



QM 45 REV 1 01/06/2023

Rig-tech Solutions risks related to working with substances Hazardous to health/COSHH policy

General company policy

The purpose of this notice is to inform you our company is complying with the Directive 89/391/EEC standard by providing you with training about the hazardous materials or harmful physical agents you could be exposed to on the job and the controls in place COSHH. As part of this effort, we have compiled a list of the hazardous chemicals used in our facility, collected safety data sheets (SDS) from our vendors for these chemicals, received reference material about the other harmful agents' employees could be exposed to, ensured that containers are labeled, and signs are present in the hazardous areas.

This program applies to all work operations in our company where you may be exposed to hazardous substances or harmful physical agents under normal working conditions or during an emergency.

The Safety Officer is the program coordinator and has overall responsibility for the program. The Safety Officer will review and update the program, as necessary. Copies of the written program may be obtained from the Safety Officer.

With this program, you will be informed of the contents Article 16(1) of the Directive 89/391/EEC standard, the hazardous properties of the chemicals you work with, safe handling procedures and measures to take to protect yourselves from these chemicals.

Training

Everyone who works with or is potentially exposed to hazardous chemicals or harmful physical agents will receive initial training about the hazards and signs to look for, risks and control measures, and instruction and training to use the control measures. Also, the safe use of those chemicals or agents prior to work assignment. A program has been prepared for this purpose and is outlined below. Whenever a new hazard is introduced, additional training will be provided. Training updates will be performed at least annually and may be brief summaries of information included in previous training sessions. The program coordinator is responsible for ensuring this training is provided.

Training plan

The risks and control, measures related to chemical agents at work training will include:

- a summary of the standard and this written program.
- the chemical and physical properties of hazardous materials and methods that can be used to detect the presence or release of chemicals.



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- the physical hazards of chemicals (e.g., potential for fire, explosion, etc.) and how to detect explosive atmosphere zones on site.



- the name of the substance and the level, if established, at which exposure to the hazard has been restricted according to standards adopted by the government, or, if no standard has been adopted, according to guidelines established by competent professional groups.
- the health hazards, including signs and symptoms, associated with exposure to chemicals or harmful physical agents and any medical condition known to be aggravated by exposure to these hazards.
- the procedures to protect against those hazards (e.g., use and maintenance of personal protective equipment; work practices or methods for proper use and handling of chemicals; and procedures for emergency response).
- the work procedures to follow to assure protection when cleaning up incidental spills and leaks of hazardous chemicals.
- where SDSs information can be found.
- instruction about how to read and interpret the information on labels, SDSs; and
- direction about how employees may obtain additional hazard information.

Records of training will be maintained for three years in the safety training file and will include:

- the dates of training.
- the name, title and qualifications of the person who conducted the training.
- the names and job titles of the employees who completed the training; and
- a summary or outline of the information that was included in the training session.

List of hazardous chemicals

The list of all hazardous substances and related work practices in the facility will be updated as necessary. All of the chemicals used can be found on our partner intranet site, (<http://www.myntic.com>) by clicking on the links for SDS – Finished products and SDS – Raw Materials. Related work practice documents can be found in the ISO drive or by contacting a Rig-tech representative.

List of harmful physical agents

The Safety Officer has created a list of the harmful physical agents that are present in the workplace in amounts approaching regulatory limits through equipment use, product handling, etc. Heat, noise, ionizing radiation and nonionizing radiation sources have been identified for each work area.



Safety data sheets (SDSs)

Safety data sheets provide specific information about the chemicals you use and produce. The program coordinator will maintain the SDS database for raw materials and finished products (<https://ulmysds.com/Home.aspx>) with an SDS about every hazardous substance identified in the facility.

The program coordinator or designee is responsible for acquiring and updating SDSs. He or she will contact the chemical manufacturer or vendor if additional research is necessary or if an SDS has not been supplied with an initial shipment. All new materials to be brought into the facility must be cleared by the program coordinator.

Harmful physical agents' information

The program coordinator is responsible for acquiring a physical agent fact sheet (PADS) or comparable written information about the identified harmful physical agents' employees may be exposed to during assigned work. The PADS or other written information will be maintained in a binder at the Safety Officer's desk.

Labels and other forms of warning

The program coordinator will ensure all hazardous chemicals in the facility are properly labeled and updated as necessary. Manufacturer's container labels should be left on the containers if possible and must list, at a minimum, the chemical's identity, the appropriate hazard warning, and the name and address of the manufacturer, importer, or other responsible party.

If you transfer chemicals from a manufacturer's container into another container, the new container must have a label that identifies the chemical identity and any appropriate hazard warning. Immediate-use containers, which are containers of hazardous substances remaining under the control of one employee *and* that are emptied during the same work shift, need not be labeled.

The program coordinator will ensure equipment or work areas that specifically generate harmful physical agents at a level that may be expected to approximate or exceed the permissible exposure limit or applicable action level are posted with the name of the physical agent and the appropriate hazard warning.

Nonroutine tasks

When you are required to perform hazardous nonroutine tasks, a special training session will be conducted by the Safety Officer to inform you regarding the hazardous chemicals you might be exposed to and the proper precautions to take to reduce or avoid exposure. SDSs will be available about the hazardous chemicals used. The program coordinator is responsible for ensuring this training is provided.



Multi-employer workplace

If another employer has its employees working at the facility, such as service representatives or subcontractors, the program coordinator will:

1. provide the other employer with copies of the SDSs for the hazardous substances its employees may be exposed to while working at the facility.
2. inform the other employer of any precautionary measures that need to be taken to protect the employees during both normal working conditions and in foreseeable emergencies; and
3. inform the other employer about the labeling system used in the facility.

The program coordinator will document in writing that the above information was conveyed to the other employer.

Frequency of training

The program coordinator will review our employee training program on a regular basis and will advise management regarding initial or annual refresher training needs. Retraining is also required whenever a new hazard is introduced into the workplace. As part of the assessment of the training program, the program coordinator will obtain input from employees regarding the training they have received and their suggestions for improving it. This review will be performed annually; necessary revisions will be made to ensure currency and applicability.