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# Brunel Energy, Inc.

## Personal Protective Equipment

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### 1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, “the Company,” has established a Personal Protective Equipment Program compliant with the OSHA 1910.132 standard.

### 2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
  - 2.1.1. On or in, any Company or client property, including parking areas; or
  - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

### 3. Definitions

- 3.1. **Personal Protective Equipment (PPE)** is equipment (including clothing affording protection against the weather) and is intended to be worn or held by a person at work which protects against one or more risks to their health or safety. Examples include, but are not limited to:
  - 3.1.1. Safety helmets
  - 3.1.2. Gloves
  - 3.1.3. Hearing Protection
  - 3.1.4. Eye and Face Protection
  - 3.1.5. Visibility clothing
  - 3.1.6. Safety footwear
  - 3.1.7. Respiratory Protection
  - 3.1.8. Safety harness (fall protection) & associated equipment
- 3.2. **Donning** is putting on a specific piece of PPE.
- 3.3. **Doffing** is taking off a specific piece of PPE.
- 3.4. **PPE Assessment** is a process of identifying hazards associated with a work task and recommending PPE along with other relevant protection measures to reduce the risk from hazards.

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#### 4. Responsibilities

##### 4.1. Manager(s):

- 4.1.1. Management is responsible for implementing, supporting, and enforcing the requirements of this policy in their locations.
- 4.1.2. Managers shall conduct a workplace PPE assessment for exposures and recommend PPE where needed.
- 4.1.3. Managers shall ensure every affected employee knows how to use their PPE correctly and that use the required PPE when performing tasks.

##### 4.2. HSE Supervisor(s):

- 4.2.1. Supervisors are responsible for assisting management in the implementation of this policy.

##### 4.3. Employee(s)

- 4.3.1. Shall wear proper PPE and never perform a task for which PPE is required but not available.
- 4.3.2. Always wear and use the required PPE correctly.
- 4.3.3. Never use PPE that is defective or damaged.

##### 4.4. Subcontractor

- 4.4.1. Shall wear proper PPE and never perform a task for which PPE is required but not available.
- 4.4.2. Always wear and use the required PPE correctly.
- 4.4.3. Never use PPE that is defective or damaged.

#### 5. Requirements

- 5.1. A PPE assessment lists the types of hazards that are to be assessed to determine the appropriate PPE. Each PPE assessment checklist should be reviewed to ensure all applicable work tasks are assessed.

#### 6. Procedure

##### 6.1. Personal Protective Equipment

- 6.1.1. All work clothing and PPE provided shall comply with a recognized and appropriate industry standard and be certified as such.

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- 6.1.2. The company shall provide PPE to be used and maintained in a sanitary and reliable clean condition, wherever it is necessary by reason of hazards of processes or environment, including; chemical hazards, radiological hazards or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.
- 6.1.3. Where employee-owned equipment is permitted, the Company shall be responsible for the assurance of its adequacy, maintenance, and sanitation.
- 6.1.4. Employees shall wear tight cuffed protective gloves or mitts and proper fitting PPE. Loose clothing is not permitted. Employees shall never work around rotating equipment wearing loose clothing or improperly fitted PPE.
- 6.1.5. Coveralls shall be worn which are of a good fit and in good condition, without tears or flapping/loose parts. The coveralls should be blue or site-specific colors, have reflective strips, and be worn properly.
- 6.1.6. Shorts shall not be allowed as outerwear.
- 6.1.7. PPE shall be maintained as per country regulations, and manufacturer's standard.
- 6.1.8. Employees shall have a spare set of work clothes easily accessible and shall promptly change into them if their clothing becomes contaminated.
- 6.1.9. Employees shall wash or discard clothing which has been contaminated with oil or a hazardous chemical (this does not apply where willful damage has been caused by the worker).
- 6.1.10. Suitable work clothing shall be worn for the existing environmental conditions and the work being performed, for example appropriate rain wear is required for wet conditions.
- 6.1.11. In areas where fire or explosion hazards exist, an employee shall wear proper fitting approved fire-retardant clothing.
- 6.1.12. PPE shall be sized and properly fitted to each employee requiring specific PPE including proper donning, doffing, cleaning, and maintenance.
- 6.1.13. Defective or damaged PPE shall not be used and should be discarded and/or removed from service.
- 6.1.14. All personnel shall be competent in the use and general maintenance of PPE.
- 6.1.15. Worksites are designated as mandatory wearing of hard hat, eye protection and safety footwear locations. At the discretion of the site supervisor, other protective clothing or equipment may be required as identified during hazard identification or PPE assessment.
- 6.1.16. Personnel who are newly assigned to a worksite shall be issued a green hard hat. This provision shall last for 3 work cycles and is to assist experienced colleagues to provide such personnel with particular care and attention, particularly in the event of an emergency.

