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**1. Purpose:**

1.1 Describe the procedure to execute management and storage of industrial products for Cargill, Incorporated, a Delaware corporation with its principal offices at 15407 McGinty Road West, Wayzata, Minnesota, 55391, on behalf of its Bioindustrial division (hereinafter referred to as “Cargill”).

**2. Scope:**

2.1 Applies to all third-party warehouse facilities (the “Warehouse”) that store and/or distribute raw materials and industrial products (the “Products”) on behalf of Cargill.

**3. Procedure:**

**3.1. General Requirements:**

3.1.1. Warehouse management shall ensure that storage and services shall be performed in accordance with all applicable laws, regulations, and Cargill requirements set forth in the Agreement. The Warehouse must obtain all necessary legal authorizations and permits to carry out materials storage and handling and provide the services set forth in the Agreement.


3.1.2. Warehouse management is responsible for promptly notifying any triggering events or significant changes occurring at the Warehouse to all Cargill businesses represented at the Warehouse. This notification should occur within four (4) hours of any safety concern or otherwise within two business days of all other events. This communication shall be made pursuant to the notification provisions set forth in the primary agreement between the parties. This notification shall be made to the designated Cargill warehouse contact.

3.1.3. Significant changes or triggering events include:

- a. Fire, explosions, water damage, or other incidents which may impact Product integrity.
- b. Natural disasters or catastrophic events.
- c. Spills or releases of Cargill Products or other materials at the warehouse that may impact Cargill products.
- d. Security breaches.
- e. Failed third-party audit or audit(s) with major/significant findings.
- f. Facility deterioration leading to unsatisfactory facility conditions.
- g. Storage in a new/different building at the Warehouse.
- h. Facility modifications.

3.1.4. Responsibility and authority for ensuring Warehouse operations are in compliance with all applicable laws and regulations shall be clearly assigned to competent management personnel. The Warehouse’s organizational chart shall identify the position(s) responsible for product safety, quality, and regulatory compliance.


3.1.5. The Warehouse shall maintain programs, procedures, and documentation sufficient to ensure that Cargill Products are handled, stored and transported in conformance with the requirements of this manual, any relevant and communicated Cargill specifications, and all applicable laws and regulations.

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- 3.1.6. The Warehouse shall inform Cargill of any requests by regulatory authorities to view Cargill records prior to sharing the information; or take Product samples. The Warehouse shall quarantine any container of Product sampled by any regulatory agencies until further notice from Cargill.
- 3.1.7. In the case of other third-party audit requests, in addition to compliance with the confidentiality provisions in the Agreement, Cargill shall be informed of any requests to view Cargill records prior to sharing the information, and the Warehouse shall not provide any Cargill records to third parties without Cargill's prior written consent, unless required by law.
- 3.1.8. Cargill may perform periodic quality, good warehouse practice, or inventory management audits of the Warehouse.
- 3.1.9. Products are not to be further placed on the market (e.g., transferred to another premises or legal entity) except under the express instructions of Cargill. The following exceptions are made:
  - a. Orders/requirements issued by a regulatory authority.
  - b. Force Majeure cases where material needs to be rapidly transferred to avoid damage, etc.
- 3.1.10. All Warehouse facility personnel are expected to understand and comply with these requirements and guidelines. Any questions or concerns should be directed to the designated Cargill warehouse contact. Training (including but not limited to training with respect to worker health and safety, shipping and receiving procedures, transportation regulations, good hygiene practices, cleaning and housekeeping, proper storage practices, pest control, and documentation practices) is required for all new employees that are involved in storing and handling the Products, and retraining specific to job tasks must be performed annually. Training requirements and records of completion shall be documented and retained for a minimum of three years.

