

**Safety and Environmental rules
for
Contractor companies**

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A MISCELLANEOUS

Our company attaches great importance to the safety of its employees as well as the safety of the contractor employees working on the Sappi Ehingen premises!

By accepting the order, you accept the safety and environmental rules and undertake to comply with them.

1. Responsibility

For the compliance of legal occupational health and safety regulations as well as intra-company rules of Sappi Ehingen the contractor is solely responsible for its employees. He alone has got the instruction and documentation obligation against its employees.

If the contractor company employs sub-contractors, he must notify Sappi accordingly. Moreover he must take care that the subcontractor instructs its employees extensively.

Before starting work the contractor must obtain information concerning the risk potential of each work location and must keep written records about employee's instructions. The documentation of these instructions has to be presented on request to the project leader or to the safety expert of Sappi. The information about the special risk potential of the respective location is effected by the responsible project leader of Sappi Ehingen.

2. Coordination

If the contractor employs employees of several companies at the same time, a supervisor / coordinator according to DGUV-regulation 1 (before BGV A 1) is to be assigned in order to avoid reciprocal endangering. The supervisor / coordinator adjusts the working processes of the involved companies, thus a reciprocal endangering is eliminated.

3. Regulations and Assignments

3.1 Generally valid regulations

For all your work in our premises the valid rules for accident prevention (especially the institution for statutory accident insurance and prevention in natural resources and chemical industry (BGRCI)) in connection with the generally known rules of technique and the specially valid safety rules for the work to be processed must be observed. For this reason your assembly personnel has to be instructed about safety regulations before starting work by our respective project leader / contact partner or by advance notification via our company safety engineer (telephone 305). Without written confirmation of the already conducted instruction, under no circumstances may the work be started. If there is still a lack of clarity regarding safety questions thereafter, you have to refer again to our safety engineer.

For all problems concerning compliance of regulations, the respective master / plant or department engineer alternatively the project leader have to be informed. Also all open questions can be clarified with them.

For expert questions concerning safety, fire and environmental protection the following telephone numbers are available:

Staff division environment /safety	tel. 305
Safety officers	tel. 305, tel.: 553 or tel.: 257
Company physician / ambulance	tel. 263
Company ambulance man	tel. 553
Fire brigade commander	tel. 501 or 518
Fire prevention officers	tel. 501/522
Radiation safety officer	tel. 344

3.2 Permitted stay at Sappi premises

It is only permitted to stay at areas where work is to be executed based on the contractor's concluded agreement. The entrance of other company areas is prohibited. The commands and instructions of the safety engineer and for the premises' other safety responsible persons must be strictly obeyed.

3.3 Additional requirements

On demand the personnel liable to be present on the construction site are to be named and each change must be noted in written form.

To guarantee a proper and smooth installation process the personnel may however not be changed unnecessarily.

Your staff has to follow the instructions of the local site management. We reserve the right to demand that people who cause grievance leave the construction site. You are obliged to look for an appropriate replacement in such cases, without entitlement of a right for the missing deadline or extra costs.

The normal working time is generally according to our day shift, i.e. between 7.00 h and 16:00 h.

Your assembly staff is obliged to use the rotation lock at the gate 1 before starting and ending work. This measure is essential for accidents with far-reaching consequences in order to have an overlook of the people who are located on the premises.

B SAFETY

1. Fire alarm and accident notifications

Fire alarm and accident notifications must be notified immediately via internal telephone no.

+49 7391 501 333

The notification must contain the following information:

*Who is reporting?
What has happened?
Where has it happened?
How many injured persons?*

In emergency situations you can directly reach from every phone via telephone No.

**7112 Emergency Coordination Centre
(emergency doctor/fire brigade)**

7110 Police

In such a case subsequently the gate 1 and the boiler house via telephone No. 333 are to be informed so that the rescue team can be guided immediately to the accident location.

2. Housekeeping

Order and cleanliness is an essential part of safety, fire prevention and environmental protection. We take great care in disposing of or storing waste and appliances in order to create no obstacle or endangment for anybody. Therefore the leaflet "housekeeping on construction site" is to be adhered to. The disposal of any kind of waste is to be agreed with the respective project leader.

