

General Safety Instructions for PAUL WURTH Sites

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I SAFETY GLOSSARY

■ Project owner

Physical or legal person for whom work is performed.

■ Master Builder

Physical or legal person responsible for designing and/or executing and/or monitoring the project's execution on behalf of the project owner.

■ Prime contractor

Representative responsible for placing orders with an External company and following up their execution on behalf of the manager (the manager can be his own prime contractor).

■ User company

Site of the project owner which uses the services of an External company.

■ External Company (E.E)

The company which undertakes a task (service provision) on behalf of the user company, either directly or through successive subcontracting.

■ Contributor

External company or department responsible for performing or subcontracting the work.

■ Service provider

External company to which the user company has assigned a contract.

■ Manager

Responsible for the operating of a facility.

SPECIFIC CASES:

■ Scheduled maintenance shutdown:

Sector maintenance services which, through delegation, become the managers of the areas allocated to them. Exceptions are subject to specific rules, at the Units' level.

■ Long term shutdown:

The Production service can then transfer the managing of the facility to a third party: Sector Maintenance, Central Maintenance, New Works... The transfer must be specified when the works are being prepared.

**■ Representative of the project owner's site**

Representative of the project owner's site with the necessary authority, ability and means to represent the user company during the execution of a "Prevention Plan" procedure. He is in charge of the coordination of the External companies who are responsible for executing the works entrusted to them.

■ Prevention plan

Written document specifying the measures to be taken by each company so as to prevent risks which could arise from interference between an operation's activities, its facilities and materials.

■ Safety protocol

Written document comprising all of the appropriate instructions and information to prevent any kind of risk produced during the loading and unloading of a haulage vehicle.

■ External company safety coordinator

Operator responsible for following safety issues in particular.

■ Hot spot works operator

Operator responsible for performing works requiring a welding and cutting permit.

■ Work station conditioning

Set of procedures and actions to be undertaken before any work is done so as to allow the work to be carried out in safe conditions. Only once all of these conditions have been met can the document authorising the work be delivered.

■ Consignment

Consignment refers to implementing the appropriate safety measures so that a project can be executed without any risk to the employees and the material. Consignment must particularly prohibit any possible energy source from being present.

■ Condemnation

*To condemn a machine means undertaking the necessary steps to:
put and maintain the machine in a specific position
forbid its use and display a sign stating that the condemned machine must not be operated.*

■ Deconsignment

This refers to lifting the safety measures taken at the time of consignment after checking that the work to be done has been finished or interrupted and that all of the operators have left the area consigned.

■ Consignment department

Department responsible for undertaking consignments:

- *as specific department: electrical department, mechanical production ...*
- *or as a coordinator in the case of a general consignment.*

■ Consignment official

Operator responsible for implementing or having implemented the various consignment operations.

■ Consignment operator

Operator performing operations in view of a consignment ordered by a consignment manager.

■ Works official

Person appointed by his employer (User company or External company) to ensure the works that he has been allocated are being run efficiently. He is responsible for taking or enforcing any necessary safety measures and making sure they are applied.

■ Protected area

A facility's or a piece of equipment's consigned area within which the safety measures taken by the consignment officials allow one or more work areas to be created.

■ Work area

An area located within the protected area and allocated by the Works official to personnel within his team.

■ Health and Safety Coordinator

Authorised physical or legal person responsible for ensuring the site's coordination.

■ HSE (SSE)

Health – Safety – Environment (Santé – Sécurité – Environnement)

II FOREWORD

The **present safety instructions** recall the main obligations in force; they complement and specify the regulations. **These instructions are to be applied as a complement or if instructions from the project owner are missing.** It goes without saying that the instructions and documents from the project owner take precedence to any instructions given by Paul Wurth: **the strictest measures are to be applied and respected.**

The **general safety instructions** are applicable to all **EXTERNAL COMPANIES** which carry out works on our sites.

These instructions aim to focus the attention of external companies on the main risks to be found on a project owner's site and to help them implement the preventive measures and provisions. The aim is the suppression of all accidents or incidents when works are being performed.

The works performed on a project owner's site is done by companies which specialise in the work entrusted to them. They are entirely responsible for their employees. They must ensure that the subcontractors and the temporary staff they use know and apply the General Safety Instructions.

The external companies are responsible for the *modus operandi* which they plan to use to carry out the work.

The work, regardless of its nature, must be performed whilst respecting:

- the laws,
- the regulations specific to the line of work which the external companies belong to,
- the internal rules, specific rules and measures particular to the project owner's site
- the safety policy of the project owner's and/or the Prime Contractor and/or the Instructing party; as well as the Management's commitment to the safety policy of the project owner's and/or the Prime Contractor and/or the Instructing party.

It is up to the External company officials to draw up their own safety policy. They ensure that it is distributed within their company and that each year the policy is sent to the Safety department at PAUL WURTH.

Furthermore, they commit themselves to taking into consideration, communicating to and enforcing among their employees all of the requirements hereby stated in the PAUL WURTH General Safety Instructions.

The external company commits itself, both during assembly and for tests, to putting forward any additional measures which could improve safety.

III OH&S POLICY



OH&S POLICY – Operational Health and Safety

Protecting the health of our employees and continuously improving safety in all workplaces is our ongoing concern.

Beyond the inherent dangers of our industrial activity and present in the production facilities and on the civil construction sites of our customers, new issues affect our Health and Safety policy. In fact, the medium-term obligation to drastically reduce CO₂ production requires us to reconsider traditional steelmaking processes, which can generate new risks. In addition, climate change, whose consequences are often catastrophic, can cause local crisis situations for exposed personnel. On the other hand, we consider that digitalisation will allow us to optimise and better target on-site interventions. All these factors, together with increasingly stringent regulations, require us to put in place a health and safety management system that includes:

- the elimination of hazards and the reduction of risks in our activities,
- compliance with all requirements to ensure safe and healthy working conditions,
- effective communication and transparency at all levels,
- specific in-depth training of the staff,
- and the implementation of appropriate procedures for managing emergency situations and crises.

Being also very concerned about the well-being of our employees exposed to professional and road stress, we have already undertaken actions such as the introduction of flexible working hours and telework, as well as offered the possibility of practicing sports activities.

Employees are constantly informed and asked to give their opinion and share information through our intranet site, toolbox meetings, health and safety day, risk assessments or site audits.

For this, we entrust to Anne Ferber and Teddy Quénée all authority to implement our Health and Safety policy and carry out the appropriate actions as part of a drive towards continuous improvement, with the participation and awareness of all employees.

Luxembourg, 2nd March 2020

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IV GENERAL POINTS

1 PREPARING THE WORKS AND ORGANISING SITES

Work related accident prevention is based on:

- the search for possible risks on future sites, so that all prevention, protection, and health and safety measures are taken before the works starts.
- This especially implies that External companies visit the site, and that work procedures, tools, individual and collective protection equipment and devices are prepared.
- When bidding for the offer, the External company **specifies a modus operandi which integrates these various parameters and ensures the environment's safety, health and preservation**. It commits itself to respecting the modus operandi when the order is received.
- the selection, informing and training of operators by the External companies,
- the organising and checking of prevention measure enforcement on the site, as well as the adaptation of the measures in unplanned circumstances which could arise at some point during the work.

Any change in the modus operandi must be brought to the attention of the PAUL WURTH representative and the Safety Coordinator, who is the project owner's Prevention plan coordinator. If new risks arise, a new coordination meeting will be held.

The project owner's site highlights the fact that the local specific legislations and regulations concerning health and safety of workers may be applied.

It is up to the External company to contact the Instructing party to find out which regulation will apply to its site.

3 ENVIRONMENT

The External company representative commits himself to informing his staff on current environmental regulations as well as the project owner's site requirement and making sure they are enforced.

In line with the anti-pollution regulations, it is forbidden to emit any contaminating substances (gases or particles which are either solid, liquid, corrosive, toxic or odorous), into the atmosphere and pour polluted water or polluting products (chemical, bacterial, mechanical and radioactive) into pipes, sewers and rivers and onto the site's ground.

It is strictly prohibited, due to the risk of an explosion, to deposit hollow recipients (gas bottles, tanks, empty canisters ...) in the metallic waste skips and in the scrap area.

The External company must, at its own cost, remove its waste from the site to approved processing facilities.

The, below-mentioned, environmental regulations are to be apply as a complement or in the absence of a health and safety plan established by the customer. It goes without saying that the instructions and documents dictated by the health and safety plan of the customer take precedence over the Paul Wurth regulations **(the strictest measures are to be respected).**

- To diminish the impact of waste on the environment by separating and by reducing the quantities of solid and dangerous waste. When the storage areas are in the factory, waste must be deposited in the approved and identified containers.
- To monitor the energy consumption by stopping the machines and switching of the lighting at the end of work
- To feel accountable for the cleanliness on the building site: the care taken to work contributes to the safety of everybody.
- To carry out all work so as to avoid any outflowing, overflowing or leaking of products such as solvents, fuel, mineral oils, etc, which could pollute water or basements.
- If despite of everything, a minor outflow happens, it is necessary to limit this outflow (especially to avoid an outflow towards the water drains) by means of absorbents products, so as to eliminate the cause, and to warn the construction superintendent for health and safety.
- In the event of more important outflow, it is necessary to inform the fire brigade of the factory and meanwhile to take the same measure as in the event of minor outflow.
- To comply with the applicable environmental regulations.
- To respect the property of the company and that of the colleagues. It is strictly forbidden to seize the property of others.
- To ensure the cleanliness of your workplace. Before leaving it, the personnel will have to tidy it up and to clean it.