**3.2. Good Warehouse Storage and Distribution Requirements**

- 3.2.1. **Storage of Products:** Warehouse product storage shall be under conditions that will protect the Products against physical, chemical, and microbial contamination as well as against deterioration of the Product and its packaging.
  - a. Storage areas shall be dry and appropriately ventilated. Monitoring and control of temperature and humidity shall be applied where specified.
    - 3.2.1.a.1. Requirements shall be defined and implemented.
    - 3.2.1.a.2. Measuring equipment shall be in place, identified, calibrated, and adjusted or its accuracy verified.
    - 3.2.1.a.3. Procedures shall be in place to record the actions to be taken when the prescribed measuring devices are found not to be operating within specified limits.
    - 3.2.1.a.4. Where the safety or legality of the Products have been compromised, Cargill shall be contacted to determine appropriate action.
  - b. Products shall be stored off the floor (on pallets and on slip-sheets, upon customer request, unless alternative or additional storage conditions are set) and with sufficient space around the Products to allow inspection, maintenance, cleaning and pest control activities to be carried out.
  - c. At no time shall any Warehouse employee or contractor stand or walk across any Products, either in the warehouse or in trailers.
  - d. Knives or other tools provided shall be used in such a way as to prevent damage to the Products.
  - e. Vehicles other than electrical (battery) and liquified petroleum gas powered lift trucks are prohibited within the contracted Warehouse. If alternative vehicles are necessary for the materials stored in the location, written approval shall be provided by Cargill. If diesel powered handling equipment is approved for use, it shall incorporate an appropriate exhaust filter system for the removal of particulates that can pose a contamination risk to product.

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- f. Where physical automation systems (including vertical lifts, retrieval systems, conveyor systems, robotics, etc.) are used for product handling activities, no adverse effect to product safety and quality shall occur.
  - g. External storage shall be avoided. Upon agreement with Cargill Product Safety, Quality and Regulatory (PSQR) department, external storage may be accepted under the condition that it is minimized, items are protected from contamination and deterioration, and there is no product safety risk.
  - h. Procedures shall be in place for managing all non-conforming/damaged Products. Procedures shall account for proper identification, storage requirements, responsibilities, and record keeping. Non-conforming product should be segregated to prevent shipment. Any Cargill product that is placed on hold shall remain on hold until released, in writing, by Cargill.
  - i. Returned Materials Authorization (RMA) process shall be followed any time a Product is returned from the customer. Products shall be evaluated by Cargill any time there are returns of Cargill Product from the customer. Product disposition shall be determined by Cargill.
- 3.2.2. Personal Hygiene:** The site's personal hygiene standards shall be documented and adopted by all personnel entering the warehouse storage areas, including warehouse personnel, contractors, drivers, and visitors. Standards shall be sufficient to prevent Product contamination.
- a. Personal items shall be stored away from warehouse operating areas.
  - b. Facility shall ensure that eating, drinking, chewing, smoking and/or use of tobacco in the warehouse product storage area shall not pose a risk to stored product. Such activities should be confined to designated areas.
  - c. Hand washing facilities shall contain soap, water, and paper or air hand dryers. Signage outlining hand washing requirements shall be prominently posted.
  - d. Clothing shall be appropriate to prevent product contamination.
- 3.2.3. Building and Grounds:** The site and facility shall be located and maintained so as to provide protection and prevent hazards to the products. Safety, legality, and quality of products shall not be compromised. Consideration shall be given to local activities and the environment which may potentially have adverse impact on the Products, and measures shall be taken to prevent Product contamination.
- a. The outside grounds shall be maintained to prevent standing water and pest harborage.
  - b. The roof shall be maintained to prevent leakage into the facility and to provide proper drainage.
  - c. The building shall not have any openings which would allow pests to enter.
  - d. Adequate lighting shall be maintained in product storage and dock areas to allow identification and inspection of products and areas. All lights shall be properly shielded where risk to product exists.
  - e. The warehouse shall be adequately protected against fire and flood incidents as well as other environmental exposures (e.g., storm, earthquake). Any such event shall be communicated to Cargill within 4 hours, to discuss Product integrity.
- 3.2.4. Site Security:** Warehouse site security shall ensure Product safety and integrity. The Warehouse shall have documented site security policies and procedures to initiate a quick response to security incidents, safeguard and control sensitive information, maintain appropriate records, and ensure all employees are aware of security requirements and measures at the warehouse.
- a. Specific cargo integrity processes shall include:
    - 3.2.4.a.1. Restricting facility access by securing doors or using electronic access. Access to the site by employees, contractors, and visitors shall be controlled. Warehouses shall maintain a visitor/contractor/driver log to clearly identify anyone entering the facility. Visitors



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and contractors allowed access to the floor shall be escorted unless a written program is in place to appropriately manage unescorted contractor access.

