Deltech Furnaces
We Build The Furnace To Fit Your Need®

An ISO 9001:2015 certified company

Environmental Health and Safety Program

Deltech Environmental Health and Safety Policy

Deltech Furnaces is committed to protecting the environment and the health and safety of our customers, employees, visitors, and our community. This means that we comply with all applicable environmental, health, and safety laws. In addition we assess the impact of our operations in the community and the potential risks to our customers of the products and services we provide. Awareness and compliance with this policy is an ongoing responsibility of management and employees in all functions.

Policy Requirements

Comply with applicable environmental, health, and safety (EHS) laws and regulations.

Ensure that employeess have a healthy and safe working environment by implementing programs and practices that eliminate or reduce workplace injuries and illnesses.

Raise awareness and ensure compliance with all local laws and practices which protect the environment in which we all work and live.

Consider EHS impacts in the design and manufacture of our products.

To the extent practicable, reduce the use and release of toxic and hazardous materials, prevent pollution, increase the energy efficiency of our procedures and facility, and conserve, recover, and recycle materials.

Continue to improve our EHS programs and performance as an integral part of our operations.

Responsibilities

Environmental health and safety is everyone's responsibility. Every employee must follow this policy and applicable procedures, laws, and regulations to protect their own health and safety as well as that of other workers, our vendors, our customers, and our visitors in addition to our community and the environment. This also means promptly raising any concerns about possible violations of this policy as well as reporting any work related injuries, and illnesses, fires, chemical spills, and property damage to your supervisor or a Deltech manager.

Responsibilities of Deltech Leads, Supervisors and Managers

Maintain awareness and regularly assess compliance with corporate EHS programs and practices.

Continually seek to identify and correct deficiencies as well as identifying ways to improve our EHS program and practices.

Ensure that assessments of compliance with EHS requirements are included in the performance evaluation of every employee at every level.

The Production Supervisor and Quality Assurance Engineer must conduct an annual review and assessments of the EHS program policies, procedures, and actual practices, taking into consideration any changes in business operations, laws, insurance requirements, and community expectations.

Continually monitor and assess the EHS impact for our customers of our products and services.

Communicate responsibly with employees, the community, customers, and government agencies regarding environmental, health, and safety issues. Cooperate with the community, government, and other interested parties to develop appropriate regulatory and public policies that protect employee and public health and the environment.

Promptly inform Deltech's directors of

- Emergency evacuation, communicable disease or other serious health related incident that may have exposed employees to health hazards.
- All work related incidents and injuries, regardless of severity.
- Any environmental incidents, regardless of extent.

Penalties

Employees who violate Deltech's environmental, safety, and health policies and procedures are subject to disciplinary action up to and including termination of employment. Violations include, but are not limited to, failure to follow procedures and failure to report.

Deltech Training Policy and Plan

Deltech Furnaces is committed to including environmental health and safety training for persons in all positions and at all skill levels. Every staff member will receive an introduction to all trip, fall, and electrical hazards as part of their new employee orientation, and then annually thereafter. Production and engineering staff members will receive this basic training plus training that is specific to the production environment. Training on all EHS procedures for production staff and engineering staff, including supervisors and managers, will be conducted on a semi-annual basis and any time that an incident has occurred. Deltech's directors assume overall responsibility for ensuring that every Deltech staff member receives initial and ongoing training

Employee Orientation EHS Training

As part of new employee orientation, every employee, regardless of position, will receive training conducted by Deltech's Quality Assurance Engineer on the following topics:

Basic fire response skills including building exit points, location and use of fire extinguishers

Location of first aid supplies and emergency shower

Trip and fall hazard identification, remediation, and reporting procedures

Hazard avoidance when on the production floor, including use of PPE and awareness of manufacturing operations and lift truck operations

Deltech's Emergency Plan

Weather related hazards

Refresher sessions will be conducted for all Deltech employees on a semi-annual basis. It is the responsibility of the Quality Assurance Engineer to schedule and conduct the sessions, as well as ensure employee attendance and participation. Training records will be maintained in Deltech's electronic files.

