HSE POLICY FOR CONTRACTORS AND PROJECT MANAGERS

HSE Manager's order

SP-408

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1. PURPOSE

One of the Hydro Extrusion Hungary Kft. core values states 'We want to work safely in an environment that guarantees the person's health and well-being.'

This value is extended to contractors while working in the premises of Hydro Extrusion Hungary Kft. You are expected to act in accordance with the instructions set out for the health and safety of your own and those being present in your environment.

The company management should be aware that they are responsible for the health and safety effects their employees are exposed to and for those exposures the employees' actions may create for others.

In all these the role of Hydro Extrusion Hungary Kft. and in particular, of the project managers is to communicate the Hydro Extrusion Hungary Kft. expectations with the manager of the third party company and to promote the creation of a healthy and safe working environment.

Hydro Extrusion Hungary Kft. expects each contractor and his employees concerned to participate in a meeting covering the information of the work site. Such information will be delivered by the appointed Hydro Extrusion Hungary Kft. project manager(s) on a meeting, where he/she communicates the safety, health, fire prevention, and environmental requirements and provides information on the potential risks.

Beyond this, Contractors shall deliver regular training to his employees, which deals with the general and specific safety issues related to work.

COMPLIANCE WITH THE STANDARDS

Contractors shall meet all the statutory and local occupational safety, occupational health, fire prevention, environmental and safety laws, rules, regulations, standards and any additional standards Hydro Extrusion Hungary Kft. may make available to contractors with regard to the scope of work to be performed.

2 SCOPE

The present policy applies to each and every contractor when working on the premises of Hydro Extrusion Hungary Kft.. This procedure aims to define the responsibilities of outside contractors while they work on the premises of Hydro Extrusion Hungary Kft. and to provide minimum requirements guidelines to them.

This policy applies together with the standards/rules set out or referred to in the contractual terms and conditions.

In some cases, however, application of exceptions will be needed. Examples are, but not limited to are the presence and job assignments of foreign nationality employees of a company registered abroad. In such cases, compliance with the domestic legal requirements (e.g. medical fitness for duty, machine operators, etc. by the Hungarian law) can be disregarded from, and the legal requirements of the person's native country and the core values will apply.

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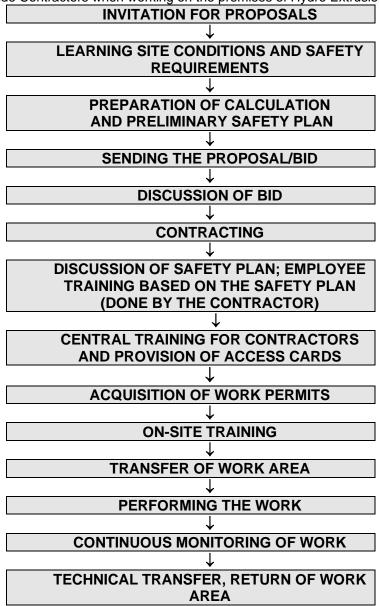
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3 DEFINITIONS

3.1 FLOW CHART

(For Outside Contractors when working on the premises of Hydro Extrusion Hungary Kft.)



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3.2 PROCEDURES BEFORE THE WORK IS COMMENCED

3.2.1 ROLE AND RESPONSIBILITIES OF PROJECT MANAGERS

At Hydro Extrusion Hungary Kft., by definition, project managers are those employees that are assigned principally to deal with the contractors performing on-site projects, where 'deal with' means managing Outside Contractors, having an impact on their job assignments, or ordering job/services from contractors.

Such works may include:

- Transportation,
- · Building, construction, demolition,
- Cleaning, rodent control, gardening, building management services,
- Service jobs
- Maintenance work.
- · Others, which involve on-site activities

It does not include the use of the design, packet sender, advisory and similar services.

Beyond proper quality and on-time completion of the project the project managers are held responsible to manage the project steps from the commencement up to the return of the project site and in certain cases even after that; in a manner that provides safe and environmental-friend performance, and this applies also to construction and/or any other job. So at Hydro Extrusion Hungary Kft. primarily the project manager is responsible for the HSE compliance of the on-site activities and in this the HSE team acts as a resource.

3.2.2 Preliminary specifications and risk assessment

The Hydro person(s) in charge will always assess the project HSE risks with the consideration of the that time effective HYDRO international requirements, the Hydro Extrusion Hungary Kft. internal requirements, and the prevailing Hungarian legal requirements. Those involved in the work must ensure that each contractor, subcontractor, contracted service provider and Hydro employee understand the level of risk that might develop while the scope of the project is being achieved. They shall ensure identification of the known risks and make sure the implementation of the necessary controls and procedures in order to eliminate or minimize those risks.

3.2.3 Preliminary safety site visit and consultation

Before submitting the bid Contractors are recommended to visit the site in the company of the Hydro Extrusion Hungary Kft.'s project manager and understand the subject of the project, and the applicable work safety, fire prevention, environmental and safety regulations, the general terms and the site conditions. Site specific general and special requirements will also be disclosed to the contractors. This is also an occasion to discuss any other issues, where the contractor's work may interfere with the processes of the operating plant.

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The project manager will be primarily responsible for the consultation with and involvement of participants.

During the discussion:

- The date of the transfer and acceptance procedure and the preliminary schedule of jobs are agreed upon with all the involved contractors and subcontractors;
- Hydro Extrusion Hungary Kft. communicate the safety, fire prevention and environmental protection requirements;
- The contents of the preliminary safety plan submitted attached to the bid, shall be discussed:
- The parties shall come to an agreement on the method and frequency of regular health and safety, fire protection and environmental walk-through.
- Authorizations for planning and construction shall be evidenced. Contractors shall assign a responsible technical manager pursuant to SP-408.4 HSE Manager's order.

3.2.4 DISCUSSION OF THE DETAILED SAFETY PLAN

The contractor after the contract is awarded, but not later than at least two working days prior to the start of work shall submit a detailed safety plan, which will be discussed with the Hydro Extrusion Hungary Kft. HSE department.

The HSE department will involve the affected project manager and other professionals. In case of mutual consent each party will enforce the safety plan by signing it. See *Annex 3* for information on the preparation of the plan.

3.2.4.1 Purpose of the Safety Plan

Pre-qualification of the contractor: ensuring, that the workers on site are prepared according to the activites carried out and to prepare them to the hazards of the work environment and introduce the method of eliminating those hazards. Another important aim of the safety plan is assuming responsibility, as the Contractor, with the preparation and signing of the safety plan assumes responsibility that the work will be done as described in the safety plan.

3.2.5.1 REQUIREMENTS SET FOR THE SAFETY PLAN

A detailed safety plan shall use the hazard analysis form annexed hereto, see Annex no.3.