- 3.2.4.a.2. When personnel are terminated or leave the company, Warehouse shall maintain a secure facility by ensuring keys are returned or codes are changed to prevent their re-admittance. Internally, ensure communication of terminated employees is shared with necessary warehouse staff.
- 3.2.4.a.3. Management, control, and use of high security seals.
- 3.2.4.a.4. Physical inspection on outbound cargo transport units ("CTUs").
- 3.2.4.a.5. A documented process to ensure goods shipped or received from the warehouse are validated at time of handover.
- 3.2.4.a.6. Pre-alert system to corroborate documentation required to pick up a shipment including truck driver ID and specific vehicle details.
- 3.2.4.a.7. Leaving prepacked or staged CTUs pack condition.


b. A site-specific documented risk assessment (threat assessment) shall be undertaken to identify any potential risks to the security of the Products held on the premises in storage and appropriate controls shall be implemented. The assessment shall be reviewed at an appropriate frequency. The physical security risk assessment shall include:

- 3.2.4.b.1. External areas of warehouse such as perimeter fencing.
- 3.2.4.b.2. Access gates.
- 3.2.4.b.3. Shipping, handling, and receiving yard.
- 3.2.4.b.4. Employee parking.
- 3.2.4.b.5. Roof access.
- 3.2.4.b.6. External doors, windows, and dock areas.


c. All significant changes to Warehouse security shall be documented and communicated to Cargill.

**3.2.5. Cleaning and Housekeeping:** Cleaning and housekeeping programs shall be in place to ensure that appropriate standards of cleanliness are maintained, including in storage areas, eating/break areas, and restrooms.

- a. Documented cleaning schedules shall be in place and implemented for the Warehouse, vehicles, and equipment.
- b. Warehouse cleaning schedules shall ensure that Warehouse product storage areas are clear of unnecessary detritus, including wood, plastic, glass, metal, etc.
- c. The frequency and depth of cleaning shall be based on risk.
- d. Any spilled materials shall be promptly cleaned and properly disposed of.
- e. All cleaning shall be documented to include at minimum, the item/area cleaned, who conducted the cleaning, and verification should be completed by an appropriately trained individual.
- f. Waste or scrap compactors and/or covered dumpsters shall be used to minimize leakage and contain waste materials. Containers shall not create a harborage area or attract pests.
- g. All trash containers (interior and exterior) shall be sufficiently covered and emptied on a regular basis and not overloaded. Trash containers shall be properly labelled or color identified as such.

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- 3.2.6. Fire Protection:** The Warehouse shall maintain a fire protection system and procedures commensurate with the materials and amounts to be stored. The following should be part of but not limited to a fire protection program:
- a. Periodic risk assessments of the facility.
  - b. Procedures for fire responses and considering non-routine tasks such as hot work.
  - c. Smoke and heat detection systems connected to a remote monitoring system.
  - d. Fire compartments, safe zones, and fire rated doors.
  - e. Automatic sprinkler systems based on risk assessments.
  - f. Access to adequate supply of water and fire extinguishers.
  - g. Fire water retention.
  - h. Periodic inspection of firefighting apparatus and review of program.
- 3.2.7. Maintenance:** The Warehouse is responsible for maintenance of and conditions at the Warehouse. A system of planned and preventive maintenance shall be in place to ensure critical Product protection devices are effective. Examples include dock seals and shelters, door seals, overhead lighting, fork trucks, dust collectors, air filters, temperature control and recording devices, etc. The maintenance requirements shall be defined when commissioning new equipment. All third-party contractors and engineers shall be aware of, and adhere to, product safety standards. All significant facility changes shall be documented, reported, and communicated to Cargill. The maintenance system shall be documented, and records of work shall be saved.
- a. The Warehouse shall have appropriate maintenance and contractor programs to ensure that the Products are not compromised when work is being performed at the facility.
  - b. Maintenance employees, engineers and contractors shall have appropriate training to ensure product quality and safety guidelines are adhered to.
  - c. All maintenance equipment, utensils, and tools shall be properly stored when not in use.
  - d. Following maintenance work, all tools, utensils, and debris shall be removed.
  - e. Temporary repairs may be used as a short-term fix where product contamination is not a risk, subject to a scheduled plan for permanent repair being on file.
  - f. All equipment and product moving vehicles shall be maintained in good working condition to prevent product damage or foreign material from being placed onto the product.
  - g. Leakages (e.g., product, oil, grease, lubricants) shall be avoided. Spills shall be cleaned up immediately.
- 3.2.8. Pest Control:** The facility shall maintain a pest control program administered by an appropriately certified Pest Control Officer (PCO) adequate to prevent product damage or pest infestation, with monitoring at a defined frequency.
- a. The warehouse shall have a contact person for pest control review. They shall review results of the pest control activities and sign off to verify records are reviewed on a regular basis. Records shall be maintained for each inspection documenting deficiencies, corrective actions, and any use of equipment/pesticides.