V CIRCULATION ON SITE

1 ACCESS AND ROAD CIRCULATION

- a) The circulation rules throughout the site (inside and outside of the buildings) are defined by the concerned project owner's site.
- b) The External companies request the right to enter the site and respect the circulation rules which they have been transmitted. They only bring onto the site vehicles or machines which are in a good state and which comply with current regulations.
- c) **Under all circumstances, drivers must comply with:**
 - the Traffic Law requirements,
 - the requirements on the signs displayed on the site roads, especially the speed limit, rights-of-way signs, no overtaking signs and stop signs, ...
 - the instructions given by officers who may be placed to regulate the circulation.

2 PEDESTRIANS

It is imperative to access the buildings through the pedestrian doors. Employees moving around the project owner's site must use the specific paths. Employees must not leave the areas and paths which have been specified for them.

3 MATERIAL TRANSPORTATION

When material or goods transportation is likely to release dust or particles which may harm other users or which could pollute the site roads and the other vehicles, the transportation company must either use specifically converted vehicles (tanks, containers, reservoirs) or carefully plug the hole of the vehicle releasing the matter.

Any infringement of this measure can lead to the seizure and the immediate consignment of the vehicle or the machine by the project owner's site security department. If the infringement reoccurs, the vehicle's and the driver's circulation permit will be immediately withdrawn. The External company must pay for the cleaning and repair of the damage caused.

Any material or goods accidentally spilled onto the paths and roads will be removed as soon as possible by the External company, which, if appropriate, will place markers, take safety measures and inform the security department of the project owner's site.

4 PARKING AND MAINTENANCE AREAS

Vehicles must be parked in the Owner's representative site areas and car parks or those specifically set aside for this purpose. The vehicle must always be parked facing the exit, especially in no-through roads.

For vehicles, machines and selfpropelling trucks used by the External company as part of its contract and the Prevention Plan, the car park and maintenance areas will be defined with the Owner's representative site officials.

Unless under exceptional circumstances, the parking of vehicles (vans, lorries, etc.) is strictly forbidden in the buildings. Access is only authorised for slow loading and/or unloading of material. In this case, the side lights must be on.

It is forbidden to park within two meters of the external part of a railway track unless otherwise stated by the site. This is to take into consideration the clearance limit of railway material circulating on the tracks.

5 PAVEMENT PROTECTION

The site machines which are not equipped with tyres or solid rubber bands will only be allowed to enter the site carried on trailers which themselves are equipped with tyres. This is particularly the case for metal caterpillar machines (pusher tractors, cranes, excavators), rollers or compactors with metal tyres which are likely to damage the road surface.

Any infringement of these measures will lead to a claim for compensation against the External company.

6 VEHICLE SIGNALLING:

6.1 VERY LONG ITEMS.

Special attention will be given to the transportation of flat metal sheets, or items whose dimensions are not highly visible and which may not be seen by the other users and may mislead them as to the load's real clearance limit (indicator lights and cushions on the corners for protection are compulsory).

6.2 VEHICLES OR MACHINES WITH AN EXCEPTIONAL CLEARANCE LIMIT:

Vehicles or machines whose width is greater than 2.50 metres must comply with site regulations.

A prior check and a scouting of the itinerary to be covered shall be performed as part of the "Prevention Plan" or the "Safety Protocol" procedure. Specific requirements relating to signalling, accompaniment and timetabling may be introduced by the site. The same applies when the length exceeds 15 meters (secluded vehicle) or 18 meters (vehicle with a trailer).

6.3 SIGNALLING

The site machines must be fitted with a horn, reversing lights, photoluminous strips, revolving warning lights or flashing lights. The machines must be clean and environmentally friendly. The cranes must be fitted with a revolving flashing light at the head of the boom.

6.4 BLIND MANOEUVRING

When the driver of a vehicle or a machine must perform a manoeuvre, especially reversing when visibility conditions are insufficient, a person must, either through voice instructions or signs, direct the driver and also warn or have warned individuals working in the area where the vehicle is manoeuvring. To avoid anyone getting run over, all measures will be taken to ensure nobody is in the area between the manoeuvring vehicle and the set obstacles.

All manoeuvres must be performed very slowly.

The same care must also be taken when unloading a lorry's skip or a haulage vehicle.

6.5 CHECKS

If any circulation regulations are broken, the site security personnel are authorised to immediately stop any vehicle or machine which does not meet the requirements outlined in the Highway code or those in these instructions and to enforce the appropriate corrective measures.

6.6 SLOW VEHICLES

Slow vehicles must, whenever in motion, be clearly signalled either by a turning or a flashing light.

VI ASSISTANCE IN CASE OF ACCIDENTS, INCIDENTS OR FIRE

1 GENERAL INSTRUCTIONS IN THE CASE OF AN ACCIDENT

Anyone who witnesses a work related accident must do two important things

a) PROTECT YOURSELF

- if there is danger, protect yourself, so as to be able to intervene
- eliminate the cause of danger and make sure that it has been neutralised, remove the victim if there is any danger threatening him
- if there is no danger, do not touch anything

b) ALERT (OR HAVE INFORMED)

- the rescuers closest to you
- the first aid or emergency services whose contact details are specified in the Prevention Plan (internal sick bay or others)

Alert procedures:

- specify the reason for your call and indicate the place of the accident. The person who has made the call must ask for the information to be read back by the receiver.
- give a meeting point which is easy to find.
- wait for assistance

2 GENERAL INSTRUCTIONS IN CASE OF AN INCIDENT

Any "**dangerous event**" arising unexpectedly on the work premises which has not physically harmed anyone must be stated and analysed so as to draw up corrective actions. If there is imminent danger, immediate measures may be taken to avoid the accident.

In all cases, contact a sector official and, depending on the site, fill in a specific form so that the incident or near accident can be managed.

3 GENERAL INSTRUCTIONS IN THE CASE OF A FIRE

3.1- PREVENTION

If you discover a situation which could cause a fire, **warn** or **have warned** the project owner site official (the name of this person is specified on the Prevention Plan).

3. 2- IN THE CASE OF FIRE

In all cases, if you discover the beginning of a fire and you cannot extinguish it on your own immediately, remain calm and sound the **ALARM**.

The person must **clearly** state:

- his name and the telephone number from which the call is being made
- the reason for the call, the fire's location and the type of fuel,
- if anyone is injured,
- and have the information read back to him.

The caller will only hang up the phone when requested by the receiver (the caller may phone back if he has additional information).

The employees will immediately start to fight the fire with the equipment available for this task.

4 GENERAL INSTRUCTIONS IN THE CASE OF EVACUATION

If appropriate, the employees must be evacuated in line with the site's specific instructions.

VII COLLECTIVE AND INDIVIDUAL PROTECTION

Collective protection.

Collective protection must be put first when adopting safety measures.

Any risks uncovered during the work's preparatory stages must be eliminated or face appropriate preventive measures.

For example:

- **guardrail around an opening's edge,**
- **scaffolding in height**
- **screen around arc welders,**
- ...

Areas representing accident hazards are to be indicated clearly (sign, safety cordon, barrier,...) and/or access is to be forbidden if appropriate.

Any dangerous obstacle, any place where objects or sparks can fall and any ground opening must be systematically signposted and markers must be placed through one of the following methods:

- guardrail, protective barriers
- white/red or yellow/black strips
- anti-fall safety nets
- pickets set into the ground, with a chain, rope, boards or steel pipes
- ground marking
- if it is a highly frequented passage area, hard markers will have to be used.

The boards, scaffolding, gangways, provisional stairwells, etc. must be fitted with guardrails to stop people and material from falling.

The guardrail must have a rail more than one meter high, an intermediate rail at 50cm and a baseboard.

All vertical openings must be temporarily closed or fitted with guardrails.

The material used will be in a perfect condition. Any material which shows alterations or weaknesses will be immediately replaced.

Individual protection

The External company supplies its employees with the items needed for their protection and gives them training regarding their use, especially:

- **the helmet:** a helmet with a chinstrap for assembly work, the helmet must be worn throughout the site (except for inside the offices, changing rooms and refectories)
- **safety shoes:** compulsory throughout the site and for anyone involved in physical work and handling.
- **gloves:** compulsory for manual demolition work, torch work, boilermaker's hammer work, and grinding work
- **insulated gloves:** compulsory for work on live facilities
- **adapted glasses:** coloured or colourless according to the work station, compulsory for work involving: grinding, torches, welding and boilermaker's hammers (in general: any work which presents a danger to your eyes and work performed on windy days)
- **anti-noise protection:** compulsory for work exposed to noise
- **anti-dust masks:** compulsory for dusty work.
- **safety harnesses for work in height**
- **protective material against gas**
- **work clothes:** obligatory throughout the site according to the project owner's instructions - fireproof clothing for flame cutting work
- **waterproof clothing:** available if needed
- **safety boots:** available for earthworks if needed
- **insulating earth mats:** compulsory for work in live facilities
- **and any article needed for individual protection.**

The External company ensures that this equipment is always adapted to the nature of the operation in question, can be used at once and that the equipment is actually worn.

