

Alpha Chemical Ltd. Responsible Distribution® Manual

Element 7 Code of Practice - Requirements Pertaining to Suppliers

Each member company shall have a program to educate, assist and assess suppliers of chemicals, chemical products, and services. The program shall:

7.1 Include a supplier policy, which clearly establishes the applicable areas of this code, within Canada

ALPHA CHEMICAL will preferably select suppliers who are committed to Responsible Care or its equivalent such as members of CCPA, ACC or their equivalents outside North America.

For such suppliers their compliance with their association's Responsible Care Code will be accepted as evidence that they meet the requirements of element 7 of CACD's Code of Practice.

For North American suppliers who are not yet members of CCPA or ACC, CACD's supplier policy and self-assessment will be applied, completed, evaluated and where necessary visited.

For suppliers for whose products ALPHA CHEMICAL is the importer of record we will ensure products are properly labeled, packed and correct MSDS's are available.

ALPHA CHEMICAL will assess each Supplier of Services and apply as applicable the ethic and principles of Responsible Distribution to their approval process. If the Service Supplier has assessment by another Responsible Distribution or Responsible Care Company this can be the basis of our approval. However specific requirements may need to be addressed and documented

Procedure(s) Title & No: #32-Product Supplier Selection & Evaluation Policy

#33- Service Supplier Selection Evaluation &

Operation

Self Assessment Forms: # B 2. To B 12. Various Supplier Assessments

Forms A 13. Warehouse/Miscellaneous Supplier

Assessment & Approved List

A 19. Product Supplier Assessment & Approved

List

Other Documents: Information Bulletin # 10 Selecting & Verifying

Your ER Contractor

Information Bulletin #11 Assessing & Selecting

Your Public Warehouse

| Changes: Revised for JWEL Verification | Issued: September 24, 2002 |
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7.2 Establish criteria for the selection of suppliers based on their capability to meet the applicable area of the distributor code

The Company's criteria for selecting a Supplier of Product or Services is that they meet the general terms of the Distributor Code of Practice and that they have an understanding of the principles involved.

Procedure(s) Title & No: #32-Product Supplier Selection & Evaluation Policy

#33- Service Supplier Selection Evaluation &

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7.3 Assess suppliers' performance, as appropriate, against the criteria

The Company will ensure those Suppliers of Product and Services are evaluated prior to doing business with that company (See Appendix for assessment documents),

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#33- Service Supplier Selection Evaluation &

Operation

Self Assessment Forms: # B 2. To B 12. Various Supplier Assessments

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7.4 Take any follow-up actions to cause the supplier to correct shortcomings including, if necessary, termination of agreement to purchase

The Company will, on a regular basis, review its arrangements with a supplier and address any problems to ensure they are corrected.

If unable to correct shortcomings the Company will terminate business with that supplier.

Forms A 13. Warehouse/Miscellaneous Supplier

Assessment & Approved List

A 19. Product Supplier Assessment & Approved

List

7.5 Allow new chemicals and chemical products into the member's distribution network only after all the preceding requirements have been met

ALPHA CHEMICAL will only introduce new products or services into the Company after all conditions laid out in the CACD's Distributor Code of Practice have been met.

Procedure(s) Title & No: #6-Product Assessment & Introduction

Form (s) No. A 6. Product Introduction & Information Report

A 14. New Product Warehouse Advice

Self Assessment Forms: # n/a

Other Documents: Information Bulletin # 5 Understanding an MSDS

WHMIS, CEPA (DSL) & TDG Regulations

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