3. Alcohol ban and prohibition of smoking

Take note of the absolute prohibition of **s m o k i n g** for the complete factory, this also applies inside vehicles. As a matter of principle it is allowed to smoke in specially identified smoking areas (refer to C. 4.).

For the complete premises (including canteen) an **a l c o h o l b a n** without exception applies. An infringement of the limited prohibition of smoking and the absolute alcohol ban will lead to an immediate removal from the factory.

4. Traffic

4.1 Road traffic

On the whole premises and complete factory a speed limit of **10 km/h** applies. If necessary, the speed must be further reduced. If the speed limit is exceeded, the entrance access permission may be removed. Basically the rules of the road traffic act apply on the company area.

Company and railway traffic have priority!

Do not park in front of fire brigade driveways, in front of fire fighting water area (hydrants), and in railway areas. Illegally parked vehicles will be towed away at own expense.

4.2 Entrance to premises

The entrance of private vehicles into SAPPI work premises is generally forbidden. Excluded is only the loading and unloading of tools and materials for the duration of the loading activity in agreement with the relevant project leader. An appropriate parking ticket will be issued at the gate 1 by our gate keeper.

Vehicles of mounting staff may only be parked at the parking area of the sewage plant. The allocation of parking ground cannot be guaranteed. Illegally parked vehicles can be towed away by Sappi at own expense.

4.3 Traffic routes

The traffic routes in the area of construction sites must be kept free for rescue vehicles and fire brigade and to ensure that other transportation are not obstructed.

5. Tools and appliances

For the correct application and maintenance of tools and appliances which are made available by Sappi to the contractor, the latter is responsible. In case of defects related to the tools or on the appliances he has to notify Sappi Ehingen and has to return the appliances immediately for repair.

If the operation of certain appliances and tools requires special knowledge or certification, the contractor is responsible for the assignment of accordingly skilled and certificated employees. The use of machines and devices for which one is not sufficiently instructed, is forbidden.

For damage to persons and property which are caused by non-compliance of the obligation in this point, the contractor is exclusively liable.

6. Electric facilities

6.1. Construction power supply

For all labour and assignments regarding construction power supply the respective regulations have to be adhered to. The faultless condition of junction, cable, protection and earthing equipments is to be regularly checked and any damage is to be immediately repaired.

In case of civil engineering works, as well as pipe and steelwork, the electric energy must be withdrawn from an appropriate installed distribution box with an earth leakage circuit breaker (ELCB). When positioning the distribution box take care that this is well protected against mechanical damage and is easily accessible. During operation the door must be closed. The connection of the distribution box to our electric circuit is to be executed in the presence of an electrical skilled person and on instruction of our electrician.

The facility must be openly switchable by an accessible and identified circuit breaker any time which can be switched to all non-earthed conductors simultaneously. The positioning of the switch must be visible. Main switch could be e.g. the ELCB (earth leakage circuit breaker – FI).

A rubber hose cable with a minimum type H07RN-F should be used for connection cables. For endangered areas the cables must be protected e.g. by higher positioning or a cable type NSSHÖU is to be used.

A test certificate must be issued for the release of construction distribution and to be presented to our electric master.

The test key of the ELCB must be activated once each working day. The inspection of the distribution box has to be done on a monthly base, the test certificates must be collected and presented on request at any time. In addition to this leaflet the appropriate VDE-regulations must be adhered to in any case for the construction and the operation of construction power supply.

Please take note that every electric installation which is in contrary to regulations will be abandoned immediately.

6.2. Switching operations at electric facilities

This operation may only be executed without any exception by the appropriate specialist department of Sappi Ehingen.

6.3 Closed electric operation rooms

Only electricians (burden of qualification proof by employee) or persons specifically trained for the respective tasks while keeping the compulsory control are allowed to enter.

6.4 Moveable electric operating facilities

All movable operating facilities (extension cables, electric tools et cetera) have to be inspected according to VDS 0701/0702 and according to regulation *DGUV- Vorschrift 3* (before BGV A3) (see statement 1). An inspection plate must be attached as proof.