Concerning individual protection equipment, External companies will respect the legal provisions and the current requirements on the project owner's site.

Individual protection measures are at the External company's cost, except for material which is specific to the project owner's site. In such a case, the provision and use of the procedures are drawn up during the Prevention Plan. The team manager and the supervisors, as well as the Security department officials, the project owner's officials and/or the Prime Contractor's officials and/or the Instructing party will be responsible for ensuring the safety instructions are strictly observed.

VIII PREVENTION PLAN

1 PRINCIPLE

When work of any kind is performed on behalf of the project owner by an External company and its subcontractors, the safety measures to be followed by the various parties are defined according to the current regulations of the country (improvements in the health and safety of workers at work, work equipment and health and safety requirements at temporary or mobile sites).

These rules will be outlined in a Prevention Plan, referred to as the Health and Safety Plan (PSS). The Health and Safety Plan (PSS) is drawn up under the project owner's responsibility and under the Prime Contractor's responsibility when the latter is explicitly contracted by the project owner to undertake and fulfil this mission. The aim of the Health and Safety Plan is to lay down the rules to be respected when one or more External companies or building trades work on the same site. It aims at preventing any risks which could arise from interference between the working activities and equipment of the various companies present. The Health and Safety Plan lays down the specific rules which apply to the site in question. It also takes into consideration the operating activities taking place on the project owner's site.

2 SUMMONING OF THE INDIVIDUALS CONCERNED

It is the project owner's site official, or even the Health and Safety Coordinator under the project owner's authority, who calls for a site inspection and who chairs the meeting to draw up the Prevention Plan.

He calls to the meeting the Companies concerned and the officials from the project owner's site and/or the Prime Contractor and/or the Instructing party. It is up to each of the companies to call their subcontractors and to invite the Prevention coordinators and operators, staff representatives on the safety board (Prevention Advisor, Designated Worker, Safety Delegate,...).

A representative from each External company must attend; it is imperative that the representative is the person actually in charge of performing the work (service provider and/or subcontractor).

3 CASE OF SUBCONTRACTORS

When an External company has all or part of the work performed by subcontractors within the project owner's site, the company must imperatively inform the project owner's site official before the meeting to draw up the prevention plan. The project owner's site reserves the right to refuse an unapproved subcontractor or a successive list of subcontractors which is deemed too long. The same applies if the External company changes

subcontractor after the meeting to draw up the Prevention Plan. A Prevention Plan coordination meeting will be held once this information has been received and a coordination report will be put together.

4 JOINT SITE INSPECTION

Before the work begins, a joint inspection of the work premises, site installations and material which may have been made available to the External companies takes place. All of the External companies and their subcontractors must attend the inspection.

During the inspection, the project owner's site official specifies the work area, the hazardous areas as well as the paths and roads to be used by the External companies' employees, vehicles and machines.

Emergency equipment and its location are indicated.

5 JOINT RISK ANALYSIS – MODUS OPERANDI

Following the joint site inspection:

- all of the External companies working on the same operation are to **supply their modus operandi** to the project owner and/or the Prime Contractor and/or the Instructing party. . Jointly, all of the participants specify the measures to be taken so the work can be performed and in order to avoid any work-related risks which could be caused by the activities of the various companies working at the same time and in the same place. These measures are recorded in the Prevention Plan
- during the meeting, each Company informs the others of any specific work related risks or illnesses which could be caused by the installations or the Company's activities and to which the other companies' employees could be exposed
- safety and protection measures (instructions) which it has implemented or plans to implement to prevent these risks
- the project owner's site official ensures the overall coordination of his own prevention measures and of those taken by all of the company managers in his firm
- such overall coordination aims to prevent risks which could arise from interference between the various companies' activities, installations and materials present on the same premises
- **each Company manager is responsible for enforcing the appropriate prevention measures to protect the company's employees and for enforcing the measures contained in the Prevention Plan.**

6 PREVENTION PLAN, (OPENING OF SITE)

A detailed prevention plan, (Opening of Site), specifies the measures taken or to be taken by each party concerned, defined during the meeting to draw up the Prevention Plan.

The work can only start once the Prevention Plan (Opening of Site) has been signed by the parties concerned.

The works official must have the Prevention Plan, (Opening of Site), on the premises where the work is to be done, for the possible inspection by the officials from the project owners and/or the Prime Contractor and/or the Instructing party.

7 FOLLOW-UP OF SITE SAFETY.

Each participant must specify how safety is organised on the site allocated to him. He must appoint one of his operators who is qualified to follow up safety issues closely.

8 COORDINATION MEETING

A Prevention Plan coordination meeting, (Opening of Site), is compulsory in the following cases:

- when the risks change or new risks appear during the work,
- when new participants are involved,
- when the work required is modified.

This meeting is called in by the Safety Coordinator under the project owner's site official's authority, the coordinator of the initial Prevention Plan, (Opening of Site).

9 INFORMING OF THE EXTERNAL COMPANY'S EMPLOYEES AND SUB-CONTRACTORS

External company managers must, prior to the beginning of the work and on the site where it will take place, inform all of those employees allocated to do the work of the specific hazards to which they will be exposed and the measures taken to prevent these hazards as established in the Prevention Plan, (Opening of Site).

They give appropriate instructions for the implementation and compliance with the measures outlined.

They must especially:

- specify the dangerous areas as well as the means adopted to mark out these areas,

- explain the use of collective and individual protection measures,
- show all of the employees the paths or roads to be used to access and exit the place of work as well as the emergency exits, if appropriate.

10 LMRA – Last Minute Risk Analysis

Objective

Before starting any type of work, we must ensure that all risks are under control. The same vigilance is requested from our subcontractors, as well as all external company under PW responsibility. For ensuring this we apply the LMRA explained here below.

This check-list (mental) should allow any worker to check on last time the following before starting work:

- the list of tasks to be carried out
- the method to be used,
- the hazards and dangers on site and,
- the means of avoiding or reducing those dangers.

When starting with the work, the environmental circumstances can have changed compared to the moment when the risk analysis was established.

Use

This check-list is aimed at any worker within the frame of his/her activities on site or even for works in our own facilities. This check-list also applies to any of our co-contractors/sub-contractors if they are part of a close surveillance system.

METHOD: red light - green light

The LMRA check-list works like a traffic light.

When starting with the LMRA, the light is set on amber, which means vigilance has to remain

high. Then answer the different questions enlisted.

- If you reply to 1 question with a **NO** → the light turns **red**. This means that you cannot execute your work in safe conditions, there are still risks remaining. Your work can not begin. Contact immediately a responsible person.
- If the detected risk can be eliminated or minimised, you need to make sure that all protective methods and measures are in place. If those are available and the risk has become acceptable: the light turns **green** and the work can begin.
- If there is no unacceptable risk factor identified and all questions can be answered with **YES** → the light turns **green** and the work can begin.

LMRA Last Minute Risk Analysis

STOP

FOR 2 MINUTES

A CHECKLIST FOR YOUR PERSONAL SAFETY



Whenever you attend an unfamiliar site or one where your health and safety may be at risk, take two minutes to answer the following questions:



- 1 Do I understand the work instructions?**
- 2 Am I prepared and able to carry out the work?**
- 3 Do I know the site safety instructions?**
- 4 Do I know the risks I am exposed to?**
- 5 Are the risks acceptable?**
- 6 Do I have the right PPE?**



6 times **YES** = **GO**
 ↓ 1 x **NO** = **STOP** ↓
 Turn the **NO** into a **YES**



Examples of hazards to your health and safety. This list is non exhaustive.

- » **Slip, Trips, Falls:** untidy areas, liquid spills, holes, not fixed gratings
- » **Working at height:** poor/wrong equipment, poor position
- » **Hazardous substances:** gas, dust, solvent
- » **Dust fume and vapour:** ingestion, inhalation
- » **Noise:** equipment, engines, louder in confined spaces
- » **Vehicles:** trains, high load vehicles
- » **Access paths:** blocked, slippery floors, exposed route
- » **Electricity:** damaged cables, not isolated, HV
- » **Radiation:** x-ray
- » **Hostile weather:** wind, exposed positions
- » **Confined spaces:** low O₂, air not checked, watchman missing, darkness
- » **Pressure systems:** direction of release valves
- » **Falling objects:** walking or working underneath
- » **Customer site:** no induction session, unknown specific hazards

IX TASKS INVOLVING SPECIFIC RISKS - CIVIL ENGINEERING AND BUILDING SITES

1 SITES CONCERNED

Any building or civil engineering project as soon as two companies or more are employed, including freelance workers, or as soon as it is decided by the site works official of the project owner and/or Prime Contractor and/or Instructing party, especially when there is work with specific risks present.

They must comply with the current regulations of the country which has transposed directive 92/57/EEC on the implementation of minimum health and safety requirements at temporary or mobile sites concerning building and civil engineering operations so as to guarantee the safety and protect the health of workers. These rules will be outlined in a Prevention Plan, known as a Health and Safety Plan (PSS). The Health and Safety Plan (PSS) is drawn up under the project owner responsibility and under the Prime Contractor's responsibility when the latter is explicitly contracted by the project owner to undertake and fulfil this mission. The aim of the Health and Safety Plan is to lay down the rules to be respected when one or more External companies or building trades work on the same site. It aims at preventing any risks which could arise from interference between the working activities and equipment of the various companies present. The Health and Safety Plan lays down the specific rules which apply to the site in question. It also takes into consideration the operating activities taking place on the project owner's site.

