

Manual for partner companies

Sappi Alfeld GmbH



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1. Preface

Occupational safety, health and environmental protection are of great importance at Sappi Alfeld (hereinafter referred to as the "Client").

We are certain that we can accomplish our activities with

"zero personal injury, environmental damage or property damage."

This objective also applies to the **partner companies** that we work with (hereinafter referred to as "Contractors").

The companies that work on behalf of Sappi are held to the same high standards as the Sappi business units themselves.

If it's not safe, we don't do it!

That means that if the work or activity is not safe before it starts, the work won't be started until safe conditions have been established.

This also means that if unsafe conditions are detected, the work/activity is interrupted and immediate measures are taken to secure the working environment, and the work/activity is not resumed until safe working conditions have been ensured or restored.

In order to protect third parties and employees of both the Client and the Contractors, further internal regulations have been defined in this manual for partner companies in addition to the statutory regulations.

The specifications in this manual are mandatory, and also serve as a guide. Based on our experience and knowledge, the topics covered provide a broad basis for safe working practices.

Furthermore, Contractors agree at a minimum to comply with and observe all international, European and national laws and rules, employers' liability insurance association regulations and "generally recognised codes of practice," as well as company-specific requirements.

Further measures may be necessary based on the manufacturer's risk assessment in accordance with the Machinery Directive as well as the manufacturer's operating instructions and risk assessment pursuant to the German Occupational Safety and Health Act (Arbeitsschutzgesetz — ArbSchutzG) to ensure that the work performed by certain trades is safe.

This manual for partner companies does not release Contractors from their general obligations to comply with applicable provisions and regulations on occupational safety, health, environmental and fire protection, product safety and insurance that are necessary for the execution of assigned tasks.

Prior to the start of work, the Contractor agrees to accept the regulations and to implement them in full, with a corresponding declaration.

2. Scope

The requirements in the manual for partner companies must be complied with by all Contractors and their sub-suppliers (subcontractors) who engage in work on behalf of the Client.

The manual for partner companies applies at the Alfeld site.
This includes the entire area of the main mill as well as all external properties located in the town of Alfeld.

3. Definitions

3.1 Contract manager (Sappi partner company coordinator)

A contract manager is appointed by the Client (the Sappi partner company coordinator) to ensure that the Contractor is able to work in accordance with the contractual conditions.

This is the main point of contact for the Contractor, providing supervision, coordination and support.

The Sappi partner company coordinator for the Contractor is, unless otherwise directed, the person who is responsible for initiating or has initiated an order (purchase request) for a service.

3.2 Partner company coordinator (German Occupational Safety and Health Act/German Statutory Accident Insurance [DGUV] Regulation 1)/health and safety coordinator ("SIGEKO" in accordance with the German Construction Site Ordinance and Rules for Occupational Safety and Health on Construction Sites)

If employees of the Client and Contractor are working at a workplace or in a work area and may pose a risk to each other, a Sappi partner company coordinator will be appointed to coordinate the work.

In accordance with the German Construction Site Ordinance (Baustellenverordnung) and the Rules for Occupational Safety and Health on Construction Sites (Regeln zum Arbeitsschutz auf Baustellen — RAB), a health and safety coordinator (also known as a "SIGEKO") can or must be used on construction sites.

In order to fulfil their duties, the partner company coordinator is given the appropriate authority to issue instructions in relation to occupational health and safety, fire and environmental protection issues.



By comparison, the health and safety coordinator has the authority to issue instructions **only in the event of imminent danger**, i.e. the immediate removal of a significant immediate risk to the health of persons, property or the environment.

In the event of imminent danger to employees or third parties, work will be stopped immediately by the safety coordinator, and appropriate immediate measures taken if necessary to avert danger. The health and safety coordinator must check and ensure the effectiveness of the immediate measures taken.

The health and safety coordinator must then immediately inform the supervisor of the employees involved and the site management.

Note:

The functions of the contract manager, i.e. the Sappi partner company coordinator and the health and safety coordinator, may be performed by one person, i.e. the Client.

Since the Sappi safety partner company coordinator can only fulfil their duties if they are familiar with the operational conditions (company organisation, work procedures, contact persons etc.), this individual is appointed by the Client, unless otherwise agreed in the contract.

If a Contractor acts as general contractor for the Client, this general contractor must appoint a coordinator to coordinate the subcontractors employed.

In this case, the Contractor coordinator must liaise with the safety partner company coordinator and/or the health and safety coordinator of the Client in good time before starting work.

The tasks are defined as follows:

- Development of a project plan
- Establishment of the job schedule
- Safe separation of the work area/construction site from the ongoing operations of the mill
- Creation of a construction site plan
- Preparation of a health and safety coordinator plan in accordance with the German Construction Site Ordinance, RAB and Sappi internal guidelines
- Set-up of the workplace and environment or construction site
- Protection of the workplace/construction site against access by unauthorised persons
- Timely collection and review of the risk assessments necessary for the individual trades, implementation, compliance and enforcement of the measures defined in the risk assessment before commencement of the activity, including documentation and storage of these measures after the completion of work
- Timely notification of internal/external parties, authorities and institutions
- Obtaining of the necessary permits and approvals from internal/external parties, authorities and institutions
- Notification of the Client and partner contractors (subcontractors) of changes to the plan and risks
- Notification of the areas concerned about required safety measures
- Identification, definition and isolation of hazardous areas
- Obtaining and storage of proof of qualification of the employees involved
- Obtaining and storage of proof of the safe condition of the working equipment used

- Implementation of the first instruction. Documentation of the first instruction and workplace-related safety instruction in SARA
- Adherence to working hours and employment restrictions
- Definition of measures for incidents (first aid, fire, evacuation, environmental damage etc.)
- Joint spot checks of order and cleanliness in the provided standing and storage areas and working areas of the Contractor
- Review of the Contractor's emergency organisation
- Regular review of compliance with the established job schedule and safety measures
- Organisation and implementation of joint regular safety meetings and site inspections
- Recording of the times that the Contractor is present
- Reporting of all HSE incidents via SARA

The Sappi partner company coordinator and/or health and safety coordinator must intervene if:

- the HSE regulations are obviously being disregarded (negligently/intentionally)
- employees cannot prevent unforeseen situations – in which they themselves or third parties are unknowingly endangered – on their own (imminent danger) or
- the Contractor or its sub-supplier (subcontractor) is obviously not capable of handling this task or is unable to cope.

In principle, the Sappi partner company coordinator and/or health and safety coordinator must always intervene via the manager of the Contractor for the employee concerned. (Exception: imminent danger)

3.3 Supervisor

Activities involving special hazards are monitored by a supervisor of the Contractor, who ensures the implementation of the specified protective measures.

This individual is to be designated by the Client's contract manager before the work is started.

Special hazards include activities such as working in traffic, crane work, demolition work, working on communication and power lines, working on and in tanks, working at height, working with a risk of fire and explosion, working in contaminated areas, working on the recovery of explosive ordnance, working on railway tracks or work where third parties can be put at risk.

3.4 Manager for the partner company

If the manager for the Contractor is not personally on site, they will designate a person responsible **(in writing)** for the performance of their management tasks and duties prior to the start of the work and will inform the Client of this appointed person in due time before commencing the contractually agreed work/activities.

4. Awarding and execution of assignments

As understood in this manual, occupational health and safety, fire and environmental protection issues are taken into account from the outset when awarding contracts to a Contractor.

In addition to a high-quality work result, the safety and health of the employees involved, including sub-suppliers (subcontractors) and third parties, must be ensured at all times. To the same extent, the Contractor is also responsible for the prevention of occupational accidents, occupational diseases and occupational health risks for their employees and companies and the employees and companies that they contract to perform the work.

