

Alpha Chemical Ltd. Responsible Distribution® Manual

Element 4 Code of Practice - Compliance with Legal Requirements

Each member company shall have a program in place to:

4.1 Meet or exceed all legal requirements related to distribution of chemicals, chemical products, services, and information

ALPHA CHEMICAL's policy statement comprises a commitment to meet or exceed all legal requirements related to the distribution of chemical products and services.

It is the responsibility of the Responsible Distribution Coordinator that this commitment is met; the periodic audit of company practices will also cover this point.

The major pieces of legislation relative to distribution are:

The Transportation of Dangerous Goods Act and Regulations;

The WHMIS Regulations;

The CEPA Act and Regulations, in particular New Substance Notification and the DSL:

And any other required legislation (Federal, Provincial or Local) that is relevant to the Company's Products.

Procedure(s) Title & No: #4-Training Program & Recording

Form (s) No. A 5. Personal Training Record

A 8. General, Employee Safety & Information

Meetings Report

Other Documents: Information Bulletin # 14 Initial Employee Training

4.2 Communicate with its own and contract employees and ensure they are trained to understand and comply with all requirements of the law

These requirements are communicated to all employees and appropriate training is provided and the training documented and maintained current.

Procedure(s) Title & No: #4-Training Program & Recording

#22-General, Employee Safety & Information

Meetings

Form (s) No. A 5. Personal Training Record

A 8. General, Employee Safety & Information

Meetings Report

| Changes: New, for JWEL Verification | Issued: September 22, 2002 |
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| | Replaces: New |
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