Civil engineering and building work is understood to mean:

Work involving excavation and earthwork, foundations and lining, hydraulic works, roads and infrastructure, laying of utility networks (especially sewers, water, gas or cable pipes and work on these networks), building of any kind (including buildings, industrial and civil engineering construction, roads and railways, waterways and taxiways), assembly and disassembly of prefabricated structures, development and equipment, alterations, renovation, repairs, dismantling, demolition, maintenance, upkeep, decontamination, painting and cleaning work.

Tasks involving specific risks are:

Work exposing workers to the risks of burial, engulfing and falling from a height which are particularly aggravated by the nature of the work or the processes implemented; work exposing workers to hazardous chemical and biological risks, especially asbestos and explosive substances which are easily flammable, cancerogenic or mutagenic; work with dangerous ionising radiation, work close to aerial or buried electrical high power cables where there is a risk of entering into contact with the live items; work involving a risk of drowning; well, tunnel and underground earthwork; work in compressed air tanks, the assembly or disassembly of heavy prefabricated items (above ten tonnes), work involving the use of explosives; demolition, deconstruction, rehabilitation work on the supporting structures of a construction; work with specific site obligations (on an industrial site in operation; close to a road,

railway or other form of circulation; night work, neighbouring sites, during the partial opening of the site while work continues).

2 PRINCIPLES BEHIND THIS REGULATION

- it implies the implementation of safety coordination,
- it involves all of the participants,
- it starts at the drawing board stage,
- it concerns the undertaking of the work,
- it concerns later work.

3 HEALTH AND SAFETY COORDINATOR

The project owner appoints one or more Health and Safety Coordinators for the whole site where at least two External companies are working. The respective Health and Safety Coordinators are to consult each other so as to avoid the risks which may be caused by the interference of work undertaken on the same site. The project owner obligation to appoint a Health and Safety Coordinator lets him:

- either fulfill this role himself if he has the appropriate approval
- or resort to a third party to fulfill this function under their own responsibility. A contractual agreement with the project owner must be drawn up specifying: the tasks of the Health and Safety Coordinator(s), the beginning and the end of the mission, the obligations of the project owner and/or the Prime Contractor and/or the Instructing party.

4 OBLIGATION TOWARDS THE HEALTH AND SAFETY COORDINATOR

The Health and Safety Coordinator must participate in all of the project's stages from the designing to the undertaking of the actual work; he must be informed of and invited to all design and implementation meetings. The Safety Coordinator must receive and may demand any designs necessary to fulfill his role.

5 PROJECT HEALTH AND SAFETY COORDINATOR'S TASKS

During the design, study and development stages of the project, the Health and Safety Coordinator, known as the Project Health and Safety Coordinator, must draw up a General Health and Safety Plan (PGSS), a Project description file as well as a coordination book. The Health and Safety Project Coordinator presents the suggestions relating to collective protection, lifting equipment, access, site installations, and the industrial operations occurring on the project owner's site or close to the site. The Health and Safety Coordinator participates in the drawing up of a temporary work plan while considering the specific risks of each kind of work and allocating sufficient time for the various tasks to be completed.

He must make sure that the specifications sheet clearly specifies the measures to be mentioned in the offers in order to respect the Health and Safety Plan. He checks whether the External companies' offers contain the safety measures catered for in the Prevention Plan. He ensures that any obligations on the use of certain hazardous substances and materials (asbestos, freon, ...) are respected. He advises the project owner and/or the Prime Contractor and/or the Instructing party on administrative formalities. He is the adviser on all issues relating to safety techniques such as safety lighting, fire prevention, site layout plan, etc. With a reasonable time span, he passes the information on to the Site Health and Safety Coordinator.

6 SITE HEALTH AND SAFETY COORDINATOR'S TASKS

The Health and Safety Coordinator, known as the Site Health and Safety Coordinator, organises cooperation and coordination between the External companies.

He makes sure the site is in a good state and that it is sufficiently clean. He analyses the choice of work station locations while considering the access conditions to these work stations and the placing of circulation paths or roads and areas of transit. He checks the material handling conditions. He checks the state of maintenance and periodic inspections of the facilities prior to their commissioning. He makes sure that the material storage areas are marked out. He checks the removal conditions of the already used dangerous material. He checks the storage and disposal conditions for waste and rubble. He undertakes inspections and visits. He is the company information intermediary and holds regular meetings with all of the companies. He updates the General Health and Safety Plan (PGSS), the Project description file as well as the coordination book.

7 GENERAL AND SPECIFIC HEALTH AND SAFETY PLAN (PGSS - PPSS)

The project owner makes sure, considering the work involving specific risks and in line with the country's regulatory requirements, a General Health and Safety Plan (PGSS) is drawn up establishing the specific measures to prevent risks related to the work performed either simultaneously or consecutively by the various participants. This plan is modified in accordance with site developments.

The General Health and Safety Plan outlines site related administrative information (participants, participant's services, public works, permits), the specific risks and the description of risk related work, specific safety measures planned for risk related work (schedule, collective and individual protection), obligations connected to operating activities on the project owner's site, information relating to emergency assistance organisation, how participants cooperate in collective protection, site cleaning, dangerous product storage, the storage and removal of waste and rubble, material handling, site access and transit paths or roads.

External companies working on the site draw up Specific Health and Safety Plans (PPSS), which will be integrated into the General Health and Safety Plan (PGSS), at least 15 working days before the External company starts its work. The Specific Health and Safety Plan reclaims the assessment of the risks to which the workers are exposed given the working methods. This plan puts forward the protection and prevention measures which are to be implemented.

It mentions the External company's name and address, the foreseeable change in the number of staff on the site, the name and position of the person responsible for directing the work, work schedule with proposed start and end dates, first aid instructions in the case of an accident, an analysis of the building and execution procedures, an assessment of foreseeable risks connected to the modus operandi, material, equipment and installations implemented, and the use of dangerous substances and mixtures. It specifies the collective and individual protection measures implemented to offset these risks, as well as the measures taken to ensure the continuity of the collective protection solutions.

8 PROJECT DESCRIPTION FILE

This file holds all of the data (plans, technical datasheets, calculations, ...) which facilitate the prevention of work related risks during subsequent work. It especially provides information on the administrative items, the identification of specific risks, the work's main technical data, and health and safety measures for maintenance work.

9 COORDINATION BOOK (BOOK REGISTER - RJ)

This file contains the General Health and Safety Plan (PGSS), important decisions, observations and events, the participants' shortfalls in relation to the Health and Safety Plan, comments made to the participants and their follow-up, communication with and remarks to participants, reports on site visits and inspections, site meetings, and incident and accident reports. The Safety Coordinator must keep a copy of the coordination book for five years as from the work's date of receipt.

10 WARNING NOTICE

The project owner makes sure that a Warning Notice is drawn up according to the country's regulatory requirements. It must be visibly displayed on the site and updated, if appropriate. The purpose of the Warning Notice is to inform the national authorities on the health and safety conditions of the project owner's site before the work starts.

X SAFETY PROTOCOL: LOADING AND UNLOADING OPERATIONS

Any carrier who is to carry out loading or unloading on the project owner's site must inform his drivers in writing of the information contained in the Safety Protocol.

These documents are previously established by the transit company and the project owner's site.

The specific health and safety requirements applicable to all that involves loading and unloading operations are: :

- the carrier vehicle's movement within the project owner's site,
- access and parking procedures in the loading and unloading areas,
- preparation of the vehicle,
- loading and unloading operations as such.

In the case of the carrier not having previously been identified, information relating to the Safety Protocol must be provided when the vehicle enters the site. This information is provided by the project owner's site official to the vehicle's driver.

Loads must not exceed in weight or volume the carrier vehicle's capacities.

XI WORK ORGANISATION

1 SITE LOCATION

It is up to the project owner's site to mark out the work area and display or have the hazardous areas displayed. The Prevention Plan will specify what has to be done by whom.

The External company erects signs displaying its site within the work area. It sets up its signs and protective measures for the prevention of its own risks (for example, work at height through signs, work in pits and excavations surrounded by sufficiently strong protection, lighting for site at night ...).

Throughout the whole duration of the work, each External company must take all measures necessary to ensure the safety of transit areas, especially through the placing of strong guardrails around the openings the company has made.

2 CLOSED SITES - OBSERVATION BOOK

Building work and public works must be performed in compliance with regulations applicable on the project owner's site. An observation book may have to be kept on site premises.

3 USE OF HYGIENE FACILITIES

External company employees must have washrooms, changing rooms and catering premises. These premises can be provided by the project owner's site or supplied and put in place by the External company itself.

If they are provided by the project owner's site, the site official will specify their location and the conditions of use in the Prevention Plan.

It will be specified in the contract if they are provided by the External company. If so, they will be placed in the area indicated by the project owner's site official. The External company representative must supply the project owner's site official with a certificate stating that these premises comply with the appropriate legal requirements. Furthermore, these premises will have to meet the possible specific requirements of the project owner's site. The Prevention Plan will mention the installation of the premises by the External company.