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- b. Usage labels and Safety Data Sheets (“SDSs”) shall be available for all chemicals used for pest control purposes. This list of chemicals shall be reviewed annually to ensure use of legally permitted/appropriate chemicals.
- c. A site map shall be maintained showing the location of all mechanical traps and outside bait stations. All equipment shall have specific identification, indicating the date of last service, and must be properly installed, clean, and well maintained.
- d. All deficiencies, corrective actions, and pesticide usage shall be shared with the appropriate Cargill warehouse contact, upon request.

### 3.3. Warehouse Operational Program Requirements:

**3.3.1. Product Handling:** Product handling and movement shall be carried out to minimize the risk of product damage. Personnel shall be aware of any Products requiring specific handling conditions and be trained in appropriate procedures. The procedures shall include, as appropriate:


- a. Segregation of Products that cannot be stored together for safety reasons.
- b. Specific handling requirements to prevent product damage, including double stacking and any necessary barriers.
- c. Where Products are repacked onto pallets for storage or further distribution, the packing configuration and packaging type shall prevent the risk of damage (e.g., overhanging cases). Where required, repacked pallets shall be wrapped to prevent damage in storage or distribution.
- d. Pallets, racking and skids shall be kept in good condition.
- e. Cargill or customer requirements for pallet configuration shall be followed where established (e.g., use of slip sheets, cases per pallet, etc.)
- f. Cargill requirements for product labelling shall be followed where established (e.g., application of the Globally Harmonized System of Classification and Labelling of Chemicals (“GHS”) and hazardous materials/dangerous goods labels)
- g. Where product sampling is included in the warehouse and distribution agreement with Cargill, the Warehouse shall follow the agreed and defined sampling procedure(s) including proper sealing of the sample. It shall be carried out by trained personnel.

**3.3.2. Inspection and Unloading of Goods:** Inbound goods acceptance procedures shall be in place to ensure Products are within loading/unloading specifications before acceptance. Where specific measurable conditions, such as temperature and product handling safety requirements, are critical to the safety, quality, or integrity of products, processes shall be in place to ensure requirements are fulfilled before acceptance.


- a. There shall be a procedure for inspection of loads on arrival to ensure that Products are free from visual contamination or damage and are in a satisfactory condition. Procedures shall also be in place to ensure that the Products have been held under secure conditions before acceptance. Inspections shall be documented.
- b. All damage shall be identified and photographed upon receipt. Notification of damages after receipt date may result in the Warehouse’s expense.
  - 3.3.2.b.1. Examples of non-conformances include, but are not limited to lack of or incorrect seals, incorrect paperwork, product damage, spills, wrong product, shortages, and presence of unexpected items, foreign matter, odors, unacceptable trailer conditions, etc. If issues are seen when opening a trailer, do not proceed with unloading, but notify the designated Cargill warehouse contact immediately.
- c. Receiving BOL/packing list and CoA shall be reviewed to assure that they indicate the batch codes(s) on all incoming materials, and that these batch codes match the product in the trailer, and that all product is accounted for.

**3.3.3. Inspection and Loading of Goods:** Outbound loading procedures shall be in place to ensure Products are in good, shippable condition prior to loading. Where specific measurable conditions, such as temperature, are critical to the safety, legality, quality or integrity of products, processes shall be in place to ensure requirements are fulfilled for transit.



