

# ENVIRONMENTAL MONITORING SYSTEM CERTIFICATION

**CERTIFICATION DATE:** January 11, 2024

**COMPANY:** Polar Dynamics Robotics, Inc.

**FACILITY:** Primary Manufacturing Facility

**LOCATION:** 4200 Arctic Way, Dover, Delaware 19901

**CERTIFICATION PERIOD:** January 1, 2024 - December 31, 2024

## 1. CERTIFICATION STATEMENT

The undersigned, being duly authorized officers of Polar Dynamics Robotics, Inc., a Delaware corporation (the "Company"), hereby certify that the Company's Environmental Monitoring System ("EMS") meets all applicable regulatory requirements and industry standards for the design, manufacture, and testing of autonomous mobile robots in temperature-controlled environments.

## 2. SYSTEM SPECIFICATIONS

1 The Company maintains and operates a comprehensive environmental monitoring system consisting of:

- a) Continuous temperature monitoring stations at 24 designated control points
- b) Humidity sensors with accuracy of 2% RH
- c) Particulate matter detection systems (PM2.5 and PM10)
- d) VOC (Volatile Organic Compound) monitoring equipment
- e) Digital data logging system with 24-month retention capability
- f) Automated alert system for parameter deviations

2 The monitoring system covers all critical manufacturing areas including:

- a) Primary robot assembly area (Zones A1-A4)
- b) Cold-environment testing chambers (Zones T1-T3)
- c) Actuator calibration facility (Zone C1)
- d) Electronic component storage (Zone S1)
- e) Quality control testing area (Zone Q1)

### **3. COMPLIANCE VERIFICATION**

1 The Company's EMS has been verified to comply with:

- a) ISO 14001:2015 Environmental Management Systems
- b) 21 CFR Part 11 (Electronic Records)
- c) GAMP 5 Guidelines
- d) Delaware Environmental Control Regulations
- e) EPA Monitoring Requirements (40 CFR Parts 60-63)

2 Third-party validation was performed by TechCert Laboratories (Certification #TC-2023-8844) on December 15, 2023.

### **4. MONITORING PROTOCOLS**

1 The Company maintains the following monitoring protocols:

- a) Continuous 24/7 environmental parameter monitoring
- b) Automated data collection at 5-minute intervals
- c) Daily system calibration checks
- d) Weekly sensor verification procedures
- e) Monthly comprehensive system audit
- f) Quarterly external validation

2 Alert Parameters:

- a) Temperature deviation: 2 C from setpoint
- b) Humidity deviation: 5% RH from setpoint
- c) Particulate matter: >50 g/m PM10
- d) VOC levels: >5 ppm sustained

### **5. RECORD KEEPING**

1 The Company maintains the following records:

- a) Continuous monitoring data (24-month retention)
- b) Calibration records (36-month retention)

- c) Maintenance logs (24-month retention)
- d) Alert investigation reports (60-month retention)
- e) Corrective action documentation (60-month retention)

2 All records are maintained in compliance with 21 CFR Part 11 requirements for electronic records.

## **6. RESPONSIBLE PERSONNEL**

1 The following personnel are responsible for EMS oversight:

- a) Environmental Compliance Manager: Dr. Robert Chen
- b) Quality Assurance Director: Maria Santos
- c) Facility Manager: Thomas Wright
- d) Environmental Systems Technician: David Kumar

## **7. CERTIFICATION VALIDITY**

1 This certification is valid for the period specified above, subject to:

- a) Maintaining continuous system operation
- b) Completing required periodic validations
- c) Addressing any critical deviations within 24 hours
- d) Maintaining current calibration status
- e) Completing monthly compliance reviews

## **8. REPRESENTATIONS AND WARRANTIES**

The undersigned hereby represent and warrant that:

- 1 All information contained in this certification is true and accurate to the best of their knowledge.
- 2 The EMS is operating in full compliance with all applicable laws and regulations.
- 3 All required maintenance and calibration procedures are current and documented.

## **9. EXECUTION**

IN WITNESS WHEREOF, the undersigned have executed this Environmental Monitoring System

Certification as of the date first written above.

POLAR DYNAMICS ROBOTICS, INC.

**By: \_**

Name: Katherine Wells

Title: Chief Financial Officer

**By: \_**

Name: Dr. Elena Frost

Title: Chief Executive Officer

WITNESS:

**By: \_**

Name: Sarah Nordstrom

Title: Chief Operating Officer

[CORPORATE SEAL]