4 RENDERING SITES SAFE – CONSIGNMENT - CONVICTION & WORK PERMITS

The procedures implemented on the sites specify the conditions for rendering the sites safe and for the delivery of the work permit. The company's staff generally carries out this task. A contract must be drawn up in the case of this task being entrusted to an External company. This operation will comply with trade practice and will be undertaken by qualified employees under the authority and responsibility of the External company.

It is recalled that rendering a site safe comprises all of the safety measures needed so that a given task can be performed without any risk, namely:

1) Visibly separate and isolate:

- any energy sources which could pose a hazard (electric, mechanical, hydraulic, pneumatic, etc.)
- radiation (ionising, laser, ...)
- products which are toxic, asphyxiating, explosive, corrosive, etc.

2) Purge, if appropriate, the items which have been isolated.

3) Lock out the isolating, cutting and sectioning etc. parts. namely:

- forbid manoeuvring and access
- keep in a specific position
- display the state of an instrument, a machine, a piece of equipment or an installation.

4) Lock out the units and equipment which can start up.

5) Display the condemnation by specifying, for example, the date and time it was done and the name of the individual who condemned the item.

6) Check the steps taken and their effects (checking of the operations, lack of energy sources, evacuation, atmospheric inspection, etc.)

7) Mark out the consigned area within which the safety measures taken allow for one or several work areas to be created. In the case of actions occurring at the same time, signs will specify each participant's area of action.

8) Draw up a consignment certificate so that a work permit can be given to the External company's works official who has been appointed to the operation in question.

In all cases, the works foreman makes sure that there is no danger to the employees before the work starts.

Reconnecting the installations

Reconnecting consists in reestablishing the energy source(s) while taking all of the appropriate safety measures.

It will be undertaken when the works in the rendered safe work area are finished or interrupted and all of the work permits have been given back to the works official.

THE RECONNECTING OFFICIAL WILL MAKE SURE THAT ALL PARTICIPANTS HAVE LEFT THE WORK AREA WHICH HAS BEEN RENDERED SAFE BEFORE ACTUALLY RECONNECTING THE POWER SUPPLY.

5 CONNECTION TO WATERWORKS SYSTEM

Any connection to a project owner's site waterworks system is subject to the prior authorisation of the project owner.

6 WORK UNDERTAKEN AT NIGHT OR IN AN ISOLATED PLACE OR AT A TIME WHEN THE OPERATION'S SECTOR'S ACTIVITY IS INTERRUPTED

The External company manager must take the necessary measures so that no employee works alone in an area where he would not be able to be assisted quickly if an accident occurred.

7 LENDING AND USE OF MACHINES AND MATERIAL BELONGING TO THE PROJECT OWNER

a) Lending material

As a specialist, the External company has all of the tools and/or equipment needed to fulfill its service on the project owner's site. These tools and/or equipment must comply fully with current regulations and trade practice. The External company must only use the said material in line with its given technical purpose.

Nevertheless, in consideration of the industrial situation, the project owner's site could exceptionally put at the External company's disposal certain installations, especially for handling, to allow the External company to fulfill its service on the company's site. The installations put at the External company's disposal by the project owner's site, as part of its service on the Company's site are mentioned in the Prevention Plan and come under a specific provision clause which outlines instructions on use, restrictions, maintenance conditions and checking of the machines provided.

The project owner's site commits itself to providing installations which work perfectly well. Nevertheless, the External company is bound to make sure, at its own cost and either directly or through an authorised third party, that the installations function well prior to any use by the company's employees. The project owner's site has no obligation as to the appropriate use of the installations put at the External company's disposal.

The latter must ensure that its personnel are informed of and trained on the use of the installations provided.

b) Use of the machines on the project owner's site by External company operators

Under the conditions contained in the contract and in the Prevention Plan, the handling machines could exceptionally be placed at the External company's disposal as long as the External company's operator, at least 18 years of age, is specifically appointed by his employer, who shall have made sure that:

- he is medically apt (medical check taken within less than a year),
- he has successfully past the handling machines operating test of an approved trainer or body,
- he has received training on the instructions of use by the project owner's site and additional training on any possible special features relating to the handling machine provided by the manager.

The External company appoints a trained manoeuvring operator who is responsible for tying down the loads and giving orders, if necessary.

c) Use of the project owner's machines by an project owner's operator and/or Prime contractor and/or Instructing party on behalf of the External company.

In this situation, the Prevention Plan must imperatively specify who will direct the work undertaken in this way.

8 SUPERVISION OF THE EXTERNAL COMPANY'S PROPERTY

The External company takes measures to ensure its material, facilities, plots, work and storage areas are monitored. It informs the project owner of the measures taken.

9 STORAGE AND DISPOSAL

9.1 DURING THE WORKS

The tools and materials which remain on the site are tidied away at the end of each working day by the External company so that they do not block the passage ways and risk falling from a height.

Storage: storage will occur on the areas set aside by the project owner's site official. The company will make sure the following clearance limits are respected:

- railways: two meters from the outside track.
- roads: at least one meter from the edge of the road.

The stored items will be secured, stabilised and signalled.

Stowage: stow in a safe place the gas bottles which have been suitably secured and all of the tools and dangerous materials.

Take all steps to avoid light materials from being blown away in strong winds (for example, light sheets).

Disposal: At its own cost and on a daily basis, the External company disposes of rubble and waste material in the approved disposal plants and makes sure that its site is clean and tidy.

9.2 AT THE END OF THE WORK

The External company removes all material and waste, and cleans and tidies the site.

It removes its gas bottles and all of its tools and dangerous materials. It is responsible for any bodily and/or material damage caused by a gas bottle or dangerous material left on the site.

It carefully seals any holes made.

If the External company did not clean its sites, the project owner's site reserves the right to clean the sites or have them cleaned at the External company's cost.

9.3 AFTER THE WORK HAS BEEN COMPLETED

The External company must inform the project owner's site official that the work has been completed.

The company returns, if appropriate:

- the access permit
- the consignment certificate(s) and the work permit(s)
- the welding and cutting permit and other work permits.

XII SPECIFIC WORK

1 HIGH LEVEL WORK

1.1 PRINCIPLE

“Working at height must be carried out in compliance with the regulation in force”. Duty holders must:

- avoid work at height where they can
- use work equipment or other measures to prevent falls where they cannot avoid working at height
- where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

Safety must be a part of the work's preparatory stage so that the risks of falling are eliminated, first through collective protection (guardrails, scaffolding, nets ...) and then complemented through individual protective equipment.

1.1.1 Collective protection

Collective protection measures meant to stop people from falling are obligatory when employees are exposed to the risk of falling.

1.1.2 Individual protection

When the work does not exceed one day, the measures mentioned above do not have to be observed as long as safety harnesses are provided to the External company's employees. The harnesses must be in a good state and adapted to their purpose and must not permit the person to free-fall by more than one meter, unless an appropriate device restricts freefalling from a greater height (energy absorber). The External company will make sure that the employees are trained in how to use the material provided and have anchorage points or life-lines adapted to the work to be done.

When a safety harness provides a worker's protection, the worker must never remain alone on the site. The External company will take all necessary measures.

1.1.3 Work undertaken in strong winds

In compliance with current regulations, work can only proceed in strong winds if all of the precautionary steps have been implemented to ensure the workers' safety. All steps must be taken to tie down any materials or tools which are likely to cause an accident.

1.1.4 Falling objects

All safety measures must be taken to avoid people being hit and injured by objects or material which could fall or be projected from the scaffolding or other work stations.

As an object can always fall accidentally despite the safety measures taken, it is obligatory to wear a safety helmet with a chinstrap.

When work is planned at various levels, one on top of the other, all measures must be taken to eliminate the risks of work occurring at the same time (the falling of objects or material onto the teams below).

This protection can be ensured through fixed or mobile boards or strong tarpaulins, depending on the nature of the work and tools used. Safety nets are not considered to be an effective protection against falling objects.

The same obligation stands when the work is likely to project material which could cause injury by hitting workers in neighbouring work stations directly or by creating a work related nuisance which could affect the safety and health of other workers (sanding, shot blasting, painting and cleaning work etc.).

In the event that protection is materially infeasible, the work should be staggered over time and on the site so as to eliminate this hazard. The hazardous area will be marked out and placed under the authority of an External company's supervisor who shall forbid access to the area.

1.1.4 Signalling

All work at height is signalled through signs visibly placed on the hazardous areas' edges. These signs are placed by the External company, unless stated otherwise during the meeting to draw up the Prevention Plan.

1.2 ROOF WORKS

Work on a roof must be carried out in compliance with current regulations, especially with regard to the preventive measures implemented (scaffolding guardrails, protective barriers, roof handrails, tiling ladders, devices allowing the operator not to lean directly on weak material, prohibition to work on slippery roofs).

Access to the project owner's site roofs is forbidden. When access is necessary, prior authorisation must be given by the project owner's site works official. This authorisation will be granted once the specific safety measures specified during the meeting to draw up the Prevention Plan have been implemented.

1.3 WORK ON OVERHEAD CRANES AND RACEWAYS

For all of the work, the crane(s) or the raceway section found in the work area as specified in paragraph X.1 (Site location), must be "out of use".

