Mitra QSR KNE, LLC
Hazard Communication Program

Purpose

Mitra QSR KNE, LLC is committed to the prevention of chemical exposures that may result in injury and/or illness. The purpose of this program is to make sure that all affected employees understand the information concerning the dangers of all known hazardous chemicals used by Mitra QSR KNE, LLC and to protect company employees who may encounter hazardous chemicals while performing their job duties.

All employees are required to follow the procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of the Program Administrator.

Scope

Mitra QSR KNE, LLC strives to provide all employees with a safe and healthy workplace. This Hazard Communication Program is integrated into our company's written safety and health program. This safety program affects all company employees who may encounter hazardous chemicals while performing their job duties.

Exclusions from this program:

- Any substances which are foods, drugs, cosmetics, or tobacco products intended for personal consumption by the employees while in the workplace.
- Any consumer products or foodstuffs packaged for distribution to (and intended for use by) the public.
- Any contractor working onsite, it is their company's responsibility to ensure their safety and training.

Program Responsibilities

Management. The management of Mitra QSR KNE, LLC understands the importance of informing employees of the chemical hazards encountered in the workplace. Management supports the efforts of the Program Administrator by pledging financial and leadership support for the program. Management will regularly and effectively communicate with employees about the program.

Hazard Communication Program Administrator. The Program Administrator is responsible for the program's implementation, management, and recordkeeping requirements. The Program Administrator will report directly to upper management and be responsible for this policy and program. All safety data sheet (SDS) evaluations, implemented control measures for chemical handling, PPE requirements and training will be coordinated under the direction of the Program Administrator in collaboration with management. The Program Administrator will monitor the results of the program to determine if additional areas of focus are needed. The Program Administrator will also:

- Develop a list of all hazardous chemicals in the workplace
- Obtain SDS for all hazardous chemicals on-site
- Complete a chemical hazard assessment for all hazardous chemicals
- Determine the appropriate PPE for all work tasks involving chemicals
- Obtain and review SDS for new chemicals prior to using the chemical
- Ensure annual training is performed and documented (Maintained in Yum Brand Portal)

- Conduct an annual review of the Hazard Communication Program and document the review using the proper form (Appendix B)

Managers And Supervisors. Managers and supervisors will:

- Be accountable for the health and safety of all employees within their location and actively support the Hazard Communication Program
- Attend annual training on the program
- Verify that employees in their store(s) have received appropriate training
- Ensure that recommended controls are implemented and/or used appropriately
- Notify the Program Administrator when new hazardous chemicals are purchased

Employees. Every employee is responsible for conducting himself/herself in accordance with this policy and program. All employees will:

- Attend hazard communication training as required and apply the knowledge and skills acquired to all work activities
- Become familiar with label information, including pictograms
- Become familiar with the 16 sections of SDS
- Use appropriate PPE for the chemicals and tasks being performed
- Know where and how to locate SDS Sheets and the Hazardous Communication Program

Chemical Inventory List

Mitra QSR KNE, LLC maintains a list of the hazardous chemicals currently present in the workplace (Appendix A). This list is periodically reviewed and updated by the Program Administrator in conjunction with Yum Brands corporate office. The list is cross-referenced with the SDS and is kept with this program and SDS to serve as an index to help employees identify and locate necessary information.

Safety Data Sheets (SDS)

These sheets provide detailed information on each hazardous chemical, including its potentially hazardous effects, its physical and chemical characteristics, and recommendations for appropriate protective measures.

The Program Administrator obtains the necessary SDS for all hazardous materials. SDS are kept electronically and assessable to each employee by scanning the QR Code. The code is posted near all other employee postings.

If the internet is down and one is needed, reach out to the Area Coach, Director of Operations, and /or Head of Risk Management.

Employees who require emergency medical treatment after exposure to a chemical should take a copy of the SDS to the medical facility.

Container Labeling

The chemical manufacturer, importer or supplier is responsible for labeling the chemical containers received by Mitra QSR KNE, LLC. Employees receiving chemical shipments are responsible for ensuring the chemical containers are labeled. If the chemical containers are not labeled or if the label is damaged, contact the Program Administrator. Chemicals transferred to secondary containers in the workplace must also be appropriately labeled.