4.1 Execution of assignments from the partner company's perspective

Work steps include:

- accepting the order — observe/implement the "Health and safety regulations for partner companies"
- knowing who is responsible for the assignment at the Client (contract manager)
- determining and identifying responsible persons on site
- ensuring communication with the Client and the Contractor
- ensuring the PDCA process is followed in its area of responsibility
- ensuring the timely collection of information, permits and approvals
- identifying and announcing the name of the coordinator (in case of mutual hazards)
- identifying and announcing the name of the supervisor (in case of special hazards)
- logging in and out all own/external workers employed on the construction site
- instructing in-house employees and sub-suppliers (subcontractors) used
- applying for ID cards from the Client, received following provision of proof
- creating job schedules — identifying mutual hazards and defining the required safety measures
- ensuring the health and professional suitability of the sub-suppliers/subcontractors used on a job-related basis
- ensuring the proper use of suitable and serviceable, tested work equipment
- carrying out the work and checking, documenting and communicating the safety measures taken to the Client for the purposes of safety and loss prevention in a timely manner.

5. Health and safety regulations for partner companies

This "**Manual for partner companies**" is part of the Sappi general terms and conditions, and is therefore binding.

Please familiarise yourself with the regulations governing your work before starting work for our company under the work order.

This applies in particular to compliance with occupational health and safety, fire and environmental protection requirements. If these statutory regulations are specified by official measures (permits, orders etc.), you are obliged to comply with them.

Furthermore, you are obliged to observe the Client's internal regulations regarding occupational health and safety, fire and environmental protection and to ensure and monitor their compliance by the employees you assign.

In accordance with the German Occupational Safety and Health Act, you must take measures to prevent accidents at work that comply with employers' liability insurance association regulations and, in addition, with generally accepted safety and occupational health rules.

In addition, an effective organisation must be established in the Contractor's area of responsibility.

This includes in particular:

- ensuring the Contractor's own preventive and reactive occupational safety, fire protection, evacuation and environmental protection organisation in consultation with the Client (STOP principle: suitable procedures as well as targeted and sustainable technical, organisational and personnel measures)
- ensuring the capability to place an internal/external emergency call at any time (fixed and mobile emergency telephones)
- ensuring possibility of and consent for accessibility to the injured person for the persons involved in the rescue chain

If other requirements should exist in other legal provisions, in particular health and safety regulations, these remain unaffected.

5.1 Risk/hazard assessment

Each company must prepare a risk and/or hazard assessment before starting its work.

This includes all internal and external operational/neighbourhood influences caused by the services to be provided themselves, as well as environmental events (heavy rainfall, strong winds etc.).



The results and the ensuing preventive measures must be provided to the Client, discussed and agreed upon, and updated (included/considered) in the job schedule/health and safety coordinator plan, and the affected companies or employees informed accordingly in advance of carrying out their activities.

The risk assessment must also take into account the mutual hazards arising from the activities of the Contractor, the activities of the Client's employees and the activities of the business in whose area of responsibility the work is carried out.

The documentation of the risk assessment and any updates must be submitted to the Client and, if necessary, to the employers' liability insurance association and the labour inspectorate, and discussed and stored on site.

Unsafe/dangerous conditions must be avoided and, if such conditions are detected or occur, they must be immediately secured and eliminated.

Requirements of authorities and institutions such as the labour inspectorate, building authority, regulatory authority, police, customs, employers' liability insurance association etc.) must be followed.

5.2 Staff

5.2.1 Persons responsible

The manager for the Contractor must supervise the contractually agreed and assigned work as supervisor.

The person responsible for the Contractor, i.e. the supervisor, must have suitable vocational training, current professional experience and the necessary legal knowledge, and must have been appointed by the Contractor in writing as the supervisor.

This person must be available at all times whenever the Contractor's/sub-supplier's (subcontractor's) personnel are on the job site or on the company premises.

The supervisor must be able to understand German.

The manager must be designated to the Client's contract manager before the start of the work assignment.

The Client's contract manager must be informed immediately of any personnel changes.

The tasks of the manager for the Contractor include:

- ensuring that housekeeping is maintained at all times in its area of responsibility (accommodation, space, work/activities etc.)
- coordinating and ensuring a safe job schedule
- ensuring compliance with national social legislation and providing the appropriate documentation for any inspections by authorities and institutions
- ensuring the use of qualified personnel

- ensuring that its own employees and employees of sub-suppliers (subcontractors) assigned are trained
- checking that employees are following safety instructions and safety measures
- in the event of unforeseen hazards, stopping work until the necessary safety measures have been carried out and
- checking or having checked equipment and work tools (e.g. scaffolding, ladders etc.) to ensure they are safe before use
- ensuring the prohibition of the creation and transmission of image and audio files of the premises, property and persons
- ensuring proper performance of the contract through implementation and enforcement of safety-compliant behaviour

The manager for the Contractor is instructed by the Client's contract manager.

The manager for the Contractor must therefore contact the contract manager for such instructions (general first instruction online by the Client for the commencement of works) before arriving at the workplace, but no later than before entering the mill premises.

The safety instruction provided immediately before Contractor performs/commences work, i.e. directly at the workplace, remains unaffected.

Written confirmation of both safety instructions must be documented in SARA at the Client by uploading the relevant documentation.

5.2.2 Qualification

To ensure that the work is carried out properly, professionally and in a timely manner, the Contractor must only use personnel that are qualified and meet the relevant health requirements.

Industrial trucks (e.g. forklifts), lifting platforms, wheel loaders, cranes and other power-operated work equipment of the Client may be operated only if a contractual basis exists for this purpose with the corresponding guarantees, as well as the necessary qualification certificates (driving licence), a written order (driving order) and an equipment- and location-specific safety instruction provided by both the Client and Contractor are available.

These and any other personal qualifications required for the safe fulfilment of the work order/activity must be provided at any time at the Client's request. Where required, other operations-related documents, such as proof of professional operation in accordance with the German Water Management Act (Wasserhaushaltsgesetz) or the German Closed Cycle and Waste Management Act (Kreislaufwirtschaftsgesetz) (in the case of waste disposal specialists) etc., must be submitted for legal reasons.

The health suitability of the employees deployed by the Contractor must be proven by means of occupational medical examinations and any other measures required by law to ensure health protection (e.g. regulations to combat pandemics) and the Client must be allowed to conduct a corresponding inspection in justified cases (unsafe situation/unsafe behaviour or near misses).

The Contractor will support all necessary measures to ensure health protection and to maintain and fulfil its legal and contractual obligations to the Client.

5.2.3 Occupational safety professional/safety officer/first aider/ fire protection assistant/evacuation officer

The Contractor shall notify the Client's contract manager in writing of its occupational safety professional.

In order to carry out work on the Sappi mill site and/or construction sites, qualified occupational safety professionals, safety officers, first aiders, paramedics, fire protection and evacuation assistants etc. must be appointed by the Contractor in accordance with the applicable legal requirements and risk conditions and must be available on site in accordance with legal requirements.

5.2.4 Training

All employees of the Contractor must be instructed in accordance with applicable regulations.

Before entering the site and before commencing work, the Contractor's managers must familiarise themselves with the local safety conditions for the relevant site and include this knowledge in the workplace-related training.

Any conditions and hazard situations that change as a result of the progress of the work must be observed when updating the risk assessment and must be regularly communicated to employees during repeat training sessions.

All evidence of the instructions provided must be kept by the Contractor (on the Client's premises) for official inspection where necessary and a copy provided to the Client's responsible employee for documentation in SARA.

The Sappi partner company coordinator or the health and safety coordinator of the Client always ensures the documentation of the training documents via SARA. If the health and safety coordinator has not been appointed internally, a person designated by the Client can assume this task owing to a lack of access rights.

5.2.5 Working hours

Working hours must be clarified with the Client's contract manager in accordance with the statutory and contractual regulations before commencing work.

National statutory working hour regulations must always be observed.



Any deviations must be approved by the local competent authority of the Contractor and/or sub-supplier (subcontractor) and must be notified in writing to the Client's contract manager before starting work.

5.2.6 Subcontractors

The use of sub-suppliers (subcontractors) by the Contractor must be notified to and approved by the Client beforehand in writing.

All employees present must be recorded at all times in accordance with the accident regulations in force on the site and for the purposes of the accident statistics to be subsequently produced, and must be identifiable by their surname, first name and company address.

The Contractor is responsible to the Client for the sub-suppliers (subcontractors) that it uses and for the implementation of/compliance with statutory occupational health and safety, fire protection and environmental protection regulations, as well as contractual agreements.

The occupational health and safety, fire protection and environmental protection regulations agreed with the Client that go beyond legal requirements must be laid down in a contract between the Contractor and subcontractor.

