



Corporate Policies

SECTION

POLICY-P

EFFECTIVE DATE

09-09-21

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Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		05-01-19
Quality Assurance Officer	Jim Sumner		05-01-19

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
08-09-04	0	Internal	Kelley Keenan (ETS)	Original document
06-01-11	1	Internal	Kelley Keenan (ETS)	<ul style="list-style-type: none"> Corrected typographical errors.
10-01-17	2	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Updated policy to NELAP format.
07-19-18	3	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Updated policy to include rehire requirements.
05-13-19	4	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Updated policy to include Security and Building Keys requirements.



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Introduction

The policies stated in this handbook are guidelines, only, and with the exception of the “at-will employment” policy, are subject to change at the sole discretion of Environmental Testing Solutions, Inc. (ETS). From time to time, ETS will provide updated information on changes in policies. If you have questions regarding any policies, please contact your supervisor.

This handbook is not a contract, express or implied, and it does not guarantee employment for any specific duration. Although we hope that the employment relationship with ETS will be long term, either you or ETS may terminate this relationship at any time, for any reason, with or without cause or notice.

At-Will Employment

Employment with ETS is “at-will”. This means you are **not** promised employment for a specific duration, and you, or ETS may terminate the employment relationship at any time for any reason without notice. No supervisor, manager or other representative of ETS, other than the owners have the authority to enter into any agreement with any employee for employment for a specified period of time or to make any promises or commitments contrary to “at-will” status.

Equal Opportunity

ETS strives to ensure that all personnel decisions are in the best interest of our customers and our employees. As such, all personnel actions are made based on an employee's skills, qualifications, conduct, and work habits. ETS provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, genetic information, citizenship, or active military or veteran status, in accordance with applicable federal laws. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, benefits compensation, and training.

Individuals with Disabilities

ETS complies with applicable federal and state laws providing for nondiscrimination in employment against qualified individuals with disabilities. Environmental Testing Solutions, Inc. also provides reasonable accommodation for such individuals in accordance with these laws.

Qualified individuals with disabilities may make requests for reasonable accommodation to a member of ETS management. Upon receipt of an accommodation request, management will meet with the requesting individual to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Environmental Testing Solutions, Inc. might make to help overcome those limitations.

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Environmental Testing Solutions, Inc. management will determine the feasibility of the requested accommodation, consistent with applicable law and will inform the employee of ETS's decision on the accommodation request or on how to make the accommodation.,

Employee Classifications

For purposes of salary administration and eligibility for benefits, ETS classifies its employees as follows:

Regular Full-Time Employees: Regular full-time employees work between 32-40 hours per week and have completed ninety (90) days of employment.

Regular full-time employees are not guaranteed 32-40 hours of work per week. Work will be scheduled based on work flow and volume and if the work flow and/or volume are reduced, full-time employees will be asked to take unpaid leave.

Regular full-time employees are eligible for benefits including vacation, sick time, holiday pay, and health/dental benefits after the initial ninety (90) days of employment. Reduction in hours based on work flow does not affect a full-time employee's employment classification, however vacation and other accruals will be based only on hours worked.

Regular Part-Time Employees: Regular part-time employees work less than 32 hours per week. Part time employees are not eligible for benefits.

Interns: Interns work up to 20 hours per week with ETS while working through a University to fill a class requirement or to graduate. An intern is not eligible for benefits.

For purposes of wage and hour laws, including classification for overtime pay purposes, employees are also classified as Exempt or Non-Exempt

Exempt employees: Exempt employees are not paid overtime, in accordance with applicable state and federal law, for work performed beyond forty hours in a workweek but whose salary represents payment for all hours. Exempt employees are usually compensated on a salary basis.

Non-Exempt employees: Non-exempt employees are required to be paid overtime at the rate of one and one half the basic regular rate of pay for each hour worked beyond forty (40) in a workweek.

Probationary Employees: Each new employee will go through a 90-day evaluation period. This will give the employee and supervisor an opportunity to discuss performance, training and expectations. This ninety (90) day evaluation period is not a guarantee of employment. At any time during this evaluation period the employee or employer may terminate employment.

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Payroll and Time Procedures

Clocking In and Out: Each employee will be required to clock in at the beginning of each working day, clock out/in for lunch breaks and out for the end of the working day. Employees are prohibited from clocking in before the scheduled shift start time. Supervisor's advance permission is required to clock in more than ten (10) minutes early or clock out more than ten (10) minutes late. If you do not remember to clock in/out, then that time will need to be entered by management. Employees may only clock in or out for themselves. Clocking in or out for another employee will result in discipline, up to and including termination.

Task Completion: Employees who believe they cannot complete the day's assignment within the scheduled work day (by the end of the shift) must notify the supervisor at least one hour prior to the end of the shift.

Pay Periods: ETS's pay period runs from each Sunday through the following Saturday. Employees are paid for time worked every two (2) weeks and receive their checks after 12:00 pm the Friday following the end of a pay period. As an example, if an employee's first day of employment is Monday, August 2nd and he/she works the entire week, his/her first pay week will end on Saturday August 7th. The employee will receive his/her first check for the first two weeks of work on Friday August 20th, which is the Friday following the end of the second pay week ending Saturday, August 14th.

Time Cards: Time cards are to be completed daily. Employees are required to clock in before work and to clock out at the end of each day, especially the last working day of the week. Time cards are to be maintained in, and should not be removed from, the time clock area. **Employees are responsible for completing their time card and employees will not be reminded that a time card is incomplete or missing. Failure to complete a time card or removal of a time card from the time clock area may result in the employee's pay being delayed, and/or discipline.**

Task(s) Completion: Every employee must perform all assigned tasks in a timely manner and must truthfully report work time by clocking "in" and "out". The following rules apply:

- If an employee is picking up samples (going directly from home), then the time that the employee leaves to pick up the sample(s) is the "clock in" time.
- ETS expects consistency in the amount of time that any employee requires to perform tasks.
- ETS expects all tasks to be completed in a timely manner. This means that tests are not to be used as excuses to prolong a working day and are not to be used to avoid performing assigned/required duties. ETS understands that different factors affect a working day; however, ETS expects fairness from each employee in regard to the amount of time required to perform a required task.
- Employees who unnecessarily prolong tasks or work days may be subject to discipline, up to and including dismissal.



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Breaks

As a benefit to our employees working in ETS offices, ETS allows two (2) fifteen-minute breaks each day, one in the morning and one in the afternoon. Because these breaks are a benefit, we ask that everyone respect the policy as written and not abuse the privilege of taking a break. Morning breaks are to be taken between 10:30 AM and 11:00 AM and afternoon breaks are to be taken between 2:00 PM and 2:30 PM. Supervisors, in their discretion, will determine the exact time that a break is to be taken. Breaks are to be taken before or after a duty is completed, and an employee should never leave a duty or task incomplete to take a break. Employees may not delay the start of a task for the purpose of taking a break. Missed breaks **are not** to be added to the lunch period, **are not** to be added to an employee's payroll time, **are not** to be "doubled up" at the next break time and **are not** an excuse to leave the job early. Employees may not leave the premises for breaks. After use, the break room area is to be clean of trash and food. Food is not allowed in any laboratory. Beverages are allowed in areas that are away from testing and samples.

Lunch Period

Full-time, part-time and intern employees working more than four (4) hours in the ETS offices are required to take a one (1) hour lunch break. The scheduling of the lunch break is at the discretion of the supervisor. **Lunch breaks will be taken between 11:00 AM and 1:00 PM, and this policy applies to all work days. This means that each employee must return from lunch no later than 2:00 PM.** Lunch breaks are unpaid time and employees are required to clock out at the beginning of lunch and to clock back in when the employee resumes work after lunch.

Performance Evaluations

A new employee who is classified as full-time or part-time will be reviewed initially each 30 days until the end of the initial ninety (90) days of employment, then again, at least annually. The evaluation process requires the employee to first complete the review form and then the supervisor will complete the same form and include any comments, suggestions, disciplinary action, or expectations. The employee will have a chance to rebut any comments, suggestions, disciplinary action, or expectations of the supervisor.

An employee classified as an intern will be evaluated on a schedule consistent with the academic requirements. Where the university directing the intern's program requires an evaluation form, either the intern or the university must present the evaluation form to the supervisor within a reasonable time for it to be completed in time to meet any University imposed deadline.

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Benefits for Regular Full-Time Employees

As part of our ongoing efforts to attract and keep quality personnel, ETS provides the following benefit package to our full-time employees. Some benefit differences exist for salaried employees and those will be explained as needed at the time of hire. Full-time employees are not eligible for these benefits until they have completed ninety (90) days of employment with ETS.

Health and Dental Insurance: Health and dental insurance is available for all full-time employees and their families. The cost of the insurance is shared by the employee and ETS.

- ETS will pay 50% of the premiums for employee's health and dental insurance.
- Family coverage is available to the employee but will be paid 100% by the employee.

Paid Holidays: Full-time employees will be paid for seven (7) paid holidays per year. The following is a list of paid holidays for **full-time** employees:

- New Year's Day
- Memorial Day
- July 4th
- Labor Day
- Thanksgiving Day (2 days)
- Christmas Day

If any holiday listed above falls on a weekend, the day or days of observance will be posted in advance on the bulletin board. **In order to receive wages for a paid holiday, an employee must report to work the last working day preceding the observance of the holiday and the first working day immediately following the observance of the holiday unless his/her supervisor pre-approves the absence.** This policy is to ensure that we have the workforce necessary to keep our commitment to our clients during holiday periods. If an employee has to work on a holiday, then the employee will be paid double time.

Sick Leave: Full-time employees accrue one week (40 hours) of sick leave per year at the rate of 1.54 hours per 80 hours. Sick days are accrued based only on hours worked. Sick leave hours may not be used for vacation, given to other employees, or used for other family members. Accrued but unused sick leave will **not** be paid to the employee at the time of termination of employment.

Vacation: Full-time employees will accrue two weeks (80 hours) of paid vacation per year at the rate of 3.08 hours per 80 hours. Vacation days are accrued based only on actual hours worked. Vacation scheduling is subject to management approval and may be denied based on work needs. Employees must complete a Leave Request Form (Exhibit P1.1) at least one week prior to the desired start of vacation. Accrued but unused vacation will be paid to employees at the time of termination if the employee's employment is terminated for a reason **other than cause** and if the employee provides at least two (2) weeks' notice of resignation. Employees who are involuntarily terminated from employment with ETS for cause or who fail to provide the two weeks' notice period will forfeit accrued and unused vacation pay.

Jury Duty: Full-time employees who are called for jury duty will be paid for up to 2.5 days per year while serving jury duty, regardless of the length of jury service. Payment for days spent on jury duty is

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contingent on the employee presenting their supervisor with proof from the court of the days served. Employees may keep any check received from the court for jury duty. Employees are required to contact their supervisor each evening to report if they will continue jury duty or will be available to return to work. Upon release from jury duty, if the release is during the work day, the employee must contact his/her supervisor to determine if the employee is required to report to work that day.

Bereavement Leave

In the event of death of an immediate family member, full-time regular or part-time regular employees will be compensated for up to two (2) days absence, based on the employee's regularly scheduled shift. Immediate family members are defined as: the employee's spouse, domestic partner, child, parent, or sibling, grandparent, father-in-law, mother-in-law, son-in-law, or daughter-in-law. Requests for bereavement leave should be made to your immediate supervisor.

Military Leave

Leaves of absence without pay for military or Reserve duty are granted to full-time regular and part-time regular employees. If you are called to active military duty or to Reserve or National Guard training, or if you volunteer for the same, you should notify your supervisor and submit copies of your military orders to him or her as soon as is practicable. You will be granted a military leave of absence without pay for the period of military service, in accordance with applicable federal and state laws. If you are a reservist or a member of the National Guard, you are granted time off without pay for required military training. Your eligibility for reinstatement after your military duty or training is completed is determined in accordance with applicable federal and state laws. Please see management for a more detailed description regarding your obligations and reinstatement rights.