Assets/operating Facilities	Inspection period Guiding value/max. values	Type of inspection	Inspector
Moveable electric facilities (if being used)	Guiding value 6 months, for construction sites 3 months If there is an error fault ratio < 2% reached, the control ratio can be extended	Conditions must be checked according to the rules	Electrician by using appropriate inspection device or an electrically instructed person
Extension and appliance connecting cable with plug-in			
Connecting cable with plug	<u>Maximum values</u>		
Moveable circuits with plugs and fixed connection	On construction sites , in manufacturing plant , and workshops or under similar conditions one year, In offices or under similar conditions two years		

Statement 1: inspection periods for movable electric facilities

7. Use of crane and forklift

If a crane or a forklift of Sappi Ehingen is used while work is in progress, make sure that the person scheduled for the operation of the crane or forklift has got the appropriate knowledge and, additionally possesses the necessary training for leading a crane or a forklift as defined by the accident prevention regulations (proof by certificate /driver license). If the requirements are fulfilled Sappi gives an assignment.

When using forklift trucks the use of safety belts is obligatory, even with a closed cabin or an alternative restraint system.

The use of our cranes and forklift trucks is only allowed after instruction and issuing of a driving order (in writing). A drivers license must be presented. Never work directly at or near cranes in operation. The stay under floating load is forbidden.

8. Gas defence

For working areas where in case of damage the emission of harmful gases can be expected, the following regulations apply:

- Before starting work the relevant department is to be notified and the people working there must be equipped with escape filters (rental devices are available at the control room of the pulp mill). Only then it is permitted to enter this area.
- The shortest way from working place to outside must be known.
- Escape filters must be taken along in order to leave the working place hurriedly in case of a possible gas eruption.
- If working with a gas mask is necessary, it must be agreed with plant management. Only specially trained people are allowed to work with gas masks.

9. Personnel Protective Equipment (PPE)

All employees must use their personal protective equipment appropriate to their work and the degree of endangerment.

9.1 Safety Shoes

On construction sites and in the whole factory of Sappi Ehingen GmbH (exception administration building) it is mandatory to wear safety shoes. Excluded are the areas in which offices are situated including the corridors in these areas, control rooms, social rooms and wash/toilet rooms as well as the complete administration building.

9.2 Mandatory use of safety glasses

This regulation applies in all production areas including the waste water treatment and on the wood yard. Excluded are the areas in which offices are situated including the corridors in these areas, control rooms, social rooms and wash/toilet rooms as well as the complete administration building.

9.3 Mandatory use of ear protection

The use of ear protection in noise areas is mandatory. The rules of the DGUV applies.

9.4 Mandatory use of helmets

Helmets are required on construction sites or during repair and maintenance shutdowns. Only accredited helmets may be used (manufacturers instruction for service life "crack test").

Generally for the whole wood yard safety helmets are mandatory.

9.5 Fall protection

If a fall protection cannot be secured via handrail, safety scaffold or safety net, the employees must use a safety harness. The use of a safety belt as a fall protection is not permitted.

9.6 High visibility jackets in loading areas.

In the area of the woodyard the wearing of high visibility jackets is compulsory due to the traffic of trucks, rails, and wheel loaders. An exception is the interior area of buildings.

9.7 Personal Warning System

In the outside area of the woodyard, beepers are to be carried close to the body, these are available from the master woodyard or at the wood scales

In principle, if PPE with special requirements is required, this must be used.

10. Working with machines

10.1 Safety against unintentional start-up

When working in or at machine facilities, which cannot be completely overlooked from the control position, in particular, secure the main switch into the "OFF"- position with your padlock. Remove the lock from the main switch only after you are absolutely certain that by resetting no staff is endangered and also the facility itself will not be damaged. All switch and operation activities may only be executed by authorised SAPPI personnel. It must be guaranteed that facilities and machine parts are not unsupervised and cannot start-up autonomously and thereby create damage to persons and property. The permit for "switching electric facilities" is to be observed! Pay attention!

10.2 Start-up of machines and aggregates

The start-up of machines and aggregates may only be executed by authorised staff.

10.3. Working at running machines

General precaution when machines are running!

It is strictly forbidden to work above running machines, e.g. wet sections of paper machines.

Always estimate that there is the danger of hot media (e.g. steam, leach, substances, water).
Possible risk of skin burning!