The approved safety plan is a condition of commencing and performing on-site activities.

Contractors shall explain the Safety plan approved by the Customer to his employees performing work at the site; the customer has the right to check whether the safety plan was understood prior to the commencement of the on-site work; checking will be made in the form of question-and-answer.

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A copy of the approved safety plan shall be kept at the place of work.

Any deviation from the approved safety plan will be allowed when such is discussed with the project manager and the HSE department.

Contractors shall make sure that any changes to the safety plan be explained to his employees working on-site and this shall be documented.

3.2.6 TRANSFER-AND-ACCEPTANCE OF WORK AREA

Work area transfer-and-acceptance process of each project involving area occupation looks like the following, except for certain regularly performed standard jobs, like simultaneous cleaning of several production halls, road sweeping, trash removal, etc.

When a work is performed by contractors the "Work Area Transfer and Acceptance Form", attached to the present policy as *Annex no.1*. shall be applied (also available at the following link: <u>Terület átadás_átvétel fn2518</u>).

For the completion of the above Form the project manager and the assigned on-site supervisor are responsible on behalf of Hydro Extrusion Hungary Kft. and the Contractor, respectively.

Upon request Contractor shall submit the work-related documents, i.e.:

- Regulatory approvals, certifications for specific job (radiation protection, welding, etc..)
- Test reports of machinery and equipment on periodic inspections (examples are periodic monitoring of welding machines, electrical shock protection test, mounter's control etc.)
- Special qualifications of the personnel, medical fitness certificate document (a medical fitness for duty, psychological test results, fire safety test).

On behalf of Hydro Extrusion Hungary Kft. the project manager will convene the meeting for the completion of this procedure. The HSE organization representing the company, the manager of the area and, if applicable, the relevant maintenance department shall always be invited. The Project Manager will be responsible for inviting other corporate professionals, should any special functions incurr.

With regard to maintenance, troubleshooting, construction (pothole repair, painting, etc.), that is, so-called standard works performed under a Framework Agreement the simplified work area transfer / acceptance and return/take back" form per Annex no.2 shall be used. (Also available at the following link <u>Terület átadás_átvétel fn2518</u>).

With regard to minor service activities (like computer repair, repair of office equipment, copiers periodic review, etc.) or activities performed in an emergency situation the work area transfer / acceptance procedure can be made with an entry to the Construction Log. In this case, the Log entry will be signed by the contractor's on-site supervisor on behalf of the contractor and the project manager and the competent area manager on behalf of the company.

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3.2.6.1 WORK PERMITS

The work permit system should be applied as a minimum for the following activities. To obtain the work permits is the shared responsibility of the project manager/technical supervisor and contractor:

- Hot Work (fire hazardous) activities such as: welding, brazing, cutting that creates sparks or flame, heating and burning, painting, etc.. As per SP451 HSE Manager's order
- Excavation, trenching, demolish of flooring, work on/in/with walls (drilling, demolition) as per SP416 HSE Manager's order
- Hazardous work (involving entry to confined space) as per SP404 HSE Manager's order
- Scaffold put into service as per SP405 HSE Manager's order
- Work permit in confined electrical control rooms,
- Works to be carried out on built-in extinguishing systems/fire alarm system or such operation that would affect their operation,
- Outdoor activities at elevated height, as per SP405 HSE Manager's order

The above work permits should be available at the job site!

3.2.7 SAFETY TRAINING

3.2.7.1 CONTRACTOR'S TRAINING DUTIES

Pursuant to Act XCIII of 1993, Health And Safety Act, Contractors shall ensure safety training to their personnel. Hydro Extrusion Hungary Kft. may check if the personnel received safety training by viewing into the training documents and by interviewing the employees.

Contractors shall ensure that the involved personnel and subcontractor personnel receive training about the approved safety plan prior to the commencement of the work.

3.2.7.2 TRAINING DELIVERED BY HYDRO EXTRUSION HUNGARY KFT., HSE SKILLS

Those contractor/sucontractor/vendor employees that will work on the project shall participate in the training. As the project progresses and new employees arrive at the site they shall receive the same training.

HSE professionals of HOWMET-KÖFÉM Kft. and Hydro Extrusion Hungary Kft. jointly deliver a safety orientation training to Contractor employees when they work first time on the premises. Contractor employees shall again participate in a central safety training after a year.

The training addresses the following.

- The entire site (Hydro Extrusion Hungary Kft.) safety rules
- Personal protective equipment

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- Emergency procedures
- Fall Protection
- Lock out/tag out
- Confined spaces
- Mobile equipment / transport
- Noise protection
- Respiratory Protection
- · Permit conditions / procedures,
- Environmental information
- Fire prevention
- Site knowledge
- Rules of Conduct
- Verification of understanding of the Safety Plan

The training will be held every Tuesday and Thursday from 09:00 a.m. to 11:30 a.m. in HSE training room (building #33) of HOWMET-KÖFÉM Kft. after prior appointment with the project manager.

A representative of the contractor or its Hydro contact person will send a letter to the Howmet-Köfém Communication Center (communicationcenter.sze@howmet.com) if the entry request has already been sent to the Communication Center (new entry or entry extension).

In the letter, it is to be specified which company and workers will attend on which training date (Tuesday or Thursday).

During business hours, applications are recorded in a table by the Reception and beyond by the Communication Center.

Applications will be accepted for up to 50 people for a given training day. If the limit is reached, a feedback will be sent via email and other training days will be proposed. Applications will only be registered for this new day if the company or contact person agrees. On the day of the trainings, only those companies and those with as many people whose application has been pre-registered and who either have a valid card or have previously arrived for a new entry or extension will be admitted to the training at the Reception.

After the training, the Communication Center will delete the application data for data protection.

At the check-in the name, date of birth and ID card number of the participants shall be provided in order to speed up the administration.

Based on the above data, the project manager will complete the *Annex no.4* Outside Contractors Personal Data Sheet (also available via the following link <u>Külsös személyi belépő fn2516</u>) and the *Annex no. 5* Outside Contractors Vehicle Sheet ((also available at the following link <u>Külso kiv gépkocsi fn2519</u>) and forward them to the Security Services not later than 24 hours prior to the training.

The trainer will issue a certificate for those appearing on the training pursuant to SP402 HSE Manager's order.

Contractors can get the Access Card that authorizes entry to Hydro Extrusion Hungary Kft. areas after the presentation of valid training certificates.

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Contractor employees shall have training certificates with them on Hydro Extrusion Hungary Kft. areas and present them upon request.

After the central training the project manager shall communicate the project related HSE requirements and other local information to the Contractor before the work is commenced.