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- 6.1.17. Where qualified medical personnel, such as Medics, are available, then such personnel shall be provided with distinctive and identifiably colored hard hats with appropriate markings.
- 6.1.18. Employees shall receive training regarding the policies, procedures, and expectations for the wearing of PPE during at the time of initial hire.
- 6.1.19. A certified hazard assessment shall be completed to determine if hazards are present or are likely to be present, which necessitate the use of PPE. The person conducting the hazard assessment must include their name, signature, date, and identification of assessment documents.
- 6.1.20. If hazards are present, or likely to be present, the employer shall select and have each affected employee use the type of PPE necessary, communicate selection decisions and select PPE that properly fits each affected employee.
- 6.1.21. Shirts shall be long sleeved (no cut-offs, singlets, or tank tops) and cover the trunk area.
- 6.1.22. Clothing worn shall be in good condition without tears or loose material that could get caught in rotating or reciprocating equipment. Clothing made of synthetic materials should be avoided.
- 6.1.23. Long sleeved shirt/coveralls (worn outside of boots) and rubber aprons shall be worn when mixing acids or alkalis.
- 6.1.24. Jewelry or other similar loose items shall NOT be worn.
- 6.2. Head Protection
  - 6.2.1. A protective safety hat (non-metallic), manufactured to recognized international standards, shall be worn by all personnel at worksites.
  - 6.2.2. Hard hats shall be secured to the wearer when working.
  - 6.2.3. Bump caps are not an acceptable form of hard hat.
  - 6.2.4. Five white hard hats labeled 'Visitor' shall be kept at the facility/worksite for use by personnel, if required, when not assigned to the facility/worksite and visiting for less than a day.
- 6.3. Hearing Protection
  - 6.3.1. Hearing protection devices designed to recognized international standards, either compressible foam, hard mounted silicone ear plug inserts or earmuffs, shall be worn in work areas where noise levels exceed 85 decibels (dB), or a noise warning sign is displayed.
  - 6.3.2. Hearing protection devices as described above shall be provided in areas identified to have noise levels in excess of 85 decibels.
  - 6.3.3. Supervisors shall assess the appropriate type of device dependent on the task, previous risk assessments and noise surveys.

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#### 6.4. Eye Protection

- 6.4.1. Eye protection manufactured to recognized international standards shall be worn at worksites.
- 6.4.2. Supervisors shall assess the most appropriate type, depending on the task or previous Task Risk Assessment.
- 6.4.3. The following are levels of protection required for associated work processes:
  - 6.4.3.1. Level 1: High Impact – Molten Metal: Impact Goggles and Full-Face Mask
    - 6.4.3.1.1. Short blasting, power nail or staple drivers.
    - 6.4.3.1.2. Water blasting, chipping paint, scale, rust, slag, etc.
    - 6.4.3.1.3. Chipping metal, use of high-speed metal saw
    - 6.4.3.1.4. Use of grinding abrasive disc/wheel cutters, driving out/cutting of rivets, pins, cutters bolts, nuts, lugs, dies with punch/drift.
  - 6.4.3.2. Level II Splashing of Materials: Chemical Goggles and/or Face Mask/PVC Aprons for chemical products handling to include:
    - 6.4.3.2.1. Handling open vessels of acids, alkalis, corrosive or hazardous materials.
    - 6.4.3.2.2. Handling chemicals, chemical containers, sacks, drums, pallets, or packaging.
    - 6.4.3.2.3. Work on pumps or tanks with previous hazardous chemical content.
    - 6.4.3.2.4. Wash down glue gun.
  - 6.4.3.3. Level III: Low Impact / General Process: Safety Glasses with Slide Shields to include:
    - 6.4.3.3.1. Movement around the worksite and tasks that do not involve those activities in Level I or II.
    - 6.4.3.3.2. If eye protection gets dirty or impaired due to work process or environment employees shall stop and clear vision. Shaded lenses shall only be used during bright sunlight conditions and changed to clear lenses during the hours of darkness.

