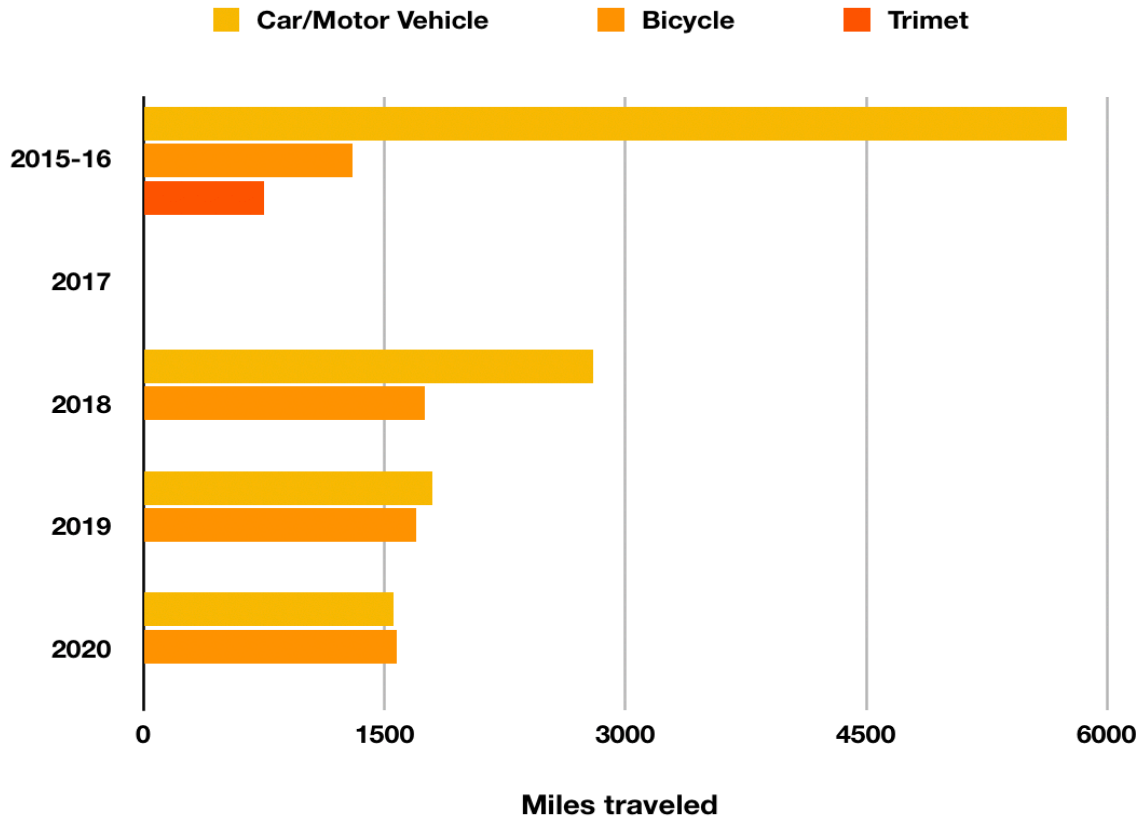
Henkels Law also saw reunification of parents with their children, and mediation of a continued relationship between biological parents with their children. In one case, a mother and daughter were happily reunited after four years of separation, foster parenting, and termination of parental rights proceedings. Diane Henkels represented the mother in the last year of that matter.

GENERAL PUBLIC BENEFIT

Under Oregon Revised Statute 60.750(3), a “general public benefit” is a material positive impact on society and the environment, taken as a whole, from the business and operations of a benefit company. Through our services and operations, Henkels Law provides a material positive impact on society and the environment in the following ways:

TRANSPORTATION

In mid-March, the COVID-19 pandemic began, inducing school closures, many workplaces, and government offices, requiring most work to be completed virtually and online. Diane Henkels remained going to her office at times because the space was CDC compliant (enclosed walls and closed doors, etc.). Throughout the Fall 2020, Diane Henkels was off-site frequently facilitating schooling. Due to the pandemic, transportation was divided in 2020 between bike commute and electric vehicle commute to the Newport workplace.



WASTE, PAPER, AND TOXICS REDUCTION

Like many spaces, the office-share space experienced a challenging year. Use of single use plastics increased as pandemic conditions sharply reduced sharing of materials by others. Use of toxics likely increased, as cleaning took priority under the circumstances. For Henkels Law LLC and Small Business Utility Advocates, paper reduction and recycling remained approximately the same as prior years. Henkels Law LLC typically does an in-house recycling CLE which did not happen in 2020, though the SFS ethics and recycling did occur remotely in 3Q .

SUSTAINABLE SOURCING / PROCUREMENT

Henkels Law obtained 2020 Apple Conflict Mineral Report due to the Firm’s use of almost exclusively Apple products, which include minerals sourced from a part of the world Henkels Law focuses on- the Democratic Republic of Congo and neighboring Central African countries.¹ In the 2020 Apple Conflict Mineral Report, we note that of the many countries sourcing for Apple, it appears that just two are from the Africa region.