Workers Compensation

ETS provides workers' compensation insurance for all employees. The amounts payable to an employee for work related injury or illness will vary depending on the nature and duration of the injury or illness.

If you are injured or become ill on the job, you must immediately report the injury or illness to your supervisor or another appropriate member of management. Failure to follow this procedure may jeopardize your right to benefits in connection with the injury or illness.

Employee Conduct

ETS wants to instill in all our employees a sincere respect for our clients. Without our clients, ETS would not exist. We should never underestimate the value of good client relations. Each client is to be treated with respect at all times. We don't argue with our clients, talk back to our clients, or do less than our best work for our clients. Employees must always be aware that conduct, language, appearance, and work habits affect our relationships with our current and potential customers. Employees are required to review and adhere to the standards of conduct as outlined in the **Standard of Conduct Policy** provided to each employee. Direct any questions about the

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information in the Standard of Conduct Policy to your supervisor. Violation of any of ETS's standards of conduct may be grounds for discipline, up to and including, immediate dismissal from employment.

Attendance

Employees are expected to report to work on time and consistently. The work day starts at the scheduled start time. This means that an employee is to be ready and working at the scheduled start time. If any employee needs additional time to prepare for the morning, i.e. hanging up coats, morning coffee, bathroom breaks, etc. then these need to be completed **before** the scheduled start time. Excessive tardiness, absences and/or inconsistent attendance may be grounds for discipline, up to and including termination. If an employee is going to arrive at work any time after the scheduled shift start time or be absent, then the employee **must** call the supervisor or the ETS office in advance of the start of the day, as soon as possible. If the employee, because of illness, emergency or for some other reason, cannot call in themselves, the employee is responsible for having someone else call to notify of the absence. Absence from work for one day without notification will be considered a voluntary resignation. Planned absences are to be requested on a vacation request form at least one week prior to the requested time off. Requesting time off does **not** guarantee a grant of time off. Depending on the work schedule, the supervisor will determine if the requested time off may be granted.

Inclement Weather

During periods of inclement weather, all employees must exercise extreme caution in order to prevent accidents. If you are unable to come to work due to inclement weather, then you must call your supervisor, or another member of management, as soon as possible. When possible, management will provide guidance to employees concerning safety measures to be taken prior to the arrival of the inclement weather. This may include delayed starting hours or work cancellation. If inclement weather arrives during working hours, management will make the decision to curtail work based on information from news reports.

Personal Appointments

To ensure that our workforce is available to keep our commitments to clients, personal appointments requiring time away from work should be kept to an absolute minimum. Any employee who needs to schedule an appointment during the work day must complete a Leave Request Form (Exhibit P1.1) and present it to the supervisor or another member of management, no less than three (3) working days in advance of the appointment. If an employee cannot schedule an appointment to allow three (3) days' notice to the supervisor, the employee must notify the supervisor as early as possible. Approval of leave time is at the discretion of management. Employees will not be paid for absences for personal appointments. Unauthorized or frequent absences for personal appointments may result in discipline up to and including dismissal.

Returning to Work Following Injury and/or Illness

An employee who is absent due to illness or injury for more than two (2) days will be required to furnish Environmental Testing Solutions with a doctor's written verification of illness/injury. If an employee is absent 5 days or more due to illness/injury, then a doctor's note will be required indicating that the employee is able to

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return to work. The employee will be responsible for any charges associated with acquiring the required documents from the doctor for this documentation.

Anti-Harassment Policy

Environmental Testing Solution, Inc. has adopted a policy of "zero tolerance" with respect to employee harassment. ETS expressly prohibits any form of employee harassment based on race, color, religion, sex, national origin, age, disability, genetic information, or active military or veteran status. Harassment is defined as repeated, unwanted or unwelcome verbal or physical or behaviors of a sexist, racist or ageist nature or with overtones related to a protected characteristic, e.g., sex, race, ethnicity, religion, age, disability, sexual orientation, or military status.

All ETS employees have the right to a work environment free from harassment and violations of this policy will not be tolerated from anyone including but not limited to ETS employees, guests of ETS, tradesmen or customers. All alleged violations of this policy should be immediately reported to your supervisor or other member of management.

With respect to sexual harassment, ETS prohibits:

- Unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual or otherwise offensive nature, especially where:
 - Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
 - Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or
 - Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

Examples of the types of conduct expressly prohibited by this policy include, but are not limited to, the following:

- Touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body.
- Sexually suggestive touching.
- Grabbing, groping, kissing, fondling.
- Violating someone's "personal space."
- Offensive whistling.
- Lewd, off-color, sexually oriented comments or jokes.
- Foul or obscene language.
- Leering, staring, stalking.
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, cartoons.
- Unwanted or offensive letters or poems.
- Sitting or gesturing sexually.
- Sexually, racially, or otherwise offensive E-mail or voice-mail messages.
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies, or prowess.
- Questions about one's sex life or experiences.

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- Repeated and unwanted requests for dates.
- Sexual favors in return for employment rewards, or threats if sexual favors are not provided.
- Sexual assault or rape.
- Any other conduct or behavior of a sexual nature deemed inappropriate by management.

Harassment Complaint Procedure

Each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. Further, employees are responsible for respecting the rights of their coworkers.

If you experience any job related harassment based on your sex, race, national origin, disability, or another factor, or believe that you have been treated in an unlawful, discriminatory manner, promptly report the incident to your supervisor, department or division head, or director of human resources. This policy applies to all incidents of alleged harassment, including those which have occurred off-premises, or off-hours, where the alleged offender is a supervisor, coworker, or even a nonemployee with whom the employee is involved, directly or indirectly, in a business or potential business relationship.

Should the alleged harassment occur at a time other than your normal business hours, your complaint should be filed as early as practicable on the first business day following the alleged incident.

Please understand that the ETS takes complaints of discrimination and harassment very seriously. Thus, there is no need to follow any formal chain of command when filing a complaint, or discussing or expressing any issue of concern regarding alleged discrimination or harassment, and you may bypass anyone in your direct chain of command and file your complaint or discuss or express any issue of concern at any time. Management will undertake an investigation of any complaints. All complaints will be kept confidential to the maximum extent possible.

All employees have a duty to report any conduct which they believe violates this policy. In addition, every employee has a duty to cooperate with any investigation conducted by the ETS, or its designee, regardless of whether the investigation is being conducted by ETS officials or outside parties retained by the ETS for this purpose.

If ETS determines that an employee is guilty of harassing another individual, appropriate disciplinary action will be taken against the offending employee, up to and including an unpaid suspension or termination of employment.

ETS prohibits any form of retaliation against any employee for reporting a violation of this policy, filing a complaint under this policy, or assisting in a complaint investigation. However, if, after investigating any complaint of harassment or discrimination, Environmental Testing Solutions, Inc. determines that the complaint is frivolous and was not made in good faith or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information, up to and including an unpaid suspension or termination.

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Work Clothes / Dress Code

Because we want to maintain a positive image to our customers as well as the general public, all ETS employees are encouraged to dress appropriately for our trade. If management deems that an employee's attire is inappropriate, the employee will be required to leave work and change before returning. This time will not be considered working time. All employees are required to:

- Maintain as clean and neat appearance as work (i.e. outdoor sample collection) will allow.
- Wear clean clothing that is neither ripped nor torn and is without any designs, logos, symbols, slogans, etc. that may be offensive to any individual or group.
- Wear, as appropriate, clothing and/or protective equipment consistent with OSHA regulations.
- Employees are required to wear attire that is appropriate for lab work. Open toed footwear (sandals or peep toe shoes), shorts or skirts that leave legs uncovered, or sleeveless shirts are prohibited. Employees should not wear oversized or extremely loose that could present a safety hazard in the lab.

Perfumes and Colognes

Due to the sensitivity of the testing at ETS all employees are not allowed to wear any type of perfume or cologne while working at ETS

Safety Policy

The safety and wellbeing of our employees is a priority at ETS. It is our policy to promote and encourage the development of a "Safety First" attitude among all employees. By doing this, our employees will not be subject to unnecessary risk and will have the opportunity to continue to work and ETS will be able to meet the needs of our customers in a safe, profitable and productive manner.

Details of our safety policy may be obtained from our **General Safety Policy** and supervisors can provide additional information. Employees are required to obey all OSHA regulations and all ETS safety policies and procedures. Violation of any OSHA regulation or ETS safety policy or procedure will be grounds for discipline up to and including immediate termination

Accidents or Emergency Medical Situations

In the event of work accident or injury, employees **must immediately notify their supervisor or another member of management**. By making management aware of all accidents and the details surrounding them, management can facilitate obtaining the proper medical attention for any injured parties. A supervisor will evaluate the situation and determine if any additional action is required or if the police or emergency medical personnel need to be contacted. In the event of an accident, the employee is required to cooperate with the supervisor to complete an accident form. In the event of other emergency, employees must alert their supervisor or other member of management of any problems so that management may assess the need for and contact proper professional or emergency services.



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Family / Personal Emergency

If an employee has an emergency or requires medical attention, a supervisor should be notified immediately. Should it be necessary to leave the laboratory for an emergency, the employee, or someone on behalf of the employee should contact the office and/or the supervisor as soon as reasonably possible to provide status update.

Confidentiality of Information

It is the policy of ETS to ensure that the operations, activities, and business affairs of Environmental Testing Solutions, Inc. and our clients are kept confidential to the greatest possible extent. If, during their employment, employees acquire confidential or proprietary information about Environmental Testing Solutions, Inc. and its clients, such information is to be handled in strict confidence and not to be discussed with outsiders. Employees are also responsible for the internal security of such information.

Employees will be asked to sign a statement of confidentiality at the time of hire and periodically throughout their term of employment to acknowledge their awareness of, and reaffirm their commitment to, this policy.

Upon termination of employment, or at any other time at the discretion of the Company, employees will be required to deliver to the Company all documents, data, and other materials pertaining to their employment or to any of the Company's intellectual property, and after termination, are not permitted to retain copies of such documents, data, or materials in any format.

Employees found to be violating this confidentiality policy are subject to disciplinary action, up to and including an unpaid suspension or termination, and may also be subject to civil and/or criminal penalties for violations of, among other things, applicable securities laws.

Drug Free Workplace

It is the policy of ETS to create a workplace free of drug and alcohol abuse. The use of controlled substances, the abuse of prescription medication and/or the abuse of alcohol is inconsistent with the behavior expected of employees and subjects all employees, visitors and clients to unacceptable safety risks, and undermines ETS's ability to operate effectively and efficiently. Therefore, the unlawful manufacture, distribution, dispensation, possession, sale, or use of a controlled substance in the workplace or while engaged in ETS's business off ETS's premises is strictly prohibited. Such conduct is also prohibited during nonworking time to the extent that in the opinion of ETS, it impairs an employee's ability to perform on the job or threatens the reputation or integrity of ETS.

Employees of ETS and anyone else working at or visiting ETS's premises or worksites are prohibited from:

- The use or possession of any controlled substance, the abuse of prescription medication or the abuse of alcohol at any time while on ETS time, work premises, at an ETS function or in ETS vehicles.
- The manufacture, sale, distribution or dispensation of alcohol or any controlled substance while on work time or work premises or in ETS vehicles.
- Reporting to work or working while intoxicated or otherwise impaired.

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Any violations of this policy will result in discipline, up to and including immediate dismissal from employment.

Employees who, as a duty of their employment with ETS, are required to operate an ETS vehicle must, must report to management within 24 hours of the action if they are arrested and/or receive moving traffic violation.

Employees who are convicted of controlled substance related violations, including pleas of nolo contendere (i.e., no contest), must inform ETS within five days of such conviction or plea. Employees who violate any aspect of this policy may be subject to disciplinary action up to and including an unpaid suspension or termination of employment.

Drug Testing

All offers of employment to potential employees are contingent upon passing a pre-employment drug test.