Access to overhead cranes and raceways is only authorised by the project owner's site official after the department operating the cranes has given its agreement.

All appropriate measures must be taken by the External company to ensure the safety of the employees allocated to this work complies with current regulations and the project owner's site safety procedures.

When building, installation, repair or maintenance work of any kind is being carried out near to lifting apparatus, it is forbidden for this apparatus to be moved in any way while workers are busy in the hazardous area.

Nevertheless, when it is absolutely necessary to put the machine into motion when it is not usually being used so as to carry out some specific work, this work must be done under the authority of a qualified supervisor.

The intervention of a qualified supervisor is also compulsory during work requiring access to areas neighbouring live unprotected conductors.

1.4 SCAFFOLDING AND LADDERS

1.4.1 Scaffolding

Scaffolding or any other equivalent measure is compulsory for any work done at a height of over three meters. The scaffolding must comply with current regulations.

Measures must be foreseen to avoid all forms of collision, especially by machines and cranes.

The scaffolding must be earthed if electrical devices other than very low power devices are used on the scaffolding.

1.4.2 Ladders

The ladders must be sufficiently long and exceed the work top by one meter and not present any material or assembly faults.

They must be firmly attached at the top and secured at the bottom to avoid sliding and toppling. They must be set at around 75° in relation to the horizontal.

The ladders will be made out of fibreglass in electricity substations, and made out of metal or fibreglass elsewhere.

It is recalled that a ladder is not a work station but a means of access.

1.5 MOBILE ANCHORING TO PROVISIONAL CABLES (LIFE-LINES).

The company which has to install a provisional life-line must previously request authorisation from the site works official concerning the use of host structures and/or anchorage points specified by the site.

The company will make the request to the site works official before the visit prior to the drawing up of the prevention plan. The authorisation will be delivered and recorded in the prevention plan.

The way in which the life-line is mounted and dismounted will be outlined by the company and attached to the prevention plan concerning participation.

Energy absorbing lanyard:

Energy absorbing lanyards must only be used by trained personnel who fully understand the notions of FALL FACTORS, AIR DRAFT and pendular motion.

2 TRANSPORTATION OR ELEVATION OF PERSONNEL

The transportation or elevation of personnel must only be performed with equipment especially designed for this purpose which complies with the appropriate regulations.

Any breach of this rule is only permitted after the agreement of the project owner's site and the obtaining of a permit from the country's labour authority in which the site of the project owner is found (Work Inspection).

The employee allocated this task must have a training certificate in the operating of this kind of machine and an operating permit provided by his employer after training on the particular operating features of the machine with which he has been entrusted.

3 LIFTING WORK**3.1 LIFTING APPARATUS**

Hand and mechanically driven lifting equipment, used on the sites by the External company, must be in good condition and regularly checked.

The Company will hold the initial and periodic inspection certificates issued by an approved body for the material used, whether or not it belongs to the company.

If during the work there is a risk of interference between the various machines, watchmen must be posted and the priority of the machines will be specified during the meeting to draw up the Prevention Plan.

Overhead cranes have priority over moving vehicles within the workshops. A watchman can be requested if necessary.

The cables, chains, ropes and hooks will be in a good condition and checked regularly.

Any cable showing bird-caging, kinking or deformation must be removed from service.

Parking or moving under loads is forbidden. Lifting above people's head is forbidden. Electromagnet handling areas have restricted access.

Any crane or machine above three meters high must be fitted with a revolving warning light which is on whenever inside the buildings.

Any form of manoeuvring is forbidden within three meters of live electric units for voltages below 50,000V, and within five meters for voltages over or equal to 50,000V, unless there is protection against contact.

3.2 ERECTION OPERATOR HEAD

Definition:

The erection operator head is an operator appointed by his employer.

He has been instructed in:

- basic slinging rules
- conventional hand movements and signals
- specific operating instructions
- risks to the environment caused by manoeuvres

The manoeuvring head's most important tasks are:

- giving manoeuvring orders to the crane operator
- ensuring the safety of employees on the ground.

The same operator cannot be a slinger and a manoeuvring head at the same time. However, he can be a slinger and then a manoeuvring head, or vice versa.

Please note: When the slinger is entrusted with the manoeuvring of the lifting device himself, from the ground with a hanging operating control box or a remote control, he is the manoeuvring head unless visibility is poor.

The External company will specifically appoint a manoeuvring head whenever it has lifting operations to carry out.

3.3 BRACING

The use of machines requiring bracing is forbidden without prior authorisation from the project owner's site. It is forbidden to use a railway track as a bracing point. The same applies to any other resistance point which is too weak, such as air piping, poles, line supports, public work machines, etc.

The selection of anchoring points in the existing facilities is specified during the meeting to draw up the Prevention Plan and submitted to the project owner's site for its prior agreement.

No bracing must block the clearance limit. In the case the clearance limits are blocked, the External company must obtain authorisation and put in place the appropriate warning signs.

4 EXCAVATION WORK

Excavations and trenches cannot be started without the agreement of the project owner's site department concerned. The latter shall inform the External company of any electric cables or pipes in the ground.

Any possible and unforeseen shifting of pipes or electric cables will be at the cost of the project owner's site. However, the External company will not be able to use to its advantage the harm inflicted and will be responsible for any damage or accidents which it causes. Buried infrastructure must be approached by hand.

The obligations applicable on the ground and those applicable under the work and the foundations are specified by the External company and under its own responsibility. The External company relinquishes the right to take any action against the project owner's site over the information provided on this subject which is given, in all circumstances, as information only.

The excavations and trenches must respect the legal and regulatory provisions. The walls of the excavations and trenches which are over 1.30 meters deep and have a length equal to or below 2/3 of the depth must, when the walls are vertical or nearly vertical, be reinforced, braced or supported.

Regardless of their depth, the excavations and trenches must be signalled by signs reading "Warning! Works", markers with lights must be placed at night and they must be surrounded by barriers or guardrails which are sufficiently strong to avoid employees falling into the pits.

Furthermore, when the excavations and trenches are located close to workshops or roads and paths, adequate lighting must be put in place.

Openings in boards or underground tunnels are surrounded by strong guardrails by the External company or closed by firmly placed strong planking which resists local stress and is lit up at night. Whatever the circumstances, simple markings are not enough.

5 BOARD WORK

When openings are made on boards, a strong guardrail must eliminate any risk of falling. The works official will make sure that all preventive measures are implemented.

When duckboards are placed or disassembled, a *modus operandi* will outline how the work is to take place. Any risk of falling will be considered and sufficient preventive measures will be implemented by the External company entrusted with the work, such as: strong guardrails - access barred - signalling - lighting – markings

6 WORK IN A CONFINED SPACE

Wells, pits, drains, tanks, reservoirs, cisterns, chutes, silos, pipes, material collectors, ...

This kind of work considered as dangerous is subject to legal and regulatory provisions specifying the preventive measures to be implemented.

This type of work must first be preceded by an analysis to define the likeliness to encounter risk during the operation:

- Lack of oxygen,
- Presence of toxic gas,
- Explosion,
- Burial or drowning,
- Fall from a height,
- Fall of objects or tools,
- Contact with toxic, harmful or aggressive products,
- Other.

This analysis determines the equipment necessary for the protection of the employees as well as the collective prevention and protection measures to be put in place.

These provisions will be specified during the meeting to draw up the Prevention Plan. The provisions will be accompanied by a specific instruction from the operating team's official which will be distributed and commented on by the official to all participants before the work starts.

This work must always be performed under the supervision of one or more people who are always out of the danger area and carry means of communication allowing them to call immediately for assistance whenever necessary.

Nobody must enter a confined space without undertaking the necessary checks and without the appropriate safety equipment meant for such operations as well as a work permit delivered by the project owner's site, the

latter must always be informed of and consulted on the safety measures to be implemented.

Instructions on access to dangerous confined spaces:

before starting a task, you must first assess the atmosphere likely to be present in the confined space

if you believe the atmosphere to be dangerous, due to the presence of, for example, flammable gases, toxic gases, enriched oxygen, etc. . . , appropriate gas detection and checking devices are to be put into place

the introduction of oxygen bottles / acetylene / LPG into a confined space is strictly forbidden. When welding and/or cutting operations or other activities likely to produce smoke and/or steam must be carried out in a confined space, additional precautionary measures (for example, ventilation, suction) must be taken and the procedures outlined by the project owner for torch work must be respected.

7 WORK ON RAILWAY TRACKS

No work on railway tracks in use or in their vicinity can be undertaken without the prior agreement of the railway management official at the project owner's site; this official must also be informed that the work has finished.

Current legal and regulatory provisions will be respected during the work on the railway tracks and in their immediate vicinity. The safety of the employees assigned to these tasks must be ensured either through the consigning of the track(s) in question or through the placing of a physical barrier between the work area and the area of transit.

If there is thick fog, the start of the work must be postponed if appropriate.

Any material deposit or storage is to be placed at a distance greater than 2.50 meters from the closest rail and must not hide the network's signals nor block the car couplers' path.

If this is not possible, measures meant to alert the employees of an oncoming vehicle must be taken, such as the appointing of a watchman (signaller) or the putting in place of a reliable automatic signalling device. This measure will be specified during the meeting to draw up the Prevention Plan.