¹ UNITED STATES SECURITIES AND EXCHANGE COMMISSION Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020. <https://www.apple.com/supplier-responsibility/pdf/Apple-Conflict-Minerals-Report.pdf>

Henkels Law LLC staffed work in 2020 with three law students, and a consultant for the energy work, several contractors for other expert services including legal work. Contractors included senior former utility economist and a COBID Minority firm for technical support/mentoring.

- The Firm engaged a second year law student to extern, receiving school credits from Vermont Law School, to staff SBUA focusing on a general rate case, impacts of COVID-19 on utilities and utility customers, distribution system planning, and member outreach and information. Ellie Hardwick is a recent graduate of Vermont Law School where she earned her JD and Masters in Energy Regulation and Law. During law school she externed at Small Business Utility Advocates and North Carolina Sustainable Energy Association and worked as a clinician at the energy clinic at Vermont Law School. She is currently working at Sanger Law, a small energy firm in Portland, Oregon. In her free time she likes to spend time with her dog, Tallulah, get outdoors, attend concerts, and travel.
- The Firm subsequently engaged a volunteer for five hours/week from Lewis & Clark Law School for SBUA outreach and docket work in Fall 2020. That student, Carrie Ng, now a 3L, originally from Northern California. She became interested in sustainability while studying at the University of California, Davis and is now pursuing sustainability, in both resources and risk management, through the law. Henkels Law engaged a third-year law student as a paid contract Law Clerk in late 2020 through Spring 2021 for SBUA.
- Frederick Randall II is an Alabama native who attended Vermont Law School for both his Juris Doctorate and L.L.M. Frederick focused on energy and environmental law issues with both the educational and experiential opportunities. Outside of the law; Frederick enjoys Black tourism, hunting, eating peach cobbler, live music, and cooking.

2020 was challenging for staffing and working with remote staff. SBUA is committed to paying in value, either school credit or fair contract wages, for the services rendered, and demonstrated this commitment in 2020. Also, the firm maintained its share of payment for one office-share staff which included remote work opportunity, no layoff, and continuation of benefits.

EDUCATION

- Created various newsletters for SBUA: <http://utilityadvocates.org/news-and-resources/>
- Produced and lead a webinar for small businesses regarding energy utility issues in August 2020 <https://utilityadvocates.org/getting-oregons-small-businesses-the-best-energy-future-august-26-2020/> w/at least 10 live participants
- Lead 4 BESThq Executive Briefings, Voices, and other meetings, with appearances by legislations, and leaders/organizers of small business-oriented organizations
- Ongoing outreach with small business leaders and groups
- Served on OCDLA Juvenile Law Committee, with the primarily purpose of organizing day-long CLE opportunities for attorneys representing parents and

children in juvenile dependency matters, termination of parental rights and related guardianships, and juvenile delinquency proceedings. This OCDLA committee work lead a 50-minute presentation in 2021 CLE to over 100 juvenile law practitioners in an Oregon Criminal Defense Lawyers Association Continuing Legal Education program.

- Assisted with what is now the annual OSB Sustainable Future Section recycling CLE which provides a regular ethics credit.
- Otherwise, leadership and participation in presenting environmental sustainability related education events for 2020 reduced w/none for the immediate office share, unfortunately.

ACCESS TO JUSTICE

“Access to Justice” refers to helping meet the legal needs of low and moderate income Oregonians. Henkels Law implements the equity component of our sustainability policy by incorporating access to justice in individual cases. We also represent traditionally unrepresented populations including, but not limited to:

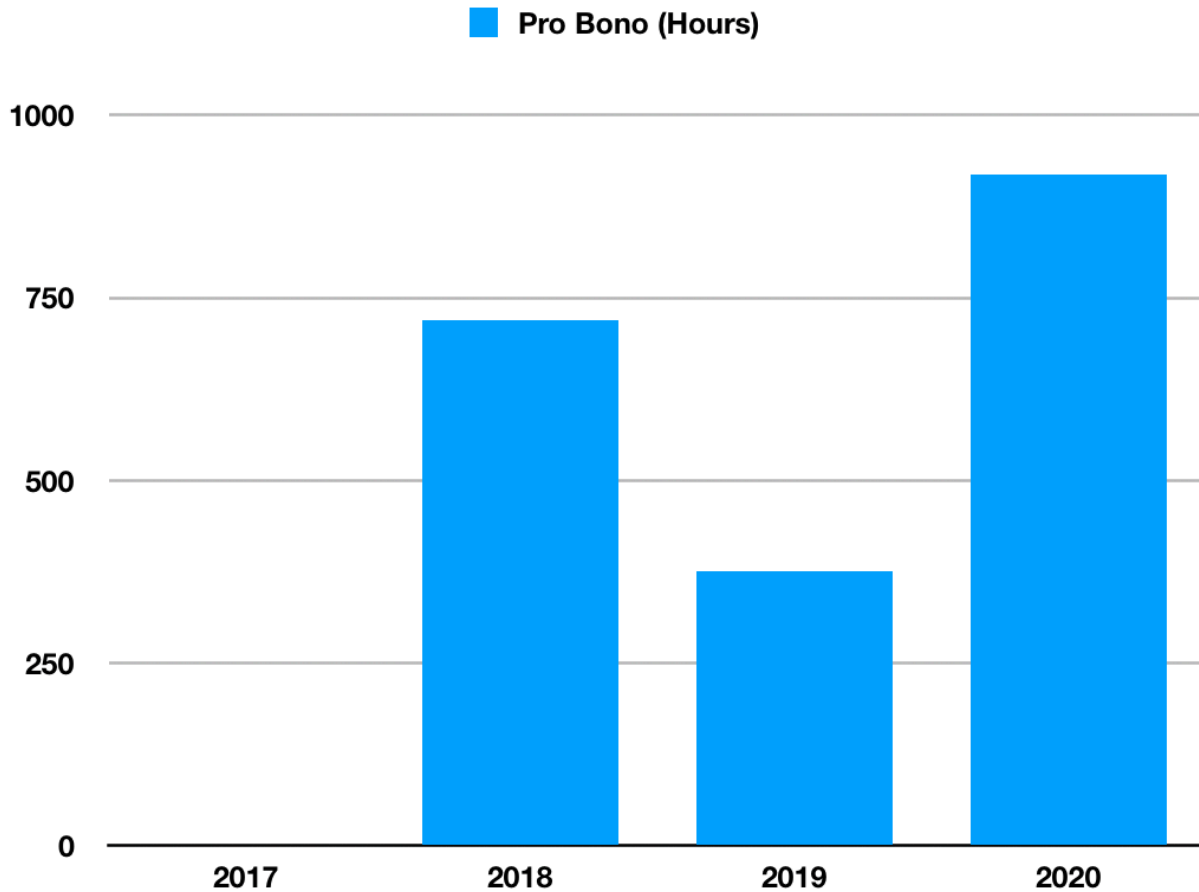
- Tribal member and Tribal community member individuals and entities interacting with Tribal and State governments, or Tribal members presented with legal problems
- Oregon’s small businesses generally in utility regulatory proceedings
- Supporting the Campaign for Equal Justice with our team winning the Most Funds Raised award for a 2020 Trivia Night

PRO BONO SERVICES

I. PRO BONO REPRESENTATION

Through 2020, Henkels Law provided representational pro bono legal work to the following local individuals, organizations, and communities:

- **Small Business Utility Advocates** — Significant pro bono was unintentional and represents a business issue for the firm that needs to be addressed better in 2021.
- **Tribal/Indian law:** Many consultations with referrals from Klamath Tribal Court.