Training for Engineering and Production Staff

Employees at all levels with responsibilities in Engineering and Production functions will receive training on:

PPE

Risk assessment, mitigation, and reporting procedures. The training will be conducted using OSHA3071 "Job Hazard Analysis" as a basis.

Hazard Identification, remediation, and reporting.

Electrical Safety including Electrical Low Voltage training and LOTO procedures

Machine safety including the use and maintenance of power tools and equipment

Hazardous materials identification and proper handling

Forklift operation and safety

Ladder safety

Training will be conducted both as part of new employee orientation and it least semi-annually thereafter. Training and record keeping will be the responsibility of the Quality Assurance Engineer; however he may at his discretion delegate training tasks including safety monitoring to the Production Supervisor, Production Lead, or other members of the Engineering team. Such delegation will be documented.

Electrical Safety

Electrical work may expose you to multiple hazards. While engaged in work involving electrical equipment, if you are not confident that your protection is sufficient or you are not able to follow established work practices, you MUST STOP WORK and contact your supervisor or Deltech's Quality Assurance Manager.

Training

As part of your new employee orientation and annually thereafter, you will be given training in both general electrical safety policies and procedures and those that are specific to your role in the organization. Additional training will be provided at any time that gaps in knowledge and performance are identified and whenever new equipment, tools, or tasks are introduced. Inform your supervisor if at any time you are unfamiliar with the procedures to be followed for the task at hand.

Electrical training will include but not be limited to:

Basic electrical safety (all employees)

PPE, including use of face shield, arc flash clothing, rubber insulated gloves, hearing protection

Inspection of electrical equipment and tools prior to use

Hazard identification and risk assessment, including safe approach distances to avoid arc flash hazard

LOTO

Use of measuring devices

Electrical equipment and tool maintenance

Emergency procedures

Primary Hazards

You can be shocked and burned by touching exposed conductors or improperly grounded equipment energized by an electrical fault. Severe shock can result in death (electrocution).

You can be burned or suffer blast effect injuries from an arc flash, sometimes serious enough to result in death.

- An arc flash is a sudden, highly luminous and intensely hot discharge of electrical current jumping a gap between two conductors or from a conductor to ground. It may also sometimes create a blast wave.
- Arc flash can be caused by dust, dropped tools, accidental contact, condensation, material failure, corrosion, and faulty insulation.

It is your responsibility to identify the risk level of your planned electrical activity and to implement the safeguards necessary to protect yourself from these hazards. The risk assessment must include assessing safe approach distances. If you cannot provide adequate protection or maintain a safe approach distance, stop work and notify your supervisor. If you are uncertain of how to proceed or are in a situation not covered by your electrical safety training, contact your supervisor or the Quality Assurance Manager before proceeding. No Deltech employees are permitted to use or service electrical equipment – regardless of the voltage level – without having completed the level of electrical safety training appropriate to the use of that equipment.

- High Voltages are greater than 1000 or 1500 VAC.
- Low Voltages range from 50 to 1000 or 100 to 1500 VAC.
- Extra Low Voltages are less than 50 VAC or 100 VAC.

Portable Electrical Equipment

If you are using portable cord-and-plug-connected equipment such as laptop computers, printers, radios, fans, power drills, saws, or extension cords, you do not need electrical PPE. But you must follow the General Safe Work Practices outlined below.

Extra Low Voltage Equipment

Work on extra low voltage equipment is less risky than working on higher voltage equipment but can still present danger from electrical shock and electric arc burns. You are required to conduct a risk assessment and follow the General Safe Work Practices described below.

Low and High Voltage Equipment

You should be aware that the majority of electrical equipment operates on low voltage (LV) or high voltage (HV). To protect yourself from the associated hazards, you should:

- De-energize the equipment when feasible. If doing so presents more hazards than does the energized condition or if the work cannot be completed if the equipment is de-energized, you should contact your supervisor for instructions on how to proceed.

