
	STANDARD OPERATING PROCEDURE	Document ID	TNCL-ENV-SOP-0004
		Document Owner	Environmental Manager
	CHEMICALS AND HAZARDOUS MATERIALS MANAGEMENT PROCEDURE	Revision	01
		Approval Date	17 th October 2025



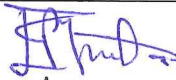
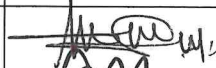



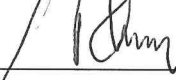


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1. PURPOSE

To manage all Chemicals and Hazardous Materials used at TNCL and reduce potential risks and adverse impacts to employees, contractors, visitors, stakeholders, and the environment. The measures outlined in this procedure will ensure that Chemicals and other Hazardous Materials are managed in accordance with the Industrial and Consumer Chemicals (Management and Control) Act of 2003 and its Regulations, TNCL Environmental Policy, Environmental Management Plan (EMP) and Environmental Impact Statement (EIS).

2. SCOPE

This procedure applies to the whole TNCL project area, including contractors & visitors and is relevant to all hazardous materials except radioactive sources and pharmaceuticals.


3. RESPONSIBILITIES

3.1 Environmental Department

- i. Before purchasing any new Chemical/Hazardous Material, Introduction of new chemical form shall be filled by the user department and submitted together with SDS to Environmental and OHS departments for review and advice.
- ii. Ensure all chemicals are stored in their original containers and as per the SDS.
- iii. Ensure chemicals are stored as per compatibility.
- iv. Ensure risk assessments of hazardous waste transported on or off site is done.
- v. Keep updated records of type, storage locations, quantities and permits for all hazardous wastes.
- vi. Conduct periodic inspections to ensure chemicals are stored as per the Industrial and Consumers (Management and Control) Act, 2003 and its regulations requirements.
- vii. Perform an external audit (by qualified professionals) on chemicals and other hazardous materials handling and management.
- viii. Ensure timely submission of the monthly Precursor Chemicals reports to the GCLA.

3.2 OHSS Department

- i. Develop the New Product Entry Form for introduction of new Chemicals / Hazardous Materials, ensure that proper controls are defined prior to the chemical


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is permitted on site.

- ii. Coordinate with Training section on Hazardous Material training for TNCL employees and contractors.
- iii. Provide advice to employees on hazardous materials based on potential exposure and type of work.
- iv. Include chemicals spill as one of the risks and include in the Emergency Response Plan for the site.

3.3 Supply Chain Department

- i. Only purchase Chemicals/Hazardous Materials which have been approved by relevant authorities.
- ii. For new chemicals / hazardous materials, signed application to introduce new chemicals onsite shall be accompanied by user department during purchase.
- iii. Only purchase and accept from vendors (or distributors) Chemical/Hazardous Materials that provide a complete SDS and that material has been properly labelled and packed.
- iv. Share the SDS of the chemical/hazardous materials to the requestor **PRIOR** delivery of the chemical/hazardous materials so that the team can read and understand precautionary measures to be taken upon receiving them.
- v. Ensure all drivers who deliver Chemicals/hazardous materials on site are well trained on hazardous materials and chemical spills management and have certificates.
- vi. Ensure transportation of Chemical/Hazardous Materials follows Tanzania laws (as a minimum) and International best practices for transportation of Hazardous Materials.
- vii. Audit transportation service providers to ensure they comply with the requirements of this procedure.
- viii. Inspect all Chemicals/Hazardous Materials to ensure they are delivered in good condition, and in proper containers with labels.
- ix. Inspect and maintain all warehouse storages of Chemical/Hazardous Materials and manage storage compatibilities.
- x. Observe Min/Max and quantities storage prior re-ordering Chemicals/Hazardous Materials and FIFO issuing practice so as to avoid having a bunch of expired chemicals in the warehouse.


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3.4 Other / user departments & contractors

- i. Fill the permit to introduce new chemical form for new chemicals to be purchased. The Permit shall be attached with the SDS for the new chemical in question and submitted to Environmental and OHS departments for review and approval.
- ii. Follow all guidelines for storage, use, handling, and disposal of chemicals and other hazardous materials as specified in this procedure.
- iii. Ensure availability of SDS hard copies for each Chemical/Hazardous Material used in your work areas.
- iv. Ensure all personnel involved in hazardous materials handling have adequate training.
- v. Ensure compliance with all the requirements of this procedure.