3.3 PROCEDURES DURING WORK

3.3.5 CONSTRUCTION LOG

Contractors shall maintain a Construction Log from the start of construction, as defined, provided that maintenance a Log is subject to the terms and conditions below.

If in the progress of the project any deviation from the approved safety plan and/or the agreed technical scope is needed then Contractor shall immediately record the deviation in the log, and notify the customer verbally. Any different scope of activities will require preliminary approval of both the. project manager and HSE professional of Hydro Extrusion Hungary Kft. The approval shall must also be entered into the log.

3.3.6 MAINTENANCE AND CONTROL OF THE CONSTRUCTION LOG

The responsible technical supervisor, assigned by Contractors shall maintain an up-to-date Construction Log that covers the work completed.

Participants of the construction and building repair/maintenance activities shall communicate with each other the danger situations, facts and circumstances concerning the construction they became aware of, which endanger the fulfillment of their obligations under the contract. Hydro Extrusion Hungary Kft. assigned person(s) may check the Construction log during the execution of construction activities daily.

The HSE department may also check the Construction log; any identified deviations will be verbally communicated with the Contractor's technical supervisor and entered into the log. If, during working a Contractor employee creates a situation hazardous at himself/herself or his/her environment, violates safety standards of the company, uses methods non compliant with the approved safety plan or puts the physical integrity of people at risk by breaching applicable legal requirements then the project manager, technical supervisor or the HSE department shall suspend the project with an entry to the Construction log.

The followings are authorized to make an entry to the Construction Log: the builder's representative, technical inspector and HSE concerning safety aspects; moreover, providing that the project is completed with on-site supervision by the designer then the designer, the contractor, the contractor's responsible technical manager and any other administrative body authorized to control. (Construction supervision, building authority, etc.).

The construction log shall be kept readily available at the place of construction work; in case of framework contract at the contractor's assigned technical manager of the manufacturing facility.

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Concerning closure and retention requirements of the logs Governmental Decree no. 191/2009 (IX.15.) requirements are governing.

Statutory template and detailed rules of maintaining the construction log are specified in Annex no.2 Governmental Decree no.191/2009 (IX.15.).

3.3.7 HOUSEKEEPING

Contractors shall maintain the following housekeeping standards at his work area continuously:

- Materials shall be stored as specified, according to the loading requirements, in a manner that excludes tilting over or slipping away and traffic roads shall be kept unobstructed. Storage of hazardous chemicals on the ground is allowed only over secondary containment with 110% receiving capacity.
- Loose materials that may fall or can cause tripping hazard, shall be removed immediately.
- Spilled materials (especially oil, chemicals, water) should be cleaned up immediately and handled as prescribed.
- Any generated waste shall be selected, regularly collected and removed continuously as ruled by the contract.
- Any generated hazardous waste shall be collected as agreed with the Environmental Engineer until it is delivered to the central hazardous waste collection place
- Hazardous waste disposal is the responsibility of Hydro Extrusion Hungary Kft.
- If not ruled otherwise by the contract Contractors shall ensure meeting the requirements on non-hazardous waste disposal.
- Cleaning/housekeeping shall be made in accordance with the safety, fire prevention and environmental requirements, and as agreed with the Hydro Extrusion Hungary Kft. designates.
- Along a straight stretch of railway track the minimal distance to be kept from the rails is 2 metres and 2.5 metres in the bends.
- Protruding nails shall be immediately removed from the planks of wood packaging or be bent.
- When working on the roof only the variety and volume of materials and tools that are approved by the Hydro Extrusion Hungary Kft. civil engineer may be moved to and stored on the roof. Storage places of the materials and tools on the roof will be specified by the Hydro Extrusion Hungary Kft. civil engineer. Flammable and potentially flying materials, that the wind may blow off, shall be removed when the work is completed or the roof remains unattended.

3.3.8 **HSE** INSPECTIONS

Hydro Extrusion Hungary Kft. reserves the right to perform inspections on the work area as frequently as it may be required by the duration and magnitude of the project while the project is progressing. The inspection will use the *Annex no.6.* form report. The HSE

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department will send its comments with the impressions and findings of the inspection as an e-mail both to the Contractor and the project manager. The contractor group/team/ area manager shall take prompt action on fixing the inspection findings that require immediate action. Findings that can be remedied later shall be fixed in a manner discussed an agreed with the Contractor's manager and the project manager.

3.3.9 FIRST AID, MEDICAL TREATMENT, EMERGENCY MEDICAL ASSISTANCE

Contractors shall keep a first aid kit at the work area.

If an accident or acute discomfort is sustained on Hydro Extrusion Hungary Kft. premises at the contractor's request Hydro Extrusion Hungary Kft. will ensure occupational health services free of charge.

In case of personal injury requiring medical treatment, depending on the degree of injury the occupational health services of ARCONIC-KÖFÉM KFT. will either transport the person to hospital or call the National Ambulance Service.

Accident, injury or discomfort cases should always be reported to the Communications Center (Comcel). Extension 21-11, Mobile phone: +36-22-532-111

3.4 TECHNICAL TRANSFER AND ACCEPTANCE PROCEDURES

The technical transfer and acceptance process is designed to finally control the actual quantity quality and safety performance of the projects versus the specification.

Every technical transfer and acceptance process is always preceded by the work area return (the latter is a condition to the previous) as per section 3.2.5.

The contractor, after completion of the work, shall return the work area, machines and equipment in a state that is compliant with the project specification, and on the other hand, is compliant with the local practice (in cleanliness, return of materials/tools provided, managing wastes).

For larger projects, the audit will involve the following persons:

- Contractor's on-site supervisor,
- Designer
- Hydro Extrusion Hungary Kft. project manager,
- HSE Department:
- Representatives of production and maintenance.

The area of technical transfer and acceptance process will be put on hold, if:

- Regulatory approvals/permits are missing,
- Specified requirements are not met,
- Safety findings contradictory to the safety specifications defined before the project commencement occur during the whole project or severe risk is present.

3.5 Environmental responsibilities of Outside Contractors

Outside Contractors shall comply with environmental standards, guidelines and specific rules for the specific task of Hydro Extrusion Hungary Kft. when working on Hydro Extrusion Hungary Kft. premises.

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Before the contract, i.e. in the tender stage Contractors shall get themselves familiarize with the location. During a walk-through Contractors shall understand the specific requirements, if applicable.

Contractors shall endeavour to minimize the use of hazardous substances, and shall in no case use any materials that are prohibited by the Company.

Banned materials are

- asbestos, asbestos-containing materials,
- PCB-containing materials,
- heavy metal-containing dyes,
- Benzene, toluene containing materials.

Use of halogenated ozone-depleting chemicals are restricted in accordance with local regulations.