ETS reserves the right to require that an employee undergo drug or alcohol testing at any time, or when, in the opinion of the management of ETS, there is a reasonable suspicion that the employee may have violated any provision of this policy or if he/she has been involved in an accident.

Smoking

Smoking is **not** allowed in ETS offices, labs, vehicles, parking lot and areas adjacent to the doorways. Smoking is only permitted off-site.

Cell Phone Usage

Personal cell phones must be turned off during work hours and their use must be limited to breaks or lunch. Cell phones may not be used in the laboratory. Employees are strictly prohibited from using cell phones while driving vehicles on behalf of Environmental Testing Solutions.

Telephone Usage

Employees' personal phone calls should be made or received while on break or lunch. Telephone usage during workdays is discouraged and family members who need to contact an employee during the workday should be advised to direct the call to the Environmental Testing Solutions office. At no time should telephone usage interfere with work. Employees are strictly prohibited from making personal long-distance telephone calls from ETS telephones.

Electronic and Telephonic Communications

All electronic and telephonic communication systems and all communications and information transmitted by, received from, or stored in these systems are the property of ETS and as such are to be used solely for job-related purposes. The use of any software and business equipment, including, but not limited to, facsimiles, telecopiers,

Subject: Employee Handbook

computers, the Company's E-mail system, the Internet, smartphones or other wireless devices, instant messaging systems, and copy machines for private purposes is strictly prohibited.

Employees using this equipment for personal purposes do so at their own risk. Further, employees are not permitted to use a code, access a file, or retrieve any stored communication unless authorized to do so or unless they have received prior clearance from an authorized ETS representative. All pass codes are the property of ETS. No employee may use a pass code or voice-mail access code that has not been issued to that employee or that is unknown to ETS without authorization. Moreover, improper use of the e-mail system (e.g., transmitting or spreading sexually, racially, or other discriminatory or harassing jokes or remarks, abusive or profane language, threatening others, etc.), including via the Internet or any other equipment, will not be tolerated.

To ensure that the use of electronic and telephonic communications systems and business equipment is consistent with ETS's legitimate business interests, authorized representatives of ETS may monitor the use of such equipment from time to time. This includes monitoring Internet usage of any kind. This may also include listening to stored voice-mail messages.

As a rule, Internet access is password protected and may only be accessed with the permission of management. The Internet represents a useful tool for the Company in conducting its business, but like any other tool, it must be used properly. For purposes of this policy, Internet includes any public electronic data communications network.

Employees may not forward, distribute, or incorporate into another work, material retrieved from a Web site or other external system. Very limited or "fair use" may be permitted in certain circumstances. Any employee desiring to reproduce or store the contents of a screen or Web site should contact the legal department to ascertain whether the intended use is permissible.

Access to and use of the internet and web includes all restrictions which apply generally to the use of the Company's E-mail and other electronic and telephonic equipment, as noted above. In addition, the following rules apply with respect to Internet usage:

- **No Browsing of Restricted-Content Web Sites:** The Company has blocked access to Web sites which contain pornographic material. However, the World Wide Web changes on a daily basis. In this connection, users who find new sites which the Company has not yet blocked are required to report such sites to the appropriate individuals in the Company's Technology Department.
- **No Downloading of Non-Business-Related Data:** The Company allows the download of files from the Internet. However, downloading files should be limited to those which relate directly to Company business.
- **No Downloading of Application Programs:** The Company does not permit the download or installation on Company computers of application software from the Internet. Such software may not only contain embedded viruses, but also is untested and may interfere with the functioning of standard Company applications. This prohibition applies to commercial, shareware and free software. Moreover, illegal or "bootlegged" software cannot be placed on any computer under any circumstances. Employees are also prohibited from making copies of any software contained on any computer. Any request for an additional copy of a program must be directed to management.
- **No Participation in Web-based Surveys Without Authorization:** When using the Internet, the user implicitly involves the Company in his/her expression. Therefore, users should not participate in Web or E-mail based surveys or interviews without authorization.

Subject: Employee Handbook

- **No Use of Subscription-based Services without Prior Approval:** Some Internet sites require that users subscribe before being able to use them. Users should not subscribe to such services without the express approval of management.
- **No Violation of Copyright:** Many of the materials on the Internet are protected by copyright. Even though they may seem to be freely accessible, many of the intellectual property laws which apply to print media still apply to software and material published on the Internet. Employees are permitted to print out Web pages and to download material from the Internet for informational purposes as long as the purpose for such copying falls into the category of "fair use." Please do not copy or disseminate material which is copyrighted. Employees having any questions regarding such materials should contact management for guidance.
- **No Blogging:** Employees are prohibited from using company systems and equipment for blogging, Twitter, Facebook or any social media. Prohibited by this policy is spending time on the job writing one's own blogs, reading those created by others, or otherwise making disparaging or derogatory comments or remarks about the company, or any of its current or former directors, officers, or employees at any time.
- **Remote Access:** If users are provided with a remote access facility, they must not log-in to a remote access service from a public internet access device (e.g., airport computer terminal, or Internet cafe). This is due to the possibility of sensitive information being monitored by video or computer surveillance in public areas.

Employees are further prohibited from taking any action designed to degrade or harm the performance of any computer or the network. Such action includes installing viruses, Trojan horses or other invasive software, destroying data, disrupting the computing progress, "hacking" the system, or the unauthorized use of a password.

Reporting Obligations: Users must notify management immediately when:

- Sensitive or confidential information is lost, disclosed to unauthorized parties or suspected of being lost or disclosed to unauthorized parties;
- Unauthorized use of Computing Resources has taken place or is suspected of taking place;
- Passwords or other system access control mechanisms are lost, stolen, or disclosed, or are suspected of being lost, stolen or disclosed; or
- There is any unusual systems behavior, such as missing files, frequent system crashes or misrouted messages.

Employees are prohibited from reading, modifying, copying, or deleting files of others without permission.

Employees who violate this policy are subject to disciplinary action, up to and including an unpaid suspension or termination.

Instruments and Tools

ETS will supply all instruments, tools, and chemicals that employees need to perform their daily tasks. Employees are expected to keep the instruments and tools in good working order and maintain accountability for them. If the instruments are worn out through "fair wear and tear," ETS will replace the instruments at no charge to the employee. In cases of abuse, loss, improper use, etc. the employee will be required to purchase the replacement instrument. If any instrument or tool is not functioning properly or is broken, the employee is required to notify his/her supervisor immediately. Employees are required to make a broken glass log entry and immediately report

Subject: Employee Handbook

any glass damage (i.e. crack, chip break, etc,) to the supervisor or other member of management. Intentional damage to glass or other equipment will result in discipline, up to, and including termination of employment.

Security and Building Keys

Control of building **keys** and access is necessary to maintain appropriate **security** and safety measures and to safeguard all ETS **buildings** and equipment. Employees are responsible for building keys issued to them. Building keys issued to employees are assigned and tracked in the Assigned Key Log (Exhibit P1.2). Keys are not to be duplicated or shared. Keys are to be used only during scheduled work hours or as authorized by management. Lost keys must be reported to management immediately.

In the event of separation from employment, or immediately upon request by management, employees must return all assigned building keys that are in their possession or control. If assigned keys are not returned with 24-hours of separation of employment, ETS may deduct \$250 from the employee's final paycheck to cover the cost of changing the locks and issuing new keys to other ETS employees.

Visitors

All visitors must remain in the lobby. At no time will a visitor be allowed into any of the laboratory areas. All visitations will be kept to a minimum and may not be disruptive to work.

Conflict of Interest

Employees of ETS are not allowed to work for any other commercial environmental laboratory while employed at ETS.

Company Vehicles

The privilege of driving a Company vehicle is a responsibility that all employees must take very seriously. Vehicle safety affects everyone and using good judgment while driving could save you and others from injury or death. Employees are always required to drive responsibly and practice common courtesy. All employees driving an ETS vehicle **must** maintain a valid North Carolina driver's license and report all moving violations (while on work or personal time) to their supervisor or other member of management immediately. Submission of a Motor Vehicle Report is a prerequisite of employment with ETS.

All ETS vehicles will always be operated in a manner consistent with state and federal law. Employees are strictly prohibited from using cell phones or texting while driving. If an employee is driving an ETS vehicle and has the need to use a cell phone, the employee must first pull over to a safe location before using the cell phone.

Employees involved in motor vehicle accidents are subject to immediate drug and alcohol testing. Failure to submit to drug and alcohol testing after an accident will be grounds for immediate dismissal from employment.

Subject: Employee Handbook

If an employee receives a ticket for a traffic violation, and/or is involved in an accident that is deemed the fault of the employee, the employee may be disciplined, up to and including dismissal from employment.

The driver of an ETS vehicle is responsible for in the vehicle and compliance with ETS policy and safety guidelines, including the requirement that all persons are wearing seat belts while riding in an ETS vehicle. The number of occupants (driver plus passengers) in an ETS vehicle may never exceed the number of functional seat belts in the vehicle. Employees backing up in an ETS work vehicle should use a ground guide unless they are alone in the vehicle, in which case before backing up, the driver should exit the vehicle to be certain that the area behind the vehicle is clear.

Employees are required to immediately report to their supervisor, or another member of management, any mechanical problem that causes the vehicle to be less than 100% safe for use. Employees will be notified if the vehicle problem cannot be repaired the same day.

All ETS vehicles assigned to individuals are the responsibility of that individual. All vehicles should be locked and secured at night and the ignition keys removed. While parked on a jobsite during the day, the vehicle should be parked in a safe location and secured in a manner that protects the contents of the vehicle. At no time will personalized items such as logos, bumper stickers, window stickers or license plates be allowed to be placed on an ETS vehicle. Smoking is not allowed in any ETS vehicle.

Gas cards are for use with ETS vehicles only. When stopping for gas, a receipt must be obtained and must be turned in daily. Use of an ETS gas card for personal use is strictly prohibited and will result in discipline or dismissal from employment.

ETS vehicles are only for use during working time and to drive directly to and from work. Employees of ETS are the only persons authorized to ride in the vehicle. Under no circumstances will any weapons, firearms, drugs or alcohol be allowed in an ETS vehicle. Failure to abide by this policy or any other ETS vehicle restrictions will result in discipline including immediate dismissal from employment.

Separation from Employment

Employees who resign from employment with ETS must submit a resignation letter via email or hard copy to their supervisor. It is the employee's responsibility to verify that management has received notice of the employee's intent to resign. Employees must give two (2) weeks' notice of resignation or the employee will forfeit pay for all accrued but unused vacation time. Management, in its sole discretion, may excuse the employee from or require the employee to work the notice period.

Employees who are involuntarily terminated from employment with ETS for cause will forfeit pay for all accrued but unused vacation time.

Final paychecks, less amounts owed to ETS will be mailed to the separated employee on the next regular pay date. Accrued but unused sick leave is **not** payable at the time of separation from the ETS



Subject: Employee Handbook

At the time of separation from employment for any reason from ETS, employees are required to return all ETS instruments and property (including building keys) to management. Management will deduct the cost of lost or damaged equipment, any debts the employee owes to ETS and the cost of re-keying the buildings (if keys are not returned) from the employee's final compensation, including vacation pay, if applicable.

Rehire

Employees who wish to be rehired, may be required to apply for employment and interview. Rehiring is at the sole discretion of management. Management will evaluate the current laboratory needs, nature of separation from employment and employee's past work performance, conduct and attendance.

The length of separation from employment and management's evaluation, may dictate whether the employee will start at the base new hire salary. If full-time, previous employment accrual of vacation and sick leave not be carried over. Full-time employees will also not be eligible for these benefits until they have completed ninety (90) days of employment.

Upon rehire, the employee will go through a 90-day evaluation period. This will give the employee and supervisor an opportunity to discuss performance, training and expectations. This ninety (90) day evaluation period is not a guarantee of continued employment. At any time during this evaluation period the employee or employer may terminate employment.