Hazard Identification and Access Control

Every Deltech employee, regardless of work responsibilities, is required to immediately report any perceived electrical hazard to their immediate supervisor. It is the responsibility of the supervisor to

- immediately identify the potential hazard by tagging or setting up a barricade or any other method deemed most effective to ensure the safety of Deltech employees and visitors; and
- If qualified, assess the threat. If not, the supervisor must immediately notify the Director of Sales, Design, and Engineering or the Quality Assurance Manager. They will in turn assume responsibility for the assessment.
- The potential hazard identification will remain in place until removal is authorized by a qualified person.

Disconnecting Devices

Disconnecting devices isolate equipment or circuits from their source of power. Circuit breakers, disconnect itches, isolation switches, and contactors are examples.

Use these devices only in the manner specified by the manufacturer and for the device's intended purpose.

Before operating the disconnecting device, visually check to see that the device cover is closed and secured and that there is no evidence of arcing, overheating, loose or bound parts, or visible damage or deterioration.

If you observe an abnormal condition, do not operate the disconnecting device. Place a DO NOT OPERATE tag and contact your supervisor or the Quality Manager.

Safe Work Practices for all Electrical Work and Equipment

Requirements for Power Tools and Electrical Equipment. Never use any electrical equipment that is not grounded, insulated and identified as safe by a NRTL.

Protective Devices and Circuits. Only Deltech engineers may re-energize circuits after determining it is safe to do so following the activation of a circuit breaker or other protective device. Never modify or defeat protective devices or circuits. Such actions require review by an engineer and the approval of the Director of Sales, Design, and Engineering.

Attire. Wear non-melting clothing or arc-rated under layers. Do not wear clothing made of fabric that contains acetate, nylon, polyester, polypropylene, or spandex while performing electrical work. Do not wear conductive jewelry, keychains, or metal headgear. The need for PPE is task and hazard risk dependent.

Environmental Conditions. Do not plug or unplug electrical equipment if your hands are wet. Do not work in wet or damp environments. Do not work at or near electrical equipment if there is not enough light or there are objects that block your view. Do not enter an enclosed space that contains exposed energized parts unless conditions allow you to see clearly. Do not reach blindly into an area that may contain energized equipment or parts. Do not clean any electrical equipment with compressed air if dust is present that may contain combustible or conductive materials.

Storage and Cleaning. Do not store materials or equipment near exposed energized conductors and circuit parts. Do not perform cleaning related activities near exposed energized equipment or parts. Do not clean switchgear, switchboards, motor control centers, or electrical panels with compressed air if dust that may contain combustible or conductive materials is present.

Use of Extension Cords. Extension cords should only be used as a temporary wiring solution. The choice of cord to be used requires Engineering approval to ensure that it has an adequate amperage rating for the task at hand. If an extension cord is used for a specific purpose/location for more than 30 days, a permanent outlet must be installed.

Power strips labeled by a NRTL and used for low-powered loads such as computers, peripherals, and audio/visual components may remain longer than 30 days. Do not plug one power strip into another.

Make sure that extension cords do not present a trip hazard. Protect them from damage due to traffic, sharp corners, or pinching. Do not secure any flexible electrical cords with anything that could damage the insulation, such as staples.

Selecting and Using Measurement and Detection Instruments

Deltech's Director of Sales, Design, and Engineering is responsible for the approval of all measurement and detection devices used by Deltech employees, whether in the company's facility or on a job site. Use of customer devices requires the prior approval of the Director.

Every Deltech production employee receives training on the function and appropriate use of every device both as part of the orientation process and annually thereafter. New devices are introduced and training provided as appropriate.

Electrical Emergencies

Any and every employee is authorized and required to dial 911 to alert emergency personnel and to implement the evacuation plan as detailed in our Disaster Plan.