5.3 Occupational safety and risk mitigation measures

5.3.1 Workplace preparation

Workplaces must be set up in such a way that everyone's safety is guaranteed at all times. Work or activities must not commence before the workplaces are safe. To this end, the areas in which work is being carried out must be clearly defined. The establishment and demarcation of the workplaces as well as any other necessary safety measures for these areas must be agreed with the Client's contract managers. Work processes must be recorded in a work plan and updated as the work progresses and risks and hazards are identified.

In addition to the applicable requirements, the findings from the revision/update of the risk assessment must be taken into account when creating the work plan.

The necessary and appropriate work equipment identified during preparation of the work plans and risk assessment, as well as the relevant personal protection equipment (PPE), must be provided and used before starting work.

The necessary internal/external notifications, permits and approvals must be made/obtained beforehand to avoid delays in construction.



Immediately before starting work or commencing activities, an LMRA (last minute risk assessment) must be performed to make sure that the working environment, the workplace and the work processes are safe before starting work or commencing activities.

5.3.2 Performing the work

The necessary and appropriate work equipment identified during preparation of the work plans and risk assessment, as well as the relevant personal protection equipment (PPE), must be kept in safe and proper working order at all times during the performance of the work.

The work equipment and PPE may only be provided in tested and serviceable condition and used in accordance with their intended purpose.

Necessary work equipment, materials and products carried on the person must be secured against falling by means of suitable aids such as backpacks, pockets in clothes, belt bags, belts with carabiner hooks, etc.

Worn or defective work equipment and PPE must be immediately removed from further use, repaired or replaced with serviceable and suitable work equipment/PPE.

The applicable statutory and employers' liability insurance association safety regulations, manufacturer's specifications and the latest technology must be considered in this regard.

Order and cleanliness must be ensured in the workplace at all times and, in order to avoid danger, intermediate inspections/cleaning must be carried out in the work environment, on the work equipment used and on PPE during the working day.

5.3.3 Workplace follow-up

The Client's contract manager must be notified of the completion of work by means of a status report.

The equipment/machines/facilities/premises and existing safety equipment must be returned in a functional and safe condition.

The removal of any safety measures must be discussed with the Client's contract manager and can only be approved by that individual.

Once the work has been completed, the work area must be returned to a clean and orderly condition in accordance with legal and contractual requirements.



The disposal of any resulting waste is the responsibility of the Contractor, and must be conducted in accordance with legal regulations.

Any contamination or damage caused by the Contractor must be reported in consultation with the Client and must be rectified at the Contractor's expense, again in consultation with the Client.

6. Access control

As a general rule, only the personnel or individuals responsible for carrying out the contractually defined work/activities may enter the work site or the construction site.

Unauthorised persons are prohibited from entering and remaining on the premises, including bringing in animals.

Suppliers and their respective persons and vehicles are permitted to briefly enter the site for the purpose of loading and unloading following registration (signing in and out, safety instruction) and weighing at the gate.

An overnight stay anywhere on the site, including construction sites, is not permitted for reasons of occupational safety.

All those present on the site and/or on the construction site must be recorded in accordance with the accident regulations applicable throughout the site and for the purposes of the accident statistics to be subsequently compiled by Sappi, and must be identifiable at all times by their first name, surname and residential/company address.

Only the persons involved in the work are permitted to enter, following visitor or partner company instruction (initial instruction) and completion of a comprehension test (certificate).

Controlled access to the site and/or the construction site is permitted only at the access control points (guards, recording devices, turnstiles etc.).

A deliberate bypass of the access equipment will result in immediate written citation by the Client and may be punished with a ban on access to the site for the person concerned.

The personal access authorisation issued (identification/chip) may not be passed on to third parties. Identification must be visibly worn or shown on request when on the premises/on the construction site.

The Client or its security service (mill security, guards etc.) is entitled to carry out random checks of the access authorisation of all persons on the premises or construction site.



To ensure smooth access to the accommodation and storage areas in the context of hazard and loss prevention, it is recommended that project management or site management be granted access rights with a replacement key for their accommodation.

Once the access authorisation has expired or the work has been completed, the visitor's identification must be returned to the reception or the guard when leaving the premises.

The costs of the replacement of the card/chip will be charged to the Contractor if it is not returned.

7. Safety markings

The safety markings in the form of prohibition signs, warning signs, mandatory signs and emergency signs displayed at mill, area and construction site entrances and on machines/systems, as well as operating instructions issued, must be observed and followed.

8. Traffic regulations on the work site/construction site

8.1 Traffic routes

Pedestrians, cyclists, internal company transport and rail and motor vehicle traffic are expected on all levels of the site and in the buildings.

Due to the structural situation, the strict and clear separation of various road users by their own transport routes is not always and consistently possible.

The road traffic regulations (StVO) apply to the entire site, including the car parks.

All road users must show mutual consideration to one another.

This principle applies in particular to pedestrians, cyclists and internal company transport. In case of doubt, always stand still and take care to maintain a reasonable safety distance.

Due to the rail transport available throughout the entire site, the utmost care is required.

Rail transport always takes absolute priority over all other traffic.

Due to the mechanical and chemical hazard potential, a greater safety distance must always be maintained.

A continuation of the internal company route and/or the journey is permitted only if the safety of all road users is guaranteed or if there is no longer any danger present.



8.2 Use of traffic routes as pedestrians

All employees of partner companies must move safely and cautiously on the site.

The basic rules include in particular:

- Always follow the safety training, as well as the safety instructions provided by your contact person, your coordinator or our Sappi employees.
- Use only safe and marked paths (pedestrian paths and crossings marked with green or white floor markings).
- On staircases, always use the handrail on the stairs.
- Always comply with transit and access prohibitions.
- Look out for each other.
- Due to the number of buildings and the large number of entrances and exits, as well as crossings and junction areas, the sudden appearance of other road users, in particular of power-operated vehicles such as forklifts, tractors etc. must always be expected.

8.3 Use of traffic routes as drivers

The most important basic rules for drivers include:

- The speed limit of max. 10 km/h must be observed.
- The traffic areas must always be kept free for all road users.
- Parking is allowed only in marked areas.
- Parking spaces for special vehicles (raw material supply and forwarders etc.) are shown separately on the mill plan and/or construction site plan.
- Do not park under pipe or power lines.
- Do not stop or park on or in front of fire hydrants.
- Pay attention to the load capacity of the subsurface, especially shafts.
- The load class of the traffic area at the building for the parking of motor vehicles, special vehicles, containers etc. must be requested in advance and taken into account.
- Parking and stopping prohibitions exist for rescue facilities as well as escape and rescue routes, including pedestrian walkways and fire brigade access to, from and on the site.
- When reversing, safety measures must be taken, e.g. a signaller or mirror, surveillance cameras and the switching on of visual signal lights/acoustic signalling systems.
- The load must be effectively secured against slipping by suitable means.
- Unloading is permitted only in the site areas provided for this purpose and agreed with the Client.

A temporary or permanent ban from the site may be issued for violations of the site traffic rules.



9. Use of work equipment

9.1 General regulations

The Contractor is responsible for ensuring the provision and safe operation of all work equipment required for the execution of the contractually agreed work.

All work equipment used must be in proper condition and comply with the applicable statutory provisions (such as the Machinery Directive, CE Declaration of Conformity etc.). This work equipment may be used only in accordance with the manufacturer's specifications, i.e. for its intended purpose.

Defective, worn-out work equipment, i.e. work equipment that is ready for replacement, must be immediately removed from further use and stored safely outside the work and activity area, if possible repaired otherwise rendered unusable and disposed of so that it is not used again in a defective condition.

The test status must be visible from a test label permanently attached to the work equipment. A test report or test log must be kept at all times and available on site, and must be submitted on request.

The safety and emergency control devices must always be proper working order. Appropriate punitive measures will immediately be taken by the Client in the event of any unilateral, i.e., unreported or unauthorised, decommissioning of safety equipment.

9.2 Use of ladders, aerial work platforms and scaffolding

The use of ladders must generally be avoided.

Only safe ladders may be used for work at low heights, to a small extent, for short durations and under safe surface and surrounding conditions.