Exhibits

Exhibit P1.1: Leave Request Form

Exhibit P1.2: Assigned Key Log



Subject: Employee Handbook

Exhibit P1.1: Leave Request Form



Leave Request Form

Employee Name	
Date	

Total Days Requested	
Dates Requested	

Nature of Request:

	Check
Vacation	
Jury Duty	
Excused Unpaid	
Other (describe)	

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Approved Declined



Subject: Employee Handbook

Receipt & Acknowledgment of Environmental Testing Solutions, Inc. Employee Handbook

This Environmental Testing Solutions, Inc. (ETS) Handbook is an important document intended to help you become acquainted with ETS. This handbook will serve as a guide; and management reserves the right to amend policies and to review situations on a case by case basis. Individual circumstances may call for individual attention. The contents of this handbook may be changed at any time at the discretion of ETS.

Please read the following statements and sign below to indicate your receipt and acknowledgment of the Employee handbook. The signed original copy of this agreement will be placed in your personnel file.

- I have received and read a copy of the ETS Employee handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of ETS at any time.
- I further understand that my employment is terminable at will, either by myself or ETS, regardless of the length of my employment or the granting of benefits of any kind.
- I understand that no contract of employment other than “at will” has been expressed or implied, and that no circumstances arising out of my employment will alter my “at will” employment relationship unless expressed in writing, with the understanding specifically set forth and signed by myself and the Management of ETS.
- I understand that any omissions, falsifications, misstatements, or misrepresentations found at any time on my employment application will, at the discretion of Environmental Testing Solutions, be grounds for termination at a later date. I understand that any information I give may be investigated as allowed by law. I consent to the release at any time of information about my ability, employment history, medical records and any other fitness for employment by employers, schools, law enforcement agencies, and other individuals and organizations to investigators and personnel staff, for employment purposes. This consent shall continue to be effective during my employment.
- I agree to submit willingly to a substance abuse test at any time, if required.
- I certify that all of the statements made at the time of my employment and on any company document are true, correct, complete, and made in good faith with full knowledge of the consequences of non-compliance outlined in the Standards of Conduct Manual.
- I am aware that during the course of my employment confidential information will be made available to me, i.e., product designs, marketing strategies, customer lists, pricing policies and other related information. I understand that this information is critical to the success of ETS and must not be given out or used outside of ETS’s premises or with non - ETS employees. In the event of termination of employment, whether voluntary or involuntary, I hereby agree not to utilize or exploit this information with any other individual or ETS.
- I understand that, should the content be changed in any way, ETS may require an additional signature from me to indicate that I am aware of and understand any new policies.
- I understand that my signature below indicates that I have read and understand the above statements and have received a copy of the ETS Employee Handbook. I understand that upon my termination with ETS this employee manual must be returned to the ETS management.

Trainee (Employee)			Trainer (Supervisor or Manager)		
Name (Print)	Name (Signature)	Date	Name (Print)	Name (Signature)	Date





Corporate Policies

SECTION POLICY-P2
REVISION NUMBER 1
EFFECTIVE DATE 10-01-17
PAGE NUMBER 1 OF 4

Subject: Standard of Conduct Policy

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none">Updated policy to NELAP format.

Scope and Application

To provide basic rules of behavior and conduct for employment with Environmental Testing Solutions, Inc.

Confidential



Subject: Standard of Conduct Policy

THIS POLICY MAY CHANGE IN PART OR IN ITS ENTIRETY WITHOUT NOTICE

Standard of Conduct

By accepting employment with Environmental Testing Solutions, Inc., you have a responsibility to the company and to your fellow employees to adhere to certain rules of behavior and conduct. The purpose of these rules is to be certain that you understand what conduct is expected and necessary. When each person is aware that he or she can fully depend upon fellow workers to follow the rules of conduct, then our organization will be a better place to work for everyone.

Unacceptable Activities

Generally speaking, we expect each person to act in a mature and responsible manner at all times. However; to avoid any possible confusion, some of the more obvious unacceptable activities are noted below. This list is not all inclusive. Your avoidance of improper conduct will be to your benefit as well as the benefit of Environmental Testing Solutions, Inc. If you have any questions concerning any work or safety rule, or any of the unacceptable activities listed, please see your supervisor or manager for an explanation.

Occurrences of any of the following violations, because of their seriousness, may result in immediate dismissal with Environmental Testing Solutions, Inc. without warning:

- Violation of any company rule; any deliberate action that is extreme in nature and is obviously detrimental to Environmental Testing Solutions, Inc.'s efforts to operate safely and profitably.
- Violation of security or safety rules, failure to observe safety rules or Environmental Testing Solutions, Inc. safety policies; failure to wear required safety equipment; tampering with Environmental Testing Solutions, Inc. equipment or safety equipment.
- Negligence or any careless action which endangers the life or safety of another person.
- Being intoxicated or under the influence of controlled substances (drugs) while at work; use, possession or sale of controlled substances (drugs) in any quantity while on company premises, except medications which do not impair work performance and are taken according to a physician's prescription.
- Unauthorized possession of dangerous or illegal firearms, weapons or explosives on company property or while on duty.
- Engaging in criminal conduct, acts of violence or making threats of violence toward anyone on company premises or when representing Environmental Testing Solutions, Inc.; fighting, horseplay or provoking a fight on company property or when representing Environmental Testing Solutions, Inc.; intentional or negligent damage of property.
- Insubordination or refusing to obey instructions issued by your manager pertaining to your work.
- Threatening, intimidating or coercing fellow employees on or off the premises at any time, for any purpose.
- Engaging in an act of sabotage; willfully or with gross negligence causing the destruction or damage of company property, or the property of fellow employees, customers, suppliers, or visitors in any manner.

Confidential

Subject: Standard of Conduct Policy

- Theft of company property or the property of fellow employees; unauthorized possession or removal of any company property, including documents, from the premises without prior permission from management; unauthorized use of company equipment or property for personal reasons; using company equipment for profit.
- Dishonesty, falsification or misrepresentation on your application for employment or other work records; lying about sick or personal leave; falsifying reason for a leave of absence or other data requested by Environmental Testing Solutions, Inc.; alteration of company records or other company documents.
- Violation of Environmental Testing Solutions, Inc.'s non-disclosure agreement; giving confidential or proprietary Environmental Testing Solutions, Inc. information to competitors or other organizations or to unauthorized Environmental Testing Solutions, Inc. employees; working for a competing business while an Environmental Testing Solutions, Inc. employee; breach of confidentiality of personnel information.
- Malicious gossip and/or spreading rumors; engaging in behavior designed to create discord and lack of harmony; interfering with another employee on the job; willfully restricting work output or encouraging others to do the same.
- Immoral conduct or indecency on company property.
- Conducting a lottery or gambling on company premises.

Occurrences of any of the following activities, as well as violations of any Environmental Testing Solutions, Inc. rules or policies, may be subject to disciplinary action, including possible immediate dismissal. This list is not all-inclusive, and, notwithstanding this list, all employees remain employed "at-will."

- Unsatisfactory or careless work; failure to meet production or quality standards as explained to you by your supervisor or manager; mistakes due to carelessness or failure to obtain necessary instructions.
- Any act of harassment, sexual, racial or other; telling sexist or racial-type jokes; making racial or ethnic slurs.
- Leaving work before the end of a workday or not being ready to work at the start of a workday without approval of your manager; stopping work before time specified for such purposes.
- Sleeping on the job; loitering or loafing during working hours.
- Excessive use of company telephone for personal calls.
- Leaving the premises during your work hours without the permission of your supervisor.
- Smoking on Environmental Testing Solutions, Inc.'s grounds.
- Creating or contributing to unsanitary conditions.
- Posting, removing or altering notices on any bulletin board on company property without permission of an officer of Environmental Testing Solutions, Inc.
- Failure to report an absence or late arrival; excessive absenteeism or lateness.
- Obscene or abusive language toward any supervisor, manager, employee or client; indifference or rudeness towards a client or fellow employee; any disorderly/antagonistic conduct on company premises.
- Speeding or careless driving of any company vehicle.
- Failure to immediately report damage to, or an accident involving company equipment.
- Soliciting during working hours and/or in working areas; selling merchandise or collecting funds of any kind for charities or others without management authorization during business hours, or at a time or place that interferes with the work of another employee on company premises.
- Failure to maintain a neat and clean appearance; any departure from Environmental Testing Solutions, Inc. dress code; wearing improper or unsafe clothing.

Confidential



Subject: Standard of Conduct Policy

- Failure to use your time card; alteration of your own time card, records or attendance documents; altering another employee's time card or records, or causing someone to alter your time card or records.
- Failure to comply with management instructions and/or insubordination, including failure to follow or comply with policies and procedures.

Disciplinary Actions

Unacceptable behavior which does not lead to immediate dismissal may be dealt with in the following manner:

- Verbal Warning
- First Written Warning
- Second Written Warning
- Dismissal

Written warnings will include the reasons for the supervisor's dissatisfaction and any supporting evidence. All pertinent facts will be carefully reviewed, and the employee will be given an opportunity to explain his or her conduct before any decision is reached. Employees who are presented with a warning, either verbal or written, will have an opportunity to respond when the warning is issued. Disciplinary actions may also include fines, suspensions or other measures deemed appropriate to the circumstances.

Dismissal

Employment with Environmental Testing Solutions, Inc. is "at will" and the employment relationship may be terminated with or without cause, and with or without notice, at any time, at the option of either Environmental Testing Solutions, Inc. or yourself, except as otherwise provided by law.



If your performance is unsatisfactory due to lack of ability, failure to abide by Environmental Testing Solutions, Inc. policies or failure to fulfill the requirements of your job, you will be notified of the problem. If satisfactory change does not occur, you may be dismissed. Some incidents may result in immediate dismissal.

DISCLAIMER: This Standard of Conduct Policy is not intended nor should it be construed as an employment contract. Employment is "at-will" and therefore, either Environmental Testing Solutions, Inc. or the employee can end the relationship at any time, without notice. Should any section, subsection, or statement contained herein conflict with any Federal, State, or Local laws, then the law will take precedence and will be considered policy. It is the intent of Environmental Testing Solutions, Inc. to set forth policies and procedures that are in complete compliance with the law. The right to change any section, subsection, or statement in this policy without prior notice is retained by Environmental Testing Solutions, Inc.



Subject: Ethics and Data Integrity Policy

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
09-01-09	0	Internal	Jim Sumner (ETS)	Original document
06-01-11	1	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none">• Corrected typographical errors.
10-01-17	2	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none">• Updated policy to NELAP format.

Scope and Application

This policy provides basic requirements to uphold ethical standards within the laboratory.

Subject: Ethics and Data Integrity Policy

I understand the high standards of integrity required of me with regard to the duties I perform and the data I report in connection with my employment at Environmental Testing Solutions, Inc. Our core values are honesty, integrity and service. I understand that it is critical for our long-term success that each and every employee aligns with all company core values. I agree that in the performance of my duties for Environmental Testing Solutions, Inc. and its clients, I shall conform to the following ethics standards and will report immediately to the Quality Assurance Manager and the appropriate supervisor any information concerning misrepresentation of analytical data that includes, but is not limited to:

- Altering any instrument, computer or clock for any inappropriate purpose.
- Altering the contents of logbooks and/or data sheets to misrepresent data.
- Misrepresenting an analyst's identity.
- Changing raw data documents with correction fluid or by obliterating with ink.
- Preparation and submittal of 'fake' data packages.
- Inappropriate calibration techniques.
- Use of computer programs that alter QC results or altering biological testing controls.
- Changing reported results without proper documentation and approval.
- Altering volumes for calibration and misrepresenting the true values.
- Failure to comply with standard operating procedures or methods without proper documentation and approval.
- Any attempt to misrepresent data or events as they actually occur in the course of data production, review or reporting.
- Disposing of or deleting electronic data files or hardcopies of raw data.
- Engaging in any practice that ultimately misrepresents data or narratives in any way.