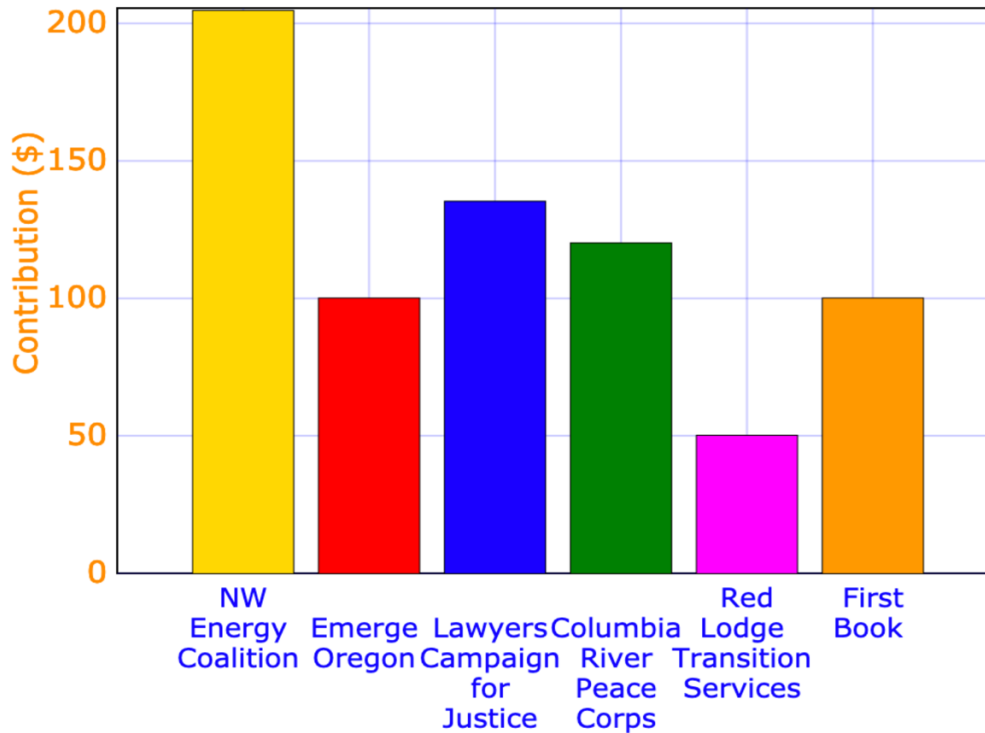


II. NON-REPRESENTATIONAL PRO BONO

Through 2020, Henkels Law provided non-representational pro bono legal support to the following local individuals, organizations, and communities including BESThq Voices (raising the political literacy of the small business community), an immigrant family, Oregon State Bar volunteer hours serving on the Sustainable Future Section Programs Committee, Oregon Women Lawyers serving on the Working Parents Committee, Co-chairing an elementary/middle school science fair (71 hrs.)

CHARITABLE CONTRIBUTIONS—CASH

Henkels Law provided roughly \$23,000 in cash contributions to Small Business Utility Advocates throughout 2020. Henkels Law made additional contributions to the following organizations, among others:



Total Professional Charitable Contributions: \$23,709.80

SPECIFIC PUBLIC BENEFIT

Henkels Law does not identify a particular “specific public benefit” in its corporate documents. However, Henkels Law continues to serve a specific public benefit through the work it does with two African countries: Madagascar and the Central African Republic. A main contact with Madagascar remains the Development and Environmental Law Clinic (DELCL) which steered us to engaging on contract basis teaching in French from Madagascar via Zoom to Oregon French immersion elementary school students on the topic of Madagascar. Work with the Central African Republic focused on assisting friends, refugees from that country to access legal immigration assistance, and to access a loaned hand pedal bike from Adaptive Sports Northwest for a parent to bike w/small child, which lead through the Oregon Women Lawyers to a donation of a complete fully equipped hand pedal bike by an OWLS member to the same parent. Took kids camping on a Portland Peace Corps Association annual camping trip and kayaking with the Tualatin Riverkeepers.



Central African Republic nationals in the United States

- Securing capable legal counsel to correct immigration/green card process for a father and his two teenage daughters who immigrated as refugees in 2019
- Facilitated donation of a new high quality fully equipped hand pedal bike to a mother of a six-year-old where mother is unable to ride a conventional bike. Collaboration through Portland Peace Corps and Adaptive Sports Northwest including obtaining bikes for the kids and borrowing rental bike in 2020 equipped all in bicycles. Then Henkels received communication by Oregon Women Lawyers colleague whose family wanted to donate a fully equipped bike for this mother, and mother accepted and was equipped.

Madagascar

- Through DELC in Madagascar, Henkels Law LLC learned of educators, R. Adele Marioelifara (“Fara”) Tantely and Franckoela (“Koela”) Nantenaina Ramanandrianina, from Ranomafana, Madagascar, who presented a series of five Zoom classes to sixth graders in a French Immersion program on Madagascar, from Madagascar, in French language. Fara is Présidente de l’AssociaHon TARATRA : Association oeuvrant dans la conservaHon , la protecHon de l’environnement par le développement communautaire à travers les femmes. Both worked for Valbio and Pivot (Conservation/education/health organization in Ranomafana). They are knowledgeable about conservation, the history of Madagascar, Henkels Law LLC also took beginning steps of (potentially) facilitating screening of Malagasy film producer film at the 2022 Cascade African Film Festival.

Other Specific Public Benefits

- Sponsored Oregon Association of Minority Entrepreneurs at a Youth business conference and attendance of one young Central African friend at the conference

TRANSPARENCY

Henkels Law LLC continues to operate with an advisory committee of a jurist and a former staff of a firm well-known for its sustainability. We meet once a year to review and provide input on the challenges and questions of the firm. The Firm plans to increase its advisory committee in 2021.

WORK-LIFE BALANCE / HEALTH

Challenges: maintaining morale during COVID-19 pandemic in 2020 with three cancelled vacations to visit family or places; organization with constantly changing schedules; 100% electronic presence in most proceedings

- Parenting a middle school student through a mostly Zoom school year
- Zoom readings with centarian father and other family members (E.g. Aristophanes “The Birds,” “Rubaiyat” of Omar Khayyam, etc.)
- Continued sailing Coronado- C22
- Continued daily bike commute to/from work

- In 2020 Henkels Law staff continued a 6th year of participation in the Kailash Ecovillage <https://www.kailashecovillage.org/> including group and family gardening, powering an electric vehicle through rooftop solar, and ivy removal and replanting plot with native species.

