HAZARD COMMUNICATION

Purpose

This program outlines how Validus Energy II Midcon (Validus Energy) will meet the requirements outlined in OSHA's Hazard Communication Standard. (1910.1200)

Scope

This program applies to all employees and wellsites operated by Validus Energy.

Process

All **chemicals** used by Validus Energy will have a **safety data sheet (SDS)** available.
A SDS database will be kept on Validus.Energy under the safety data sheet tab.

Validus energy employes will receive annual training on this program, chemicals they may work with, labeling and the precautions to take when using chemicals. They will also be retrained if new chemical hazards are introduced.

All chemicals on a Validus Energy worksite will be labeled.

Validus energy will regularly assess contractor activity to ensure that chemical **containers** brought onto a Validus Energy worksite are labeled and the SDS are included in the chemical inventory list.

Responsibilities

Leadership	Commit to, follow and reinforce the requirements set forth in this program. Provide sufficient resources for implementation.
Supervisors	Ensure Validus employees have the knowledge and skills to follow this program. Verify that SDS are on the **Hazardous Chemical** List prior to use. Mitigate any issues of noncompliance or contact EHS.
EHS	Provide technical advice and resources to monitor compliance. Maintain the **chemical** inventory and SDS database. Provide training to employees.
Validus Employees	Follow the requirements of this program. Follow the manufacturer's guidelines for chemical use. Verify all containers are **labeled**. Notify a supervisor or EHS if noncompliance is observed. Complete annual training on a timely basis.

Definitions

Chemical - any substance or mixture of substances

Container - any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like that contains a hazardous chemical.

Hazardous Chemical - any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas or hazard not otherwise classified.

Label - an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on or attached to the immediate container of hazardous chemical or to the outside packaging.

Pictogram - a composition that may include a symbol plus other graphic elements such as a border, background pattern or color that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated for application to a hazard category.

Precautionary Statement - a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage of handling.

Safety Data Sheet (SDS) - written or printed material concerning a hazardous chemical that is prepared in accordance with the OSHA Hazard Communication Standard. Formerly known as a Material Safety Data Sheet.

Signal Word - a word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are “danger” and “warning.” “Danger” is used for the more severe hazards, while “warning” is used for the less severe.

Worksite – a Validus Energy establishment, job site or project where hazardous chemicals are produced or used and where workers are present.

Policies

List of Hazardous Chemicals

- The SDS library located on Validus.Energy under the Safety Data Sheets tab (https://validus.energy/safety-data-sheets-1) will serve as the chemical inventory list of chemicals known to be present and used by Validus Energy employees.

- EHS will review the Hazardous Chemical Inventory annually and update the SDS Library as necessary.

Safety Data Sheets (SDS)

- Safety Data Sheets (SDS) are required for all hazardous chemicals.
- The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is prohibited.
- The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used or present in Validus Energy operations.
- Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain SDS libraries and archives.
- SDS's for hazardous materials to which Validus Energy employees have been exposed must be maintained for five years after the employee leaves the employment of Validus Energy.

Labels

- All containers of hazardous chemicals shall be labeled in English and prominently displayed on the container. If workers speak another language, the labels can be in that language as well.
- Container labels must be legible and contain the following information:
    - Product identifier
    - **Signal word**
    - Hazard statement
    - **Pictogram(s)**
    - **Precautionary statement**(s), and
    - Name, address and telephone number of the chemical manufacturer, importer or other responsible party.
- Chemicals that are received from vendors that are not properly labeled must be rejected.

  Note: Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the worker who performs the transfer do not require a label.

Multi-Employer Job Sites

- A pre-job briefing shall be conducted so all workers are aware of the chemicals present prior to beginning work.

- SDS for all hazardous chemicals is located is publicly available at: https://validus.energy/safety-data-sheets-1 .

- The labeling system and any precautionary measures to be taken by the contractors during normal conditions and emergencies shall be addressed during the prejob briefing

Training

- Hazard Communication training will be delivered annually to all Validus Employees
    - Requirements of the OSHA Hazard Communication Standard
    - Areas in the work area where hazardous chemicals are present.
    - Location and availability of the hazard communication program, chemical inventory list and SDS.
    - Methods and observations used to detect the presence or release of a hazardous chemical.
    - Explanation of the workplace labeling system and the labels received on shipped containers.
    - Explanation of the SDS, including order of information and how workers can obtain and use the information.
- Records of Hazard Communication training are maintained by EHS

Change Log

Date	Change (s) Made	Approved By
7/2/24	Original Document	Justin Stone