11. Entry permit for vessels

Special precaution is required while working in narrow spaces, vessels, containers, vats, chambers, tube channels, barrels and with health hazardous substances. Additionally take note of the electric dangers (voltage protection, isolating transformer, ELCB, etc.). Working in these areas may only be executed after issuing a "permit for inspection, repair or cleaning of containers, pressure vessels, pipes or similar assets" and the "rescue plan for works in vessels, pipes, similar assets". Works are only allowed the regulations of the permit and the rescue plan are followed!

Before starting work an entry permission by the user is to be obtained (vessel entry permit).

When working on pumps, pipes, fittings, fans and apparatuses, a clearance certificate for "pumps, pipes, etc. ..." must be obtained from the operator before starting works.

12. Scaffoldings, mobile working platforms, work platform for forklift trucks, ladders

12.1 Scaffoldings

For working at inaccessible positions, professional constructed scaffolding has to be erected by special trained personnel and a scaffolding certificate must be issued.

Ensure that all scaffolds are provided with a three-sided protection.

On every scaffolding created at Sappi Ehingen, a transparent plug-in bag "Scaffolding locked" must be installed by the creator, here the clearance is inserted. If a scaffold is defective, the bag is removed and the "Scaffolding locked" symbol appears.

Mobile scaffolding must not be if persons, material or loose scaffolding parts are placed on them.

12.2 Mobile working platforms

Using of mobile working platform is only allowed after instruction by the rental service or an expert. The use of PPE against falls is obligatory. The working area must be roped in.

When using Sappi mobile working platforms instruction and an assignment is obligatory.

12.3 Working platform for fork lift trucks

When using an approved work platform for forklift trucks, the driver must not leave the driving position with the work platform raised. If the working platform is occupied by persons, the truck may only be moved for fine positioning. PPE against falls from a height must be put on. The working platform can be borrowed from the factory in individual cases. > Technical consultation.

12.4 Ladders

Use approved ladders without damages. Damaged ladders must be removed immediately from the construction site.

13. Hazardous substances

13.1 Hazardous materials

If working with hazardous substances (acids, leaches, gases) appropriate protective gear must be worn. The instructions in the operation manual and safety data sheet regarding these substances are to be followed (information before starting work).

13.2 Radioactive emitters

If working in the area of radioactive emitters inform the radiation safety officer in time!

14. Disassembly and demolition work

14.1 Disassembly and demolition work

Disassembly and demolition at buildings, building parts and facilities may only be started if checked whether the electrical installation is without power supply and removed according to the rules.

14.2 Excavation work

This kind of work may only be executed after issuance of a “permit for execution of excavation work on Sappi Ehingen premises”. Excavations, cavities, ditches, open channels, ground opening et cetera must be protected from falling according to regulations. A large amount of electrical cables, gas supply and water pipes are laid on the open air ground as well as in the buildings. Inform yourself at the technical department before starting work whether and where such supply lines at eligible working place are situated. Working on assets with substances that are water endangering, may only be executed without exception by staff of a company which are a specialist firm according § 19 of the Water Management Act (WHG). Air hammers must be generally earthed by a copper cable with a minimum of 16 square meters.

C ENVIRONMENTAL PROTECTION AND HOUSEKEEPING

The mounting and configuration of all construction sites facilities are to be agreed with the local site management in written form.

You have to take care on your own account that the construction site is according to the specially imposed regulations concerning environmental protection and cleanliness and also for the currently valid instructions of Sappi.

The storage and supervision of all parts and materials connected with the assembly is your responsibility. We do not assume any liability for missing material.

You have to keep the construction site in an acceptable condition and also must take care that you leave the work area after finishing your work well-swept, at least once per working day.

You are obliged to dispose of waste and residual materials that arise in connection with the execution of the order always under your own responsibility.

Disposal on Sappi premises is not permitted, in exceptional cases a special written agreement can be made with the Sappi project manager.

The handling and disposal of waste from demolition, deconstruction and dismantling work must be specified when the contract is awarded to Sappi.

The contractor is responsible for ensuring that the relevant waste regulations are complied with and that the waste is disposed of properly (proof must be presented to the customer).

Excess and remaining material as well as scrap remain your property and should be evacuated on your own account after closure of site.

For any failure to comply with regulations regarding cleanliness and clearance the necessary action will be taken by us on your expenses without any notice of default.