2020 CHALLENGES

- COVID-19 proved challenging for Henkels Law LLC in a variety of ways. One challenge was advocacy for small commercial ratepayers with stakeholders and the Public Utility Commission. SBUA encountered resistance from the regulators though they did recognize SBUA’s representation of this community of utility stakeholders. The utility moratorium developed through UM 2114 emphasized residential customer struggles and helping residents navigate the burden of the pandemic, but often left small commercial interests at the periphery.
- Increase in plastics accumulation and screen time usage in the household.
- Henkels Law LLC social media and other outward presence which reduced in 2020.
- In 2021, Henkels Law LLC will continue to strive to capture 90% of its time and to identify a carbon footprint in its physical infrastructure aspects, and to engage a regular employee.


APPENDIX 1

THIRD PARTY STANDARD

Pursuant to ORS 60.768(2)(b), Henkels Law must select a third-party standard and assess the extent to which the benefit company met or exceeded the standard, as well as describe the process and rationale the firm used to select or change the third-party standard. Henkels Law has chosen to utilize Benefit Company for Good. Henkels Law received high marks for its performance. Henkels Law staff also worked through our current B Lab Assessment Results See below attached below and this is being updated/completed.

B Impact Assessment

[PRINT PDF](#) [DOWNLOAD](#) [BENCHMARKS](#)



This management tool, used by over 50,000 businesses worldwide, including over 3,000 Certified B Corporations, helps companies assess their impact on various stakeholders, including their workers, community, customers, and the environment.

<p>OVERALL SCORE 39.6</p> <p>OPERATIONS SCORE 37.8</p>	<p>COMPLETION 68.1%</p> <p>IBM SCORE 1.0</p> <p>N/A SCORE 0.6</p>
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APPENDIX 2

Sustainability Policy of Henkels Law LLC An Oregon Benefit Company Last reviewed and revised on 08/13/21

Sustainable development is meeting the needs of the present without compromising the ability of future generations to meet their own needs. CITE Henkels Law seeks to implement system conditions or principles articulated by The Natural Step (<http://www.naturalstep.org/the-system-conditions>). In a sustainable society, nature is not subject to systematically increasing: to become a sustainable society we must eliminate our contributions to:

1. The systematic increase of concentrations of substances extracted from the Earth's crust (for example, heavy metals and fossil fuels)
2. The systematic increase of concentrations of substances produced by society (for example, plastics, dioxins, PCBs, and DDT)
3. The systematic physical degradation of nature and natural processes (for example, over harvesting forests, destroying habitat and overfishing); and...
4. Conditions that systematically undermine people's capacity to meet their basic human needs (e.g., unsafe working conditions, not enough pay to live on).

Henkels Law adds to the equity component of the above principles and supports principles expressed in the U.N. Declaration for the Rights of Indigenous Peoples. We at Henkels Law LLC recognize that all human activity, including the operation of a law office, impacts the natural world and society. Within the firm we make daily choices regarding our work that can either reduce or increase that impact. As a firm we seek to reduce the impact. We seek to achieve and exceed the third-party standard that we have chosen as an Oregon Benefit Company. Henkels Law LLC commits to having a general public benefit by making a materially positive impact on society and the environment, taken as a whole, from the business and operations of the company. Henkels Law LLC also commits to having a specific public benefit of supporting efforts in the Africa region to support the Development and Environmental Law Center—Madagascar in its environmental justice efforts, and also Water for Good, which supports potable water systems in the Central African Republic, and other individuals and organizations from those countries.

Education. Because the daily actions of each person working in or with firm will contribute to the success of this policy, this policy includes a provision for orientation for all vendors and education for all personnel on sustainability matters. Henkels Law LLC ongoing education consists of formal trainings mostly in the form of attending Continuing Legal Education produced by the Sustainable Future Section of the Oregon State Bar, an annual office sustainability related training produced by Henkels Law LLC

and also informally by absorbing best practices observed in Portland metro area, Beaverton, the central coast of Oregon, and venues and events of Pacific Northwest Indian tribes. The firm commits to communicating its sustainability practices to vendors and building management systematically, and also to office share colleagues at least twice annually, and those working for the firm.

Sustainability Coordinator. One person is designated as the Sustainability Coordinator for the firm. The Coordinator leads the firm's sustainability efforts, is responsible for informing vendors and associates, and clients, of this sustainability policy, review and update this policy and implement improvements, and keep awareness of this policy at a high level in the firm. The Coordinator is responsible for producing the firm's Oregon Benefit Company Report.

Sustainability Team. The firm's sustainability team consists of the Sustainability Coordinator collaborating with office staff and vendors engaged to assist with sustainability efforts.

Purchasing. Sustainability shall be prioritized in the purchase of supplies, equipment, and services. Examples of sustainability criteria are reduction of materials purchased, reuse of existing materials, biodegradability, recycled content, waste minimization, hazardous-chemical free, energy conservation, resource conservation, locally manufactured or provided by businesses or individuals located in or around Oregon coast or Portland metro area. Advertisements to work with Henkels Law will state that all qualified applicants receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin.