Contractors shall provide the following information in the safety plan, and be include them in the contract:

- Name and quantity of chemicals planned to use, including hazardous materials.
- Transport, storage and handling methods of chemicals. Application of secondary containment at chemicals shall be particularly addressed.
- Provision of the proper collection of generated hazardous and non-hazardous wastes.
- Work related environmental issues the contractor is aware of.

During the performance of the activities Contractors shall retain the material safety data sheets of the chemicals applied, and present them upon request.

Before starting work, Contractors shall:

- Understand the hazards that might exist around the work area.
- Specify handling, storage and transportation method of the chemicals he will use.
- Come to an agreement with the environmental professional on the waste handling method of wastes to be generated
- Make their employees understand the environmental responsibilities and requirements set forth for the jobs involved.
- Upon request, present the Permit to Use issued by the competent regional ÁNTSZ covering each hazardous material used by the contractor or his subcontractor.
- Check whether the Hydro Extrusion Hungary Kft. contractual obligations are met.
- Discuss requirements for the use of the Company's sewer systems with the environmental specialist.

NEVER drain any chemical to the sewer system or pour chemicals on the soil.

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In case of any environmental event (including release of chemical to air, soil or sewer) the area shall be barricaded and the event shall be immediately reported to both the Communication Center (COMCEN) via calling extension 2110 or cellular +36-22-532-110 and the project manager.

Should any environmental event occur Contractors shall make every effort to localise the pollution and collect the spilled materials; though doing this they should not take any risk. Contractors shall barricade the area and evacuate it, if needed.

Hydro Extrusion Hungary Kft. will be responsible for the remediation.

Hydro Extrusion Hungary Kft. will be responsible for the management and disposal of hazardous waste generated by Contractor activities on Hydro Extrusion Hungary Kft. premises; likewise for the specification of applicable regulations and create the environment where the applicable regulations can be met.

Contractor will be responsible for the collection and storage of waste according to requirements.

Contractor will be responsible for the removal and disposal of the non-hazardous waste generated by the contractor's work on the premises. Recyclable/reusable, non-hazardous wastes (like iron, non-ferrous metals, wood) originating from demolition of objects which are owned by Hydro Extrusion Hungary Kft. shall be deposited at the central iron/wood waste site shown by the project manager.

Contractors shall deliver the collected hazardous waste to the Hydro Extrusion Hungary Kft. central hazardous waste collection site and transfer it with a completed Waste Transfer Form (*Annex no. 8.*). The hazardous and non-hazardous waste collection site, which is run by HOWMET-KÖFÉM Kft. is open weekdays from 6:00 a.m. to 14:00 p.m.

3.6 OCCUPATIONAL HEALTH AND INDUSTRIAL HYGIENE REQUIREMENTS FOR CONTRACTORS ON HYDRO EXTRUSION HUNGARY KFT. PREMISES

3.6.5 GENERAL REQUIREMENTS

Contractor shall exhibit the exposures created by the hazardous materials, biological agents and physical agents used/being present in the applied technologies in the preliminary Safety Plan.

3.6.6 MANAGEMENT OF EXPOSURES

Should Hydro Extrusion Hungary Kft. HSE department perceive the potential exposures significant or unacceptable then Contractor may be required to measure the health effects. In such cases Contractor (direct employer) shall bear the costs of exposure measurements.

If necessary, Hydro Extrusion Hungary Kft. experts (industrial hygiene, occupational physician, Contractors' safety expert) may assist Contractor in getting the survey made, as consultants.

In working in areas where the exposure derives from the activities of Hydro Extrusion Hungary Kft., Hydro Extrusion Hungary Kft. will be responsible to communicate such exposures (examples are noise exposure, dust exposure, etc.) to those affected.

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3.6.7 OCCUPATIONAL HEALTH CARE OF CONTRACTORS

Pursuant to Governmental Decree no. 89 of 1995 (VII.14.) on the Occupational Health Services and the Social Welfare Minister's Decree no. 33 of 1998 on the Fitness for Duty Check-up the Contractor (providing that he has an employee in Hungary) shall

- Maintain a valid contract with an occupational healthcare provider physician;
- Prove that his employees fit for the duty to be performed;
- Prove that the regular medical check-up has been performed, providing that the job is subject to such check-up (examples are crane operator, welder, chemicals operator, etc.);
- Prove that his contracted occupational healthcare provider physician explained to him the potential health impairment impacts of the risk factors involved in his activities and the personal protective equipment that is used against the exposure.

Pursuant to Act XLII of 1999 on Protection Of Non-Smokers and on Certain Rules Of Tobacco Consumption And Distribution Hydro Extrusion Hungary Kft. have drawn up internal rules (SP004 HSE Manager's order) that set out requirements with regard to smoking, and this policy applies throughout the company and areas rented by Hydro Extrusion Hungary Kft. The policy basically states that "At Hydro Extrusion Hungary Kft. smoking is only allowed on areas designated for that purpose."

3.6.8 WORK PSYCHOLOGICAL TESTING

Concerning certain positions associated with an increased risk of accidents, Hydro Extrusion Hungary Kft. requires from the contractor that his employees would undergo psychological testing. These positions are as follows:

- Working at elevated heights above 5.0 meters
- Working in excavations, deeper than 2.0 metres below the soil surface
- High-voltage electrical work
- Conducting fire/explosion hazardous work in places falling into fire-hazard category A or B
- Fork lift truck drivers
- Crane operators
- Working in confined spaces

The work psychological test remains valid for 5 years.

3.6.9 WHEN USING CHEMICALS

Contractor, in his Safety Plan, shall specify the list of chemicals, he plans to use for the project; and upon request he shall present the materials1 Safety Data sheets of the chemicals.

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Furthermore, he shall describe the method of use in the Safety Plan and address the methods of elimination of hazards.

Contractor planning to use hazardous materials/compositions on Hydro Extrusion Hungary Kft. premises, shall hold a valid operating permit for the activity, issued by the regional branch of ÁNTSZ (Fejér county) providing that the Contractor's company is principally active in Hungary.

3.7 NARCOTICS

Alcohol or drugs are prohibited on Hydro Extrusion Hungary Kft. areas. Under the influence of such substances nobody shall enter to Hydro Extrusion Hungary Kft. and/or shall perform job.

Concerning those entering to Hydro Extrusion Hungary Kft. premises, by definition a person is perceived under the influence of alcohol if the outcome of the breathalyser test is positive, regardless of the actual value (magnitude) of the result. Affected workers are to be prohibited from further work.