The External company will appoint a manoeuvring head when it is attributed operations involving the running of railway networks. His duties in particular are to supervise the location of the operators while working on the vehicles and to place the blocks and box junctions.

8 STORAGE, TRANSPORTATION AND USE OF FLAMMABLE OR EXPLOSIVE MATERIALS

Flammable and explosive material used on sites will be visibly labelled and must be stored in a particular fashion in a location subject to the approval of the site's Fire safety department. Their use is subject to common accord with

this department. The transportation and use of explosives and the constitution and operating of explosive deposits are subject to current regulations. They depend on a special agreement being reached on this issue and must be discussed during the meeting to draw up the Prevention Plan.

The removal of flammable or explosive material from the site to approved processing plants is at the External company's cost and will occur daily.

The use of explosives must comply with legal and regulatory requirements.

The hazards will be outlined during the meeting to draw up the Prevention Plan and the adjusted prevention measures decided by the project owner's site officials (the works official and the fire prevention specialist) and the External company will figure in the Prevention Plan. Implementation requires specialised and trained personnel (blasting permit).

Satisfactory measures will be taken to avoid the employees and the material from being hit by the blast effect and projected objects.

Written instructions are drawn up by the External company using the explosives (Prevention Plan).

9 WORK ON HOT SPOTS

In the case of a fire hazard, the work permit must be requested in compliance with the safety instructions established by the project owner's site. The "Welding and cutting permit" specifies the safety measures to be taken, the prevention measures to be implemented and the supervision to be provided when work is being carried out on hot spots (torch, electric arc, cutting, ...).

The permit is a written authorisation allowing hot spot work to be done in the hazardous areas.

It is drawn up by an approved operator on the project owner's site upon the External company's request before the work starts when the analysis of risks during the work justifies the permit.

When welding or cutting operations take place at a height, the area in which the sparks land must be marked off and warning signs must be posted in compliance with the instructions of the project owner's site. All flammable material in this area must be protected or removed from the area.

10 WORK NEAR MOLTEN METAL

For those areas in which there is a risk of molten metal projection, only those employees who have been duly trained by their Company manager or representative will be able to enter such areas.

The Prevention Plan will specify the risk, the prevention measures to implement and the information to be given to the employees.

The External company must supply adapted individual protection or collective protection such as protective screens for its employees.

Please note: If water enters in contact with the molten metal, there is a very serious risk of an explosion.

11 ELECTRICAL WORK

It is forbidden to disconnect or restore power to electrical installations. Access to electrical premises and installations is restricted to electricians and will be strictly subjected to the authorisation of the Electrical maintenance department of the project owner's site (electricity authorisation needed). Before any work, a consignment is to be drawn up according to the specific instructions of the project owner's site.

11.1 CONNECTIONS

The External companies will only be able to be connected to the project owner's site power supply after the latter's agreement.

Service and liability limits:

The project owner's site is responsible for the power supply up until the connection or the agreed power socket used. Its service is restricted to the supplying of power as from the socket or the connection.

No work must be done on the socket or the connection and their protective devices by the External companies.

Downstream of the socket or the connection, the External company is fully responsible for the supply and the liability.

External company installation designs

The electric cabinets and switch boxes, as well as the material whose power they supply, are made in compliance with trade practice, current regulations and the clauses listed below.

It is categorical that they include:

a connection cable chosen in accordance with the upstream voltage located in the switch box

an operating button or handle for all-pole power off, which can be accessed from the outside of the cabinet or box

one or more cutoff devices to protect against overload

one or more cutoff devices to ensure a highly sensitive differential protection, namely 30mA instantaneously.

The exposed conductive parts must be carefully connected to the earth conductor available on the connection or on the socket.

Protective functions against over current and differential protection can appear on the same machine (differential circuit breaker). In this case, the cable is adapted to the maximum power allowed in consideration of the protective device. Furthermore, all of these protective devices must have a lead device.

Connection, monitoring, maintenance and checking

The installations must be checked periodically and especially when being put into service or after having undergone major changes.

In the case of incidents concerning material or installations which are clearly in a poor condition, the project owner's site official reserves the right to forbid the use of any electrical material in a poor condition and demand a certificate of compliance produced by an approved body before the installation is turned back on.

11.2 WORK ON ELECTRIC EQUIPMENT

The employees carrying out the work must have received training on electrical hazards and have the relevant certificate for the work in question.

The External company will only start the work after it has received a consignment certificate or a work permit from the project owner's site consignment official which specifies the nature of the work and the detailed boundaries of the site.

The project owner's site consignment official is the only person authorised to undertake or have undertaken the consignment or deconsignment procedures except for new installations prior to receipt and specific cases which come under a specific contract.

When the employee has to work close to unprotected live power cables, the employee must not enter within the distance stated by current legal and regulatory provisions. Nor must he introduce the tools, equipment or machines he is using or any part of the materials he is handling within the said distance.

11.3 AUTHORIZED ELECTRICAL MATERIAL

The use of single phase electrical equipment of over 2KVA is not allowed. The welding and annealing stations must be of the balanced three phase kind, especially.

Only approved and standardised radiators can be used for electric heating.

Throughout the sites and in the buildings, the following is particularly forbidden:

- multiple power sockets and "stealing" sockets,
- flexible wires under a textile braid,
- hanging lamps at the end of a wire,
- metal shades if they can be touched by someone on the ground.

Class II portable electrical equipment will be preferred.

The use of hand-held portable equipment inside restricted pipelines will comply with current legal and regulatory provisions.

12 WORK WITH LIQUIFIED GASES

12.1 USE OF LIQUIFIED GASES

Use acetylene bottles which are either standing or inclined at a maximum of 54° but never horizontal, (even a raised shoulder). Attach them to the structure with a rope, chain or clamp to make sure that they do not fall or place them in trolleys specially designed for this purpose.

The oxygen bottles can be used in a horizontal position. Nevertheless, the head must be raised at least 20cm in relation to the horizontal and the valve hole must point upwards. If used in a standing position, immobilise them like the acetylene bottles.

Use the butane and the propane bottles in a standing position. Make sure that the bottles are stable in this position.

Never place:

Liquified flammable gas bottles, even for work of a short duration, in a basement.

Liquified gas bottles close to a source of heat.

The pressure regulators must be in a good condition.

The bottles must not be transported by overhead cranes, or any other lifting apparatus, without first having been packed into a suitable container.

The use of a gas bottle's protection cap window to insert a hook or any other device for handling is strictly forbidden.

The hoses will be fitted with a face shield on the torch and bottle side, and a non-return valve which has been adapted and correctly inserted. They will be in a good condition and frequently checked (leak tightness).

13 WORK IN AN AREA OF GAS AND TOXIC PRODUCTS USE

13.1 GASES AND TOXIC PRODUCTS PRODUCED BY THE USER COMPANY

For work in the areas with hazards caused by gases and toxic products, protection measures for people, property and the environment must be specified during the meeting to draw up the Prevention Plan.

Employees working in the gas areas must be trained in the detection of gas and the use of protective means such as individual breathing apparatus.

Employees must be equipped with self-contained breathing apparatus and detection means.

On some sites, the breathing masks and the gas detectors can be supplied by the project owner's site upon the External company's request. They will be used under the latter's responsibility.

The use of a compressor for self-contained breathing apparatus is strictly forbidden.

Prevention measures must be taken to avoid all risks of pollution.

13.2 GASES AND TOXIC PRODUCTS USED BY THE EXTERNAL COMPANY

The External company must state whether it has to use toxic gases, or toxic and corrosive products, during the meeting to draw up the Prevention Plan. This does not exonerate the company from the relevant legal obligations and restrictions.

The External company must gather on its operating premises and inform the users, company work doctors and the medical department on the project owner's site, on the appropriate prevention and safety information for the gases and toxic products used through a safety datasheet.

There is a special case for CMRs (Cancerogenic, mutagenic or toxic for reproduction) and HCAs (Hazardous Chemical Agents).

It is forbidden to bring CMR products or packaging which has contained CMR products onto the site.

However, in the case of work requiring the use of CMRs as there are no other equivalent products on the market which are less dangerous, prior to the Prevention Plan meeting the company will compile a report for the project owner showing the absolute need for the product and outlining the measures taken to ensure its employees' well being and the protection measures implemented to avoid others working in the vicinity being exposed, all of which is undertaken in compliance with current legislation.

The use of HCA products must also be subject to a health and safety risk analysis just as much for those using the products as those in the vicinity of the work. Measures provided for in current legislation must be implemented. The containers must have their labels visible and will be stored in places posing no threat to people, property and the environment. The removal of the waste produced by these products to approved processing plants from the project owner 's site is at the External company's cost and will occur daily.

14 WORK IN A RADIOACTIVE AREA

The introduction, use and storage of radioactive sources, as well as the use of electrical equipment which produces ionising radiation, can only happen under the supervision of an authorised person who is appointed by and works under the responsibility of the External company; the latter is especially responsible for compliance with current legal and regulatory provisions.

The authorised individual from the External company must contact the authorised person within the project owner's site and can only introduce, use and store the sources after written authorisation. The authorised individual from the External company will point out any incident likely to create irradiation or contamination risks affecting the personnel.