Waste Reduction and Recycling. Subject to security, client preference, and other considerations, Henkels Law shall minimize the use of paper in data storage, printing and copying, internal and external communications, and mailing. Systems will be established to minimize disposables and packaging, reuse equipment and supplies where feasible, and maximize recycling of all items that can be recycled in this region.

Energy. The firm shall implement practices that encourage energy conservation and efficiency in heating/cooling, lighting, and equipment. This involves communications with co-lessees of office space and communicating with building management, and Henkels Law LLC will facilitate a transfer of information to the building manager to seek best practices.

Travel. Firm members shall reduce carbon emissions from travel, and increase health benefits in its travel choices utilizing pedestrian, bicycle, carshare, teleconferencing, and purchasing

carbon offsets when plane travel is chosen as the most reasonable alternative.

Tenant Improvements. The firm shall communicate best practices to building management, and office share lessor with regard to this Sustainability policy including expressing support for best practices employed, improving recycling, energy, and water conservation opportunities, reducing or eliminating toxics in office maintenance.

Implementation and Measuring Success. In implementing this policy, firm personnel shall be guided by the following: (1) the third-party standard adopted for use by Henkels Law LLC as an Oregon Benefit Company, (2) the Oregon State Bar Sustainable Future Section Partners in Sustainability Criteria.

Where practicable, baselines shall be established for practices that can be measured and progress shall be reported at least annually in the firm's Oregon Benefit Company Report.

The business code of ethic for Henkels Law consists of the totality of the Oregon State Bar ("OSB") Rules of Professional Conduct (https://www.osbar.org/_docs/rulesregs/orpc.pdf), OSB Partners in Sustainability Criteria for any period when Henkels Law is a registered Partner (<https://sustainablefuture.osbar.org/partnerships-in-sustainability/partnerslist/>) and OSB Bylaw 26 (https://www.osbar.org/_docs/rulesregs/bylaws.pdf).

APPENDIX 3

Re: building energy use:

2020 City of Portland Commercial Building Energy Performance

Due to the COVID-19 global pandemic, the city of Portland did not require an annual report submission for the 2020 calendar year. Unfortunately, Henkels Law is unable to obtain updated information for our commercial address at 621 SW MORRISON ST.

See: <https://www.portland.gov/bps/energy-reporting/news/2021/1/20/annual-reporting-requirements-suspended-2020>

The next reporting deadline is April 22nd, 2022.

From SKB Real Estate Management on 2/5/2020:

The current energy star score is 81 due to a revamp of the energy star system and metrics. The upgrades performed to date in the building are substantial, however occupancy had been minimal creating a shortfall in the readings. The 2020 score will be much improved with the installation of the upgraded HVAC units in newly renovated spaces, the installation of the cooling tower and boiler as well as the upgraded LED lighting installed.

Report re building recycling, composting, and cleaning:

Have confirmation from building management that the recycling is being recycled, the compost is being composted in compost bags that do decompose. Building has an electronic waste collection day — items are stored in the trash room and when we collect enough the electronics recycling company is called to pick up.

Appendix 3a Cleaning Policy re American Bank Building contractor



**TOWNSHIP UNITED BUILDING SERVICES, LLC. ,
GREEN CLEANING POLICY**

1. Introduction:

The goal of Township United's Environmental Building Operations Policy for Green Cleaning is to utilize green cleaning products and practices to improve the indoor air quality of the building and to reduce the exposure of building occupants and maintenance personnel to contaminants that have an adverse effect on health and comfort.

Specific green cleaning goals have been set forth to reflect environmental concerns:

- Continually becoming more energy efficient by controlling polluting sources, streamlining cleaning processes, reducing the use of electric cleaning equipment, and using energy-efficient equipment when possible
- Continually reducing the use of potable water for cleaning purposes
- Minimizing hazardous materials and chemicals in the cleaning process in order to continuously improve the indoor air quality and overall health of the work environment
- Minimizing material waste with efficient cleaning practices and products

2. Scope: This procedure applies to the following activities at all facilities:

- Sustainable cleaning products and maintenance by Township United's personnel.
- Use of chemical concentrates and appropriate dilution systems (Solsta & 3M)
- Cleaning equipment that reduces the impacts on indoor air quality (Hepa Vacuums)
- Training of maintenance personnel in the hazards, use, and disposal of cleaning chemicals, dispensing equipment and packaging
- Storage of chemicals, inside and outside.-

3. Responsible Party:

The **Township United Building Services Regional and or District Managers** will be responsible for informing all of Township United's personnel, Owners and Building Managers of this Policy. The Township United manager will be responsible for maintaining necessary records and logs proscribed by this policy.

Time Period:

This policy is to take effect immediately upon contract commencement at all locations.