I will not knowingly participate in any such activity and will not tolerate unethical practices by others. I understand that Environmental Testing Solutions, Inc. will investigate any allegations of unethical practices and will, to the fullest extent possible, keep such investigations confidential. As a further extension of my commitment to this program, I am responsible for seeking approval to report data resulting from techniques or procedures that may deviate from standard operating procedures, methods or industry standard practices. Any such reporting of data will include a laboratory narrative that must be approved by the appropriate supervisor and the Quality Assurance Manager. If I am unsure of how to properly handle data generated by me, I am responsible for seeking advice and approval from the Quality Assurance Manager or the appropriate supervisor. I agree to inform the Quality Assurance Manager or the appropriate supervisor of any accidental reporting of non-authentic data by myself or others immediately upon discovery. I understand that if I knowingly participate in any such prohibited activity, I will be subject to serious disciplinary action up to and including immediate termination of my employment with Environmental Testing Solutions, Inc.

Confidential



Subject: Employee Handwriting Sample

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-13-20
Quality Assurance Officer	Jim Sumner		10-13-20

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none">Updated policy to NELAP format.
10-13-20	2	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none">Updated policy to include toxicity chemistry examples.

Scope and Application

To provide handwriting traceability of data entries or modifications to laboratory logs to each employee.

Subject: Employee Handwriting Sample

Printed name	Signature	Initials	Date	Time

Numeric examples:

0	1	2	3	4

5	6	7	8	9

Alphabetic examples:

A	B	C	D	E

F	G	H	I	J

K	L	M	N	O

P	Q	R	S	T

U	V	W	X	Y

Z

Special characters/units:

✓	%	8+	2B	°C

Toxicity chemistry examples:

Analyst		
pH (SU)	7.87	
DO (mg/L)	8.0	
Conductivity (µmhos/cm)	487	
Alkalinity (mg/L CaCO ₃)	92	
Hardness (mg/L CaCO ₃)	63	
Chlorine (mg/L)	<0.10	
Temperature (°C)	25.5	
pH (SU)	7.88	
DO (mg/L)	8.8	
Conductivity (µmhos/cm)	465	
Alkalinity (mg/L CaCO ₃)	99	
Hardness (mg/L CaCO ₃)	80	
Chlorine (mg/L)	<0.10	
Temperature (°C)	25.2	

Correct value and make 7.85	7.89
-----------------------------	------

Writing example (cursive and/or print):

The quick brown fox jumps over the lazy dog.



Corporate Policies

SECTION	POLICY-P4
REVISION NUMBER	2
EFFECTIVE DATE	10-13-20
PAGE NUMBER	3 OF 2

Subject: Employee Handwriting Sample

Confidential



Subject: New Hire Documentation

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	• Updated policy to NELAP format.

Scope and Application

Basic documentation required upon hiring new employees.



Subject: New Hire Documentation

Date _____

Name _____

Pay Rate _____

Start Date _____

Personnel File check off list:

- Emergency Contact form
- Employment Application, completed and signed
- Form W-4
- Form NC-4
- I-9 US Department of Justice Form
- 2 proofs of ID (driver's license, social security card, birth certificate)
- Alarm Code: _____
- Add to Employee Records File, Date: _____

Emergency Contact Information

In case of an emergency, please contact:

Name: _____

Relationship: _____

Phone Number: _____

Cell Number: _____

All information is confidential.

Confidential



Subject: General Safety Policy

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	• Updated policy to NELAP format.

Scope and Application

The safety policy of Environmental Testing Solutions, Inc. is to comply with the Standards of the Occupational Safety and Health Act and to endeavor to have a safe and injury/illness free job.

Compliance with the following Safety Policy and all items contained therein is mandatory for all employees of the company. The final authority and individuals with the ultimate responsibility for enforcement of the policy has been given to Kelley Keenan and Jim Sumner, the principle owners of Environmental Testing Solutions, Inc. The responsibility for the day-to-day management of the policy also lies with Kelley Keenan and Jim Sumner. While these individuals have certain management and administrative duties as Safety Coordinators under this policy, our safety policy requires that every employee fully supports the policy for it to be successful.

Policy

It is Environmental Testing Solutions, Inc.'s policy that accident prevention is a concern for everyone. It includes not only prevention of wasteful and inefficient operations, damage to property and equipment but foremost the safety and wellbeing of our employees, subcontractors and customers. The Safety Policy will be carried out according to guidelines established and published in this and other related procedures. Employees will be responsible for meeting all the requirements of the Safety Policy and for maintaining an effective accident prevention effort within their area(s) of responsibility.

Subject: General Safety Policy

Implementation

Our Company's Safety Policy has been designed for maximum employee involvement in four fundamental ways:

1. Management's commitment to safety.
2. Monthly safety meetings.
3. Effective job safety training for all employees.
4. Job hazard analysis and safety training given with every task.

The Safety Coordinator will provide safety status overviews each monthly safety meeting. In addition, reports will be provided through group meetings or using the company Safety Bulletin Board.

Assignment of Responsibilities

A. Supervisors

- Maintain an active safety plan whereby all members of management promote awareness and safe work practices on ETS grounds and vehicles.
- Provide a work environment in which identified occupational hazards are controlled.
- Require all employees to follow established safety rules and safe work practices. Safety performance will be measured and included in Job Performance Evaluations.
- Provide adequate resources for achievement of approved safety objectives.
- Actively support the safety policy as an example to employees.
- Delegate authority to others to expedite and facilitate the application of the safety policy.
- Maintain responsibility and accountability for safety performance under their direction.
- Institute and enforce work practices where feasible to control workplace hazards.
- Review and follow-up on accident/injury investigations to ensure that root cause(s) of all accidents and near misses has been identified and appropriate corrective action has been taken.
- Ensure all employees and subcontractors under their direction are informed of the safety policy and receive a copy of the safety rules.
- Analyze and maintain accident investigation reports and trends.
- Evaluate all injuries and accidents.
- Investigate accidents/injuries as considered necessary by management.

B. Safety Committee

- Evaluate the policy on a regular basis and make adjustments as necessary.
- Educate and train employees concerning potential job hazards and the associated safeguards.
- Assist applicable supervisor(s) if necessary in safety orientations for new employees.
- Assist in establishing procedures and guidelines for the Safety Policy.
- Bring safety concern of other employees to the attention of the supervisor.
- Notify supervisor of inadequate or insufficient personal protective equipment (PPE) items.
- Check fire extinguishers, eyewash bottles, spill kits and shower periodically.

Subject: General Safety Policy

C. Employees / Subcontractors

- Read, follow and support the safety policy.
- Perform their job in the safest manner prescribed.
- Inspect work area regularly, report workplace hazards, unsafe acts and make suggestions to correct/control hazards.
- Perform job duties in a way that enhances their personal safety and that of their fellow workers.
- Report all injuries and accidents to the supervisor on the day of occurrence, even if you deem them to be minor.
- Keep the work area and/or job site clean and organized.
- Attend all safety meetings.
- When in doubt of a job procedure or a safety issue, ask your supervisor.

Reporting Of Injuries

All employees will be held accountable for failing to fill out a Notice of Injury Form immediately, even if medical treatment is not required. (Notice must be made at or near the time of the injury and on the same day of the injury.) Employees must report the injury to their immediate supervisor. A casual mentioning of the injury will not be sufficient. Employees must let their supervisor know:

1. How accident occurred.
2. What they were doing at the time of the accident.
3. What employees were present at the time of the accident.
4. When and where it happened.
5. Other pertinent information that will aid in the investigation of the accident.

Failure to report an injury immediately (meaning at or near the time of the injury and on the same day of the injury) is a violation of Safety Policy and the employee may be subject to immediate termination. An Accident Report Form (Exhibit P6.1) of the accident or injury will be completed within one business day of the event.

Every employee is expected to comply with the Safety Policy.

Safety Meetings

- Safety Training will be part of all employee meetings.
- Subjects for safety meetings will be chosen by management.
- A written record will be kept indicating the subject(s) discussed, date, attendees and conducting speaker.
- Safety Meeting records will be retained for one year.

Subject: General Safety Policy

Safety Rules

The purpose of safety rules is to thoroughly acquaint each of you with a set of safe working rules and procedures that will help you to preserve your health and welfare.

No safety policy, however complete, can cover all conditions that might arise; therefore, it is necessary for you to use your best judgment along with the observance of established job safe practices. It is the desire of Environmental Testing Solutions, Inc. to establish the safest working conditions by using the safest protective devices and equipment available and to promote a good housekeeping program.

It is necessary to have your cooperation in order to promote a good safety policy. If you do not completely understand all of your job procedures and safety rules, ask your supervisor for an explanation prior to starting work. It is Management's responsibility to provide the equipment and methods for your safe work performance. However, it is your responsibility to work according to established procedures. Accidents are caused; they don't happen. You can prevent accidents by putting forth your best daily efforts and give your complete cooperation in accomplishing your assigned tasks. Let's remember, your job is only as safe as you make it.

General Safety Rules

Personal Conduct

The following will not be tolerated.

- Deliberate failure to follow established safe work practices, rules or regulations provided by Management.
- Disregard of any supervisor's instructions.
- Attitudes of indifference, recklessness, hostility and inattention to the work are performed.
- Horseplay of any kind.
- Drinking of alcoholic beverages or taking controlled drugs.
- Sleeping on the job.
- Disabling or bypassing any safety devices

Physical Condition

The following physical conditions must be reported to your supervisor immediately upon receiving either a verbal or written report from a medical doctor.

- Defective eyesight.
- Defective hearing.
- Muscular weakness.
- Either high or low blood pressure.
- Heart disease and/or problems.
- Any other physical defect that might affect your safe work performance.
- All accidents, whether resulting in injuries or not, all sickness or other ailments no matter how slight they may seem, which are in any way, attributable to or connected with your employment, must be reported to your supervisor immediately.



Subject: General Safety Policy

- In any accident requiring the services of a medical doctor, a supervisor must be notified immediately.

Clothing and Safety Equipment

- Required personal protective clothing and/or equipment shall be worn at all times as deemed necessary by your immediate supervisor.
- Existing written standard operating procedures pertaining to your job assignments will prevail. Additional safety procedures may be required by your immediate supervisor, as deemed necessary.

Housekeeping and Personal Welfare

- Clean bodies and clothes are essential to good health and such should be maintained.
- All trash and/or waste containers, packing and paper boxes, etc. must be put in the proper place.
- Any and all work areas must be cleaned before the job can be accepted as being complete.
- Aisles, steps and other passageways must be kept clean and free of obstruction.
- Toilets and break areas are provided for personal needs and must be used for these purposes. They are to be kept clean and orderly at all times.
- Do not run up and down stairwells. Use provided handrails. Never carry loads up and/or downstairs that block your vision while walking. Never leave obstructions in stairwells.
- Additional safety rules may be added by supervision in each individual work area. These rules will also be followed by all employees.

Safety is everyone's responsibility. Let's prevent accidents rather than treat the results that unsafe practices and unsafe conditions can produce.

Compliance with Rules

All personnel are expected to fully comply with this Safety Policy. Any failure to do so will result in appropriate disciplinary action. All disciplinary action will be consistent with fair and just treatment of each individual employee. Any disciplined employee who feels he or she has not been fairly treated should follow the established procedures in resolving this problem.

The listed Safety Rules are illustrative and should not be viewed as an exclusive listing to encompass situations specifically mentioned. Management reserves the right at all times, when circumstances warrant it, to promulgate new rules or modify existing ones in order to insure a safe, healthy and productive work environment for all our employees, contractors, or guests.



Subject: General Safety Policy

Training

Safety training will be provided for new employees, and/or existing employees as required.

1. Know associated job hazards and safeguards.
2. Potential job hazards and safeguards.
3. Required personal protective equipment.
4. Know where to get assistance when needed.

Annual training will be provided for all persons in supervisory positions in the following:

1. How to conduct safety orientations.
2. How to conduct facility and/or area inspections.
3. How to conduct accident investigations.
4. How to perform Job Safety Analysis.