Customer Electrical Safety Procedures

When on a job site you are expected to adhere to all customer requirements unless they are less stringent than Deltech 's policies and procedures. In the latter case, Deltech's requirements will apply.

Program Evaluation

The electrical safety program will be evaluated on an annual basis by a team consisting of the Production Supervisor, Quality Assurance Manager, and Director of Sales, Design, and Engineering.

Records

Incident reports, program evaluation meeting minutes, and employee training records will be retained in Deltech's Quality Management System files for a minimum of five years.

Deltech LOTO Procedure

Purpose

The purpose of this procedure is to establish the requirements for the control of hazardous or potentially hazardous energy sources during machine and equipment servicing and maintenance where the unexpected energization, start up, or release of stored energy could occur and could cause personal injury.

Scope/Application

This procedure is not intended to supersede or replace any applicable regulatory requirements. In case of conflict the most stringent requirements will prevail, provided that full compliance with applicable legal and regulatory requirements is achieved.

Any deviation from the requirements set out in this procedure shall receive prior approval from Deltech's Quality Assurance Engineer. Deviations will not be allowed without an action plan that includes documented risk reduction measures to be applied as an alternative. The Quality Assurance Manager shall be responsible for drafting this plan and ensuring its adequacy.

Procedure

General Requirements

Procedures to de-energize, isolate, and lockout (LOTO) energy sources shall be established prior to performing servicing and/or maintenance activities. "De-energized" is defined as physically isolated from all energy sources and not containing residual or stored energy. De-energizing must result in a zero energy state.

The Quality Assurance Engineer and Production Supervisor will jointly determine which engineering and production staff members will be trained in these procedures. Said employees will only be allowed to perform LOTO work once training has been completed and documented, and only if they have successfully completed refresher training on a semi-annual schedule.

LOTO authorized persons will use energy isolation devices/LOTO points capable of being locked out, including:

- A hasp or other means of attachment to which, or through which, a lock can be applied
- A device having a locking mechanism built into it
- A means to achieve lockout with the need to dismantle, rebuild, or replace the energy-isolating device or permanently alter its energy control capability

It is the responsibility of the Production Supervisor to ensure that energy isolation devices/LOTO shall be identified in a uniform manner and that adequate supplies are are conveniently located and accessible.

It is the responsibility of the Quality Assurance Engineer to assure that all energy sources are isolated using individual LOTO locks and tags.

Tags alone are insufficient without a lock unless an energy isolating device is not capable of being locked out or modified to accept lockout.

The tagout process will require approval from the Quality Assurance Manager. He/she will conduct and document a Risk Assessment.

If unexpected events/conditions occur during the course of the LOTO procedure, work will be stopped and a new Risk Assessment conducted. New protective measures may be required as a result and must be documented prior to recommencing the procedure.

Plug and Cord Single Energy Source Equipment

The majority of Deltech's power tools and equipment are plug-and-cord connected. A written procedure is not needed so long as the plug can be removed from the energy source and the plug is kept under exclusive control within sight and within arm's reach by the individual performing the maintenance or servicing activity.

Procedures Alternative to LOTO

When LOTO cannot be applied, alternative procedures shall be developed to protect employees from the unexpected release of energy during maintenance and service activities. Such situations include:

- The task is routine, repetitive, and integral to the production process;
- LOTO is not feasible or creates an additional hazard
- LOTO prevents the completion of the maintenance and servicing tasks.

The decision to use alternative procedures and the responsibility for

- Conducting and documenting a related risk assessment
- Writing the alternative procedures

Falls to the Quality Assurance Engineer and further requires documented approval from the Director of Sales, Design, and Engineering.

LOTO Devices

The Production Supervisor shall be responsible for maintaining an adequate supply of LOTO devices including keys, LOTO and transition locks, lockout and transition tags.

LOTO devices shall be unique and the locks distinct from other locks in use in the facility.

Each lock will have its own unique key; i.e. the use of master keys will not be allowed.