If the use of a safe ladder cannot be avoided, it must be securely positioned and safely ascended and a safe working situation (no risk of falling, no loss of stability etc.) must be ensured. Due to the risk of falling from the ladder and in addition to a railing, the person working on the ladder must also wear PPE to protect against falls.

The necessary work equipment must be planned and held available in advance for the upcoming work, taking into account the operating limits of the safe ladders, mobile/stationary scaffolding, aerial work platforms and the hazards involved in the work being performed.

The load class of the underlying surface must be checked and carefully observed for the duration of the work. If there is a risk that the underlying surface will collapse, it must be reinforced or access to this work area must be prevented with suitable blocking measures.



The work equipment must be secured against slipping, sinking or falling over etc.

Compliance with these conditions must be checked again after each planned and unplanned interruption of work (alteration, extension, breaks, handover of shifts, end of work etc.).

Special consideration must be given to the following factors:

- Permissible load capacity
- Fall protection in good working order (inherent stability, attachment to force points)
- Securing the areas adjacent to or below the work area (warning, cordon, signage, shutdown, evacuation, cooling etc.)
- Taking special care when setting up on or near traffic routes when using swivelling systems or bringing in bulky components

The manufacturer's installation, use and operating instructions must be kept on site and followed.

Scaffolding may be used only after approval by a qualified person, manufacturer or expert.

Modifications to scaffolding of any kind require inspection, testing and re-approval by a qualified person (proof of qualification for the scaffolding system used) and, in special cases, an expert.

Use of the scaffolding is not permitted until this approval test has been completed.

All scaffold access points must always be labelled with a scaffolding tag indicating the approval or the access prohibition to prevent the use of the scaffolding where applicable.

When using aerial work platforms, only the appropriate type may be used, with at least two trained persons who meet the relevant health requirements (1x in the basket and 1x in the ground area) and corresponding PPE to protect against falling (fall arrester).

9.3 Use of portable electrical equipment

Electrical equipment may only be used if it is in proper working order and has been tested in accordance with German Statutory Accident Insurance (Deutsche Gesetzliche Unfallversicherung — DGUV) Regulation 3.

The test status must be visible from a permanently affixed and legible test label on the electrical equipment.

The use of hand-held electrical equipment is permitted only with a PRCD-S protective device.

Selection and operation of electrical equipment and devices at construction and assembly sites DGUV Information 203-006 must be referenced for the selection and operation of electrical equipment and devices.



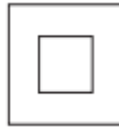
Power distribution boards must comply with the requirements of VDE 0660-501 and must offer at least IP 44 degree of protection. Each distribution board with at least one connection point must have a central disconnection facility, which must be freely accessible at all times during operation. This disconnection facility may also be a central residual current device (RCD). Testing of the residual current device must be carried out and documented daily before the start of work.

Only multi-core cables of type H07RN-F or H07BQ-F are to be used as movable cables. Type NSSHöu cables must be used for especially high mechanical loads. Where cables may be subjected to particular mechanical stress, they must be protected when laid, e.g. suspended or covered with solid materials such as wooden planks.

Cable reels

are suitable for use under harsh environmental conditions on construction and assembly sites only if they meet the requirements of Principle GS-ET-35. This means that they are built in accordance with DIN EN 61242 (VDE 0620-300) or DIN EN 61316 (VDE 0623-100), and also have the following features:

- Design in protection class II, i.e. insulated equipment with double or reinforced insulation, distinguished by
- being equipped with a H07RN-F or H07BQ-F cable,



- The carrying handle, crank handle and drum must be made from insulating material or be encased in insulating material to prevent a damaged cable transferring a dangerous contact voltage to construction parts that can be touched over a large area,
- Equipped with an integrated protective device to prevent overheating, e.g. a thermal circuit breaker,
- Equipped with protective contact plug connectors for difficult conditions, distinguished by



- at least IP 44 degree of protection (labelled in plain text or with symbol),
- Suitability for operation in the ambient temperature range of -25°C to +40°C.



If equipment with a combined electrical power of more than 1000 W (observe manufacturer's specifications) is connected, the cable reel must be used unwound. Cable reels must be operated in the intended use position (standing upright on the support frame). Here is a rating plate for a cable reel with the necessary information.



10. Activity and conduct-related safety rules

10.1 General regulations

- There is an absolute ban on alcohol/drugs during working hours.
- As a general rule, smoking is prohibited throughout the entire site. Smoking is permitted only in designated smoking areas and shelter areas. The no-smoking policy also applies to vehicles on the premises.
- Overnight stays in any form and accommodation are prohibited anywhere on the premises.
- Non-company electrical appliances such as heaters, microwave ovens, coffee machines, electric kettles etc. must not be operated on the premises.
- As a general rule, low-emission processes and work equipment must be used and operated in accordance with legal and local regulations.
- The use of heating systems or other heat-generating equipment and work equipment requires the Client's approval.
- The consumption of food is permitted only in the areas provided for this purpose.
- Access is prohibited to areas that are not related to the Contractor's work or for which the Contractor's employees have not been instructed.
- The filming and photography ban applies to the entire site and all areas; exceptions are permitted only after clearance and written approval by the contract manager.
- Any identified risks to life, health, the environment or property must be averted immediately. If this is not possible, people at risk must be warned immediately, the danger area secured immediately and the nearest accessible contact person must be informed.
- Any malfunction or danger that arises during the execution of work must be reported immediately to the contract manager and to the coordinator.
- Safety equipment must not be removed or rendered inoperable.

- The workplace must always be kept in an orderly condition and must be left clean after the work is completed.
- Violations of company and industry-wide regulations and guidelines may result in removal from the premises.
- The Contractor must take the STOP measures required for the hazard situation before commencing work and maintain them until the work is completed. The Contractor must also ensure that the personal protection equipment (PPE) provided to its employees remains in good working order and continues to provide the protection intended.
- The employees must wear the PPE provided.
- It is always mandatory to wear safety shoes/boots in protection class S3 and safety glasses on the premises.
- In designated working areas, in the case of crane operation in the production area above head level and when working on more than one level, head protection (protective caps) must be worn.
- On the construction site, it is mandatory to wear closed work clothing, a protective helmet, safety glasses and gloves, and also suitable hearing protection in the event of noise exposure, selected respiratory protection where there is a risk of inhaling chemical and biological substances, and secure PPE to protect against falling in the case of fall hazards.

10.2 Working with noise generation

Noise emissions of any kind must be minimised both in buildings and in outdoor areas and noise protection measures must be taken to prevent noise, in the following order, to ensure that national and local noise protection limits (German Technical Guidelines for Noise Reduction [Technische Anleitung zum Schutz gegen Lärm] for Industry) are observed:

- Technical noise protection
e.g. Use of low-noise working methods, use of reduced-noise work equipment, isolation of the noise source, shielding with noise barriers, use in enclosed rooms (keep doors and windows closed)
- Organisational noise protection
e.g. Modification or shifting of machine operating times, special working time regulations, compliance with the values defined in the German Technical Guidelines for Noise Reduction as well as the local noise limits for the neighbouring commercial and/or residential area
- Conduct-related noise protection
e.g. The engine must be switched off when loading and unloading motor vehicles. This also applies all year round to other vehicles and machines when not in use or bridging waiting times. The heavy slamming of doors, avoidable test runs during the night and public holidays etc.

10.3 Working with dust

The prevention of dust is an important health and safety, fire, explosion and environmental protection goal.

The following protective measures must be defined and observed by the Contractor:

- Technical dust protection
e.g. Use of low-dust products (e.g. during refilling processes), use of emission-preventing processes (e.g. wet machining)
- Organisational dust protection
e.g. Use of low-emission working methods (e.g. mobile/stationary suction, do not sweep dry, do not blow off with compressed air or sweep/brush)

10.4 Working with fall hazards

Workplaces and traffic areas with fall hazards, e.g. falling edges (< 2 m away from the falling edge) as well as floor openings and recesses must be protected by technical measures such as fixed/removable devices, covers or containment devices (e.g. collective fall protection safeguards such as nets, safety scaffolds etc.) to prevent slipping and falling off or over.

If technical measures are not possible or sufficient in certain areas (e.g. cherry pickers), employees must wear selective devices with PPE to protect against falling.