The training should be accomplished by the supervisor, but may be done by a training specialist or any outside consultant such as a vendor or safety consultant and/or the safety coordinator.

First Aid

The laboratory will be equipped with a first aid kit for use in emergency situations. Materials in the kit will not be used in lieu of seeking competent medical care.

In the event on injuries on the job, employees must notify supervisors of their injury. The supervisor will decide the best possible action for the injury.

Emergency Preparedness Program

- Discuss evacuation plans that will include evacuation routes and predetermined safe assembly areas.
- Train employees and subcontractors in emergency procedures, evacuation and assembly areas.
- Conduct training drills at least annually.
- Emergency plans will be updated at least annually and will include training of the employees and subcontractors.



Subject: General Safety Policy

Enforcement of Safety Policy

Safety violation notice(s) shall be issued to any employee, subcontractor or anyone on the jobsite violating the safety rules or regulations.

- Any violation of safety rules can result in suspension or immediate termination.

It is understood that Environmental Testing Solutions, Inc. is not restricting itself to the above rules and regulations. Additional rules and regulations as dictated by the job will be issued and posted as needed.

Exhibits

Exhibit P6.1: Accident Report Form



Subject: General Safety Policy

Exhibit P6.1: Accident Report Form



ACCIDENT REPORT FORM

Employee Name: _____

Supervisor Name: _____

Date of accident: _____ Time of accident: _____

How accident occurred (what were you doing at the time of accident):

Employees present at time of accident: _____

Where did accident occur: _____

Any other pertinent information:

Off site medical attention required: Yes _____ No _____

If yes, type of attention:

In -house medical Attention required: Yes _____ No _____

If yes, type of attention:

I certify that my answers are true and complete to the best of my knowledge.

Employee			Supervisor		
Name (Print)	Name (Signature)	Date	Name (Print)	Name (Signature)	Date



Subject: Safety Video Training Checklist

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		09-09-21
Quality Assurance Officer	Jim Sumner		09-09-21

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Updated policy to NELAP format.
09-09-21	2	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Changed video series.

Scope and Application

As part of Environmental Testing Solutions, Inc. new hire safety training, all employees are required to watch a safety video series. These videos are designed to make laboratory personnel aware of the hazards associated with laboratory testing and provide instruction in safe techniques, which will enable laboratory personnel to protect themselves from these hazards. This introduction will introduce new staff to good laboratory practices.

Check	Video
	Lab Safety Video Series: Proper Dress and PPE, Part-1
	Lab Safety Video Series: Safety Equipment, Part-2
	Lab Safety Video Series: Behavior, Part-3
	Lab Safety Video Series: Chemical Hazards, Part-4
	Lab Safety Video Series: Safe Chemical Handling, Part-5
	Lab Safety Video Series: Other General Hazards, Part-6



Subject: Laboratory Safety Orientation Checklist

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	• Updated policy to NELAP format.

Scope and Application

To provide a guided tour of the laboratory, identifying the evacuation procedures, the location of safety equipment and potential hazards.



Subject: Laboratory Safety Orientation Checklist

Laboratory Orientation Checklist (Laboratory Walk-Through)

Check	Safety Overview
	Has read, understands and signs the General Safety Policy
	Has watched, understands and signs the Safety Video Training
	Understands fire safety, emergency evacuation plan and exits, emergency phone numbers, location and operation of fire extinguishers, emergency lighting, evacuation procedures and meeting area.
	Knows location and how to use shower, eyewash, chemical spill kits and first aid kits.
	Understands chemical safety, storage and disposal procedures. Knows location of MSDS and how to read each section.
	Understands location of personal protective equipment (PPE) and appropriate use of PPE (lab coats, safety glasses, hearing protection, etc.), fume hood and other safety equipment. Instructed in proper use and care of disposable gloves.
	Instructed in the proper personal protective devices when handling corrosive, flammable, hazardous and carcinogenic substances.
	Understands safety precautions in using equipment, such as ovens and the autoclave.
	Understands hazard communication and labeling procedures, emphasizing the need for appropriate labeling of materials that are transferred from original containers.
	Understands the importance of good housekeeping practices (glassware cleaning, storage) and general requirements for good housekeeping practices (don't leave chemicals open on the counter, rinse out all glassware before washing, never leave glassware on the counter after tests have been completed, clean up after all tests have been completed, wipe down all counters and meters).
	Understands the importance of personal hygiene (frequent hand washing, no eating/drinking in the lab – only in areas designated by laboratory supervisor).
	An awareness of possible hazards associated with ongoing studies/work areas.
	Reporting needs in the event of a chemical spill or injury.
	Recycling of materials (paper, plastics, glass and aluminum).

Subject: Radiation Protection Policy

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
05-01-12	0	Internal	Jim Sumner (ETS)	Original document
06-20-12	1	External (TVA) External (NC RMB RPS) Internal	William Rogers (TVA) Donald Snodgrass (TVA) Rick Sherrard (TVA) Randy Crowe Jim Sumner (ETS)	<ul style="list-style-type: none"> • Provided additional information on building security. • Open doorways to the toxicity laboratory will be chained to prevent employees from accidentally entering the laboratory while contaminated samples are being used. • Incubators containing tests using samples containing tritium should remain locked. • Provided additional guidance on receiving samples from facilities that have historical documentation that indicates tritium concentrations are at or near background levels. • Example tritium disposal to sanitary sewer calculation was revised to exclude clean rinse water. • Exhibit P9.1: Example Signs and Postings were added. • Exhibit P9.2: Tritium Sample Receipt and Tracking Log was added. • Exhibit P9.3: Floor Plan was added.
11-02-12	2	External (TVA) Internal	William Rogers (TVA) Donald Snodgrass (TVA) Rick Sherrard (TVA) Jim Sumner (ETS)	<ul style="list-style-type: none"> • Exhibit P9.2: Tritium Sample Receipt and Tracking Log was updated and how the tritium inventory is tracked in the laboratory was described in RECEIPT, USE AND DISPOSAL OF TRITIATED SAMPLES section of this policy.
10-01-17	3	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> • Updated policy to NELAP format. • Removed requirements for ghost wipes and urine bioassays.

Scope and Application

The Radiation Protection Policy is procedures and information for the radiation worker who uses radioactive materials in a laboratory setting at Environmental Testing Solutions, Inc. (ETS). This policy also reflects the requirements of relevant federal and state regulations.

This policy specifically contains ETS procedures for accepting discharge water samples from Nuclear Power Plants, which contain trace quantities of tritium. ETS has established a limit on the level of tritium contained in these samples to meet safe disposal requirements to the sanitary sewer. All samples must contain ≤ 0.001 $\mu\text{Ci}/\text{mL}$ tritium. Samples exceeding the ETS requirement will not be accepted and returned to the client. ETS does not accept samples containing other radioisotopes, with the exception of naturally occurring radioisotopes.



Subject: Radiation Protection Policy

PREFACE

The Radiation Protection Policy is procedures and information for the radiation worker who uses radioactive materials in a laboratory setting at Environmental Testing Solutions, Inc. (ETS). This policy also reflects the requirements of relevant federal and state regulations.

This policy specifically contains ETS procedures for accepting discharge water samples from Nuclear Power Plants, which contain trace quantities of tritium. ETS has established a limit on the level of tritium contained in these samples to meet safe disposal requirements to the sanitary sewer. All samples must contain ≤ 0.001 $\mu\text{Ci}/\text{mL}$ tritium. Samples exceeding the ETS requirement will not be accepted and returned to the client.

ETS does not accept samples containing other radioisotopes, with the exception of naturally occurring radioisotopes.

INTRODUCTION

The radiation protection program at ETS combines the best efforts of management, radiation safety staff and all of its employees to ensure the safe use of radioactive materials.

ETS is licensed by the North Carolina Department of Health and Human Services (NC DHHS), Radiation Protection Branch to possess and use radioisotopes. This license has been issued by NC DHHS due to established policies and procedures designed to ensure the accountability of radioactive materials, which will minimize the exposure of employees to radioactive materials.

Subject: Radiation Protection Policy

PERSONELL ROLES AND RESPONSIBILITIES

There are three roles in ETS radiation safety program:

- The Radiation Safety Officer
- The Authorized User
- The Radiation Worker

The roles and responsibilities of each are described below:

The Radiation Safety Officer:

- oversees the radiation safety program
- authorizes the use of radioactive materials
- reviews incidents involving radioactive materials
- sets policies for the use of sources of radiation
- gives general supervision to the implementation of those policies
- advise Authorized Users and Radiation Workers on radiation safety and regulatory compliance issues
- provides the following services:
 - training
 - personal monitoring
 - pregnancy counseling
 - laboratory radiation surveys
 - incident, spill and contamination management
 - radioactive waste management

Radiation Safety Officer at ETS:

Jim Sumner, Phone: (828) 350-9364, E-mail: Jim@etsnclab.com

The Authorized Users:

Authorized Users are management who are approved by the Radiation Safety Officer to use radioactive materials under specific conditions. Any employee using radioactive materials at Environmental Testing Solutions, Inc. is either an Authorized User or is a Radiation Worker using radioactive materials under an Authorized User's supervision.

Each Authorized User is responsible for:

- The health and safety of anyone using or affected by the use of radioactive materials under his or her direction or supervision.
- Personally attending training and ensuring that his/her employees, staff and visitors receive appropriate training.
- Ensuring that his/her employees comply with relevant regulations, policies and procedures.

Authorized Users at ETS:

Jim Sumner, Phone: (828) 350-9364, E-mail: Jim@etsnclab.com

Kelley E. Keenan, Phone: (828) 350-9364, E-mail: Kelley@etsnclab.com

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Subject: Radiation Protection Policy

The Radiation Worker:

A Radiation Worker is anyone who uses radioactive materials. The Radiation Worker's training, compliance with regulations and procedures, careful work habits and respect for the health and safety of fellow workers are an integral part of the radiation safety program.

Radiation Worker responsibilities include the following:

- Complete the radiation safety training.
- Be familiar with the isotopes in use; know their radiological, physical and chemical properties, methods of detection, and types of hazards presented by each one, and the specific precautions and handling requirements for each isotope.
- Be familiar with all the relevant procedures of the radiation safety program, including waste disposal procedures.
- Maintain appropriate inventory, disposal and survey records.
- Secure radioactive materials by making sure that radioactive materials are stored or are under immediate supervision within the laboratory.
- Inform coworkers and visitors to the work area about the presence of radioactive materials and of any precautions they should take.
- Know who to notify in any incident involving sources of radiation and how to handle spills and personal contamination.

TRITIUM (Hydrogen-3, H-3)

General:

Tritium is a very low energy beta emitter and even large amounts of this isotope pose no external dose hazard to persons exposed. The beta radiation cannot penetrate the outer protective dead layer of the skin of the body. The major concern for individuals working with this isotope is the possibility of an internal exposure. Such an exposure may occur if an individual contaminates bare skin, accidentally ingests the material, or breathes it in the form of a gas or vapor. The critical organ for a tritium uptake is the water of the whole body. Three to four hours after an intake of tritiated water, the radioactive material is uniformly distributed throughout the body fluids. A tritium intake may be easily detected by analyzing a urine sample.

Many tritium compounds readily migrate through gloves and skin. Data from accidents involving tritium indicate that 80% of the body exposure occurs through skin absorption. Tritium compounds should be handled with gloved hands, and in some cases, with double gloves. Change gloves often. Tritiated DNA precursors are considered more toxic than tritiated water. However, they are generally less volatile and do not normally present a significantly greater hazard.