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- a. All Products must be verified against the pick list to confirm the correct batch/lot numbers and quantities are retrieved. If applicable, verify product meets shelf-life requirements.
- b. The Warehouse must adhere to a first in, first out rotation system unless otherwise instructed.
- c. Trailers shall be inspected, and inspections documented prior to loading. This shall include, at minimum, the absence of foreign material (glass, metal filings, blood, grease, etc.), debris, holes, protruding objects or trailer damage that can compromise the product, or any odors, insects, rodent droppings, feathers, spills, or moisture. Any findings shall be clearly documented and photographed (if possible). The trailer shall be rejected, and appropriate actions taken to restore cleanliness and/or repair of the trailer prior to loading. The designated Cargill warehouse contact shall be contacted.
- d. Paperwork for all loads must be complete and accurately reflect the material loaded. The Bill of Lading (BOL) shall contain accurate batch, quantity, and customer ship-to information.
- e. Follow Cargill instructions regarding requirements for Certificate of Analysis (COAs)/Certificate of Conformance (COCs) or other specific customer documents for all shipments. Note, many COAs/ COCs or other specific customer documents are sent electronically by Cargill whenever possible. If there is an issue generating a COA automatically, please contact the designated Cargill warehouse contact for assistance.
- f. The Warehouse shall adhere to any customer specific loading/shipping requirements, which may include:
  - 3.3.3.f.1. Certificate of Analysis requests.
  - 3.3.3.f.2. Limited number of batches per shipment.
  - 3.3.3.f.3. Specific delivery times.
  - 3.3.3.f.4. Special placarding/bar codes.
  - 3.3.3.f.5. Pallet quantity or stacking requirements, etc.
  - 3.3.3.f.6. Sample request.
- g. All outbound shipments shall be sealed with a tamper evident seal. The only exception is for Less Than Truckload (LTL) shipments where a padlock or other locking device may be used in lieu of a tamper evident seal. Other requirements include:
  - 3.3.3.g.1. Warehouse personnel shall apply the seal in the presence of the driver.
  - 3.3.3.g.2. Multiple stop truckloads are to be sealed or locked at the time of shipment. The carrier is responsible for resealing or locking the load after the initial and subsequent deliveries are made.
  - 3.3.3.g.3. In a drop trailer situation, either leave the trailer secured at the warehouse dock or seal the trailer before moving it to the yard.
  - 3.3.3.g.4. Record the seal number on all documentation for both the driver's and warehouse's records and retain a copy signed by the driver.
  - 3.3.3.g.5. Seals shall be held in a designated and secure area (not available to drivers or other individuals).
- h. The carrier shall ensure Product is adequately loaded and necessary paperwork has been obtained prior to leaving the warehouse. The carrier shall follow Cargill transportation contracts to ensure product integrity is maintained during transit. A legible driver's signature shall be obtained on the BOL.
- i. Unless other arrangements have been provided in writing, all orders will be transmitted from ERP or from the designated Cargill warehouse contact to the Warehouse. All Warehouses are required to maintain copies of the BOLs/Order information on file for an agreed time period with Cargill.

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**3.3.4. Handling Complaints:** The Warehouse shall have a system for the management of complaints and complaint investigation regarding products and/or services provided. All complaints shall be recorded, adequately assessed, and investigated, where required. The results of any investigations shall be documented. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively, and records shall be retained. Communication on the investigations and corrective action plan may be required by Cargill.

**3.3.5. Inventory Records:** Each warehouse distribution facility shall maintain accurate records that clearly depict the flow of inventory into and through each facility. Inventory records shall be maintained daily and shall clearly reflect the quantity on hand at any point in time. Inventory records shall also be retained for at least one year after the annual physical inventory reconciliation. Although each Warehouse may have a unique system of recording inventory transactions, the following data requirements shall be included as a minimum:

**a. Receipt of Product**


- 3.3.5.a.1. Date received.
- 3.3.5.a.2. Product description.
- 3.3.5.a.3. Amount received.
- 3.3.5.a.4. Material number.
- 3.3.5.a.5. Inbound reference number/Stock Transfer Order (STO)/Freight Order Number/Purchase Order (PO) Number.
- 3.3.5.a.6. Batch/lot number.
- 3.3.5.a.7. Product temperature and/or condition.
- 3.3.5.a.8. Storage location
- 3.3.5.a.9. Quantity received of each particular product per batch/lot.

**b. Customer Shipments**


- 3.3.5.b.1. Date.
- 3.3.5.b.2. Customer name and, if applicable, customer address.
- 3.3.5.b.3. Sales order number, freight order number, etc.
- 3.3.5.b.4. Product description.
- 3.3.5.b.5. Material number.
- 3.3.5.b.6. Batch/lot quantity.
- 3.3.5.b.7. Batch/lot numbers and numbers of bags/boxes/units from each pallet shipped.
- 3.3.5.b.8. Carrier.
- 3.3.5.b.9. Temperature controlled loads shall have product and reefer temperatures recorded.

**c. Month End Reporting:** Inventory reconciliations are required as agreed upon with Cargill. A listing of current inventory balances (as of month end) and activity shall be forwarded to Cargill's warehouse contact. The inventory report shall reflect the following at a minimum: Material number, description, batch/lot, and quantity. Based on the inventory reconciliations, any deviations of material/ batch inventories shall be investigated and corrected. The frequency defined for inventory reconciliations is monthly unless alternative frequencies are contractually defined.