The procedures for proper labeling of all containers are as follows:

- Inspect incoming containers to ensure they have legible labels
- Manufacturer chemical labels should never be removed or defaced until the chemical is completely used; Empty containers that are saved for reuse must have the original label removed or marked out and obliterated; Empty containers that are used for waste or chemical products must have a new label affixed or have the information written directly on the container.
- Secondary containers must be labeled with the chemical name and hazard when the substance is transferred from the primary container to a secondary container.
- All chemical storage areas such as cabinets, shelves and refrigerators must be labeled to identify the hazardous nature of the chemicals stored within the area (e.g., flammables, corrosives, oxidizers, etc.). All signs should be legible and conspicuously placed.

Mitra QSR KNE, LLC. will use labels identical to those supplied by the manufacturer, importer or supplier for all secondary containers used. No containers or chemicals will be used if not properly labeled. If there is a question about the accuracy of the label or if a container is not labeled, contact the Program Administrator immediately.

Employee Training

Mitra QSR KNE, LLC. provides employees with information on any operations in their work area(s) where hazardous chemicals are present, the location of the written Hazard Communication Program, chemical listings, and the location of SDS. Training will be provided on the job and in a classroom setting prior to first exposure to a hazardous material and will cover the specific chemicals the employee is exposed to and their associated hazards. Chemical-specific information will always be available through labels and SDS. Attendance at all training is mandatory. Refresher training will be conducted at least annually.

Employee training will cover the following items:

- Any operation in their work area(s) where hazardous chemicals are present.
- The location and availability of the written Hazard Communication Program, including the required list(s) of hazardous chemicals, labels and SDS.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area(s) (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.)
- Describe the labeling system, including the labels with the signal words, hazard statements, precautionary statements, and pictograms.
- The physical and health hazards of the chemicals in the work area(s) and where this information can be found on the chemical label and SDS.
- The measures employees should take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures and personal protective equipment to be used.
- The details of the Hazard Communication Program, including an explanation of the SDS, and how employees can obtain and use the hazard information.
- The periodic requirement for employees to perform non-routine tasks that may involve hazardous materials and the information given to them before starting work by their supervisor regarding the potential exposure hazards.

Training will also be provided on an as-needed basis when new hazards are introduced into the workplace, when new hazards are discovered, and/or when new information on a SDS has been revised. All training will be documented on the Team KFC Site.

Periodic Program Review

All hazard communication procedures and training are reviewed by the Program Administrator annually.

Annual inspections are documented with the form shown in **Appendix B** and maintained by the Program Administrator.

Outside Contractors

Subcontractors working on our property or job site are required to bring copies of SDS for all hazardous materials they are bringing on the site. These will be kept in the manager's office, so the information is accessible to all employees. Each subcontractor must bring its specific Hazard Communication Program and SDS in a binder labeled with the contractor's name and identified as a Hazard Communication Program. Upon leaving the jobsite and the removal of all hazardous materials, they may take their SDS and Hazard Communication Program with them.

Contractors working on the company's property or job site will be informed of Mitra QSR KNE, LLC. written Hazard Communication Program and where to locate SDS. It will be the responsibility of that employer to properly train his or her employees in the avoidance and/or emergency procedures for these materials.

Record Retention

All hazard communication training and program review records will be retained for ten years.

All SDS will be archived and retained indefinitely.

Revision History

March 2024 – Implementation

May 2024 – Added Email (Sanitizer Buckets) and Closed Loop System Letters as Appendix

June 2025 – Updated Chemical List and reviewed the list to ensure PPE compliance.