LOTO devices and tags will only be used for LOTO and for no other purpose.

LOTO devices shall have the following characteristics:

- Be capable of withstanding the environment to which they are exposed for the maximum period of time that exposure is expected.
- Be standardized in at least one of the following ways: color, shape, size, or specific markings. In the case of lockout devices, printing and formatting shall also be standardized.
- Be substantial enough to prevent accidental removal without the use of destructive techniques.

Tags

The **Red** LOTO tag shall be used for active LOTO and it shall:

- Be affixed to every LOTO lock where active maintenance and/or servicing activities are taking place, and remain affixed until the procedure is completed.
- Have a “Danger” header followed by “Do Not Operate”.
- Have an area to document the date and the name of the authorized person applying the device.

The **Yellow** “Out of Service” tag shall:

- Be affixed to equipment that is out of service or inoperable, and will be left in place until the equipment has been maintained/repaired and is ready to be returned to service.
- Have the “Caution” header followed by “Do Not Operate”.
- Have an area to document the date and name of the authorized person applying the device.
- Not be used for active LOTO.

LOTO Method

Steps 1 and 2. Prepare for Shutdown and Shutdown

The following steps shall be followed in preparation for shutdown:

- Verify that individuals understand the applicable LOTO procedures.

- Verify availability and acquire the necessary LOTO devices.
- Ensure notification requirements are completed.
- Identify associated or adjacent machinery, equipment, processes, and circuits and assess the risk they pose to the task to be performed.
- A safe working distance determination must be made for any energized equipment.
- The authorized person shall verify the sequential shutdown of the equipment by a knowledgeable technician or engineer prior to isolation.

Step 3. Isolation

- Energy isolating points (disconnects, valves, etc) indicated by the equipment-specific LOTO procedure shall be located and positioned (isolated, blocked, closed, etc) to prevent flow of energy.
- Authorized person shall verify the condition of the energy isolating devices.
- Partial or localized LOTO may be used on complex machinery, equipment, processes, and circuits where it is necessary to:

Isolate power or motion for a specific component while maintaining power to other systems

Support utilities and other devices and components

Step 4. Application of LOTO Device

- Individual LOTO lock and red tag shall be attached and secured to the machine, equipment, process, or circuit energy-isolating device (disconnect, valve, etc).

The “1 lock, 1 key, 1 person” process shall be followed; i.e. authorized persons involved in the maintenance activity shall place their own lock and tag on each energy control point.

One authorized person to conduct LOTO for others is prohibited.

The authorized person shall keep the key in their possession.

- A lockout device with lock (e.g. clamshell, hasp, ball valve, circuit breaker, wall switch, gate valve, etc.) shall be used if a lock cannot be applied directly to the energy isolation device.

- Where a red tag cannot be attached and secured directly to the energy isolating device, the red tag shall be located as close as safely possible to the device.

- The energy isolating devices shall remain “locked out” and in a “safe” or “off” position.

Step 5. Control of Stored Energy

- The authorized individual shall verify that all potentially hazardous energy (stored, residual, chemical, or potential) is relieved, dissipated, restrained, drained, or otherwise controlled as per equipment specific procedures.

- If the re-accumulation of stored energy is likely (e.g. static electricity, capacitors) isolation verification shall continue until the servicing or maintenance is complete, or until the potential for accumulation no longer exists.

Step 6. Verification of Isolation

Prior to starting work, the authorized person shall verify that isolation and de-energization have been completed.

Step 7. Return to Service

The authorized person shall perform the following actions before returning the equipment to service:

- Inspect the work area to verify that non-essential items have been removed, guards are in place, the machine, equipment, process, or circuit is operationally intect, and employees are in a safe location;

- Witness the removal of LOTO devices from each energy-isolating device/point by the authorized person who applied the LOTO device;

- Notify affected individuals that energy is about to be restored to the machine, equipment, process, or circuit;

- Have the knowledgeable technician or engineer follow the proper sequential startup steps for the machine, equipment, process, or circuit;

- Visually inspect and/or cycle test the equipment to complete the servicing and/or maintenance task.