The following prohibitions apply (SP-481) to persons who are identified positive for the alcohol test when entering to or working on Hydro Extrusion Hungary Kft. premises:

- In case of a blood alcohol level of 1‰ or higher, entry into the company premises will be prohibited. This ban is for 10 years.
- In the case of a blood alcohol level of 0.3-1 ‰, entry to the company's premises will be prohibited for a period of 5 years.
- In case of blood alcohol level below 0.3 ‰, entry to the company's premises will be prohibited for a period of 1 year. In cases worthy of special consideration, with the approval of the Managing Director, minor adverse consequences (eg warning, mandatory daily inspection, etc.) may be applied.
- In the case of entrepreneurs who have a contractual relationship with other companies operating on the site of Hydro Extrusion Hungary Kft. the extent of the prohibition may, contrary to the above, be more stringent, in consultation with the undertakings concerned. Primarily Contractors are responsible to check their personnel for alcohol use prior to the entry to the area of Hydro Extrusion Hungary Kft. or during working on Hydro premises.

3.8 Personal protective equipment

Contractor's personnel shall adapt to Hydro Extrusion Hungary Kft. standards and therefore in the operational areas of Hydro Extrusion Hungary Kft. at least the following personal protective equipment should be worn all the time, when production, maintenance, construction and service activities are rendered on the work area, within or outside the buildings as a minimum requirement:

- Short-sleeved top (undershirt or skivvies are is not allowed) in some places, longsleeved top may be a requirement, for which the HSE specialist will give feedback during the consultation of the HSE plan,
- Long trousers,
- Hard hat (as for colours, red and white are excluded) with the person's name and company name complete with chin strap, if for any reason work at elevated height or on the flatbed of a truck is needed. No hard hat is to be worn on areas where it is

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not specified in the Safety Plan following a discussion with the HSE department of Hydro Extrusion Hungary Kft. (example: tile-laying inside a building)

Steel-toe safety shoes with metatarsal protection, if not otherwise ruled for the specific jobs,

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- High visibility vest or clothing (orange or yellow) except for work processes where this may cause additional hazards (eg flammable work),
- Classified safety glasses that protect against mechanical exposure.
- Gloves with a cut resistance of at least category B for general mechanical work.
- Hearing protection in areas where it is required.
- Any special protective equipment and the method of wearing them shall be addressed in the safety plan.
- Special protective equipment shall be worn by those working on electrical systems
- Special fire-retardant protective clothing shall be worn when working with open flames and during welding.

3.9 FIRE PREVENTION

On Hydro Extrusion Hungary Kft. premises the requirements set forth in Act XXXI. of 1996 and the National Fire Prevention Code (OTSZ) issued as BM (Ministry of Domestic Affairs) Decree no. 54/2014 (XII.5.) and the relevant Hydro Extrusion Hungary Kft. fire prevention policies and procedures codes apply.

The Safety Plan shall contain Hydro Extrusion Hungary Kft. fire prevention and fire safety requirements applicable for the site of the project and such requirements shall be met all the time.

In the issues not covered by this document, the OTSZ or the statutory national standards a conciliation meeting shall be held with the Hydro Extrusion Hungary Kft. fire prevention representative.

Hydro Extrusion Hungary Kft. fire prevention representative and professional fire fighters of HOWMET- KÖFÉM Kft. are allowed to check the contractor's sites. They will warn the Contractor to all the hazards/risks and Contractors shall take immediate action to eliminate the hazard.

3.9.5 TEMPORARY BUILDINGS

Installing a temporary construction is a contractual condition. Main HSE aspects of the installation are as follows:

- The fire resistance and fire rating of the buildings shall comply with the requirements set forth in Paragraph 6.
- Hydro Extrusion Hungary Kft. and third-party company shall jointly determine the installation location.

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- Third-party company's buildings can be used only to the intended purpose specified in the occupancy permit.
- Third-party company may store only the materials/tools needed for the continued activity in the buildings or storage areas.
- Heating of the temporary buildings shall be provided only by heater approved by Hydro Extrusion Hungary Kft.
- Usage of heating equipment or space heaters shall be compliant with the OTSZ fire prevention rules.

3.9.6 FLAMMABLE LIQUIDS

- The names and quantities of flammable liquids, solvents and chemicals the thirdparty company plans to use and store shall be indicated in the contract.
- OTSZ regulations and relevant standards shall apply to the transport, storage and distribution of flammable liquids and appropriate secondary spill containments shall be used.
- In order to identify the content and flammability the containers, drums and cans containing flammable liquids shall clearly labelled, and such shall be placed on a secondary containment capable of catching 110% of the containing device's storage capacity.
- The Safety Plan shall clearly identify the flammable materials planned to use on company premises.

3.9.7 Precautions for fire-hazardous areas

If a field work should be done on an area which is designated by the Hydro Extrusion Hungary Kft. as a critical fire hazard area, and in addition the area is protected by built-in sprinkler system then a special fire prevention meeting shall be held in order to understand the potential hazards and the measures to be taken with the involvement of the project manager, the Company's fire prevention specialist and the operational/maintenance manager of the affected area.

3.9.8 VEHICLE REFUELLING

Refilling the third-party vehicles with fuel is not possible on company premises.

3.9.9 BAN ON OPEN FIRES

Lighting fires in the open area on company premises is prohibited; deviation will require specific authorization in advance. To obtain such authorization the Hot Work permit procedure shall be followed.

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3.9.10 FIRE EXTINGUISHERS, TOOLS

Contractors shall ensure at least 2 fire extinguishing devices to cover his hot work activities, temporary structures and storage areas. Neither the propellant and/or the extinguishing agent shall contain halogens.

3.9.11 FIRE HAZARDOUS ACTIVITY

Contractors and subcontractors shall ask for a permit to fire-hazardous activities planned to perform on company premises by using the company's standard Hot Work permit form. See the process details in SP-450.1 HSE Manager's order.

The two-copy Permit form shall be completed by the Contractor, as applicable.

The Hot Work Permit will become effective if the Contractor obtains approval before the commencement of work from the persons listed below:

- work area manager,
- project manager and
- fire fighter of ARCONIC-KÖFÉM KFT. Fire Prevention department.

If the performance of the activity is subject to fire safety certificate then the certificate number shall also be documented (applies to Hungarian persons) and upon request, it shall be presented.

The permit shall be posted in a visible place in the work area and the other copy shall be transferred to the project manager.

Contractor will get the form from the project manager.

Fire hazardous activity

- · Arc-welding and flame-welding
- Flame cutting
- Using combustion equipment (E.g. using of open-flame burner)
- Using Class "A" and "B" fire-hazard substances
- Using materials falling to Class I and II fire-hazard category, listed below:
 - > Fluids
 - Paint
 - Other materials
- Activities involving open flame or spark generation in rooms classified to Class A, B, C fire-hazard category

3.9.12 Storage and transport of Gas Cylinders

- On company areas gas cylinders only with valid pressure test are allowed.
- Contractors are allowed to supply and store the amount of gas cylinders absolutely necessary to the ongoing activities.
- Gas cylinders shall be stored only in accordance with the rules laid down in the specifications, separate from other materials and empty and full cylinders are to be stored segregated.