#### 6.5. Hand Protection

- 6.5.1. Gloves shall be worn when performing all tasks especially those involving wire rope, steel plate, cargo, tubular, wood, and other processes where hands can be injured due to sharp edges or splinters.
- 6.5.2. Rubber gloves with gauntlets shall be worn when handling hazardous chemicals.
- 6.5.3. Leather Welding gloves with gauntlets shall be worn when using welding equipment or Oxy/Acetylene Equipment.
- 6.5.4. Gloves with gauntlets shall NOT be worn around moving machines.

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## 6.6. Safety Footwear

- 6.6.1. All personnel at worksites shall wear safety footwear manufactured to internationally recognized standards, incorporating a protective toe cap, adequate sole grips, covering the top of foot. Steel toe running shoes shall not be worn on worksites.
- 6.6.2. Catering personnel shall wear safety footwear at work.

## 6.7. Respiratory Protection

- 6.7.1. Respiratory protection manufactured to recognizable international standards shall be worn when there is risk of exposure to harmful substances.
- 6.7.2. Supervisors shall assess the most appropriate type of dependent on the task, Material Safety Data Sheet (MSDS) requirements or previous Task Risk Assessment.
- 6.7.3. In H2S or similar situations personnel shall be required to wear respiratory protective equipment and shall therefore be 'clean shaven' where the facepiece of the equipment seals with the skin of the face. The following are levels of protection for associated work processes.
  - 6.7.3.1. Level 1: Vapors and Fumes: Full and Half Face Respirators – Processes include:
    - 6.7.3.1.1. Spray painting, mixing chemicals where label or MSDS indicates.
    - 6.7.3.1.2. Welding on galvanized metal.
    - 6.7.3.1.3. Using solvents or Electra-clean in confined spaces.
    - 6.7.3.1.4. Must ensure the filter cartridge on the respirator is suitable for application. Clean and store respirators after use in sealed plastic bag or container to ensure long life cartridge.
  - 6.7.3.2. Level II: Dust Particulate Filters – Disposable Masks
    - 6.7.3.2.1. Mixing chemicals where label or MSDS indicates
    - 6.7.3.2.2. Grinding or chipping paint or rust.
    - 6.7.3.2.3. Mixing cement.

## 7. Training

- 7.1. Training shall be documented, and records retained for all employees who have been issued PPE.
- 7.2. Training will include the selection, use and care of PPE. Training will also include but not limited to, proper donning and doffing, adjustment of PPE, wearing of PPE, the limitations of PPE and proper disposal of PPE.
- 7.3. Training shall be conducted at initial hire and annual refresher training thereafter. Retraining of employees shall be required when the workplace changes, making the earlier training obsolete, the type of PPE changes or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.

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**8. Recordkeeping**

8.1. Completed PPE Assessment forms shall be kept in the corporate office.

**9. Appendix**

9.1. PPE Assessment Form – Appendix 9.1

**10. Reference**

10.1. OSHA 1910.132



<b>PPE ASSESSMENT</b>											
LOCATION:	RESPONSIBLE SUPERVISOR:								DATE:	REVISION:	
JOB TITLE:	WORK AREA:								DATE:	REVISION:	
TASK	HAZARD	SOURCE	BODY PART AFFECTED							REQUIRED PPE	PPE SPECIFICATION
			HANDS	EYES	FACE	BREATHING	EARS	SKIN	HEAD		
<b>COMMENTS / NECESSARY MONITORING:</b>											
<b>HSE RESPONSIBLE SIGNATURE:</b>											
Employee Acknowledges receiving PPE upon New Hire Orientation:											
<b>Print:</b>											
<b>Sign:</b>											
<b>Date:</b>											