In situations where LOTO shall be temporarily removed from the energy isolating device(s) and circuits/equipment will be either fully or partially energized to test, troubleshoot, or position the machine, the return to service process in Step 7 above shall be followed.

Removal of Abandoned Locks

When the authorized person who applied the LOTO device is not available to remove it, the device can only be removed with the approval and under the supervision of the Quality Assurance Manager or the Director of Sales, Design, and Engineering. It will be the responsibility of the supervising party to advise the person who applied the lock that it has been removed.

Emergency Removal of Locks

The decision that emergency removal of a locking device is necessary must be made by the Quality Assurance Manager or Director of Sales, Design, and Engineering. Removal will be accomplished following the requirements for the removal of abandoned locks.

Group LOTO

When one or more energy isolation devices cannot accommodate multiple locks the following should be used:

- Multiple lock application using lock devices (hasps) that accommodate several individual LOTO locks.

- Lock boxes. The LOTO lead authorized person's key is placed inside the lock box. Other authorized persons servicing and/or maintaining the machine, equipment, process, and circuit secure and attach their individual LOTO locks to the box.

Communication and Training

Employees having responsibilities under this procedure shall be made aware of its requirements.

Engineering and production employees will receive LOTO training as part of orientation and annually thereafter. Training shall include hands-on demonstration and practice by the trainees. Training will be conducted by the Production Supervisor under the general supervision of the Quality Assurance Manager.

Retraining. The Production Supervisor, under the general supervision of the Quality Assurance Manager, will assume responsibility for the continuous monitoring of employee LOTO procedure knowledge and performance. When deficiencies are identified, the employee will be

prohibited from performing LOTO procedures until additional training is provided and performance is deemed satisfactory. Retraining will also occur if

- There are any changes in LOTO procedures, job assignments, or equipment worked on
- New hazards are introduced
- Training deficiencies are identified during audits and hands on demonstrations

Program Evaluation and Review

The Quality Assurance Manager and Production Supervisor will conduct an unannounced audit to verify staff competence and adherence to program requirements every six months.

The program will be reviewed and updated annually by the Quality Assurance Manager with input from the Production Supervisor. The program will then receive annual final review and approval from the Director of Sales, Design, and Engineering.

Stop Work Authority

Policy

Deltech employees and contract employees are empowered and are obligated to stop work when:

- There is likelihood of injury to personnel or damage to the environment
- A task or a control for a hazard is not clearly established and understood
- Anytime an unsafe condition or act may result in an incident

Purpose

This policy establishes the authority of personnel to stop work when their own personal safety and the safety of others or the environment is, or is likely to be, endangered by actions, site conditions, or omissions.

General Requirements

Employees, contractors, and persons directly impacted by Deltech, Inc's activities (e.g. customers, visitors) are expected and authorized to stop work or to decline to perform an assigned task whenever an imminent danger to self, others, property, or threat to the environment is identified.

Deltech supervisors, managers, and directors shall promote and support Stop Work Authority by ensuring that there is no retaliation on employees, contractors, or others exercising this authority. In particular:

- Retribution for intervening or retaliation of any sort against a person raising a concern or stopping work shall not be permitted.
- Positive behaviors should by recognized and reinforced.

In case opinions differ regarding the validity of a Stop Work intervention or the decision to resume work, a Deltech director will make the final decision.

Documentation

Stop Work events will be documented by the immediate supervisor and submitted to Deltech's Quality Assurrance Engineer and Directors for review. Reports will be retained in Deltech's

electronic files. Action will be taken to correct any conditions which caused the Stop Work incident.

Training

Every incident will be reviewed and discussed within 30 days of occurrence at an employee EHS meeting called for this specific purpose. The Quality Assurance Engineer shall be responsible for scheduling the meeting and ensuring that all employees attend.