This protection against falling must be provided by means of suitable harnesses attached at suitable points with a sufficient tensile force of at least 1 t.

Due to the special loads and additional risks involved in carrying out these activities, they must be avoided, if possible, especially in hot and cold conditions, or limited to the extent required and the extent permitted by law.

Only two persons who meet the relevant legal requirements may work at any one time where there is a risk of falling.

A suitable second attachment point must be provided in the immediate vicinity or kept ready for use if necessary to rescue a fallen person. (Crane, aerial work platform, hydraulic ladder etc.)



10.5 Working with hazardous materials or forms of energy

Work in areas next to or near machines or equipment where hazardous energies or dangerous movements are to be expected must be coordinated with the Client's contract manager and the facility operator.

The necessary and defined safety measures for the safe shutdown of power to the required equipment/machines/facilities and to neighbouring or related equipment must be strictly observed.

Work on pipelines, valves, pumps, machines and apparatus with dangerous media or work on tanks, pressure vessels and similar systems with dangerous media must only be carried out if corresponding approval pursuant to the "[Permit for electrical installation](#)" form has been issued.

This requires the targeted release of the work system and the safe discharge of all energies and media.

In addition, the system must be specifically protected against dangerous effects on employees by securing and labelling the switching and operating elements and related pipe parts and protecting switched-off elements/closed valves against switching back on or re-opening in accordance with the LOTO principle.

The work may only be started once the equipment has been made safe.

10.6 Working in confined spaces (e.g. tanks)

Tanks, vats and pits may be entered only after approval has been issued pursuant to the form "[Permit confined space](#)."

As a general rule, approval is issued by the facility operator as soon as it is ensured that the system/room/tank etc. is in a safe condition.

Before entering and for the entire duration of work in confined spaces, it is necessary to measure the atmosphere (for hazardous substances, decomposition products, risk of explosion or lack of oxygen) in the tank.

If necessary, protective measures must be taken to protect against falling, sinking, the spilling of hazardous substances/lack of oxygen, fire and explosion, electrical current, mechanical effects and excessively high or low temperatures for the duration of the work.
(Supply and exhaust air, installation of blanking plates in the lines/pipes)

Machinery, devices, processes, equipment and work products used, including PPE, must be suitable for work in confined spaces (e.g. isolating transformer, protective extra-low voltage, no spark-generating working methods and equipment in the event of an explosion hazard, no use of internal combustion engines, no electrostatically chargeable and combustible clothing, ventilation devices, stationary and/or mobile gas measuring devices and/or EX/OX measuring devices etc.) and emergency measures for possible rescue must be taken and rescue equipment must be provided (e.g. emergency openings, crane, scaffolding, platforms, tripod with lifting device for persons, litter, rescue cloth, water for eyes and flushing etc.)

The Contractor must assign a supervisor for the activities and operate a security post (manhole watch) with communication devices.

All parties involved must be provided with appropriate instruction by the Contractor based on the risk assessment before commencing work, and said instruction must be documented. It must be documented by the Client in SARA.

10.7 Hot work

The legal requirements, the guidelines of the German Property Insurers' Association (Verband der Sachversicherer) and the Sappi internal fire safety regulations must be observed when carrying out hot work of any kind.

The use of heat-generating work equipment (internal combustion engines, heaters, heating fans, combustion facilities of any kind or other work equipment involving thermal hazards) is strictly prohibited.

Hot work is also prohibited in areas subject to fire and explosion hazards.

Areas in which hot work is conducted must be kept free of any kind of combustibles and effectively covered with suitable non-combustible materials, and the necessary safety distances must be observed.

Exemptions may only be granted by the Client—within the scope of the Sappi fire safety regulations—by the Sappi fire protection officer and the mill manager (ATEX areas) or, on construction sites, by the respective project manager/site manager.

The approval of the hygiene officer is also required in hygiene-relevant work areas.

For all work with an open flame (welding, cutting, soldering, defrosting and grinding operations) in the workplace, the Client's form "[Hot work permit](#)" (VdS 2036) must be issued by a contact person who is technically experienced in hot work and by the qualified partner company coordinator.



In areas at risk of fire, additional appropriate and effective fire prevention and control measures must be taken due to the risk of rapid fire spread. This includes, among other things, the appointment of a qualified fire watch.

The protective measures for hot work listed in this section must be followed prior to the start of the hot work and throughout the entire duration of the hot work.

If the mill's fire protection equipment is to be taken out of service, the necessary compensatory measures must be defined in writing in the hot work permit by the responsible persons with respect to the fire protection measures (e.g. mobile fire detectors with automatic transmission to the fire alarm system, fire watch, temperature control by means of thermography, removal of combustibles, shielding/covering of combustibles, ventilation measures, remote monitoring by means of a camera, fire protection patrols, greater number of fire extinguishers and extinguishing agents, special extinguishing agents, mill fire brigade etc.).

10.8 Work on electrical systems and equipment

As a general rule, all work on electrical systems is permitted only with the approval of the facility operator and following release by a designated facility manager of the Client (SAPPI).

The execution permit for work on electrical systems may be issued only by facility managers of the Client (SAPPI) to work managers of the Contractor in writing with the Client's form (SAPPI) "Permit for electrical installations."

10.9 Work in the vicinity of live parts

Safe access to the workplace and the boundaries of the work area in the workplace must be clearly marked. The boundaries of the work area are defined by the Client's (SAPPI) facility manager before the work to be carried out is commenced, in accordance with the rules for working near live parts. It must be ensured that live parts cannot be touched and that the danger zone cannot be reached.

Live working is not permitted as a general rule, and in exceptional cases requires written permission from a responsible electrician at the Client (SAPPI). Live working also requires special technical and organisational measures. The qualified employee must provide proof that they have the relevant special training, normally in the form of a "Live working permit."



10.10 Civil engineering works

Civil engineering works may only be started after obtaining/presenting all necessary safety-related information about the condition and structure of the ground layers.

Construction approval is issued in these cases only by the Sappi specialist department of the Client and is not permitted with a general permit.

Prior to the start of civil engineering works, all necessary information must be obtained about the condition and stability of the ground and its load capacity, as well as about all underground pipes and cables. (Power lines, gas lines, communication lines, water and wastewater lines, product lines, raw material pipelines, soil contamination caused by pollution legacy, areas suspected to contain explosive ordnance, empty pipes, cavities of a structural nature such as basement rooms, pits, shafts etc.)

To assess the risks involved in civil engineering works, the rules of the employers' liability insurance association for the construction industry (BG Bau) must be consulted and observed in addition to the relevant statutory regulations.

All necessary safety measures must be taken prior to the start of civil engineering works to prevent pits and ditches collapsing and people being buried.

All lines and pipes are treated as if they are still active and carrying their respective energies and materials.

Appropriate qualified persons and internal/external specialists (active and/or retired personnel, authorities and institutions) must be used for the risk assessment for the energies and materials.

In case of doubt, specific investigative measures to assess the risk and the dangers must be implemented with the Client while taking special precautions (define protection zones, set danger zones, wide-area isolation, safety points, evacuation, robots, remote-controlled electrical and/or hydraulic tools, air/ground cameras, special tools, drilling methods, special measuring equipment e.g. for pressure, temperature, aerial image evaluation).

These must include safely draining and removing/disposing of the respective material.

10.11 Work on static components/constructions

Construction work may only be started after obtaining/presenting all necessary safety-related information about the condition and structure of the components and/or construction.

Construction approval issued in these cases only by the Sappi construction department of the Client and, if necessary, with the support of an authorised structural engineer, and is not issued with a general permit.



To protect against hazards when working on static components and structures—such as core holes in reinforced concrete, masonry, foundations or structural changes to pipeline bridges, cable trays etc.—the relevant statutory regulations and the rules of the employers' liability insurance association for the construction industry must be consulted and observed.

10.12 Solo work

Dangerous solo work is generally prohibited.

If necessary and legally permitted and cannot be delayed, dangerous solo work must always be carried out with two persons.

If this is not possible, suitable safe procedures, suitable technical equipment, organisational measures and personnel that are qualified and meet the relevant health requirements must be used, depending on the hazard concerned.