3.5 Area Supervisors

- i. Before beginning any job involving the use of Chemical / Hazardous Material, ensure employees have been trained in all hazards to which they will be exposed, providing the following information:
 - a) Specific chemical dangers involved with the task.
 - b) Personal Protective Equipment to be worn.
 - c) Safety measures need to be applied.
 - d) Ventilation and monitoring of the area during the task.
 - e) Presence of a backup person.
 - f) Emergency procedures.
 - g) Personal Protective Equipment for the job.
 - h) First aid.
 - i) Any other information on hazardous materials safety.
- ii. Ensure employees are well trained in handling Hazardous Materials.
- iii. Ensure that employees follow safe practices and procedures when working with Hazardous Materials.
- iv. Ensure that all Hazardous Materials are properly labelled (with its chemical names and not trade names) when being stored, used, or transported.
- v. Report and investigate all chemical accidents and unsafe conditions, and ensure all corrective actions are completed.


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3.6 Employees / Contractors / Sub-Contractors / Visitors

- i. Do not handle, work with, or use any chemical/hazardous material if you do not have adequate training.
- ii. Do not handle or use any chemical/hazardous material that has not been properly labelled or Labelled in a Language you don't understand.
- iii. Review and understand the SDS of the chemical/hazardous material used in your work area.
- iv. Wear the proper personal protective equipment (PPE) when working with chemical/hazardous materials.
- v. Report all spills or any chemicals unsafe conditions that do not conform to this procedure to your supervisor or to environmental department.

3.7 Training Section


- i. Training section shall ensure an overview of Chemical/Hazardous Substances Management and the related products are provided as part of the specific area induction.
- ii. Ensure Employees who are working with / exposed to specific chemicals / Hazardous materials or dangerous goods are periodically trained, assessed and competent in hazardous materials handling, including:
 - a) Hazard recognition.
 - b) How to protect themselves while handling hazardous materials.
 - c) How to access, read and understand SDS.
 - d) How to read chemical labels and placards.
 - e) Safe handling of hazardous waste.
 - f) Proper storage and transport of Hazardous Materials
 - g) Spill and Emergency response procedures.
 - h) Limits of exposure.
 - i) Personal Protective Equipment to be used.
 - j) Symptoms of exposure.
 - k) First aid treatment for exposure.

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- iii. This training shall be held for all people handling Hazardous Materials on site and shall include re-training at intervals not more than 24 months. HazMat awareness training is also included as part of new hire induction programs, annual refresher training and specialty courses.
- iv. Train employees in NFPA and HMIS code and use as well as HAZMAT classifications.

4. ABBREVIATIONS / GLOSSARY OF TERMS

Abbreviation	Meaning
TNCL	Tembo Nickel Corporation Limited
GCLA	Government Chemist Laboratory Authority
PPE	Personal Protective Equipment
SPCC	Spill Prevention & Countermeasure Control
OHSS	Occupational Health and Safety and Security
SDS	Safety Data Sheet
NFPA	National Fire Protection Association
HMIS	Hazardous Material Identification System
TANROADS	Tanzania National Roads Agency
EIS	Environmental Impact Statement
FIFO	First In, First Out
Hazardous Materials (HazMat)	Any solid, liquid, gaseous, chemical, waste, medicine, drug, plant, animal, or microorganism which is likely to be injurious to human health, life, or the environment. This term includes hazardous chemicals, substances and waste regulated by Tanzania. Government Chemist Laboratory Agency.
SDS (Safety Data Sheet)	Document containing information related to the identification of the substance, preparation, composition, information on the ingredients, hazard identification of the product, first aid, firefighting measures, handling and storage, exposure controls and personal protection, Toxicological information, and disposal consideration.
Restricted chemical	Limited ban of a chemical for which virtually all registered use has been prohibited by the Board but certain specific registered use or uses remain authorized.

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Hazardous waste	Any solid, liquid, gaseous or sludge waste which by reason of its chemical reactivity, environmental or human hazardousness, its infectiousness, toxicity, explosiveness, and corrosiveness is harmful to human health, life or environment.
Industrial chemical	Any chemical or product used or intended for use in industrial process.
Precursor Chemicals	Means Chemicals used in the manufacturing of narcotic drugs or psychotropic substances as provided for under the International Drug Control Convention.

5. PROCEDURE:

5.1 General


- i. All new Hazardous Materials will first be cleared with the GCLA for permitting through the Supply Chain Department prior to purchasing and importation into the country.
- ii. Personnel who use or handle Hazardous Materials must wear the prescribed Personal Protective Equipment (PPE). Also, they must be trained on the use of the material before being exposed to it.
- iii. SDS must be available and accessible to all personnel working with Hazardous Materials in the work area.
- iv. Emergency contacts information must be posted at visible places in areas where Hazardous Materials & Chemicals are used and must be known by all who manage Hazardous Materials.
- v. All chemical containers, bottles or cans must be stored in the approved storage for hazardous waste for disposal.

NOTE: Chemical / Hazardous Materials containers shall NOT be re-used for storing liquids / items for human consumption.

