



Alpha Chemical Ltd. Responsible Distribution® Manual

Element 3 Code of Practice - Communication of Information

Each member company shall have written procedures in place to:

3.1 Obtain, understand, and then provide, up-to-date material safety data sheets (MSDS) to the customer's designated representative preceding, or at least accompanying, initial shipment of all chemicals and chemical products, including commercial samples

The Company maintains a MSDS File for all its products. The Quality Assurance Administrator is responsible for managing the file.

The file contains supplier's MSDS's for all products and where required the corresponding equivalent Company MSDS's. The Company MSDS's are produced from the original supplier's MSDS's. Company MSDS's are produced for all Alpha Chemical packaged and blended products.

ALPHA CHEMICAL's MSDS's are updated when new MSDS's are received from suppliers or at the triggered expiry date, i.e. 3 years after the last update. After every revision a new copy is sent to all customers, with their next shipment, for the product concerned. The signature on the Bill of Lading for the product delivery or any other described method confirms receipt of the MSDS's by the appropriate person at the customer. New and updated MSDS's are also E-mailed to Canutec, to the contracted emergency responder and to contracted warehouses or terminal operators.

It is Alpha's policy to send new customers appropriate MSDS's with the first shipment of product. Samples are treated as products with regard to information transmission. Repeat customers are flagged through accounting to send new MSDS every 3 years from purchase of first order. Alpha records the MSDS it sends on Packing Slips / Bills of Ladings. Alpha request that suppliers, on direct shipments, send the MSDS with the shipment to the customer.

Procedure(s) Title & No: n/a

Form (s) No. n/a

Self Assessment Forms: # B 1. Customer Assessment

Other Documents: Information Bulletin # 5 Understanding an MSDS
Information Bulletin # 3 A Customer Risk
Assessment Process
Information Bulletin # 4 Customer Self-Assessment
Process



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3.2 Provide information on management of waste material and empty containers in keeping with the material safety data sheets, as they apply, and any other pertinent information.

It is ALPHA CHEMICAL's policy to provide customers (and other parties likely to manipulate a given product) all information, which could be vital for their health and safety. In some cases such information can be supplemental to what is included on MSDS's be this because the information is new or is additional to that provided by the originator of the MSDS.

ALPHA CHEMICAL will also make management or supplier resources available to assist customers on resolving specific problems.

Procedure(s) Title & No:	#31-Additional Product Handling & Waste Information
Self Assessment Forms:	# B 1. Customer Assessment
Other Documents:	Information Bulletin # 5 Understanding an MSDS Information Bulletin # 3 A Customer Risk Assessment Process Information Bulletin # 4 Customer Self-Assessment Process

3.3 Provide to the customer that information which the member believes to be vital to the health and safety of the end-user and which is supplementary to the material safety data sheets, and require, with due diligence, communication by the customer of such information to the end-user as a condition of sale.

The Company will attempt to ensure that information on hazards of its products be transmitted by its customers to their customers to ensure the health and safety of all persons who may come in contact with the product.

Procedure(s) Title & No:	#31 Additional Product Handling & Waste Information
Form (s) No.	A 8 General Employee Safety & Information Meeting Report
Self Assessment Forms:	# B1 Customer Assessment
Other Documents:	Information Bulletin # 1 "Responsible Distribution." Information Bulletin # 2 "Responsible Distribution and Product Stewardship." Information Bulletin # 3 "A Customer Risk Assessment Process." Information Bulletin # 4 "Customer Self Assessment Process."