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- NEVER keep or use gas cylinders under ground or in a confined space.
- Contractor shall provide the appropriate number and type of fire extinguishers in the function of the volume of gas cylinders and their filling.
- Particular attention should be paid to falling over, falling and injury prevention while transporting gas cylinders on company premises with vehicles.
- Other activities related to the gas cylinders shall be subject to GM Decree no. 35/2014. (XI.19) NGM, Gas Cylinders Safety Regulations.

3.9.13 AUTOMATIC FIRE DETECTORS AND FIRE EXTINGUISHING SYSTEMS

Certain areas of Hydro Extrusion Hungary Kft. are protected with automatic fire detection and extinguishing systems.

Permission must be obtained prior to any and each operation performed on automatic fire detection/extinguishing systems, and the affected section of the system is to be locked out.

With regard to permits on working in the proximity of automatic fire detection and extinguishing systems each case shall be examined in its merit.

To get an approval to the job the Hydro Extrusion Hungary Kft. standard HOT WORK PERMIT

(Link: Engedély tüzvédelmi_rend_munkákhoz fn2510) shall be completed in two copies.

The project manager / technical supervisor and contractor on-site supervisor shall complete the form that is to be approved by the Area Supervisor of Hydro Extrusion Hungary Kft..

The permit issuing body is ARCONIC-KÖFÉM KFT. Fire Prevention Department.

Out of the two copies of the completed and approved HOT WORK PERMIT one is annex to the Construction log and the other will be filed at ARCONIC-KÖFÉM KFT. Fire Prevention Department.

When the activities are completed Contractors shall immediately notify the project manager / technical supervisor who will take care of the restoration of the system to its normal operating conditions.

3.9.14 FIRE ALARMS, REPORTING FIRE

Outside contractors working at the company shall promptly report any fire or its imminent danger they may detect on company premises.

All fires, including the extinguished or died-out ones shall be reported because of potential of smouldering fire in hidden places; and also to enable the identification of the root cause and prevention of re-occurrences.

3.9.15 METHODS OF REPORTING A FIRE

- 1./ To Communications Center
 - > personally, by messenger
 - > by phone at extension 2111 or the direct line+36-22-532-111.

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• 2./ Through the company's manual fire alarm system by breaking in the glass of the transmitter which is the closest to the fire

3.10 FALL PROTECTION

3.10.5.1 WORK AT ELEVATED HEIGHT

Contractors shall use safety harnesses and lanyards or establish a collective protection system if there is a risk of falling, as follows: The risk of fall is considered to exist if a person is at elevated height of 1.8 meters or higher, or though staying at a lower level, but extremely dangerous circumstances exist, such as working above open containers, moving equipment, machinery, water/other liquids, or other objects which create the risk of trapping in, impaling, etc. Scaffoldings work podiums/platforms above 500 mm shall be equipped with a handrail. Safety harnesses fixed to a point above the head shall be used, if the work is done from a ladder and the footing point is higher than 1.8 metres.

Contractors shall provide to their personnel undamaged and clean ladders for its employees, which complies with the MSZ EN 131 series of standards, has a load capacity of at least 150 kg and is designed for industrial use (not for household or DIY design), compliant to the conditions of the working environment and the geometrical dimensions. The integrity of the ladders should be checked and servicing must be carried out regularly. Slipping and fall-over exposure risks shall be eliminated when ladders are used.

The size and load bearing capacity of the scaffold should meet the requirements of the job. The structure and erection of the scaffolding, performance of work/dismantling, and inspection/maintenance of the scaffolding shall meet the requirements put into effect by joint SzCsM – EüM decree no. 4/2002 (II.20), - Minimum Health And Safety Requirements to be implemented during Construction Sites and Building Processes and also, those specified in Hydro Extrusion Hungary Kft. . SP-405 Procedure, Fall-Protection Rules. Contractors shall identify the type of scaffold/ladder and method of its installation in the detailed safety plan. Following the construction of every wood/metal scaffolding structure over 1.8 meters in height, the competent Hydro Extrusion Hungary Kft. civil engineering specialist and safety professional shall approve the transfer-and-acceptance documentation, regardless of the height of the structure or the applicability of engineering requirements.

Wooden structure scaffolding shall be erected only by qualified carpenter/rigger. Metal structure scaffolding shall be erected only by qualified fitter or rigger. Metal scaffoldings shall always be connected to the shock protection system.

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Exceptions to scaffolding engineering obligations are the following:

- Up to 1.8 meters high folding trestles and ladders;
- Scaffolding-line mobile devices (up to 20 metres) qualified with a certificate;
- Various cherry-picker type devices (up to 20 metres) qualified with a certificate;

3.10.5.2 WORK AT ELEVATED HEIGHT OUTDOORS

Outside work at elevated height or lifting are permitted when the wind speed is below 36 km/hour.

Working on scaffolding or roofs is forbidden where the weather conditions are not appropriate (e.g., fog, snow, slippery walking surfaces, light inadequacy, hail). Any work to be performed outdoors at elevated height is subject to permit by the Communications Center; the approval should be provided by the work area transfer-and-acceptance protocol. Single-person roof work is prohibited.

3.10.5.3 OPEN PITS AND EXCAVATIONS

Construction sites <u>outside buildings</u>: Open pits/excavations up to 1.25 metres depth shall be fenced with a warning tape and warning board (collectively valid) or with red-and-white striped rigid guard rails and warning sign placed 0.6 m from the edge of the pit/excavation. The protective handrail shall withstand 500 N force impact at its any point. At depth greater than 1.25 m depth always rigid guard rails and warning signs shall be used for fencing.

Each open pit/excavation <u>inside buildings</u> or on <u>outdoor traffic roads</u>, regardless of the depth, shall be equipped with a rigid guard rail and warning sign. See the requirements in Company Procedure SP-405 HSE manager's order.

3.10.6 WORK IN CONFINED SPACES / ON DANGEROUS EQUIPMENT

While performing work in permit-required hazardous equipment/confined spaces the requirements set forth in Hungarian Standard MSz 09-57.033-1990, Hydro standard 18.1 and and Hydro Extrusion Hungary Kft. HSE Procedure SP- 404 on confined spaces shall be met. Contractors shall specify the entry requirements in the safety plan.

By definition hazardous equipment means equipment (machine, tank, bunker, sump, sewage, boilers, transport tanks, silos, open vats, tank cars, i.e. usually a restricted space), where hazardous and harmful (i.e. corrosive, toxic, explosive) by-products may develop or collect in the process of storage or processing steps of the production.