5.2 Inventory of Chemicals & Hazardous Materials

An inventory of Hazardous Materials used at TNCL shall be maintained by supply chain Department, and copy submitted to environment and OHS departments. The inventory shall have all important chemicals information, including:

- a) Chemical name.
- b) Hazard Levels and HazMat Classification.
- c) The storage location in the warehouse.

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- d) Date received onsite.
- e) Quantity available.
- f) Expiry date.

5.3 Labeling and Placarding

- i. Hazardous materials will be appropriately labeled and placarded, following the criteria of the Tanzania Legal requirement (GCLA), the National Fire Protection Association (NFPA) or Hazardous Material Identification System (HMIS).
- ii. If any chemical is transferred to a secondary container, the secondary container must also have adequate labels and/or placards as per HMIS.
- iii. Piping systems containing hazardous chemicals and compressed gases must be labeled using legends, chemical names, and / or color coding.

5.4 Purchasing and Shipment of Chemicals & Hazardous Materials

All TNCL chemicals are to be purchased through Supply chain who must ensure compliance with GCLA and the Industrial and Consumer Chemicals (Management and Control) Act, 2003, and its regulations requirements.


5.5 Transport

The transport of Chemicals / Hazardous Materials by TNCL, contractors and subcontractors, must be carried out in full compliance with relevant legislative requirements including:

- i. Tanzanian roads transportation requirements (by TANROADS).
- ii. The Industrial and Consumer Chemicals (Management and Control) Act, 2003 and its regulations requirements.
- iii. UN Transport of Dangerous Goods (2015).
- iv. This procedure.

5.6 Storage


- i. All Chemicals and HazMat shall be stored in accordance with relevant Tanzanian legislative requirements, industry standards and the manufacturer's recommendations.

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- ii. Supply Chain in collaboration with the end user shall be responsible for inspection, monitoring and maintenance of chemical and HazMat storage sheds.

Storage practices shall properly address the following:

- i. All stored Chemicals & HazMat must be properly labeled following NFPA, HMIS or equivalent system and have their corresponding SDS in a visible & accessible place.
- ii. All storage sheds / areas must be marked and clearly delineated.
- iii. Develop a stock rotation system to use and store all HazMat and Chemicals based on the principle: "first in, first out (FIFO)".
- iv. All Hazardous Materials must be stored according to their compatibility features and physical requirements (i.e.: isolation, ventilation, climate conditions, spacing, reactivity etc.). Incompatible materials must be separated.
- v. Before any Hazardous Materials are accepted for storage, the integrity of the packaging must be checked. Any damaged container jeopardizes the integrity of the material and safety of employees; and potential spills/leaks must be addressed with the transporter and distributor.
- vi. Storage areas shall protect HazMat from weather, heat, or any other agent that may affect their integrity.
- vii. Storage areas must be accessible for emergency response, well-ventilated, and clearly placarded.
- viii. Placards should be posted on two exterior walls of storage facilities, main entry access, and other visible areas.
- ix. Used and empty containers shall be properly stored for disposal by environmental department after consultation with GCLA. All used containers should be properly stored in designated areas until final disposal or recycling. Care should be taken not to mix incompatible materials even though they are considered "empty".
- x. Chemicals and Hazardous Materials stored shall be inspected regularly by the end user and the warehouse to ensure that its shelf life has not exceeded prior use (Expired). If no justification is found when shelf life is about to be exceeded or has exceeded, the Hazardous Materials in storage shall be returned to the manufacturer/distributor (if possible), recycled, discarded, or disposed of

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following GCLA's recommendations.

5.6.1 Inspections of Bunded Areas (secondary containment)


Area supervisors responsible for the management of chemicals and other hazardous materials within their areas shall ensure:

- i. Trapped rainwater does not compromise the availability of the bund area. If the bund storage is compromised by rainwater, then immediate action must be taken to remove all water within the bund. All bunded areas shall be roofed to prevent accumulation of rainwater.
- ii. The bund does not contain rubbish or combustibles (paper, rags, wood etc.) at all times.
- iii. Collection sumps are kept free of material/liquid. Cleaning through collection of solids via sweeping and shoveling (dry methods) from inside bunded (secondary containment) areas shall be encouraged over the use of water.
- iv. Sump drainage valves are to be locked in the closed position. A sign stating "Drain valve to be kept closed and locked at all times" is to be positioned by the drain valve.
- v. Bund walls do not contain any cracks/fractures that will compromise its integrity.

5.6.2 Disposal of Chemicals and Hazardous Materials

- i. No one is allowed to dispose any hazardous waste (Expired/Obsolete chemicals or other hazardous materials) at TNCL.
- ii. All hazardous waste (Expired/Obsolete) chemicals, hazardous materials and residues shall be well stored as per Industrial and Consumer Chemicals (Management and Control) Act of 2003 and its Regulations requirements; and disposed upon authorization and recommendations from GCLA. Depending on the chemical type and volume, the disposal methods may include disposal to tailing dam, landfill, high-temperature incineration, or encapsulation using the paste backfill plant.