This monitoring may consist of technical and organisational measures, depending on the hazard potential, e.g. working within earshot and sight, safe line connection, radio communication devices, mobile phone devices (only outdoors), qualified supervisors, cameras, personal emergency signal (PNS) devices etc.

10.13 Working with hazardous substances

Before using hazardous substances, the use of non-hazardous alternatives must be tested (substitute material test).

The Client's contract manager must be notified of the use of hazardous products and materials by submitting a project-related list of hazardous substances with the corresponding current safety data sheets of the manufacturer.

The use of CMR substances (carcinogenic, mutagenic or toxic for reproduction) must generally be avoided.

If no alternative processes or substances have been identified for this purpose after in-depth testing, all necessary protective measures must be agreed with the Client and defined in the risk assessment, approved and their compliance monitored by a supervisor of the Contractor.

If hazardous substances are used or released during work (e.g. during building and/or civil engineering work, e.g. building construction/renovation) and their release cannot be ruled out, risk assessments must be prepared and the safety measures must be defined and kept ready for use before work commences.



Hazardous substances may only be used in original containers or in approved original containers with the legally prescribed container markings at the mill or on the construction site and kept/stored in safe and legally permitted areas.

The intended handling of carcinogenic substances in this case, e.g. ASBESTOS or hazardous man-made mineral fibres, must be notified to the responsible labour inspectorate prior to the start of work in compliance with the statutory notification period.

When handling ASBESTOS or hazardous man-made mineral fibres, only qualified specialist companies are allowed to carry out the work in accordance with legal provisions.

A detailed work plan and a risk assessment must be drawn up for the scope of remediation measures involving carcinogenic substances.

These must also include the possible risks to the Client's employees.

The employees must be instructed on the work plan and the associated risk in the workplace concerned.

Measures must also be taken to prevent environmental risks from the possible release of hazardous substances in terms of health prevention.

Waste and its disposal containers must be selected in accordance with the legal requirements and marked clearly and permanently.

Compliance with the work plan and the protective measures must be monitored by a supervisor of the Contractor.

10.14 Roof work

A risk of falling is always to be expected when carrying out roof work.

Before carrying out roof work, the Contractor must obtain information on access options, the load capacity of the roof, materials used (combustible and non-combustible roof insulation, hazardous substances such as ASBESTOS, man-made mineral fibres etc.) as well as roof installations and superstructures (e.g. ceiling windows, skylights, technical equipment, traffic routes) from the Client's contract manager, with the support of the construction department, using the "Documentation for future work."

The intended handling of carcinogenic insulation materials by qualified specialist companies must be notified to the labour inspector in advance within the required statutory period.

Collective protective measures against slipping, tripping and falling and concerning the proper storage of materials and tools inside and out must be defined as part of the risk assessment and taken prior to the start of work.



If individual measures to prevent a fall should be required, the employees used must be trained in the use of PPE to protect against falling and their fitness for the work concerned must be determined.

The attachment points required for fall protection must be defined before work commences and as work progresses and their suitability must be checked (anchor protocol, specialist company certificate, installation documents, test documents, visual check for damage [mechanical, chemical, thermal etc.]).

Attachment points must have a minimum tensile load of 1 t.

The appropriate PPE to protecting against falls must be selected, defined, procured and used in accordance with the risk assessment.

The necessary and effective technical and organisational emergency measures to rescue fallen persons must be defined on a workplace-specific basis.

Due to the danger and rescue efforts involved in an emergency, two persons with the appropriate qualifications must always be present on site.

The employees must be instructed in the use of PPE to protect against falls, and this must be documented in writing.

To avoid fire hazards, only legally permissible building materials and processing procedures may be used in accordance with the state of the art. Safe building materials, i.e. non-flammable, and safe working methods such as adhesive methods (without the use of highly flammable liquids) or safe melting processes are preferred.

If the use of liquid gas cannot be avoided, only suitable work equipment and working procedures may be used for this purpose.

The work equipment must be tested for leaks and functionality before use.

Liquid gas users may only be operated with the necessary safety devices, such as pressure relief valves and leakage gas protection and/or hose rupture protection.

Inflow through openings into lower areas must be prevented. Liquid gas devices may only be operated above ground level.

Only the quantities of liquid gas required for the ongoing work may be kept on the roof.

The liquid gas valves must be closed and secured against access by third parties when work is interrupted or completed.

The necessary number of suitable extinguishing agents and devices for combating incipient fires must be kept in the immediate vicinity ready for use.



10.15 Crane work

All necessary crane work must be agreed with the Client's contract manager.

Following preliminary investigations by the partner company, it must submit a work plan, which must include the following minimum details:

- crane installation plan with feeding and insertion of the load
- technical information about the load (weight, suspension points, centre of gravity etc.)
- technical information about the crane used
- technical information about the load handling and load lifting equipment used
- final tests of the crane and the load handling/lifting equipment used
- proof of the crane driver's qualifications
- determination of the load capacity of the subsurface, which has been taken into account
- determination, isolation, identification and monitoring of the danger zone
- Use of a signaller

All safety and behavioural measures must be documented in the work plan.

In the case of several cranes working together, the danger that these cranes pose to each other must be defined and excluded by technical means (sufficient safety distances, mechanical limitation of the rotation range, an anti-collision warning system, additional persons for monitoring) and by means of a separate operating instruction taking into account the priority rules.

All work with cranes and in the crane travel area requires prior clarification and approval in the form of "Crane approval" from the Client's contract manager.

The use/operation of industrial trucks, tractors, construction machines and stationary cranes belonging to the Client by the Contractor is strictly prohibited.

If (shared) use/operation is contractually agreed upon and the corresponding requirements are met (indemnification of the Client, insurance documents of the Contractor, possibly bank guarantees, approval of the lessor etc.), the trained and authorised operators designated by the Contractor on presentation of the relevant driving order and driving licence must be instructed/trained by a responsible person of the Client.

The instruction must be documented by the Client in SARA.

The time-limited (shared) use must be coordinated with the health and safety coordinator to avoid interruptions to work and mutual hazards for the Contractor and Client.



10.16 Trials, testing and commissioning

Trials/testing and commissioning of equipment can involve unforeseeable hazards caused by the failure of equipment and machine and system components.

In the case of new construction, installation or following the repair of equipment, a separate risk assessment and a schedule for trial operation must be prepared by the partner company for commissioning and trial operation.

In addition to the designation of the person responsible for this particular area of work and activities, instructions must be drawn up for how to proceed in the event of irregularities or faults.

The risk assessment must consider at a minimum the following measures:

- determination of the person responsible
- identification and protection of the hazardous areas with information on the activity, its duration and the availability of the person responsible
- availability of communication methods
- necessary measuring, safety and warning devices must be working and ready for use
- operational readiness of all necessary emergency equipment on site
- conduct in the event of faults and emergencies

10.17 Working with (increased) fire hazard

All work in all areas of the property must always comply with legal requirements, insurance conditions and Sappi internal regulations, such as the Sappi fire safety regulations.

Before carrying out any work involving a fire hazard (see risk assessment), the necessary measures must be agreed between the Client and its fire safety officer and the Contractor, and they must be defined in writing.

When carrying out work involving a fire hazard, the Contractor must appoint a person responsible for the job.

10.18 Working in hazardous areas

As a general rule, all work must be avoided in which an explosive atmosphere in the form of gases, vapours and/or dust is already present before the start of work or could arise during the work.

Work that has to be carried out in designated hazardous areas of the property must be carried out in compliance with the legal requirements, the employers' liability insurance association rules and the Sappi internal regulations.



Suitable and safe measures must be taken to prevent the presence or emergence of an explosive atmosphere and effective ignition sources in potentially explosive or ATEX areas.

All safety measures taken to avoid an explosion hazard must be monitored by a supervisor with appropriate technical qualifications and suitable measuring equipment (clearance measurement) and alarm devices.

The start and end of work must be agreed with the Client's responsible contract manager, and approval must be obtained.

Safe working procedures must be selected and the necessary safe working equipment must be defined in this context.

If explosive substances have to be used, they may only be used at the workplace in the minimum quantities required for the work step concerned.

10.19 Work involving radioactive sources

In certain areas, measurements are performed using ionising radiation. (e.g. non-destructive material testing using X-ray equipment)

Monitoring, control and restricted areas must be identified, set up, blocked and permanently marked as such for this purpose.