TOWNSHIP UNITED'S GREEN CLEANING POLICIES

4. **Procedures and Strategies:**

5. **Pollutant Source Control:**

Pollutant source control must address both contaminants that are tracked in on clothing and shoes, and those that are emitted within the building by equipment and housekeeping products. Controlling the source of pollutants (which includes debris, dust, dirt, or any other unwanted particles or gases) helps minimize the distribution of these contaminants throughout the building. This also allows for a lighter cleaning routine, ultimately using fewer cleaning products while reducing wear and tear on cleaning tools, cleaning equipment, and interior finishes. The following are areas of focus for pollution and debris source control along with their associated cleaning methods.

5.1 Containment and ventilation:

Isolate areas of the building where hazardous chemicals are in use or hazardous particulates are generated. These relatively "dirty" zones, which include but are not limited to copy/printing rooms, laundry rooms, hazardous chemical storage, garage or combustion motorized equipment storage areas, Janitorial closets, Janitorial supply rooms, will be contained as much as possible.

Recommend Owners/Managers focus pollutant-generating tasks in contained rooms where walls are continuous from floor slab to floor slab. Other methods of containment, such as dust curtains, exhaust hoods, or monitoring of doorways, will also be encouraged. When possible, exhaust rooms or areas where hazardous gases or particulates are being generated so that the air is 100% exhausted and not re-circulated into the ventilation system.

Cleaning in these areas will take into consideration the nature of the hazardous gases or particulates being generated in the space, and use the appropriate cleaning method and agents necessary to control the migration of pollutants.

5.2 Storage and disposal of hazardous chemicals:

The storage and disposal of hazardous chemicals/wastes shall adhere to the following requirements: Cleaning products containing hazardous chemicals will be stored in a lockable and ventilated space, preferably a ventilated cabinet, marked as hazardous to caution building occupants. Liquids labeled as hazardous waste shall not be poured into janitorial sink drains, lavatories, toilets, or shower drains. These liquids shall be placed in appropriate containers and disposed of properly by Township United management.

Solids or mixed materials labeled as hazardous waste shall also be collected and disposed of properly by Township United management.

Hazardous wastes can either be brought to a municipal hazardous waste facility or be collected by a licensed waste management contractor who upholds sustainable disposal practices.

Refer to Sustainable Solid Waste Management Policy for further waste disposal and recycling protocol.



TOWNSHIP UNITED'S GREEN CLEANING POLICIES

Building Entryways, Recommendations:

All entryways and entrances into buildings shall employ the following measures:

Permanent entryway systems such as grilles, grates, or walk-off mats will be cleaned all service days. These systems should be a minimum of 6-10 feet long in the direction of travel. If grates or grilles are employed, these will be vacuumed and surface cleaned daily. Grille/grate wells will also be cleaned during this process and mopped weekly. If walk-off mats are employed at primary entrances, they will be professionally cleaned on a weekly basis and thoroughly vacuumed onsite on a daily basis. The flooring beneath the mats will be vacuumed and mopped on a daily basis as well. Secondary entrances will also have walk-off mats of 6-12 feet in length to capture initial loose particles from entering the buildings. These mats must be vacuumed daily, and the floor beneath will be vacuumed and mopped on a daily basis.

Equipment, **HEPA filters** on all **Back Pack Vacuums** and all **Upright vacuums** shall be used exclusively by all of Township United's staff at all properties serviced in order to contain the spread of unwanted particles.

5.3 Building-Specific Cleaning Methods:

All cleaning services provided by Township United Building Services shall meet the environmental standards as outlined in the GS-42, Green Seal Environmental Standard for Cleaning Services. Township United shall include the following measures as applicable:

Standard operational procedures:

- Building-specific green cleaning plan
- Powered equipment use/maintenance plan
- Reducing chemical waste/efficient use of chemicals reducing solid waste
- Vacuum use/maintenance
- Entryways
- Floor care
- Disinfection:
- Restroom care
- Dining areas and break rooms
- Trash collection and recycling
- Indoor plants
- Vulnerable populations



TOWNSHIP UNITED'S GREEN CLEANING POLICIES

5.4 Sustainable Cleaning Products and Materials:

All cleaning products provided shall meet the environmental standards as outlined below when applicable. The scope shall include products provided by Township United Building Services:

Cleaning products, tier I- Solsta from Waxie & 3M Green Seal products:

Products shall meet one or more of the following standards:

Green Seal GS-37, General-Purpose, Bathroom, Glass, and Carpet Cleaners Used for Industrial and Institutional Purposes

Environmental Choice CCD-110 for Cleaning and Degreasing Compounds

Environmental Choice CCD-146 for Hard Surface Cleaners

Environmental Choice CCD-148 for Carpet and Upholstery

Care

Cleaning products, tier 11

If cleaning products meeting the standards outlined in Tier I above are not applicable, products shall meet one or more of the following standards:

Green Seal GS-40 for Industrial and Institutional Floor-Care Products

Environmental Choice CCD-112 for Digestion Additives for Cleaning and Odor

Control Environmental Choice CCD-113 for Drain or Grease Traps Additives

Environmental Choice CCD-115 for Odor Control Additives Environmental Choice

CCD-147 for Hard Floor Care

1. 37

California Code of Regulations maximum allowable VOC levels for the specific product category

Paper products and janitorial products:

Paper products and janitorial products shall meet one or more of the following standards:

U.S. EPA Comprehensive Procurement Guidelines for Janitorial Paper and Plastic Trash Can Liners

Green Seal GS-09 for Paper Towels and Napkins

Green Seal GS-01 for Tissue Paper

Environmental Choice CCD-082 for Toilet Tissue

Environmental Choice CCD-086 for Hand Towels

Janitorial paper products derived from rapidly renewable resources or made from tree-free fibers

Hand Soaps:

Products shall meet one or more of the following standards:

Shall not contain antimicrobial agents (other than as a preservative system), except where required by health codes and other regulations (such as food service and health care requirements) Green Seal GS-41 for

Industrial and Institutional Hand Cleaners

Environmental Choice CCD-104 for Hand Cleaners/Hand Soaps



TOWNSHIP UNITED'S GREEN CLEANING POLICIES

5.5 Township United's Sustainable Cleaning Equipment:

Equipment used for cleaning the property shall meet the environmental requirements as outlined below when applicable. The scope shall include products provided by outsourced service providers as well as those purchased by building staff. The requirements listed below are per the **LEED-EBOM** rating system as excerpted from the April 2008 edition:

Windsor Vacuum cleaners, used exclusively by Township United, are certified by the Carpet & Rug Institute "Green Label" Testing Program —Vacuum Cleaner Criteria and operate with a sound level of less than 70 DBA.

Windsor Carpet extraction equipment, used exclusively by Township United, are used for restorative deep cleaning is certified by the Carpet & Rug Institute's "Seal of Approval" Testing Program for Certified Deep Cleaning Extractors. Powered floor maintenance equipment including electric and battery powered floor buffers and burnishers are equipped with vacuums, guards and/or other devices for capturing fine particulates, and shall operate with a sound level less than 70 DBA.

Windsor or Surtec-Eagle Propane-powered floor equipment, used by Township United, has high-efficiency, low-emissions engines with catalytic converter/muffler which meet the California Air Resources Board (CARB)/Environmental Protection Agency (EPA) standards for the specific engine size and operate with a sound level less than 90 DBA. Automated scrubbing machines are equipped with variable-speed feed pumps and on-board chemical metering to optimize the use of cleaning fluids.

Windsor or NSS Battery-powered equipment is equipped with environmentally preferable gel batteries. Powered equipment is ergonomically designed to minimize vibration, noise and user fatigue. Equipment is designed to reduce potential damage to building surfaces by using safeguards, such as rollers or rubber bumpers. Township United has all powered cleaning equipment on a Quarterly preventative maintenance and testing program and all repair and maintenance activities are documented for each type of equipment.

5.6 Training:

Upon hire by Township United, cleaning personnel will undergo an initial training on the proper use of cleaning products, equipment and practices; facility-specific cleaning methods and the order in which they occur; environmental standards; and safety measures regarding exposure to hazardous chemicals. Township United's personnel will receive ongoing training on an annual basis to maintain knowledge and stay up-to-date regarding any new practices, procedures, and/or environmental standards. Where applicable, personnel will also be instructed on how best to clean tenant areas and other common areas.

5.7 Record Keeping:

MSDS sheets for all chemicals used on site are to be maintained in notebooks located in the property management office and in the main Janitorial storage or office area.

6. Performance Metric

Performance will be evaluated quarterly through a review of Township United specifications systems. All activities and chemical products used will be reviewed to ensure ongoing compliance with this policy and green purchasing policies. **Records will be kept on file for**



future LEED-EBOM recertification.



TOWNSHIP UNITED'S GREEN CLEANING POLICIES

7. References

GS-42: Green Seal's Environmental Standard for Cleaning Services www.arenseal.org/certification/cleaningservices/es42.pdf

GS-37: Green Seal's Environmental Standard for General-Purpose, Bathroom, Glass, and Carpet Cleaners Used for Industrial and Institutional Purposes, www.greenseal.org/certification/cleaningservices/es37.pdf

MCPS: Sample plan by Montgomery County Public Schools, Maryland www.mcps.k12.md.us/departments/facilities/greenschoolsfocus/pdf/MCPSGreenCleaningPlan.pdf

California Code of Regulations: Title 17 Section 94509, VOC standards for cleaning products www.calregs.com

City of Chicago's "Green Cleaning — Low Environmental Impact Cleaning Policy" www.cityofchicago.org/webportal/COCWebPortal/COC_EDUCATIONAL/GreenCleaning.pdf

Green Shield Certified www.greenshieldcertified.org