

# **Subcontractor and Management Procedures**

## **Purpose**

This document outlines Tetra Corp's procedures for ensuring that subcontractors are informed of and comply with our environmental requirements. These procedures are designed to promote environmental responsibility, minimize environmental impact, and ensure that all subcontractors adhere to Tetra Corp's Environmental Policy and relevant environmental legislation.

### 1. Subcontractor Selection and Evaluation

- Pre-Qualification: Tetra Corp conducts a pre-qualification process for subcontractors to ensure they meet our environmental standards. This includes:
- Evaluating subcontractors' environmental practices and compliance with applicable environmental laws.
- Reviewing subcontractors' track records in sustainable operations and waste management.
- Ensuring subcontractors have the necessary environmental permits and certifications.
- Supplier Code of Conduct: All subcontractors are required to sign Tetra Corp's Supplier Code of Conduct, which includes provisions for environmental compliance and sustainability.

### 2. Environmental Induction and Training

- Induction Process: All subcontractors must undergo an environmental induction before commencing work. The induction process includes:
- A briefing on Tetra Corp's Environmental Policy and specific environmental requirements related to the project.
- An overview of relevant environmental laws, regulations, and best practices.
- Information on waste management, pollution prevention, and the use of eco-friendly products and materials.
- Ongoing Training: Tetra Corp provides ongoing environmental training for subcontractors as necessary to ensure they remain informed of our environmental practices and any updates to environmental requirements.

### 3. Environmental Performance Monitoring

- Site Inspections: Tetra Corp conducts regular site inspections to monitor subcontractors' compliance with environmental requirements. Inspections focus on:
- Waste management practices, including proper disposal and recycling.
- Pollution control measures, including the handling and storage of hazardous materials.
- Adherence to water and energy conservation practices.
- Reporting: Subcontractors are required to submit regular environmental performance reports to Tetra Corp. These reports should detail:

- Waste reduction efforts and recycling outcomes.
- Any environmental incidents or near misses, along with corrective actions taken.
- Progress on meeting environmental goals and objectives set for the project.

#### 4. Communication and Collaboration

- **Regular Meetings:** Tetra Corp holds regular meetings with subcontractors to discuss environmental performance, challenges, and opportunities for improvement. These meetings provide a platform for open communication and collaborative problem-solving.
- **Environmental Action Plans:** For large-scale projects, Tetra Corp works with subcontractors to develop environmental action plans that outline specific measures to minimize the environmental impact of their work. These plans include targets for waste reduction, pollution control, and resource conservation.

#### 5. Compliance and Enforcement

- **Non-Compliance Protocols:** In the event that a subcontractor fails to comply with Tetra Corp's environmental requirements, the following steps will be taken:
- **Initial Warning:** The subcontractor will receive a written warning outlining the non-compliance issue and required corrective actions.
- **Corrective Actions:** The subcontractor must implement corrective actions within a specified timeframe to address the non-compliance issue.
- **Termination:** Continued non-compliance or failure to implement corrective actions may result in the termination of the subcontractor's contract.
- **Incident Reporting:** Subcontractors are required to report any environmental incidents (e.g., spills, pollution) immediately to Tetra Corp management. All incidents will be investigated, and corrective measures will be implemented to prevent recurrence.

#### 6. Continuous Improvement

- **Feedback Loop:** Tetra Corp actively seeks feedback from subcontractors regarding environmental practices. This feedback is used to identify opportunities for improvement in environmental management procedures and training.
- **Regular Audits:** Tetra Corp conducts regular audits of subcontractors' environmental performance to ensure continuous improvement and alignment with industry best practices.

#### 7. Record-Keeping and Documentation

- **Environmental Records:** Subcontractors are required to maintain detailed records of their environmental activities, including waste management logs, incident reports, and training attendance.
- **Documentation Review:** Tetra Corp reviews subcontractors' environmental documentation during site inspections and audits to verify compliance with environmental requirements.



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### **Acknowledgment**

By working with Tetra Corp, subcontractors agree to comply with this Subcontractor and Management Procedure for Environmental Compliance and to uphold the environmental standards set by Tetra Corp.