The Contractor is responsible for its employees' observance of and compliance with the following rules:

- It is strictly forbidden to enter the entire hazardous area, in particular the *restricted area*
- Only qualified, authorised and selected personnel may enter the *control areas*
- *Monitoring areas* may only be entered for the duration of the work planned for the purposes of carrying out the work
- The effective isolation and permanent identification of the hazardous areas must be ensured in accordance with the calculated safety distance

To avoid exposure to ionising radiation:

- Individuals not necessary for the performance of the work/activity are not permitted to be present
- No use of individuals not trained and documented in SARA
- Use only of personnel that have not exceeded the maximum statutory radiation protection dose limit per year
- No use of defective radiation sources or test equipment
- Safe storage of all ionising radiation sources and equipment used
- Whenever possible, withdraw behind a suitable shield
- Maintain the greatest safety distance possible
- Keep the length of stay or exposure to a minimum

The Contractor's supervisor must ensure that the radiation exposure of the persons employed is documented.

11. Environmental protection rules related to activity and conduct

11.1 Waste

The Contractor must follow the company-specific and contractual requirements in relation to waste disposal activities.

If the mill or the construction site organisation does not provide centrally managed separate collection/waste disposal facilities, the Contractor is responsible for the collection, storage and recycling/disposal of its own waste in accordance with the law.

For the separate collection, storage, recycling and disposal of waste that is generated by the Contractor's activities on the premises/construction site and that become the Contractor's property, proof of disposal must be kept in accordance with the legal requirements of the German Closed Substance Cycle and Waste Management Act (Kreislaufwirtschaftsgesetz). In the event of any ambiguity and when necessary, the Contractor must coordinate with the Client's contract manager and the mill waste management officer in a timely manner.

Upon request, Sappi and, where applicable, the relevant authorities and institutions must be provided with corresponding proof and documents such as transport permits, acceptance declarations and proof of disposal.

The use of the Client's collection containers may be agreed with the contract managers.

For various reasons, such as to comply with the legal duty to maintain safety, the Client may remind the partner company of the need for timely disposal or may arrange for this to be carried out at the partner company's expense in the context of substitute performance in the event of impending legal violations and/or environmental impact.

11.2 Soil, water, drinking water and wastewater protection

To prevent the direct or indirect contamination of soil, water, drinking water and wastewater by dangerous substances and/or incidents (leakage of operating and

auxiliary materials such as fuel, leaks of hydraulic oil systems), backflow and discharge, the Contractor must take suitable and effective preventive and protective measures:

- It must ensure that hazardous substances are handled safely. This applies in particular to the use of work equipment, which must comply with the state of the art and the German Ordinance on Industrial Safety and Health (Betriebssicherheitsverordnung).

- It must be ensured that hazardous substances are stored in suitable facilities in a legally compliant and safe manner, that the separate storage requirement, the storage quantity limits and associated safety distances are observed and that the hazardous substances cannot reach the environment and surroundings.
- When storing hazardous or water-polluting products, the Contractor must comply with the safety recommendations of the manufacturer, the distributor and the applicable current regulatory specifications.
- Exposed adjacent areas must be secured against access and entry by third parties or unauthorised persons (cordon, marking, lock).
- Appropriate preventive measures and rules of conduct must be defined for emergency and danger events (e.g. maintenance of environmental emergency sets with durable duct covers and seals as well as suitable absorption materials for the safe absorption and binding of the substances and products used).

12. Emergency organisation

The Contractor is generally responsible for the prevention of emergencies and for the establishment of an appropriate, effective and legally compliant emergency organisation.

The Contractor's internal emergency organisation must be coordinated with the Client.

The emergency organisation must take into account local conditions such as existing escape and rescue routes, existing alarm systems and the importance of the alarm signals depending on the number of persons to be rescued, length of routes and times.

If the risk assessment reveals any evidence of a hazard to persons, the necessary conditions for a safe and speedy rescue must be created in consultation with the Client.

To this end, the Contractor must choose appropriate procedures, keep technical equipment and resources operational and ready for use, provide qualified personnel and ensure effective and sustainable deployment.

The employees of the Contractor and of its sub-suppliers (subcontractors) must obtain information on emergency measures before work commences by referring to the escape and rescue plans on display.

Safety

The Contractor shall be responsible for the health and safety of its employees and the subcontractors engaged by it.

The appointed occupational safety professional, the safety officers and the company doctor of the Contractor provide support with personnel deployment planning, occupational preventive medical examinations, dehydration, protection against UV radiation, infection protection, the protection of third parties in all contractually defined work/activities at the work site/construction site etc.

Health protection

The Contractor is responsible for the occupational health and safety of its employees and the subcontractors engaged by it. First aid services are to be provided by the appointment of first aiders/paramedics, and follow-up care, such as in the case of cuts, burns, chemical burns, bruises, abrasions etc. must be ensured.

Preventive and protective fire safety

The Contractor is responsible for ensuring fire safety within its accommodation and in relation to all contractually defined work/activities on the premises/construction site. The Contractor must ensure that suitable extinguishing devices and extinguishing agents are available in the necessary quantity. The Contractor's legally required fire protection assistants shall support the Contractor in the performance of its duty.

Note:

The use of powder extinguishers for fire fighting is not permitted anywhere on the site due to their lower heat absorption capacity and secondary damage (corrosive behaviour, e.g. in electronic/electrical and ventilation systems).

Depending on the type and extent of a possible fire, water, foam and/or carbon dioxide must be kept ready for use at all times, with due regard to the rules for fighting fires, and used by the Contractor's fire protection assistants if necessary.

Evacuation

The evacuation of its employees and sub-suppliers (subcontractors) it uses from the hazardous area to the safe area (e.g. assembly points). The Contractor's evacuation officer must ensure this during all operating times.

Property damage (material of any kind)

The Contractor is responsible for property damage within its accommodation and in relation to all contractually defined work/activities on the premises/construction site. If the Contractor causes any damage, it must report this damage to the project management/site management and its insurance company.

Environmental events (storage of hazardous substances, storage of waste, leaks from pipelines, hoses, tanks etc.)

Within its accommodation and in all contractually defined work/activities on the premises/construction site.

The safe and legally compliant handling of substances that are hazardous to the environment must be ensured and established by initial and repeated inspections by qualified persons.



In the event of danger to public safety and order due to accidents, fires or environmental events, the relevant authorities must be notified **immediately** via the mill's internal emergency telephone number

77 333 (alternatively: 77 437)

at the gate at the south main entrance.

In an emergency, the Contractor must ensure that internal and external assistance (emergency services, mill fire brigade, public fire brigade, police, Federal Agency for Technical Relief [THW] etc.) has unhindered and prompt access to the site by keeping the access roads and deployment areas free and by positioning signallers/guides accordingly.

12.1 Conduct in the event of health safety environment events (unsafe conduct, unsafe conditions, first aid services, medical treatment after accidents), property damage and environmental events

Immediate action must be taken in the event of unsafe conduct, unsafe conditions or near accidents and such incidents must be immediately reported to the Client's contract manager.

Suitable permanent measures to prevent similar accidents must be agreed, defined and implemented jointly between the Client and the Contractor in conjunction with the site manager, the responsible persons, the coordinators, the relevant occupational safety professionals, the safety officers and assistants in keeping with the aim of prevention.

In case of HSE emergencies, the internal emergency number 77 333 must be called immediately so that the emergency rescue chain can be instigated and all safety personnel (company paramedics, medical personnel, mill fire brigade etc.), internal persons in charge and other relevant personnel can be informed and, if necessary, also warned.

Note: A different emergency organisation may be provided on construction sites.

All HSE incidents must be reported immediately to the Client's contract manager in the form of an ISHIKAWA diagram (fish bone diagram/analysis).

- Location and date of incident
- Type of Incident
- Course of events
- Personal injury, property damage, environmental damage
- Identification of the cause of the incident (five W questions; RCA [root cause analysis] documentation)
- Contact details of all witnesses
- Downtime of persons involved
- Immediate action taken
- Further measures

- If third parties are at fault; contact details of the party that caused the incident, insurance information
- Assistance organisations, authorities and institutions involved
- Communication of the incident
- Psychological follow-up care of those involved

13. Sanctions

In order to comply with legal requirements and maintain the mill/construction site regulations and mill/construction site safety, sanctions will be announced and enforced if necessary.