The burning of waste, the emptying of chemicals, oil, petrol et cetera in sewage water holes and pipelines, as well as the use of petrol and oil for washing is prohibited. Vehicles, facilities, containers and so on have to be leakproof, possible leakage has to be absorbed without any delay and duly disposed.

D FIRE AND EXPLOSION PROTECTION

1. Miscellaneous

Our fire alarm system is connected to the central control stations of the fire brigades in Ehingen and Ulm. To avoid any false alarm, please take note of the following:

False alarm can be activated:

- a) By arising of smoke, dust and steam in areas of fire detectors
- b) By increased temperature in areas of fire detectors and sprinklers
- c) By current or pressure fluctuations in the sprinkler net, e.g. activated by
 - activating of wall fire hydrant hoses
 - damage of sprinkler
 - damage of sprinkler installation

Please absolutely avoid such kind of tasks and activities in flame proofed areas. If tasks (e.g. welding, cutting, soldering, grinding, working with open flame, steam cleaning, blowing away of dust and so on) cannot be carried out in other working areas, the following employees must be notified imperatively before starting work in order to activate the respective areas.

Mr. Aslan / Mr. Altun
Mr. Rapp / Mr. Peter

Tel.-no.: 538 / 593 or
Tel.-no.: 501 / 518

Moreover these employees must be informed **immediately** after completion of their task in order to reactivate the fire-protection appliances instantly.

In all central control rooms and CO₂-fire-fighting system areas the use of mobile phones is forbidden. Some central control rooms are protected by CO₂-fire extinguishing equipment. They may be entered only after special instruction and in agreement with our electrical department. The contractor will be held liable for resulting damages and costs if this instruction is not followed (e.g. faulty fire alarm, activating of the sprinkler, water damage and so on).

On some facilities and areas on the premises a potentially explosive atmosphere by gas or dust may occur. These areas are identified and marked as EX-areas. For these EX-areas special regulations must be observed. The details for EX-areas are described in EX-protection document.

2. Behavioural Rules

Order and cleanliness on the premises are one of the basic requirements of fire protection. Hazardous waste like saw chips, wooden dust, oil-soaked and solvent-soaked cleaning clothes, hot ash, enamel varnish residuals, thinning agents, scrap of papers and similar things must be removed immediately after work and disposed professionally.

Pressure containers of all kinds (e.g. gas bottles) should be stable secured against tilting over and stored in a way so that they can easily be removed in case of danger.

Absolute care must be taken when parking vehicles in order to keep traffic routes, emergency exits and also the emergency vehicles freely accessible.

Heating devices may only be used and put into operation after approval by the project leader. The storage and drying of inflammable things (e.g. wood, packing material, work gear) near the abovementioned devices are forbidden.

Intra-plant traffic routes should be kept free from any obstruction.

Storage and also temporary storage are not permitted at emergency routes and exits.

All doors and gates must be kept closed, except fire-protection doors with firm lock devices which close autonomously in the event of a fire. Existing self-closing safety devices may not be blocked or set out of order.

Fire extinguishing equipment and devices may not be blocked or be out of view or removed from the specified location improperly or be used inappropriately.

The storage or use of propane gas in basements is forbidden.

Absolute care must be taken that inflammable liquids must be kept in explosion-resistant containers. Only half of the daily consumption may be kept at the work station.

Please take note of the particular regulations if using bolt-firing tools with powder charge.

When working in EX-areas an entry permit is to be obtained before starting work in order to ensure that no explosive atmosphere is existent. In case of a potentially explosive atmosphere, work may be started only after having consulted the coordinator. When working in EX-areas only suitable tools (non-arcing tools) and ex-protected devices may be used. Telephones and electronic devices have to be switched off as these are very often not EX-protected.

In the case of cable and pipe ducts, the fire-barriers shall be temporarily closed with fire-protection cushions on a daily basis until final completion.

3. Permit for works involving fire hazard tasks

If fire hazardous works (welding, burning etc.) must be carried out while settling an order in or at buildings which already contain plant components, generally on request of the contractor a welding permit issued by the project or department leader is essential before starting the work. Without this permit work may not be started.

4. Prohibition of smoking

On the complete factory an absolute prohibition of smoking applies. The respective project or department leader informs you about specially identified smoking areas.

The rooms and work locations in which smoking is permitted may never be left with a burning cigarette. This also applies to e- cigarettes.