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Scan-Hide Chemical Management Policy



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Scan-Hide Chemical Management Policy

Our Mission:

Through the responsible management of chemicals and materials used at our site, and incorporated into our products, Scan-Hide A/S strives to reduce environmental and occupational health and safety risks associated with chemical exposures and hazardous wastes, while providing premium hides to our customers.

Our commitment:

- Safe and responsibly sourcing and managing of chemicals purchased, used in production, and disposed of, after use.
- Striving to reduce the consumption of hazardous chemicals, or chemicals suspected of being hazardous.
- Following all applicable laws and regulations related to chemicals management and discharges to the environment.
- Ensuring all chemical hazards are communicated to all levels of staff.
- Ensuring all staff receives appropriate training in safe handling and disposal of chemicals.
- Ensuring all suppliers of chemicals abide by the restrictions of the ZDHC MRSL 3.1.
- When possible, substitute chemicals listed on ECHAs SVHC candidate list.
- Ensuring our production chemicals are registered in ZHDC by our suppliers.

1.0 Scope

This policy outlines Scan-Hide's requirements for the safe and responsible management of all hazardous substances used or brought on-site. This policy applies to all management and staff. Relevant sections of this policy also apply to contractors performing work on-site that involves the use of hazardous substances or work in areas where hazardous substances are present.

This Policy have been developed to ensure:

- The health and safety of all staff and contractors
- Compliance with regulatory requirements regarding hazardous substances
- Protection of the surrounding environment
- Compliance with requirements in LWG, EcoLabel and OEKO-TEX certifications, ZDHC MRSL, and our customers Restricted Substance Lists (RSL's)

2.0 Responsibilities

General responsibilities relating to the safe management of hazardous substances within the company are outlined below:

2.1 Management/Leadership Team

Theresa Stenmann Hansen, Plant Manager

2.2 Quality, Environmental, Health and Safety (QEHS) Manager

Peter Kierans

2.3 Supervisors and Line Managers

Mikkel B. Hansen, Tannery Manager Hans Christian Clausen, Technical Manager Patrick Vintern-Ernstorn, Production Assistant

2.4 Employees

Bent-Erik Weiglin-Chrone, QEHS Coordinator Lars Falk Hansen, Supply Chain Operator Mathias Mosebo Hansen, Process Operator

3.0 Chemical Purchasing

The Tannery Manager shall ensure that the following actions are completed prior to the purchase of any new chemicals:

- Obtain a compliant Safety Data Sheet (SDS) for the substance.
- Ensure an appropriate risk assessment is conducted in collaboration with QEHS department. The risk assessment shall include a review of all regulatory requirements, restriction, RSL, PRSL and MRSL requirements, occupational and environmental exposure risks.
- Ensure supplier and product is registered in ZDHC.

4.0 Safety Data Sheets

The QEHS Coordinator is responsible for developing, maintaining, and monitoring the company SDS program. He will ensure that procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. He will see that any new information is communicated to affected employees.

Copies of SDS's for all hazardous substances to which employees and staff are exposed or potentially exposed, will be kept in EcoOnline, accessible at https://chemicalsafety.ecoonline.com

When revised SDSs are received, the following procedures will be followed to replace old SDSs: Upon reception of an updated SDS from supplier, QEHS Coordinator emails the updated SDS to sds.dk@ecoonline.com and awaits a receipt from EcoOnline. EcoOnline completes the update within 24 hours.

5.0 Risk Assessment for Hazardous Substances

QEHS department must ensure all EHS hazards and risks associated with the hazardous substances have been evaluated and that appropriate controls have been identified. The documented risk assessment will be included in the Chemical Risk Assessment located at EcoOnline.com. Priority to hazard elimination, substitution and engineering controls shall take precedent over administrative controls and the use of personal protection equipment (PPE).

6.0 Chemical Inventory

The Tannery Manager must ensure details of all hazardous substances purchased for use on-site are entered in the Chemical inventory. The following information will be included in the chemical inventory

- Substance name
- Chemical Abstract System (CAS) number
- Supplier
- Quantity purchased/stored on-site
- Hazard Classification, including CLP signage on packaging and storage facilities.
- Any special storage/disposal requirements e.g. shelf life, storage temperature, chemical incompatibility.

The chemical inventory is reviewed when new or additional quantities of chemicals are purchased or at minimum every six months.

7.0 Labelling

Supply Chain Operator shall verify and ensure that all containers received for use and secondary containers will be clearly labeled as to describe the contents and hazards they contain, in accordance with the CLP Regulation and GHS. All texts should be in Danish, English or both.

- GHS/CLP-Pictogram: A symbol plus other graphic elements, that is intended to convey specific information about the hazards of a chemical.
- Signal words: The signal words used are "Danger" and "Warning." "Danger" is used for the more severe hazards, while "Warning" is used for less severe hazards.
- Hazard statement: The nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- Precautionary statement: Recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling of a hazardous chemical.

8.0 Storage

The Technical Manager and QEHS Manager must ensure that all hazardous substance storage areas have been assessed with regards the potential risks of the hazards present, the physical and chemical properties, and the quantities of the substances stored.

The assessment should consider the type of storage that is required, the potential impacts of fire and the general health and safety of persons working in the area. The following requirements will be complied with in all hazardous substance storage areas:

- Area is secured and covered.
- Containers are stored on impervious surfaces.
- Secondary containment units are in place.
- Area is well ventilated.
- Accessible safety shower/eye wash nearby.
- Drinking, eating, and smoking is prohibited in storage areas.
- Spill kits with materials for containment and absorption.
- Fire-fighting equipment, fire hoses, and/or fire extinguishers.
- Signs indicating PPE required to work in area.
- Incompatible materials are segregated.

- Flammable and combustible materials are stored away from ignition or heat sources.
- Monthly inspections conducted by Tannery Manager/Production Assistant and QEHS Coordinator.

9.0 Emergency Response

The QEHS Manager must ensure that appropriate emergency management provisions are available for use in the event of a chemical emergency (i.e. spill or exposure). The emergency response equipment include:

- Spill kits or containment equipment
- Safe work procedures for spills or release of chemicals
- Fire extinguishers
- First aid kits
- Eye wash stations and emergency showers
- Emergency shutdown procedures for equipment
- Appropriate numbers of trained emergency personnel and first aiders
- Appropriately displayed emergency contact details
- PPE

10.0 Disposal of Hazardous Substances

The Supply Chain Operator must ensure that chemical wastes are properly packaged, labelled and stored in suitable designated areas. Labelling will include the material identifier and a hazard pictogram with the correct classification of the chemical (if relevant). Chemical waste will not be mixed with other waste. PPE must be used when handling chemical waste as per the SDS or risk assessment findings.

The Technical Manager will ensure all hazardous substances are disposed of by qualified contractors who have obtained legal approval to collect, transport, and dispose of each specific hazardous waste category as defined by local law.

11.0 Training

The QEHS Manager must ensure staff are provided with suitable instruction and training to enable them to work safely with hazardous substances. QEHS Manager will also ensure that staff providing training is sufficiently skilled and competent to provide the necessary training. All staff will receive training on the following:

- · Hazards of substances used
- Risks to health presented using those substances
- Relevant workplace exposure limits
- Relevant safety data sheet (SDS) information
- The significant findings risk assessments
- Precautions to be taken to prevent or reduce exposure
- Proper use of equipment and control measures.
- Proper disposal methods for hazardous substances