Incident Reporting, Investigation, and Follow Up Procedure

Purpose

The purpose of this procedure is to establish the requirements for reporting, investigating, and follow up of environmental, health, and safety related incidents.

The objective is to ensure that injuries, illnesses, property damage, fires, spills, near miss incidents, and other significant events that occur while working at Deltech or customer sites are identified and appropriately reported, investigated, and communicated.

Scope/Application

This procedure applies to operations at Deltech's home facility in addition to customer sites.

This procedure is not intended to supersede or replace any applicable regulatory requirements. In case of conflict the most stringent requirements shall prevail, provided that full compliance with applicable legal and regulatory requirements is achieved.

Any deviation from requirements set out in this procedure shall receive prior evaluation and approval by Deltech's Quality Assurance Engineer and both of Deltech's Directors. Any

requested deviations must be accompanied by a risk assessment and action plan with documented risk reduction measures to be applied as an alternative.

Procedure

Incident Reporting and Escalation

Employees and contractors working for Deltech, Inc. shall report any level of incident to their supervisor and/or Deltech contact immediately after the incident occurs; or if this is not possible then as soon as practical. The supervisor or Deltech contact is further required to report the incident to one of Deltech's Directors.

In the case that Deltech employees are working at a customer site, the appropriate customer representative must also be notified immediately or as soon as practically possible.

Supervisors shall ensure that there are no repercussions or retaliation against employees or contractors for reporting an incident.

If required by applicable laws, regulations, and/or permits, recordable incidents shall be reported to the applicable authorities within the designated timelines.

Deltech subcontractors are required to have equivalent procedures or to follow Deltech's program requirements.

Adequate provisions will be made for the prompt medical care of any injured or ill employee following an incident.

For minor injuries, an employee can self-administer first aid treatment. For severe and significant injuries or illnesses, the employee will be promptly transported to the nearest medical facility on our designated provider list. This is a requirement of our Pinnacol workmen's compensation policy.

All incidents involving employee injuries shall be reported to our workmen's comp carrier by phone or by using the Pinnacol online employer portal. As Deltech's EHS Leader, this is the responsibility of the Production Supervisor.

Incidents of property damage or motor vehicle accidents not involving personal injury shall be reported by the Directors to the local authorities and/or the insurance companies, as appropriate.

All incidents will be recorded on the Incident Log maintained in the electronic EHS files. It is the responsibility of the Quality Assurance Manager to ensure that the incidents are recorded and are recorded properly; i.e. with all relevant information.

Incident Investigation

Every incident will be investigated, regardless of the severity of injury or level of damage. The investigation will be conducted by the Production Supervisor in his or her capacity as EHS Leader and by the Quality Assurance Engineer immediately after the occurrence or as soon as practically possible.

Investigation methodology may include but not be limited to fishbone diagrams, the 5 Whys, Cause Mapping, and Failure Modes and Effects Analysis. The Quality Assurance Engineer shall present all findings in a Root Cause Analysis report to the Directors. All investigation and report records will be maintained in the EHS electronic files.

Investigation results will be shared with the employee(s) involved and corrective action taken. Results will also be used for health and safety training efforts and improvement of procedures/work instructions. All such corrective action and training sessions will be documented and the records kept in the EHS electronic files. Corrective actions and training sessions shall be conducted within 30 days of the incident, or sooner if the risk/threat level is high.

Post Incident Review

The Quality Assurance Manager will review the investigation reports with the Directors as part of the QMR (Quality Management Review) process. Recommendations resulting from that review will be implemented within 30 days.

Program Evaluation

The Incident Reporting, Investigation, and Follow Up program will be evaluated annually as part of Deltech's Safety Program review. The review shall be conducted by a team including the Production Supervisor acting in his capacity as EHS Leader, Quality Assurance Engineer, and at least one Director. Minutes and recommendations from the review will be maintained in the electronic EHS files, and recommendations will be implemented within 30 days of the review.