Such activity is subject to Entry Permit requested via completion of Hydro Extrusion Hungary Kft. standard form. The project manager will provide the standard form in appropriate number of copies to the Contractor. The Contractor's on-site supervisor assigns the person to perform the work with the completion of the two-copy form.

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3.10.7 REQUIREMENTS ON LOCK OUT/TAG OUT

- In any activity where unexpected release of energy (electricity, pressure, etc.) may cause a system start or injury/damage the equipment shall be switched off and the lock out/tag out procedure shall be carried out.
- Energy lock out/tag out procedure shall be carried out in each case by the competent Hydro Extrusion Hungary Kft. person; Contractors shall never apply the lock out/tag out procedure.
- Personal padlocks needed to the lock out procedure will be primarily provided by Hydro Extrusion Hungary Kft.; however, in certain cases Contractors shall provide such to all employees concerned.
- The project manager will ensure the white card, labelled 'Contractor' to all concerned contractor employees in the area transfer-and-acceptance process or before the commencement of activities.
- Each involved contractor employee shall attach his/her personal padlock and white card before the commencement of work in the danger zone. At the end of the shift the personal padlock and personal card shall be removed.

A personal card include:

- Name of the card holder;
- Name of the main/ sub-contractor company;

NEVER REMOVE OTHER PERSON'S PADLOCK OR CARD!

See the steps of the procedure detailed in Annex no. 7.

On completion of the contract work Contractors shall return the cards and padlocks they received in good condition, latest in the process of work area return. In other issues the rules of MSz 1585, Company HSE Procedure SP-406 on Lock Out/Tag Out, and Lock Out/Tag Out procedures of each individual equipment shall be followed.

3.10.8 SAFETY REQUIREMENTS ON EXCAVATION, TRENCHING OR DIGGING

Excavation, trenching and digging shall meet the requirements set forth by joint SzCsM – EüM decree no. 4/2002 (II.20), - "Minimum Health And Safety Requirements to be implemented during Construction Sites and Building Processes" and also, those specified in the prevailing Hydro Extrusion Hungary Kft. . SP-415 Procedure.

By definition earthwork is an activity which involves ground work of 0.25 m or deeper. Contractors shall prepare a plan for shoring by following the requirements of MSz 04-901:1989 standard. The adequacy of the shoring plan will be examined by a competent civil engineering technical inspector. Shoring plan is part of the Safety Plan.

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- Prior to the commencement of any excavation or digging inside or outside the buildings on company premises a digging permit shall be requested from Hydro Extrusion Hungary Kft. Energy Department.
- Hydro Extrusion Hungary Kft. Energy Department will issue the digging permit after instrument-aided survey of the area.
- Regardless of the depth digging permit shall be requested before the floor of any production hall building is disarrayed.
- Beyond the above, all wall-works (including drilling, chiselling, etc.) are also permitrequired activities.
- If, based on the survey or the information available, an energy cable or pipe runs on the area to be excavated a condition of starting any work in the area is the lock out/tag out of the involved energies.
- Contractor shall enter the fact of energy lock out and permit to start an activity into the site Construction Log and attach the permit that was issued by Hydro Extrusion Hungary Kft.

Subject to digging/drilling permit is each activity, which involves

- Excavation or drilling 0.25 m or deeper outside operational buildings or even at smaller depth where energy lines are known or suspected to run;
- Drilling or interference of flooring/wallwork of operational buildings at any depth;

The project manager shall ensure the availability of Digging/Excavation Permit. Contractor's on-site supervisor shall complete the permit form. The permits is annex to the contractor's Construction Log.

3.11 EQUIPMENT AND TOOLS OF HYDRO EXTRUSION HUNGARY KFT.

Contractor and its employees shall NEVER use equipment or tools of Hydro Extrusion Hungary Kft. Any deviation from this rule is allowed only in particular cases providing that the case is managed with a controlled procedure which is annex to the contract.

3.12 PUBLIC UTILITY SERVICES

Water, steam, compressed air, gas and electricity supplied by Hydro Extrusion Hungary Kft. to Contractors shall only be used if the conditions of use are fixed in the contract. "Taking of energy" shall follow the specifications, laid down in the transfer-and-acceptance protocol, that is, only from the locations and in the manner defined by Hydro Extrusion Hungary Kft.

3.13 CONTRACTOR'S EQUIPMENT, FACILITIES, AND CONDITIONS OF WORK

Contractors shall ensure and verify that test/inspection of equipment required for the contracted work have been made and the requirements are met.

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Contractors shall certify that their employees met the conditions of equipment operation and that of employment (qualifications and medical fitness for duty). A condition of operating lifting equipment (i.e. cranes, cherry-picker trucks, trucks with expandable ladder, forklift) that the requirements on use are defined in the safety plan and that would address all factors affecting the operation.

Such equipment may only be brought to and used on Hydro Extrusion Hungary Kft. premises if the conditions are regulated either in the contract or in its annex.

3.14 APPLICATION OF HYDRO STANDARDS

Hydro Extrusion Hungary Kft. is committed to Hydro standards and other more modern safety rules and expect the same from the contractors active on the site. Should Hydro standard more stringent then the Hungarian standard applicable to the activity and this is included in the HSE Plan, *then adherence to the stringer one is mandatory*.

3.15 REPORTING AND INVESTIGATION OF EVENTS/INCIDENTS

Every safety, environmental, health, or fire prevention related event, including injury-free events, occupational illness and property damage, regardless of the severity of those listed, if occurred on Hydro Extrusion Hungary Kft. premises, shall be reported to Hydro Extrusion Hungary Kft. Communication Center, the project manager and the competent HSE professional, responsible for the area without delay.

3.15.1 MANDATORY CONTENT OF THE REPORTS

Incident

- Place and date of the incident
- Name of injured person(s)
- The injured body part
- Nature and severity of injury
- What happened?
- Reporting person's name, place of residence, phone number

Injury Free event:

- Place and date of the event
- What happened?
- Any material damage,
- Measure taken
- Reporting person's name.

Fire alarm:

- Exact location of the fire (damage), time of detection,
- What is on fire? (What damage occurred), What is at risk,
- Is human life in danger or any personal injury occurred,
- Reporting person's name. (If reported via phone then the phone number as well).

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Property damage incidents

- Name and telephone number of reporting person
- Name and telephone number of detecting person
- Name of witnesses or eye-witnesses
- · The nature, quantity and value of property concerned
- When was the property last seen
- When was it reported missing (vandalism, etc.).