Subject: Radiation Protection Policy

Physical data:

Radiological half-life: 12.28 years
Emissions: beta particles with a maximum energy of 18.6 keV and an average energy of 5.7 keV
Maximum range in air: 4.7 mm in air, 6 mm in tissue

Fraction transmitted through the dead layer of the skin: none
Dose rate to the skin at 10 cm: none
Dose rate to epidermal basal cells from skin contamination of 1 mCi/cm²: none
Shielding: none needed

Safe drinking water limit: 20,000 pCi/L = 0.00002 µCi/mL
ETS sample receipt limit: ≤ 0.001 µCi/mL

Internal occupational limits (annual limits on intake as tritiated water):
Ingestion: 80 mCi which is equivalent to 5 rem

Detection:

Liquid scintillation counting is the preferred method for detecting H-3. Most Geiger-Muller (G-M) detectors will not detect the presence of H-3.

Precautions:

H-3 contamination cannot be detected with a G-M meter, and special precautions are needed to keep the work environment clean. The regular use of wipe testing, using a liquid scintillation counter, is the only way to insure that your work space does not contain contamination.

USING TRITIATED SAMPLES SAFELY

In some cases the practices described below are required by regulation or by license conditions but in all cases these practices represent good laboratory practices which will promote the safe use of radioactive materials. Additional good laboratory practices are described in the laboratory General Safety Policy (POLICY-P6).

Protective Clothing

Lab accidents often involve spills or splashes which can readily contaminate exposed wrists, legs and feet. For any work with contaminated samples:

- Double gloves
- Full-length lab coat (worn closed with sleeves rolled down)
- Close-toed shoes (do NOT wear sandals or other open-toed shoes)
- Safety glasses

Keep an extra set of clothing and shoes in the lab in the event that clothing becomes contaminated.

Avoid using petroleum-based hand creams when wearing gloves because petroleum-based hand creams may increase glove permeability.



Subject: Radiation Protection Policy

Food and Beverages

- Do not eat or drink in any room where contaminated samples are in use.
- Do not store food, beverages, or medicines in refrigerators or freezers where contaminated samples are used or stored.
- Do not store food, beverages, medicines, cosmetics, coffee cups, eating utensils, etc. on open surfaces near lab benches where contamination can be readily spread.
- Smoking is not allowed on ETS property.

Mouth Pipetting

Never mouth pipet any solutions.

Security

- Building should remain locked at all times.
- Security alarm must be armed during non-working hours.
- Supervise visitors in the lab.
- When visitors who are not accompanied by authorized lab personnel enter the lab, find out who they are and why they are there.
- When samples containing tritium are used in the toxicity laboratory, open doorways will be chained to prevent employees from accidentally entering the laboratory.
- Incubators containing tests using samples containing tritium should remain locked.

Signs and Labels

- A Tritium Safety Sheet will be posted in all laboratory areas where tritiated samples are actively being used. The signs will indicate the name of the facility that has submitted tritiated samples. For example postings, refer to Exhibit P9.1.

Monitoring:

- Due to the low levels of tritium received by the laboratory, monitoring with ghost wipes is not required. Geiger counters (survey meters) are not sensitive to tritium radiation and therefore wipe tests and a liquid scintillation counter are necessary to determine levels of contamination. In the event that testing becomes required, ETS contracts wipe tests to a laboratory that has been approved for this testing. Radiation badges are not issued to individuals using only tritium because the radiation emitted by tritium is not of sufficient strength to penetrate the badge.
- Due to the low levels of tritium received by the laboratory, analyses of urine samples are not required.

Subject: Radiation Protection Policy

SPILL AND INCIDENT PROCEDURES

An accident may happen to even the most careful of workers and any worker may be called upon to assist in the case of a spill, a contamination incident, or an emergency. Be prepared and know how to respond before an incident happens.

The following procedures provide an overview of who to notify and how to respond to several different types of incidents.

Who To Notify

An incident can be readily handled by the laboratory and may include a spill of contaminated samples or an incident of personal contamination. In all cases, contact the Radiation Safety Officer or Authorized User of the incident.

In the event of a fire or serious injury:

- Call 911
- Begin evacuation procedures (POLICY-P6)

What to Do When a Spill Occurs

For skin and body contamination, wash skin using mild soap and warm water for 2-3 minutes. Do not abrade skin or use hot water.

For spills onto laboratory surfaces:

1. Start cleanup at the edge of the contaminated area and work inward.
2. Clean wet spills or contamination using absorbent paper towels.
3. Change paper towels frequently to avoid smearing contamination around.
4. Change gloves frequently and check for rips and tears.
5. Mild acids may be used as decon solutions (e.g. acetic acid).

A Serious Injury with Radioactive Contamination

Serious injury and life-or-death situations always take priority over radiological concerns. In all cases of physical injury, even minor injuries, medical attention and hospitalization take precedence over contamination concerns. There are no radiation sources at ETS that produce contamination and radiation exposure risks large enough to prevent first aid from being given.

1. Call 911. Public Safety responders are trained to provide first aid.
2. If possible, have someone meet emergency response personnel and escort them to the accident scene.
3. Remove contaminated items and clothing from the victim only if these actions will cause no further harm.
4. If time permits, attempt to provide an uncontaminated pathway for the emergency crew.
5. Have someone who can provide useful additional information accompany the victim to the emergency room.

Subject: Radiation Protection Policy

RECEIPT, USE AND DISPOSAL OF TRITIATED SAMPLES

Documentation:

- Nuclear Power Plant sample locations which have no potential of receiving tritium contaminated waste streams are required by ETS to provide documentation that indicates that there is no potential of tritium contamination at the location where samples are submitted for testing (this may include facilities that have historical records where tritium levels have been documented to be at or near background levels).
- Nuclear Power Plant sample locations which have the potential of receiving tritium contaminated waste streams are required by ETS to:
 1. Provide test results of the tritium concentration ($\mu\text{Ci}/\text{mL}$) contained in each sample submitted for testing. Documentation may be sent by fax or email but must be received before samples are accepted by our laboratory.
 2. Tritium concentrations must be $\leq 0.001 \mu\text{Ci}/\text{mL}$ in each sample submitted. This may result in the termination of a toxicity test, if a sample containing $\leq 0.001 \mu\text{Ci}/\text{mL}$ cannot be collected for completing a test (meeting hold times and renewal requirements).
- Our laboratory will not receive samples contaminated with other radioisotopes.

Sample Receipt:

1. Wear protective clothing as described in "Using Tritiated Sample Safely" above, when unpacking tritiated samples.
2. Follow laboratory Sample Receipt, Handling and Storage Procedures (SOP-G4).
3. Log samples into the Tritium Sample Receipt and Tracking Log. The tracking log is an excel spreadsheet which documents the date received, sample description, tritium concentration and volume received. The spreadsheet calculates the total tritium contained in the sample and the contribution to the tritium inventory in the laboratory (Exhibit P9.2). Once samples are disposed to the sanitary sewer, the date is entered into the log and that contribution is removed from the laboratory's tritium inventory. Tritium test results, supplied by the facility, are maintained in the tracking log book.

Use of Tritiated Samples:

ETS standard operating procedures are used to perform the required testing of tritiated samples.

Subject: Radiation Protection Policy

Sample Disposal:

All samples will be disposed down the sanitary sewer. Work areas, glassware and plasticware that come in contact with contaminated samples will be washed with soapy water or a weak acid (e.g. acetic acid). Waste generated from washing will be disposed down the sanitary sewer.

Below is a conservative estimate of tritium released to the sanitary sewer, based on the tritium concentration limit set by ETS for samples received in the laboratory ($\leq 0.001 \mu\text{Ci/ml}$).

Monthly average concentration for release to sanitary sewer requirement:

$\leq 1.0 \times 10^{-2} \mu\text{Ci/ml}$ or $\leq 0.01 \mu\text{Ci/ml}$ for Tritium obtained
from Table 3 of Appendix B to 10 CFR 20.1001-20.2401

Monthly average water use at the laboratory (obtained from water bill):

5 CCF/month = 14,158,424 mL/month
(low conservative estimate = 10,000,000 ml/month)

Monthly average volume of samples containing tritium:

10 gallons for 1 test = 37,854 mL
(high volume estimate = 50,000 ml)

Maximum concentration of tritium contained in samples:

0.001 $\mu\text{Ci/ml}$

Highest estimated concentration released to sanitary sewer:

0.001 $\mu\text{Ci/ml}$ contained in 50,000 ml of sample disposed down sewer
with dilution by 10,000,000 ml of clean water in a month

= $(0.001 \times 50,000) / 10,000,000 = 0.000005 \mu\text{Ci/ml}$ monthly average

The maximum monthly average (0.000005 $\mu\text{Ci/ml}$) is well below the requirement for release to the sanitary sewer ($\leq 0.01 \mu\text{Ci/ml}$).

SURVEYS AND CONTAMINATION CONTROL

Surveys performed by laboratory personnel are the main line of defense to prevent the spread of contamination within and beyond the laboratory. This section summarizes the requirements for performing surveys.

Wipe surveys, using "wipes" counted on a liquid scintillation counter, are used to monitor possible laboratory contamination at ETS. Wipe tests are the most versatile and most sensitive method of detecting low-level contamination in the laboratory.

Defining Contamination:

If an item or area with a sustained count rate of three times background or more is found, the item or area should be considered to be contaminated.

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Subject: Radiation Protection Policy

How to Perform a Wipe Test

1. Wipe tests are performed by an approved testing laboratory using sample kits provided. In general, a piece of filter paper (about 1" in diameter), Q-tip or other swab is used to perform the wipe test. Wipe the area being surveyed. If the area is very large, subdivide it into smaller areas and use several wipes to better pinpoint the location of contamination. For some surfaces, including skin and clothing, the wipe media should be moistened with water or other appropriate solvent. Identify the area that the wipe sample was collected on the Floor Plan (Exhibit P9.3) and attach to the chain-of-custody form supplied by the laboratory performing the analysis.
2. The wipes are then shipped to the approved laboratory for analysis. The sample activity is determined by dividing the sample count by the counter's efficiency for the isotope in question.

When to Perform Wipe Tests:

Laboratory personnel should conduct wipe tests on individual work areas (which may include floors, benchtops, experimental equipment, etc.) under the following conditions:

- at the end of a study using tritiated samples
- if a major spill occurs and decontamination is required

Where to Perform Wipe Tests:

Wipe tests can be performed on areas where splashes or spills may have occurred and areas where a person could unknowingly transfer contamination. Typical survey locations include:

- Bench tops, including the edges
- Sinks where tritiated samples were disposed (sink basin, surrounding bench, faucet handles)
- Floors: at working areas, laboratory entrances and waste containers
- Communal equipment, such as pipettors, timers, incubators, centrifuges, water baths, etc.
- Clean areas (offices, desks, doorknobs, phones, computers)

When to Document Wipe Tests

Records of each wipe test are maintained in the laboratory files. Wipe tests should contain the following information:

- Name of person performing the wipe test
- Date
- Brief description of the area
- Follow-up action taken when contamination is found

Subject: Radiation Protection Policy

DOSE LIMITS AND PERSONAL MONITORING

Annual Radiation Dose Limits

Each worker who is monitored for internal radiation exposure at ETS is notified about the doses he or she receives.

When a worker accumulates during any part of a year a dose at or above background, the Radiation Safety Officer will investigate to determine causes of the dose and to recommend practices to minimize radiation exposure in the future.

Annual Limits of Intake is the amount of a specific radioisotope taken internally which will produce a whole body dose of 5000 millirems. For example, if a worker is has had an intake of 80 mCi of tritium with a resulting dose of 5 mrem, then the table below indicates this dose to be 0.1% of the annual radiation dose limit.

