

THE GEON COMPANY**One Geon Center, Avon Lake, Ohio 44012****Date:** 06/25/97

To: Wendy Sherman @ CMA Fr: 703/741-6091	Phone From: ☒ Edward Beeler 216-930-3030 ☐ John Gressler 3031 ☐ Jim Lewis 3032 ☐ Herm Waltemate 1912 ☐ Jan Suhay 3033
Number of pages including this page: 4	Fax Number: 216-930-3034

MESSAGE: Attached survey from "IRRC" —
Wendy / Just wondered if you / Has Shah / others at CMA
are familiar with the Investor Responsibility Research
Center. We are checking via other Washington sources —
hard to tell from this communication if their motives are
driven by investors or animal rights activists! Possible
that CMA has or will receive similar inquiry?
- While normally our product safety testing
involves no testing related to animals, the current
CMA sponsored VCM health studies do — and
if we decide to respond to the survey, would
need to be mentioned. Might deserve some
coordination thru CMA Panel members.

FAXAVON.DOC/JS

Comments? This — Ed Beeler

CMA 114859



IRRC

RECEIVED

JUN 23 1997

DEPT. 545A

June 18, 1997

Gregory L. Rutman
Corporate Secretary
Geon Company
One Geon Center
Avon Lake, OH 44012

Dear Gregory L. Rutman:

I am writing to ask for your assistance with an animal testing survey that is being conducted by the Investor Responsibility Research Center (IRRC). Founded in 1972, IRRC is an impartial, not-for-profit research organization that gathers company-specific information on corporate governance and corporate social issue-related subjects for more than 400 institutional investors. In recent years, investors have increasingly expressed an interest in being able to identify whether or not a company tests on animals when making investment decisions. In response to their requests, IRRC has identified 250 manufacturing companies which operate in industries that are required to conduct safety tests on animals. It is our understanding that Geon Company is one such company.

The survey asks for data on animal care and test policies, including testing that is either conducted or commissioned by Geon Company and its suppliers, and on corporate support for alternative research. We hope that given IRRC's impartiality, a response from your company will be forthcoming.

Please feel free to call me with your questions and concerns.

Sincerely,

Ashley Cook
Research Assistant

Enclosure

Investor Responsibility Research Center

1350 Connecticut Avenue, NW - Suite 700 - Washington, DC 20036-1701
202/833-0700 • Fax: 202/833-3555

CMA 114860



1997 Animal Issues Survey

Parent company*: GEON COMPANY
 Person completing this survey: _____
 Title: _____
 Telephone: _____ Fax: _____ Date: _____

*We are asking for information about the parent company's policies and practices as they are applied to all subsidiaries and affiliates in all U.S. and non-U.S. operations.

Thank you for your cooperation. Please return this survey by July 11, 1997 and direct inquiries to Ashley Cook, Investor Responsibility Research Center, 1350 Connecticut Ave., NW, Washington, DC 20036, phone: 202-833-0700 x.723, fax: 202-833-3555.

I. Policies on Animal Use and Care

1. Testing Policy

a. Please provide a copy of your policy on animal use in product safety trials, or describe below.

☐ Copy enclosed ☐ Company does not have policy ☐ Company does not disclose policy

b. Does the company have a special approval process for testing protocols that researchers believe will cause pain to the test animals? Please describe below or attach a copy of the policy.

2. Animal Care Policy

a. Please provide a copy of your policy on animal care procedures or provide animal care guidelines issued to caregivers.

☐ Copy enclosed ☐ Company does not have policy ☐ Company does not disclose policy

II. Animal Use

A. Cosmetics and Toiletries

1. Testing conducted or commissioned by your company

a. Has your company conducted or commissioned animal tests for cosmetics or toiletries (not classified as pharmaceuticals) or ingredients of these products within the last five years?

b. Does your company have a policy not to conduct or commission any animal tests on cosmetic or toiletry products, or their ingredients, after a fixed cut-off date? Cut-off date: _____

Yes No

IRRC Animal Issues Survey - p. 2 of 2

2. Testing conducted or commissioned by suppliers (firms that manufacture ingredients used in your company's cosmetic or toiletry product)

- a. Have any of your company's suppliers conducted or commissioned any animal tests on the ingredients used in your cosmetics or toiletries (not classified as pharmaceuticals) within the last five years?

- b. For non-pharmaceutical cosmetics and toiletries, does your company have a fixed cut-off date after which it will not use suppliers' ingredients that have been tested on animals?

Cut-off date: _____

If your company has a fixed cut-off date, does it use a formal monitoring system to ensure the suppliers adhere to this policy?

Yes	No	Don't Ask

B. Non-Cosmetics

Your company is listed by Standard and Poors under the following Standard Industrial Classifications:

2821 (Plastic materials, synthetic resins, and non-vulcanisable elastomers)

1. Given federal product safety and efficacy regulations, we therefore are assuming that—within the last five years—your company has conducted or commissioned animal tests on some of the products it makes, or that some of the company's suppliers have conducted testing on ingredients used in these products. (The products involved may include but are not limited to pharmaceuticals, food additives, or agricultural, industrial or household chemicals.) If no testing is conducted, please explain:

III. Support for Alternatives Research

Many companies have devoted significant resources to efforts that will reduce, refine and replace animal use in product safety testing, through alternatives including but not limited to *in vitro* tests, computer modeling and new statistical methodologies. So that we may compile a well-rounded profile of your company, please complete the following questions, enclosing any appropriate attachments.

1. Please indicate if your company has provided financial or in-kind support for the following, within the last three years:

Approx. annual budget
for most recent year

☐	In-house program on alternatives.	_____
☐	Sponsorship of university research on alternatives.	_____
☐	Contribution to alternative research centers (such as the Johns Hopkins Center for Alternatives to Animal Testing).	_____
☐	Contribution to trade organization efforts on alternatives.	_____
☐	Other (please specify): _____	_____

2. In addition, please give examples of any outstanding recent accomplishments by the company in the field of alternative toxicology. Use additional sheets if necessary.

** TOTAL PAGE.04 **

CMA 114862