Appendix A – Chemical List

DESC	Manufacturer	Gin #	Item Number	SDS Sheet	SDS #
AIR FRESHNER REFILLS AROMIST 2.7OZ (12) 4CT	Kay Chemicals	29082	1110052	Yes	1
CLEANER DISINFECTANT RTU TB (6) 1QT	Kay Chemicals	59634	1110126	Yes	2
CLEANER DRAIN BEVERAGE TOWER DAILY (2) 64OZ	Kay Chemicals	31387	1110399	Yes	3
CLEANER DRAIN TREATMENT (6) 1QT	Kay Chemicals	32819	1110375	Yes	4
CLEANER FLOOR & ALL SURFACE KAY (120) 3OZ	Kay Chemicals	27518	1111727	Yes	5
CLEANER FLOOR & TILE KADET QUARRY (2) 2GAL	Kay Chemicals	27590	1111715	Yes	6
CLEANER FLOOR KADET (120) 2OZ	Kay Chemicals	9129	1114110	Yes	7
CLEANER GLASS & MULTI SURFACE (40) 1.5OZ	Kay Chemicals	28629	1111714	Yes	8
CLEANER GRAFFITI REMOVER KAY (8) 4CT	Kay Chemicals	54117	1114115	Yes	9
CLEANER KAY LIQUID DISINFECTANT (4) 1QT	Kay Chemicals	54876	1110006	Yes	10
CLEANER KAY QSR SUPER CONTACT (4) 32OZ	Kay Chemicals	32962	1110096	Yes	11
CLEANER KAY SPECIALTY POLISH (6) 1QT (SS Polish)	Kay Chemicals	54119	1110055	Yes	12
CLEANER OVEN KAYÂ® AUTO DISPENSED II (4) 1GAL	Kay Chemicals	26112	1112007	Yes	13
CLEANER PEROX MULTI SURF AND DISINFECTANT (1)2GAL	Kay Chemicals	31139	1110387	Yes	14
CLEANER QSR 2 IN 1 CONC FLOOR & DEGREASER (2) 2GAL	Kay Chemicals	26610	1111807	Yes	15
CLEANER QSR BAKED ON SOIL REMOVER (4) 1GAL	Kay Chemicals	15527	1111725	Yes	16
CLEANER QSR HEAT ACTIVATED GRILL & TOASTER (4) 1QT	Kay Chemicals	93385	1111716	Yes	17
CLEANER RESTROOM (6) 1QT	Kay Chemicals	27407	1114114	Yes	18
CLEANSER KAY QSR FRYER (6) 20OZ	Kay Chemicals	26028	1111747	Yes	19
DEGREASER KAY QSR HEAVY DUTY (4) 1GAL	Kay Chemicals	26004	1114105	Yes	20
DEGREASER QSR HEAVY DUTY (2) 2GAL	Kay Chemicals	27587	1111799	Yes	21
DELIMER LIQUID (4) 1GAL	Kay Chemicals	32681	1111004	Yes	22
DETERGENT MULTI PURPOSE SINK QSR HD (168) 1.5OZ	Kay Chemicals	29682	1110158	Yes	23
DETERGENT POWER SOAK (120) 2.7OZ	Kay Chemicals	92508	1111732	Yes	24
DETERGENT QSR LOW FOAM POWERSINK (2) 2GAL	Kay Chemicals	54678	1110125	Yes	25
DETERGENT ULTRA CONCENTRATED POT & PAN (2) 2GAL	Kay Chemicals	32776	1110960	Yes	26
NEUTRALIZER, KAY RESTROOM ODOR (4) 32OZ	Kay Chemicals	93117	1111784	Yes	27
RELEASE AGENT, KAY (4) 32OZ	Kay Chemicals	93119	1111449	Yes	28
SANITIZER KAY FOAMING HAND (4) 1250ML	Kay Chemicals	57989	1110233	Yes	29
SANITIZER KAY QSR HAND (6) 800ML	Kay Chemicals	54116	1114112	Yes	30
SANITIZER KAYQUAT II (2) 2GAL	Kay Chemicals	28630	1111722	Yes	31
SANITIZER SINK KAY - CHLORINE (200) 1.5OZ	Kay Chemicals	20939	1114107	Yes	32
SOAP HAND ANTIBACTERIAL KAY QSR (12) 800ML	Kay Chemicals	54120	1111712	Yes	33
SOAP HAND QSR FOAMING ANTIBACTERIAL (4) 1250ML	Kay Chemicals	57988	1110209	Yes	34
MULTI SURFACE DISINFECTANT CLEANER	Kay Chemicals	33222	1112321	Yes	35
AIR FRESHNER STARTER KITS AROMIST (1) 12 CT	Kay Chemicals	29081	1110051	Yes	36
DESTAINER MULTI USE PH (4) 1.7 LB	Kay Chemicals	17911	1111770	Yes	37
DISHWASH DRY ALL RINSE ADDITIVE ESTEEM (4) 1 GAL	Kay Chemicals	60558	1114151	Yes	38
KAY-5 SANITIZER - CHLORINE (200) 1OZ	Kay Chemicals	55910	1111735	Yes	39
PAD KAY POWER (4) 12 CT	Kay Chemicals	29458	92212986	Yes	40
3 in One Telescoping Spout Multi-Purpose Oil	WD-40 Company	N/A	N/A	Yes	41
Haynes Lubri-Film Plus	Haynes	N/A	N/A	Yes	42

Annual Evaluation Report

Date of Evaluation: 07.31.2025	Evaluated by (list all present): Marie Reyes
Written Program Reviewed: Yes No	
Comments on Written Program: Written program has no concerns – issue with the list of chemicals. Get updated SDS sheets and updating the list.	
The following specific chemical handling procedures have been reviewed: All SDS Sheets were reviewed for updates. 1111716 had a new SDS Sheet.	
The following specific chemical handling procedures were modified: No changes were needed based on SDS Sheets.	
The following specific chemical handling procedures were added: None	
A review of the chemical inventory was made: Yes No	
Annual training completed? Annual training completed and new hire training continues as new hires. Yes – now doing just new hires until next year when we will do a refresher.	