Organ	Limit (mrem/yr)	Comments
Whole Body	5,000	Includes dose from external and internal sources
Lens of Eye	15,000	---
Extremities	50,000	Extremities include the arm below the elbow or leg below the knee
Skin	50,000	---
Embryo & Fetus	500 for entire pregnancy	---
Occupational exposure of a minor	10% of the limits above	Applies to anyone under age 18
Member of the General Public	100	---



Corporate Policies

SECTION	POLICY-P9
REVISION NUMBER	3
EFFECTIVE DATE	10-01-17
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Subject: Radiation Protection Policy

Internal Monitoring

Radioactive materials can be taken up internally when volatile or other airborne radioactive materials are inhaled and when radioactive materials are absorbed through skin or ingested. Internal uptakes may occur when lab personnel unknowingly handle contaminated objects, when permeation occurs through highly contaminated gloves, or when spills occur. To determine the dose resulting from an intake, bioassays must be performed. For the tritiated samples used at ETS, bioassays involve urinalysis counting.

When are Bioassays Required?

The Radiation Safety Officer may request bioassays when widespread contamination has occurred in the laboratory and when skin contamination has occurred. Any worker can request a precautionary bioassay at any time.

Declared Pregnant Worker Program

Any radiation worker who is pregnant or believes that she may be pregnant should contact the Radiation Safety Officer. All inquiries will be kept in confidence. The Radiation Protection Officer will alter work activities for the pregnant employee so that she is no longer working with tritiated samples. This will minimize additional exposure.

Exhibits

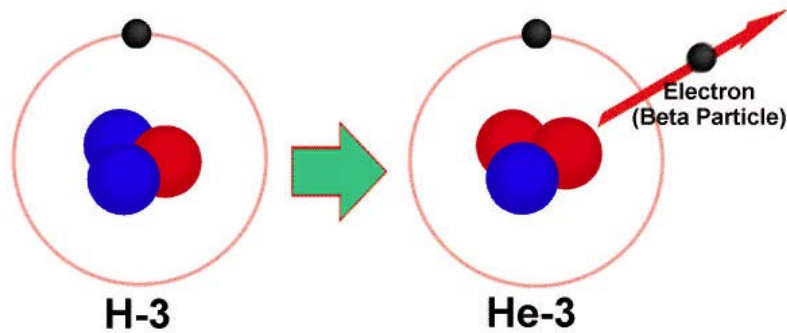
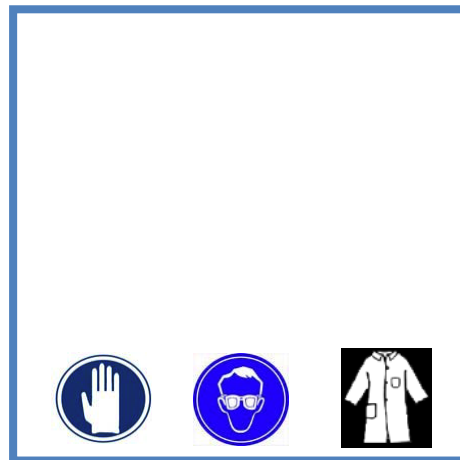
- Exhibit P9.1: Example Signs and Postings
- Exhibit P9.2: Tritium Sample Receipt and Tracking Log
- Exhibit P9.3: Floor Plan

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Subject: Radiation Protection Policy

Exhibit P9.1: Example Signs and Postings

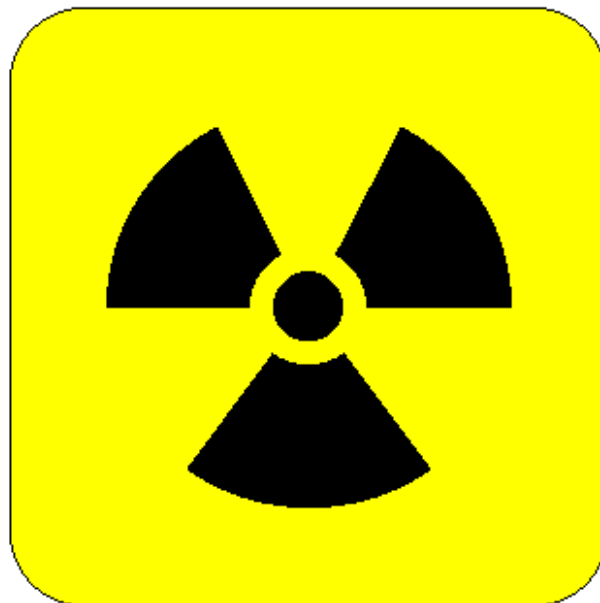
Tritium LAB SAFETY



Subject: Radiation Protection Policy

CAUTION

Tritiated Samples in Use



Samples which may contain tritium include:

Sequoyah Nuclear Plant

Shearon Harris Plant

Watts Bar Nuclear Plant

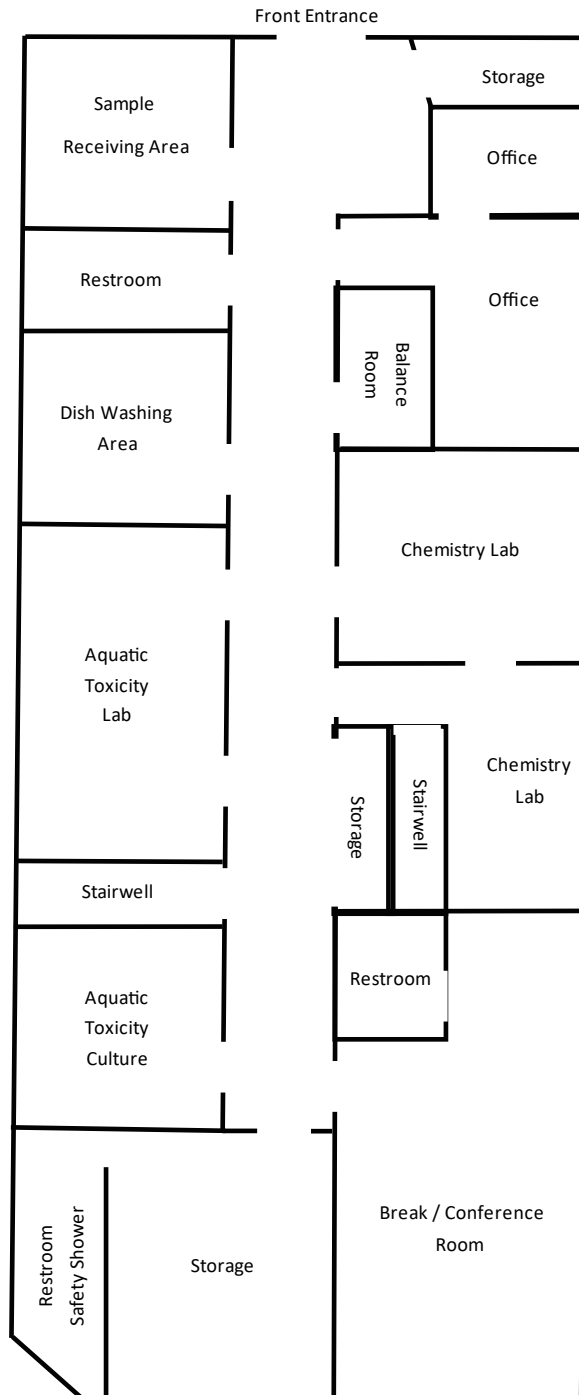
Subject: Radiation Protection Policy

Exhibit P9.2: Tritium Sample Receipt and Tracking Log

Tritium Sample Receipt and Tracking Log						
Date received	Sample description	Tritium concentration (µCi/mL)	Volume received (mL)	Total tritium (µCi)	Contribution to Inventory (µCi)	Date disposed to sanitary sewer
08-09-17	Shearon Harris	0.0000484	4000	0.0194	0.0000	08-24-17
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
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				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
				0.0000	0.0000	
		Limit (µCi)	100	Total Inventory	0.0000	

Subject: Radiation Protection Policy

Exhibit P9.3: Floor Plan



POLICY P9-Revision 3 — Exhibit P9.3

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Subject: Exit Interview

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-01-17
Quality Assurance Officer	Jim Sumner		10-01-17

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
06-01-11	0	Internal	Kelley Keenan (ETS)	Original document
10-01-17	2	Internal	Jim Sumner (ETS)	• Updated policy to NELAP format.

Scope and Application

To obtain necessary information during employee interview at termination of employment.

Exit Interview

Employee: _____ Date: _____

- Obtain building keys.
- COBRA insurance information and sign sheet.
- Address to send last check and W2:

- Verify vacation hours. # hours: _____



Subject: Exit Interview

Reason for termination:

- Unsatisfactory performance
- Unsatisfactory attendance
- Unsatisfactory conduct

Explanation of termination:

Recommended for rehire?

- Yes
- No



Subject: Rules Governing Certified Laboratories Training Checklist

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		07-31-19
Quality Assurance Officer	Jim Sumner		07-31-19

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
08-17-15	0	Internal	Jim Sumner (ETS)	Original document
10-01-17	1	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Updated policy to NELAP format.
07-31-19	2	Internal	Jim Sumner (ETS)	<ul style="list-style-type: none"> Updated policy to included revised rules.

Scope and Application

As part of Environmental Testing Solutions, Inc. new hire training, all employees are required to read the rules that govern certified testing laboratories. Environmental Testing Solutions, Inc. is certified by various programs and each program has specific rules for certification.

Check	Rule
	Rules Governing Drinking Water Laboratory Certification (10A NCAC 42D .0100, 2004)
	ENR – Environmental Management Commission – Laboratory Certification (15A NCAC 02H .0800, 2019)
	ENR – Environmental Management Commission – Biological Laboratory Certification (15A NCAC 02H .1100, 2019)



Subject: Face Covering Requirement during COVID-19

Approval

Title	Name	Signature	Date
Laboratory Supervisor	Kelley E. Keenan		10-05-20
Quality Assurance Officer	Jim Sumner		10-05-20

Document Revision History

Effective Date	Revision number	Review Type	Evaluators	Revisions
10-05-20	0	Internal	Jim Sumner (ETS)	Original document

Policy

To protect the health and safety of our employees and clients, face coverings are required when anyone enters Environmental Testing Solutions, Inc. This includes, but is not limited to, all employees, contractors, vendors, guests and visitors. Face coverings must also be worn when entering any client or vendor facility, whether it is a requirement of that facility or not. This policy is in effect until further notice.

Wearing a face covering must be practiced in combination with other preventative measures:

- Physical distancing (keeping at least 6 feet of distance between yourself and others)
- Covering your nose and mouth when coughing or sneezing
- Following cleaning and disinfecting protocols
- Washing your hands often with soap and water for at least 20 seconds or, if soap is not available, using a hand sanitizer that contains at least 60% alcohol.

When to wear a face covering

You must wear a face covering at all times unless:

- You are alone in a private indoor space (e.g., a laboratory space that is not shared with any other individual)
- You are alone in a company vehicle
- You are eating or drinking in the office or breakroom where you are approved to remove your face covering and you maintain at least 6 feet of physical distance between yourself and others

Subject: Face Covering Requirement during COVID-19

- You are outdoors and are able to maintain at least 6 feet of physical distance between yourself and others

You must keep a face covering with you at all times.

How to wear a face covering

Face coverings **must**:

- Securely cover one's nose and mouth and fit snugly but comfortably against the side of the face
- Be secure with ties or ear loops
- Allow for breathing without restriction
- If made from cloth, include at least 2 layers of fabric
- Be kept clean
 - Cloth face coverings must be able to be laundered and machine-dried without damage or change to shape
 - Single-use face coverings must be properly and safely discarded in the trash after use

Face coverings **must not**:

- Be reversed, moved or removed unnecessarily
- Be shared with others
- Have one-way exhalation valves, as they are designed to allow droplets to pass through the covering
- Include face shields as a substitute for face coverings as there is currently not enough evidence to support the effectiveness of face shields
- Include bandana or gaiter-style face coverings, as they do not securely cover the mouth and nose.

Environmental Testing Solutions, Inc. will provide face coverings to anyone in need. To obtain a face covering, employees should contact their supervisor.

Enforcement

Anyone not wearing a face covering according to this policy will be subject to corrective action and/or disciplinary process.

If you see someone not wearing a face covering in a situation where one is required, you can:

- Approach the person and remind them that a face covering is required
- Notify the supervisor

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