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- 3.3.6. Record Retention:** All Cargill related information shall be retained according to Cargill's Record and Information Management Policy (RIM). For defined Cargill requirements, contact the designated Cargill warehouse contact in the region where the Warehouse is located. In some regions, local or country laws shall be followed, if retention requirements are longer than Cargill's requirements. The records shall be legible and genuine.
- a. The Warehouse shall retain the following records for a minimum of five (5) years or for the duration of the shelf life, if it exceeds five (5) years:
    - 3.3.6.a.1. Batch/ Lot Arrival Cards/records
    - 3.3.6.a.2. Batch/ Lot Shipment Cards/records
  - b. By way of derogation from the five-year recordkeeping requirement above, Products subject to the application of the EU (European Union) REACH Regulation 1907/2006 shall be retained for a period of 10 years.
- 3.3.7. Audit Program:** The Warehouse shall collaborate in the Cargill PSQR warehouse audit program and execute on the audit action plan. Cargill, or third parties designated by Cargill, may periodically conduct an audit or inspection of the Warehouse. Such audits shall include product safety and warehouse inspection audits ensuring compliance to these requirements. Additional audit requirements may be specified within the Agreement. The warehouse shall provide Cargill or its third-party designee conducting the audit or inspection with reasonable assistance, including access to buildings, programs, records, appropriate personnel, and workspaces.
- a. The purpose of such inspections shall be to:
    - 3.3.7.a.1. Determine warehouse's compliance with all applicable laws and regulations and Cargill requirements;
    - 3.3.7.a.2. Determine the acceptability of the warehouse as a storage facility or distribution center for products; and
    - 3.3.7.a.3. Verify inventory counts and condition of products.
  - b. Cargill may conduct periodic audits of Products to determine current quality preservation. Stock inventory status may be altered by the results of the inspection.
  - c. Cargill may perform inspections at any reasonable time to determine the Warehouse's compliance with the requirements described in the manual as well as the day-to-day operational performance of the warehouse with regards to sanitation, sampling procedures, and inventory.
  - d. Cargill's audit, inspection, or failure to conduct any such audit or inspection, will not release warehouse from any of its obligations.
- 3.3.8. Traceability Requirements:** The Warehouse shall have a system of traceability for Products throughout receipt, storage, packaging, and shipping/distribution forward and backward. Warehouses shall be able to trace all Product and packaging through the warehouse and provide accurate inventories, as requested by Cargill. Product shall be able to be traced at a minimum by the following pieces of information: order numbers, product code(s), batch/lot number(s), pallet number(s) and Product status (list of on-hold products shall be available) and if applicable, the number of bags from each pallet. Full traceability should be achievable within 4 hours, and where not, justification for the longer traceability should be provided to Cargill PSQR on request. The traceability system shall be tested at least annually to ensure accuracy. Records shall be retained.
- 3.3.9. Management of Product Quality/Regulatory Quarantines:** The company shall have effective documented procedures to facilitate product quality/regulatory quarantine.
- a. This shall include, at a minimum:
    - 3.3.9.a.1. Identification of key personnel who constitute the quality /regulatory quarantine management team, with clearly identified responsibilities.

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- 3.3.9.a.2. An up-to-date list of key contacts.
- 3.3.9.a.3. A plan to handle the logistics of product traceability and packaging, recovery or disposal of affected product, and stock reconciliation.
- 3.3.9.a.4. A plan to record timings of key activities.
- 3.3.9.a.5. A plan to take and retain samples for testing, where appropriate.

b. These procedures shall be reviewed at least annually to ensure their effective operation.

**3.3.10. Regulatory Compliance:** Each Warehouse must have effective programs to address compliance with applicable laws and regulations that include, but are not limited to, the following:

- a. Mobile powered equipment safety.
- b. Hazard communication plan.
- c. Emergency response plan.
- d. Spill response and clean-up.
- e. Worker health and safety, including use of personal protective equipment.
- f. Transport of dangerous goods and associated training.
- g. Loading and securing packages/contents of containers/trucks.
- h. Unloading of containers/trucks.
- i. Handling, storing, and disposing of waste, including hazardous waste.
- j. Applicable environmental permits and registrations.
- k. Fire protection.
- l. Incident investigation.
- m. First aid and response.
- n. Site security.

**4. Revision History:**

**Version:    Date:                    Summary of changes:**

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**5. Authors and Contributors:**

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