

## Environmental Policy

Green Plains Inc. (the “Company”) is committed to minimizing any potential negative impacts on the environment. We have a “vision of zero” – a goal to have zero environmental incidents, zero spills/releases, and zero environmental harm. We continually strive to improve our environmental performance over time and initiate projects and activities that will further minimize our impacts on the environment.

Our commitment extends to our customers, employees, and the communities in which we operate.

We are committed to:

- Lead the industry in creating sustainable ingredients that matter;
- Meet and exceed all applicable environmental laws, regulations, and industry best practices;
- Monitor environmental performance and report regularly on environmental issues;
- Prevent unintended releases, spills, and pollution;
- Develop and improve operations and technologies to reduce hazardous waste, non-GHG air emissions, and effluents safely and responsibly;
- Ensure the responsible use of energy throughout our operations, including conserving energy, improving energy efficiency, and giving preference to renewable over non-renewable energy when practicable;
- Continually improve our environmental impacts by periodically setting goals and targets to reduce these impacts;
- Participate in recycling to the greatest practical extent to reduce impact on landfills and promote recovery of valuable resources;
- Communicate our environmental commitment to our customers, suppliers, and community;
- Conserve natural resources by adopting pollution prevention practices;
- Ensure all employees are knowledgeable of, understand, and comply with all applicable environmental laws and regulations;
- Train staff on our environmental programs and empower them to contribute and participate;
- Promptly report all noncompliance issues in accordance with applicable governmental reporting requirements, evaluate causes of noncompliance, and implement corrective actions; and
- Protect the environment by only purchasing and processing harvested grain at our biorefineries. The company will ensure that unharvested grain, such as treated or untreated seed corn, shall not be processed or blended at any facility.

All tasks are to be conducted in an environmentally friendly manner complying with all local, state, and federal environmental laws and regulations and industry standards. Further, we will hold all Company suppliers and vendors to these same standards.

If an employee observes any violation of environmental procedures or regulations, it is their obligation to report it to management immediately so that the problem can be corrected. Employees may also submit violations anonymously through the company EthicsPoint compliance hotline, which is administered by an independent provider and can be reached in the following ways:

Online: <https://gpreinc.ethicspoint.com>  
Telephone: 844.957.2596

## Environmental Management System Framework

### Introduction & Policy

Green Plains has developed an Environmental Management System (EMS) Framework to ensure that the company meets the objectives of our Environmental Policy and improves performance over time. The primary tenet of the Environmental Policy is the Vision of Zero – a goal to have Zero Incidents, Releases, or Harm. Business Unit leadership is responsible for implementing this framework, driving its success, and striving to achieve the Vision of Zero. The framework is built upon the ISO cycle of continuous improvement – Plan, Do, Check, Act, which is achieved through the next sections.

### Risk Assessment

Risk Assessment will be performed to identify potential environmental consequences for onsite and offsite release. Assessments will cover the entirety of the process from sourcing, to processing, storage, and release of products or wastes. These assessments will address potential impacts or consequences and mitigation of the risks. Assessments may be informal or formal, with formal assessments documented and communicated to employees. Assessments will include normal, abnormal, and emergency conditions. Examples include Process Hazard Analysis (PHA), Pre-Startup Safety Review (PSSR), Risk Management Planning (RMP) Worst Case and Alternate Case Scenarios, and Air Emissions Modeling.

### Legal Requirements & Standards

Legal requirements and standards are monitored by the company to ensure adherence to all applicable current and changing requirements. Responsibilities are assigned to the applicable subject matter expert (SME), documented in a procedure, and periodically reviewed for changing process or regulatory requirements. Legal requirements include all laws and regulations, standards and specifications, and industry best practices.

### Strategic Planning, Goals & Objectives

Strategic Plans, Goals, and Objectives set for the company will include areas of environmental compliance or stewardship. The goals will have components for both identification and removal of risks, as well as overall emission reductions. Environmental goals have long term and short time timeframes to ensure continuous improvement and will be reviewed periodically. Environmental goals are discussed in the Annual Sustainability Report.

### Structure & Responsibility

The organizational structure will ensure assignment of EHSS personnel to manage environmental compliance for the company and all business units. The company and business units will provide necessary resources to ensure environmental compliance. The designated lead for the EMS will report all environmental matters directly to the Senior Leadership Team, which is headed by the CEO, on a regular basis.

### **Programs and Procedures**

Programs and Procedures will be developed to mitigate environmental risks and to meet regulatory requirements and standards. These materials will be reviewed periodically. The business units will maintain the necessary programs, permits, procedures, and records to meet these requirements. The programs and procedures will be made available to employees and representatives, contractors, and regulators.

### **Asset and Operational Integrity**

Assets are to be designed, operated, and maintained properly to minimize risk of failure and release to the environment. Applicable equipment will meet all requirements of the Process Safety Standard in 29 CFR Part 1910.119. Preventive maintenance and inspection programs will meet requirements prescribed by manufacturer and industry standards. Standard Operating Procedures will be issued as required and reviewed periodically.

### **Emergency Preparedness**

Each business unit will make a review of potential emergency situations and develop plans for responding to each. As applicable, plans will include Emergency Action Plan, Risk Management Plan, Facility Response Plan, Spill Prevention Control Countermeasures Plan, Stormwater Pollution Prevention Plan. Plans must be trained, reviewed, and drilled periodically as required.

### **Awareness, Training, and Competency**

Employees will be trained and evaluated for competency to ensure that they are able to properly perform their duties. Training will include applicable environmental requirements and required plans. Employees will be trained as necessary on changing regulations and operational conditions in their business units.

### **Nonconformance Investigation and Corrective Action**

Environmental permit exceedances, risks, and issues (incidents) will be reported and investigated promptly at each business unit. Each incident will be submitted utilizing a central incident reporting system, an investigation report created, and corrective actions completed as deemed necessary by the investigation.

### **Communication**

EMS related communication will be made available to stakeholders, including employees, the community, customers, and suppliers, at each business unit. Changes in regulations, policies, procedures, and training requirements will be made available to employees. The business unit will ensure that two-way communication occurs down from and up to management.

### **Document Control and Records**

Documents – plans, procedures, forms – will be issued, reviewed, and archived according to company policy. The business units will ensure that current documents are accessible as necessary for employee use. Records – data, inspections, reports – will be maintained according to record retention requirements for both regulators and to company policy.



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### **Measuring and Monitoring**

Mechanisms will be in place for each business unit to Measure and Monitor environmental compliance. This will include data collection and analysis, inspections, observations, and training. Issues will be tracked, such as air and water permit deviations, spills, and excess emissions. Environmental compliance trends will be analyzed as part of performance and sustainability metrics.

### **Audits**

Audits will be conducted to ensure compliance to environmental requirements, including third-party, corporate, and business unit internal audits. Business units are also subject to audit by applicable federal and state regulatory bodies. For all applicable audits, business units will review and correct all findings issued and consider all non-binding recommendations issued by internal or regulatory bodies.

### **Review**

Periodic reviews will occur to assess the effectiveness of environmental programs. Review will include leading and lagging indicators, audit findings, non-conformance, and incident trends. Results from the reviews will direct policy changes, improvements, and action items across the company or similar business units.