Access to "monitored" areas where radioactive isotopes are used or stored by an External company must be strictly forbidden except to "authorised" individuals, from a legal perspective, and who have received express authorisation from the official at the project owner's site. These areas must be displayed through regulatory signs beyond which nobody is allowed to pass.

15 NOISY WORK, MOTORCOMPRESSORS AND ELECTRICITY GENERATING SETS

The site's motor-compressor units and the electricity producing units must comply with current legal and regulatory provisions relating to noise reduction. For electricity producing units in particular, the acoustic level allowed in db (A) is 102 for those with an output of less than 2KVA and 100 for those with an output of 2KVA or more. For motor-compressors, the acoustic level allowed in db (A) is 100 for usual standardised rates below 10m³/mn, 102 for rates of between 10m³/mn and 30m³/mn and 104 for rates above 30m³/mn.

They must be installed, unless not materially possible, outside of the workshops, premises and buildings, in areas in which they are less of a nuisance because of the noise or exhaust fumes.

16 PAINTING AND SANDING WORK

Painting and sanding work are signalled through signs marking out the hazardous area and bearing: "WARNING! SANDING WORK" or "WARNING! PAINTING WORK".

The External company sets out markers on the ground around the hazardous area. Damage caused to the installations, buildings and vehicles around the site are the External company's responsibility.

16.1 PAINTING

The painting work shall be performed in compliance with the legal and regulatory provisions of the project owner's site for specific measures relating to the protection of workers undertaking spray painting or varnishing work.

Technical protection and medical supervision:

Spray painting or varnishing being applied to small or medium-sized objects will take place inside a booth or otherwise in a shield. The booth or shield must be fitted with a sufficiently powerful ventilation system to allow for the evacuation of condensation and steam during the production process and the renewal of air.

If condensation or steam capturing equipment cannot be installed, effective breathing masks or equipment must be provided by the External company's manager to the employees performing spray painting or varnishing.

No worker must be allowed to spray paint or varnish without a doctor's certificate stating that he is considered fit to do this work.

Fire prevention:

Only the quantity of flammable products needed for the day's work will be introduced into the workshop. These products will be kept in closed and labelled metallic containers.

The machine applying the paint will be earthed electrically.

No flame or heating element which could cause a spark will be allowed into the operation's perimeter.

Cleanliness of the work premises:

The polluted air removal systems and the paint workshop area must be cleaned regularly. The removal of flammable or explosive material from the site to approved processing plants is at the External company's cost and will occur daily.

Display:

A display must be placed near the work station, stating the painting procedure as well as the identity of the products used.

16.2 SANDING

The sanding work shall be performed in compliance with legal and regulatory provisions of the project owner's site for specific measures relating to the protection of workers assigned to jet stripping, scrubbing and sanding. Employees assigned to sanding operations must be male and aged over 18 and supplied with the appropriate individual protection means.

Technical prevention

Unless not technically possible, jet stripping and sanding operations must be done either in a closed machine whose leak tightness must be maintained or in a chamber.

The dust released during the work must be captured and evacuated in such a way as not to harm the environment.

When sanding occurs outside for technical reasons, the External company manager must place markers around the area and provide each worker exposed to the work with suitable individual protective equipment (hood, working clothes, gloves, shoes, etc.) and protect the environment effectively (car parking boundary, restricted access, surrounding protection).

17 FIXING WORK

Only the indirect explosive actuated tools are allowed. Care must be taken against the risks of projection which could hit neighbouring workers. External company employees performing work with explosive actuated tools must have a firing certificate delivered by their employer and be over 18 years of age.

18 WORKS WITH HANGING LOADS

The attention of the suppliers and assemblers of materials comprising hanging loads is particularly focused on the absolute need to check the resistance calculations of the props, fasteners, and joints and the need to check the execution of assemblies, whether they have been done through bolting, riveting, welding or clamping. This obligation applies especially to silos, chutes, reservoirs and pressureless tanks of all kinds for which the regulations or the contract did not foresee receipt by an approved body.

It is also applicable to the supplies and work subcontracted by the main External company. Furthermore, the first lifting operation after assembly or

relifting after maintenance work must occur after employees have been evacuated from the areas in which the load's fall could cause an accident.

19 WORKS IN HEAT

The External company will take all measures so that its employees work in good conditions, such as adapted individual protection, ventilation and personnel rotation.

20 CONFINEMENT AND ASBESTOS REMOVAL WORK

Confinement and removal work will be performed by specialised and approved Companies according to a list drawn up by the authorities in the project owner's site country.

20.1 - OBLIGATION OF THE EXTERNAL COMPANY

The External company compiles and updates a list of its employees indicating the nature of the work performed, as well as, and if appropriate, the levels of exposure and inhalation of asbestos dust to which they were subjected and the length of exposure.

This list is supplied to the External company's work doctor. The External company provides access to the information to the employee requiring it.

A demolition, removal and confinement plan is drawn up.

This specifies:

- the nature and probable duration of the work,
- the place where the work is being carried out,
- the methods implemented,
- the characteristics of the participants' protective and decontamination equipment,
- the characteristics of the protective equipment of those close to the work,
- the frequency and methods of inspection on the site.

Please note: in the case of demolition: prior removal of asbestos unless technically impossible.

It is submitted for advice to:

the work doctor

the bodies concerned according to the country of the project owner.

It is sent one month before the work starts to:

the Work Inspection authority

the authorities concerned according to the country of the project owner.

20.2 INCIDENTS

The External company must inform the site official of the project owner and/or the Prime Contractor and/or the Instructing party of the incidents likely to expose employees to inhaling abnormal amounts of asbestos dust.

The employees, work doctor, Work Inspectors and authorities concerned according to the country of the project owner are informed, as quickly as possible, of the causes and remedies for abnormal exposure levels.

It is forbidden to touch or pierce items labelled as Asbestos; if in doubt, contact the project owner. Highlight any incident, evacuate and seal the site.

20.3 WASTE DISPOSAL

Waste of any kind and empty packaging likely to release asbestos fibres must be packed and handled in such a way as not to release any dust during handling, transportation, temporary storage and final storage. They must be removed from the work area in appropriate and closed packaging with the label, **a**, as mentioned below.

They must be transported and eliminated in compliance with current legal and regulatory provisions.



XIII TESTS

When, either during or after the work, tests are performed on either unloaded or loaded machines or equipment, all measures must be taken to keep employees away from dangerous areas and protect the person responsible for testing.

The following operations in particular must be performed after the employees have been evacuated from the dangerous areas: first filling of silos, chutes or reservoirs, the supply or resupply of toxic or explosive gases into pipelines, the powering up of hydraulic circuits and high voltage electrical installations. Only authorised personnel who are strictly needed for the tests and who have been suitably warned about and protected from the risks may participate.

In the case of new installations, the respective capacities of the consignment officials and the participants must be specified between the External company and the project owner's site.

XIV SITE VISITS

Project owner site officials, prevention coordinators, administrators, and any operator from the site of the project owner and/or the prime contractor and/or the instructing party who has a role in following up the development of the work performed by external companies are authorised to undertake site safety visits and produce a site visit/inspection report.

In line with the seriousness of the remarks recorded during the visit/inspection, the site official belonging to the Project owner and/or the Prime Contractor and/or the Instructing party may decide to stop the work and only authorise it starts again once the appropriate corrective measures have been implemented.

These site visit reports may be used in drawing up an assessment of the External companies which will be taken into account during subsequent consultations.

XV COMPANY SAFETY ASSESSMENT

To assess the safety policy of External companies working on our sites and to take the safety results into account, the safety department officials, the Project owner and/or the Prime Contractor and/or the Instructing party officials may carry out a safety audit on the participants' premises and produce an audit report.

The assessments drawn from these audits will be considered during Company consultations for new services.

XVI NON-OBSERVANCE OF SAFETY REGULATIONS BY EXTERNAL COMPANIES

To assess the safety policy of External companies working on our sites and to take the safety results into account, the safety department officials, the Project owner and/or the Prime Contractor and/or the Instructing party officials may carry out a safety audit on the participants' premises and produce an audit report.

Noncompliance with safety prevention requirements and their clauses by the External company can lead to it being immediately expelled from the Project owner's site.

- Any person found not wearing the individual protection equipment (helmet, safety glasses, safety shoes, special protection equipment for welders, safety harnesses for high level work, etc.) will be sent off the site for the rest of the day without any prior warning. If the situation reoccurs, the person breaking the rules will no longer be allowed to enter the site.
- Work is stopped immediately if it is not accompanied by adequate safety measures (regulatory scaffolding, signalling, installation consignment, etc.).
- Possible cancellation of the order in line with the Instructing party's general purchase order conditions.

XVII GENERAL SAFETY INSTRUCTIONS ACKNOWLEDGEMENT OF RECEIPT FOR PAUL WURTH SITES

As soon as this document has been received, the External company will return the acknowledgement of receipt attached to the PAUL WURTH representative mentioning that company X has duly received the general safety instructions for the PAUL WURTH sites and that it commits itself to making them known and enforcing the instructions among its employees and those of any subcontractors used for the work entrusted.

RECIPIENT

OFFICIAL:-----

As of -----/----- 201--, we have noticed that these had not been applied.

ANOMALIES recorded:

[illegible]