Negligent violations of the manual for partner companies will be penalised with max. two written warnings.

After the first written warning, the Contractor must provide repeat instruction to the person(s) concerned and written proof of instruction must be documented in SARA.

After the second written warning, the continued presence or assignment of the person on the premises/construction site or the issuing of a temporary site ban will be discussed between the Client's management and the Contractor's management.

In the event of the deliberate disregard of the manual for partner companies, an immediate ban on site access and a permanent expulsion from the mill or construction site will be issued by the mill management/project management in agreement with the area manager or site manager.

In case of the suspicion or proof of negligence or deliberate crimes, this illegal behaviour must be reported immediately by the Client and/or the Contractor to the local police.

14. Final remarks

This manual describes the main workplaces and activities where (safety) measures are necessary.

This manual for partner companies does not claim to be complete. The legal requirements and internal regulations in place at the time of performing the relevant work/activities always apply.

The Contractor shall at all times take all measures that protect the life and limb of its own employees and the Client's employees, as well as uninvolved third parties and the environment.



15. Applicable documents

The following documentation and binding applicable documents must be observed:

- Code of conduct for Sappi suppliers and subcontractors
Available on the Sappi website at:
<https://www.sappi.com/sappi-code-of-ethics>
- Mill overview plan
- Construction site plan
- "Controlling and managing vehicles and means of conveyance" procedure
- Waste guidelines
- Fire safety regulations
- Conduct in the event of an accident involving personal injury
- Conduct in the event of a fire
 - "Alarm and hazard prevention plan" procedure
 - Bau BG modules
 - Bau BG risk assessment
 - LMRA
 - German Building Materials Association (BBS)
 - Hygiene concept

Information sheet for employees of partner companies

that carry out construction and assembly work, carry out tests or perform similar activities on the premises of Sappi Alfeld GmbH

1. Authority to issue instructions

In the event of a contract being awarded, the responsible partner company coordinator of Sappi Alfeld GmbH will be assigned to you by the commencement of work at the latest. You and your employees are required to follow the instructions issued by the partner company coordinator and the persons responsible for safety and the maintenance of order. Sappi Alfeld GmbH may check compliance with all the obligations listed below.

In the event of non-compliance, we reserve the right to removal from the site.

You are solely responsible for observing and complying with all relevant regulations during your work.

2. Information

The coordinator or, if the coordinator is unavailable, our guards will be happy to provide you with information about the rules within the mill and other organisational matters.

3. Smoking ban

Smoking is prohibited throughout the site. This ban is lifted only in designated places ("smoker's islands"). Smoking is also prohibited in cars and truck cabins.

4. Alcohol ban

It is forbidden to bring or consume alcohol or drugs on the premises or to work under the influence of alcohol or drugs.

5. Parking rules for passenger cars

The parking of passenger cars on the premises and in the car park at the main entrance to the mill—with the exception of visitor parking spaces—is prohibited. In individual cases, the parking area at the northern bypass can be used. This, however, requires express authorisation. Sappi Alfeld GmbH is not liable for damage to the vehicles parked there.

6. Permission to drive onto the premises

Vehicles from partner companies may only be driven onto the premises if the vehicle is required to be present at the mill or if it has to be loaded or unloaded at the mill. Your coordinator is responsible for the parking permit and compliance with the parking regulations on the site. If heavy parts have to be loaded or unloaded, the vehicle may be driven to the loading point. The vehicle may only remain there for as long as is required to load or unload.

Vehicles that are needed directly at the construction site will receive an exemption from the guard, which must be signed by the coordinator and clearly displayed in the vehicle.

Road traffic regulations apply on the site as appropriate. The maximum permissible speed is 10 km/h. As a general rule, stopping and parking in the railway operating area, usually marked by yellow lines parallel to the railway tracks, is prohibited at all times.

Deutsche Bahn AG's rail traffic always has right of way.

The washing of vehicles and the cleaning of tanks on the premises is prohibited. The discharge of excess pressure from tankers must not result in noise or other emissions.

Our guards are authorised to inspect vehicles entering and leaving the site. All vehicles entering and leaving must be weighed.

Any infringement or verbal objection to these instructions will result in the withdrawal of the parking permit or removal from the site.

7. Canteen

You have the option of sitting at the lunch table in our staff building, as well as making purchases at the kiosk. Please note that sales at the kiosk are cashless only and the purchase of a payment card is required.

8. Cleanliness of our facilities

When using mill-owned sanitary facilities, strict attention must be paid to cleanliness. The use of our shower rooms is permitted only if permission has been granted. The changing rooms assigned to you must be returned to the coordinator in a clean and tidy manner at the end of the assembly work. The same applies to cabins.

9. Waste

General waste must never be included with paper waste. Packaging must be disposed of in the containers provided for this purpose. You must dispose of other waste properly and in accordance with the law in containers to be provided by you.

10. Tools

You may use machine tools in our workshops after prior approval by our workshop managers or their representatives.

11. Theft

We ask you to keep your tools, small auxiliary equipment, machine equipment and materials carefully locked away outside of working hours. We do not assume any liability for theft.

12. Storeroom use

The partner companies working with Sappi Alfeld GmbH are generally not permitted to request small materials from the Sappi storeroom. In exceptional situations, the site manager of the partner company may be granted permission to retrieve materials after approval by the coordinator. We will charge you for these materials, adding general administrative costs. Forms for material requisitions are available in the storeroom.

13. Occupational health and safety

Accident prevention has absolute priority at Sappi Alfeld GmbH. Every employee is responsible for their safety and will alert colleagues to unsafe conduct.

14. Personal protective equipment

The wearing of safety shoes and glasses is mandatory on the premises. Additional PPE may be required depending on the hazards involved. It is essential that your employees are equipped with the necessary personal protective equipment before starting work.

15. Fall protection

Handrails, ladders, scaffolding and lifting platforms must be used to prevent falls. Where necessary, you must ensure adequate fall protection in your area of activity.

16. Hazardous work

For work involving fire hazards (activities involving heat generation, flying sparks etc.), entering tanks or similar spaces, working on pipelines, working on electrical equipment, drives and units, and excavation work, approval certificates must be issued in writing by your coordinator and countersigned by you. Such work may only be carried out at the locations specified by the coordinator.

In the case of work involving fire hazards, preventive fire protection (e.g. fire extinguishers) must be ensured. After welding and similar work, a fire watch appointed by the Contractor must remain on site for at least one hour after the work has stopped.

17. Use of mobile transport equipment

Mobile transport equipment such as trucks, cranes, lifting equipment etc. may only be operated by holders of a valid driving order and driving permit of the Contractor (qualification certificate/driving licence). Sappi's own mobile transport equipment may be operated/used only by contractual agreement with the approval of your partner company coordinator and following instruction/training and entry in SARA.

18. Mill-specific hazards, movement on site

Before starting work, you are obliged to have your coordinator inform you about the mill-specific hazards on our site and about how to behave in the event of an alarm. There is a risk of a gas outbreak of sulphur dioxide (SO₂). Please observe the "Rules of conduct for sulphur dioxide gas alarms." Other hazards must be observed: vehicle movements (forklift trucks, rail traffic, swing loaders, cranes), movement of small but heavy paper rolls. **For this reason, only those areas which are linked to the assigned activity may be visited. The marked footpaths must be used.**

19. Hazards specific to the activity/workplace

You are obliged to have your coordinator inform you about the hazards specific to your activity/workplace before you start work.

20. Hygiene area

When entering/working in the designated hygiene area, the "Hygiene manual for partner companies on the premises of Sappi Alfeld GmbH" applies.

21. Emergencies/damage

(Near) accidents, damage to property (e.g. equipment, machinery, vehicles), fire, leakage of substances or contamination of wastewater lines must **always and immediately** be reported to your coordinator (in case of their absence to the emergency number 77 333).

In case of emergency/accident: emergency number (05181) 77 333 (this number takes precedence over the official emergency number 112)

22. Obligation to instruct your employees

You are required to pass on the information provided to you to all employees under your responsibility, to all employees of subcontractors and to all new employees before starting work.