Appendix:

Email regarding labeling of sanitizer buckets:

Cell: 336-430-1298

From: Covington, Amy <amanda.covington@ecolab.com>
Sent: Thursday, May 23, 2024 3:38 PM
To: Hall, Aaron <Aaron.Hall@ecolab.com>; Rock, Chris <christine.rock@ecolab.com>; Hessey, Scott <Scott.Hessey@ecolab.com>
Subject: Update concerning MD Inspector

Hi All,

Great news! I spoke with the MD inspection supervisor, and the issue has been resolved. The customer can remove the warning sticker from the bucket, and this is not an issue anymore. The inspector has accepted the 2b classification that is listed on the SDS sheet.

Please forward this message to those that need to know, I was not able to pull their e-mail addresses out of the meeting invite for some reason. Thank you!

Warm Regards,
Amy Covington

Amy Covington
Sr. REGULATORY SPECIALIST I,
ECOLAB QSR I KAY® CHEMICAL 8300 CAPITAL DRIVE GREENSBORO, NC 27409
C 336 312-6538 **E** amy.covington@ecolab.com

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Closed Loop System

ECOLAB
PROTECTING WHAT'S VITAL

Amy Covington
Sr. Regulatory Specialist I

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Greensboro, NC 27409 USA
T (336) 312-6538
E amy.covington@ecolab.com

March 4, 2024

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)
Case No: T8477-020-23

RE: Facilities for Flushing Eyes

To Whom It May Concern,

It was brought to my attention that our products below were cited referencing regulation 29 CFR 1910.133(a)(1). The product mentioned is as follows and a copy of the SDS will be provided:

a) KAYQUAT II
b) Peroxide Multi Surface Cleaner and Disinfectant

The products or use solutions that the employee is exposed to are not classified to cause serious injury.

a) The concentrate of KAYQUAT II is contained in a closed loop- system specifically engineered to eliminate contact from the user (a diagram with an explanation of this system is included with this letter), so that the only exposure the employee has is with the dilute use solution. The use solution is classified as an Eye Irritation Category. 2B. This classification requires no protective eyewear or any other personal protection equipment.

b) The concentrate of Peroxide Multi Surface Cleaner and Disinfectant is contained in a closed loop- system specifically engineered to eliminate contact from the user (a diagram with an explanation of this system is included with this letter), so that the only exposure the employee has is with the dilute use solution. The use solution is classified as an Eye Irritation Category. 2B. This classification requires no protective eyewear or any other personal protection equipment.

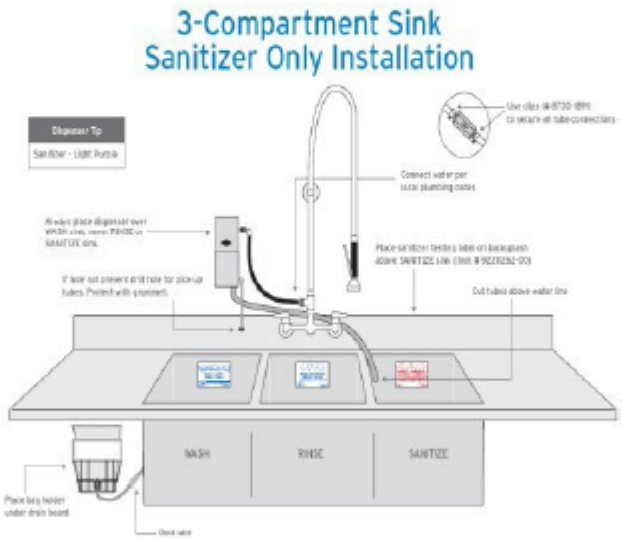
The hazards of our products are determined. If they were not determined, something along the lines of Classification Undetermined in the GHS classification of Section 2 on the SDS would appear.

The product listed above, to which the employee is physically exposed to, has not been classified to cause serious injury at the use dilution.

