

GRADIANT HEALTH, SAFETY & ENVIRONMENTAL (HSE) POLICY

Gradiant Corporation (including all wholly owned subsidiaries) is a responsible water treatment technology, EPC, and O&M company committed to taking adequate precautions related to Health, Safety, and the Environment (HSE) in developing, manufacturing, testing, storing, handling and distributing of all our products and operations. Adherence to the HSE policy is a core company value and is the responsibility of every employee. The following bullets cover the key Gradiant's HSE policies:

Safety Strategy

- Set up required governance for safety related activities through formation of a Safety Committee, which will oversee all safety related decisions
- Incorporate HSE considerations as a priority in the company's planning and operational decisions.
- Commit the resources needed to implement the HSE policy

Zero Incidents

- Every Gradiant employee will strive to ensure our goal of zero incidents. Certain areas require extra focus due to Gradiant's nature of business: Injuries resulting in permanent disabilities or fatalities, Catastrophic fire and explosions, Release of hazardous materials into the environment, Incident Reporting, Response and Closure.
- Ensure active reporting of all types of incidents within all levels of the company
- Ensure timely and standardized reporting and response to any incident; fair and unbiased investigation into every incident and appropriate close-out with all stakeholders of the incident in order to prevent and/or mitigate the severity and impact of such incidents

Stakeholder HSE Management

- Know and adhere to all applicable HSE policies established by the customer for whom we are conducting business (generally outlined in customer's HSE policy document and/or third party verification systems, e.g. ISNetworld).
- Raise conflicts or non-conformances immediately to the customer to ensure timely resolution
- Comply with all applicable HSE laws and regulations and cooperate with local, state and federal agencies in their cataloging, inspection and enforcement activities

Safety Communication

- Develop and communicate HSE objectives on a frequent basis throughout the organization so that all employees are accountable and understand their individual responsibilities
- Communicate HSE policies and local rules clearly through posters, signs or other relevant media

Safety Training

- Develop, maintain and continuously improve on a comprehensive training safety program
- Ensure appropriate and adequate training is provided to all employees to carry out their routine job functions effectively and safely
- Ensure unsafe activities are stopped and rectified before progressing

Emergency Response

- In the event of a safety or environmental event, report and disclose information to the operating company and/or governmental authorities as required by laws and/or agreements or contracts concerning the situation in order to facilitate a prompt and appropriate response to potential public inquiries.
- Plan and respond to emergency, crisis and business disruption situations, as applicable

Safety day-to-day management

- Provide PPE (Personal Protective Equipment) to all employees and enforce strict adherence to wearing appropriate PPE
- Manage operations in a responsible manner and respond effectively to avoid and/or mitigate adverse HSE impacts associated with our operations
- Design safety features into all our products and services, where applicable

Safety Compliance and audits

- Conduct periodic assessments of operations and audits to evaluate, measure, and assure HSE performance and compliance
- Provide a path for swift action to bridge gap due to non-conformances

Substance Abuse

- Ensure strict adherence to Gradiant's zero tolerance substance abuse policy which includes drugs, alcohol and smoking.

Danny Jimenez

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