NOTE: In an effort to minimize the amount of expired / obsolete chemicals produced at TNCL, any department /contractor that will produce expired chemicals,

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will need to fill in an incident report. This will help to understand the root cause for having expired/obsolete chemicals on site.

5.6.3 Chemicals/Hazardous materials storage bund areas

The bund or secondary containment area for chemicals/Hazardous material shall:


- i. Be impermeable.
- ii. Be able to contain >110% of the volume of the largest storage vessel or inter-connected system, and at least 25% of the total volume stored.
- iii. Be graded or include a sump to allow recovery of liquid.
- iv. Be chemically resistant to the substances stored.
- v. Be designed such that jetting from any storage vessel or fitting will be captured within the bunded area.
- vi. Be designed in such that chemicals are stored according to compatibility; and
- vii. Be well controlled in such that the capacity of the bund is maintained at all times.

5.7 Personal Protective Equipment (PPE)

- i. No one shall work with / handle chemicals / hazardous materials without proper PPEs.
- ii. Area supervisor must ensure that all required PPEs for handling chemicals and other hazardous materials are made available for the employees working with such hazardous materials.
- iii. Correct PPE signage shall be displayed and well maintained in all areas where the chemicals / hazardous materials are stored or used.
- iv. All PPEs, Safety and Emergency Equipment (including spill kits) shall be checked periodically and well maintained.
- v. Inspections shall be documented with any faults or defects reported and rectified. All PPE and safety equipment shall meet the relevant standard.

6. CHEMICALS SHELF LIFE

All chemicals purchased by TNCL, or contractors, shall have a shelf life of at least 2 years to minimize incidents of expired/obsolete chemicals on site.

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7. PRECURSOR CHEMICALS

All precursor chemicals stipulated in the seventh schedule of the Industrial and Consumer (Management and Control) Act ,2003 purchased and used at TNCL shall be properly recorded and well tracked; Monthly reports shall be submitted to GCLA via GCLA's Customer Chemicals Management Portal.

8. EMERGENCY

- i. Emergency response will be triggered by the notification of any fire, major chemical/hazardous materials spill, leak, contamination, or misuse of any hazardous material which may adversely threaten/affect life, property, or the environment. The type of response will depend on the size, type, and location of the reported incident.
- ii. Following every emergency response event or scenario involving hazardous material, a review shall be conducted to identify gaps/deficiencies and communicate these to the appropriate department. Actions identified from the review should be closed and filed.

9. PREMISES INSPECTIONS


All Chemicals and Hazardous Materials premises/storages shall be inspected on Monthly basis by Environment team to ensure conformity to the Industrial and Consumer Chemicals (Management and Control) Act 2003 and its Regulations requirements.

10. OHSS COMPLIANCE

Refer to TNCL-OHS-SOP-0012, HAZARDOUS CHEMICAL AGENTS' MANAGEMENT for information on compliance with OHS requirements.

11. REVIEW

This Procedure will be reviewed and updated whenever changes to the Sustainable development Policy, practices, Significant Environmental Risks, Objective and Targets, or procedures are made that may affect it. In addition, this document will be reviewed for adequacy and appropriateness at least annually and updated as necessary. All modifications will be reviewed with affected personnel, and controlled copies of this document will be updated.

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12. SYSTEM EVALUATION

This procedure shall be reviewed at least after two years by members of Environmental Department and presented to the Standard Committee for approval, or when organizational changes take place or required as part of internal and external audits. The TNCL Document Controller will monitor compliance with the document control system on an ongoing basis.

13. DISTRIBUTION

List physical locations which require a controlled copy of this document.

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

14. CONTRAVENTION

Any breach of this procedure shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary procedure.


15. DOCUMENT CHANGE PROCESS

The process of document change starts when the document custodian identifies there is need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off and submit it to the Document Controller.

The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.

15.1 Reason for Change

A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of risk assessments
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Changes in legislation	I	New document format
E	Changes in technology	J	To integrate special instruction into the document control system


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15.2 History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer
17.10.2025	01		I, H	Naziel Eliakimu

16. RECORD CONTROL

Document Title:	Document ID:	Responsible for Maintenance :	Responsible for Filling:	Location of Storage:	Retention Period:	Method of Disposal:
Chemicals and Hazardous Materials Management Procedure	TNCL-ENV-SOP-0004	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic

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17. DECLARATION

I hereby declare that I have taken part in the discussion of this procedure, and I understand its contents and do commit that I shall ensure compliance hereto:

	Name and Surname	Company Number	Designation Role /	Signature	Date Signed
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