Closed Loop Dispensing

At the heart of the closed-loop dispensing system is the lock and key connection between the product concentrate and the dispensing system. This connection is designed to prevent workers from being exposed to the product concentrate. The concentrate in the bag is connected directly to the dispenser and employees work only with the highly diluted product solution. With this containment system, the filling and dispensing operations are cleaner, safer, and more efficient. The lock and key system starts with the bag insert. The insert (lock) is recessed into the container neck. A matching cap adapter (key) unlocks the system when mated to the container insert, allowing a controlled product flow. The lock and key connection creates the closed-loop liquid containment. The closed loop prevents leaks, spills, drips, and workplace contamination thereby effectively protecting end-users. In addition, the closed-loop dispensing system eliminates costly mixing, measuring and dispensing mistakes by untrained personnel.

Closed-loop Dispensing System



I trust this information meets your needs. However, should you have any additional questions or need further information, please feel free to contact me at amy.covington@ecolab.com.

Sincerely,

Amy Covington
Sr. Regulatory Specialist I

Amy Covington
Sr. Regulatory Specialist I

8300 Capital Drive
Greensboro, NC 27409 USA
T (336) 312-6538
E amy.covington@ecolab.com

March 13, 2024

Ms. Marie Reyes
Mitra QSR
7250 Dallas Pkwy., Suite 800
Plano, TX 75024
214.440.4144

RE: Peroxide Multi Surface Cleaner and Disinfectant (EPA Registration No. 1677-238)

Dear Ms. Reyes,

It was brought to my attention that there is some concern about how our closed loop system works to prevent product exposure to users handling Peroxide Multi Surface Cleaner and Disinfectant (EPA Registration No. 1677-23).

The product or use solutions that the employee is exposed to are not classified to cause serious injury. The concentrate of Peroxide Multi Surface Cleaner and Disinfectant (EPA Registration No. 1677-23) is contained in a closed loop- system specifically engineered to eliminate contact from the user. The closed loop system alleviates the requirement for an eyewash station, as the user is only exposed to the diluted product. This classification requires no protective eyewear or any other personal protection equipment.

A diagram with an explanation of this system is included with this letter, so that the only exposure the employee has is with the dilute use solution. The use solution is classified as an Eye Irritation Category 2B. This classification requires no protective eyewear or any other personal protection equipment.

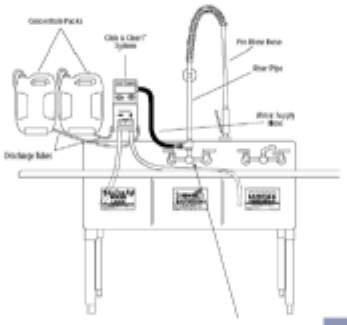
The hazards of our products are determined. If they were not determined, something along the lines of Classification Undetermined in the GHS classification of Section 2 on the SDS would appear.

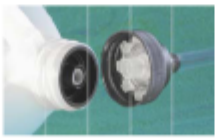
The product listed above, to which the employee is physically exposed to, has not been classified to cause serious injury at the use dilution.

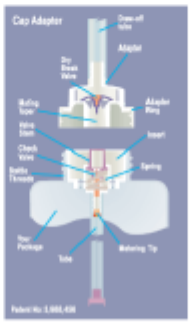
Closed Loop Dispensing

At the heart of the closed-loop dispensing system is the lock and key connection between the product concentrate and the dispensing system. This connection is designed to prevent workers from being exposed to the product concentrate. The concentrate in the container is connected directly to the dispenser and employees work only with the highly diluted product solution. With this containment system, the filling and dispensing operations are cleaner, safer, and more efficient. The lock and key system starts with the container insert. The insert (lock) is recessed into the container neck. A matching cap adapter (key) unlocks the system when mated to the container insert, allowing a controlled product flow. The lock and key connection creates the closed-loop liquid containment. The closed loop prevents leaks, spills, drips, and workplace contamination thereby effectively protecting end-users. In addition, the closed-loop dispensing system eliminates costly mixing, measuring and dispensing mistakes by untrained personnel.

Closed-loop Dispensing System







Only when the Cap Adapter is attached does a check valve open to allow liquid to flow. The bottle insert includes a patented membrane which permits gases to pass through, thereby relieving bottle pressure. A pre-calibrated dilution control module installed in the bottle insert tube measures a prescribed amount of concentrate.

I trust this information meets your needs. However, should you have any additional questions or need further information, please feel free to contact me at amy.covington@ecolab.com.

Sincerely,

Amy Covington
Sr. Regulatory Specialist I