Environmental Issues:

- · Exact place and date of pollution .
- Type of emission.
- · Amount of material escaped to the environment,
- The extent of personal injury or property damage.
- The extent of environmental damage.
- What steps have been taken to eliminate emissions.
- · Reporting person's name.

Contractors shall commence the investigation of all injuries and events that occurred on Hydro Extrusion Hungary Kft. premises during the project implementation immediately with the involvement of the project manager, competent safety professional and other individuals delegated by the manufacturing unit.

This policy does not include reporting obligations, investigation and registration requirements under Hungarian law; this will be the sole duty and responsibility of the contractor.

3.16 EMERGENCY PHONE NUMBERS

Extraordinary circumstances (accident, fire, disposition, gas leak, oil and chemical spill highly polluting the environment, etc.) shall be reported at the following numbers and asking for help continuously possible. Contractors shall post this list of phone numbers next to the telephone.

COMCEN (COMMUNICATION CENTER) ONLY FOR EMERGENCIES From internal extension 2111 From cellular phone: +36-22-53-2111

OTHER PUBLIC INTEREST CORPORATE TELEPHONE NUMBERS:

- COMMUNICATION CENTER 2110/2111
- HSE DEPARTMENT: 2490.
- MEDICAL CENTER 1710.
- RECEPTION, Gate no.2: 2115, 1775
- Gate no.3. 1940, 2102
- Gate no.1. 2115, 1775

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3.17 ENTRY AND EXIT RULES

Contractors access to Hydro Extrusion Hungary Kft. premises, regardless if on foot or in their vehicles, will be allowed only with permission of Hydro Extrusion Hungary Kft. by using valid magnetic card.

3.17.5 Process of issuing personal access cards

In order to obtain access cards Contractors holding a valid contract shall forward the following data to the Project Manager at least 2 working days prior to the commencement of work:

- Name of the company
- Contract number
- On-site supervisor's name, date of birth, identity card number, telephone number
- Name of employees engaged in field activities, date of birth, the number of identity cards

A condition of transferring the personal access cards is that both the contractor and its employees hold a certificate of valid central HSE training. Beyond that, another condition is that a completed *Annex no.4*. form shall be forwarded to Gate no. 2 to at least 24 hours before the requested date of issue of the access card.

3.17.6 PEDESTRIAN TRAFFIC

Contractors may use Gate nos. 1, 2 and 3 for pedestrian traffic round the clock; except for Gate no.3, which does not operate on weekends.

Each contractor employee shall hold his/her personal access card all the time while working on Hydro Extrusion Hungary Kft. premises and to show it at request.

Any and all abuses of the access card will be sanctioned by banishment by the Security Service .

Lost, destroyed, etc. cards shall be reported to the project manager who takes care of the provision of a new card. Without access card any person can enter to the premises as a visitor.

Contractors shall indicate the name of the firm and the wearer on the hard hat clearly visible and legible, with letters at least 20 mm to 30 mm high. The hard hat shall not be white or red.

The Contractor and its employees will be only authorized to enter to the area identified in the work area transfer-and-acceptance protocol and they shall be obliged to restrict their movements only those areas. During pedestrian traffic, they are obliged to pay close attention to vehicle traffic, to use their mobile phones in a safe way, and not to use them on the pedestrian crossing. It is FORBIDDEN to enter the buildings on foot through industrial gates! Personal doors must be used for this purpose!

HSE POLICY FOR CONTRACTORS AND PROJECT MANAGERS



Version: 2

ID no.:

Date: 2022.04.19.

Made by: Török Ferenc

Reviewd by: Török Ferenc

Reviewd by: Török Ferenc

3.17.7 VEHICLES ENTRY

In order to obtain access cards Contractors holding a valid contract shall forward the following data to the Project Manager at least 4 working days prior to the commencement of work:

- Vehicle registration number,
- · Vehicle model,
- Nature (cherry picker, mixer, passenger car, etc.).
- Detailed justification of entry and purpose of use.

In terms of length of stay the nature of authorization can be one of the two below:

- Qualifying to permanent entry,
- or in specific cases, that is, for emergency repair, Shipment department will issued an access card valid at Gate no.3. which will be withdrawn automatically at exit.

The project manager will request the access card from Gate no.1. personnel by sending the *Annex no.5*. form completed with the information provided; after review the Gate no.1. personnel will notify the project manager. Following notification, Contractors shall ensure that the name of the company is indicated on the vehicle side of at least 10 cm high letters or a sticker. Contractors shall not enter to company premises if such indication is missing from the car.

Contractor's vehicles shall only use Gate no.1 and can be occupied only by the driver.

At the request of the Security Services, both at entry and exit the driver of the vehicle shall show his/her valid access card, ID card, driver's license valid for the vehicle, the vehicles' registration certificate, green card, and a delivery note on materials and/or devices to be delivered in or out.

Failing the above requirements, the controlling security guard may refuse the access.

3.17.8 DELIVERY OF MATERIALS AND DEVICE

Delivery of any materials to company premises will require a delivery note. A two-copy list of tools shall be presented about the tools necessary for the work of the contractor, which shall also indicate the serial number of the valuable machines and/or tools. One copy is kept by the gate of entry used, and one is for the contractor. The tools mentioned above will be taken out of premises based on the above list; items not included in on the list will be withheld by the Security Services.

Upon completion of the activity the contractor- owned remaining materials may be removed from the premises only with a delivery note, which is to be signed by a responsible representative of Hydro Extrusion Hungary Kft. (project manager).

If the contractor plans to remove material from the premises not supplied by him then the standard Hydro Extrusion Hungary Kft. "Delivery Note programme" should be used.

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The use of video recorders is forbidden on company premises. You may find that you need a photo or video recording to a job or to process checks. In these cases, the manager of the relevant area may allow camera or camcorder use. The recordings shall not be used for advertising purposes. Entry of members of the press can only be granted by the CEO of Hydro Extrusion Hungary Kft..

The following items are banned from company premises: all kinds of weapons and self-defense gas spray, as well as alcoholic beverages, or other substances/drugs that can cause dizziness or affect the work performance.

3.18 ROAD SAFETY RULES

Only vehicles meeting statutory standards and regulations may enter to company premises. The operator of a vehicle is responsible for the technical condition and traffic safety compliance of the vehicle. If either the security services or an internal audit identify any deficiency in this respect the vehicle will not be allowed to enter the territory of the Company or will be obliged to leave the Company immediately.

The driver / operator shall have the appropriate category of license by the type of vehicle. After completion of the the work or shift the vehicle must leave the territory of Hydro Extrusion Hungary Kft. Exceptions to this policy may be, only in special cases, subject to any contractual terms. Hydro Extrusion Hungary Kft. assumes no responsibility for vehicles left on company premises in such manner. In the area of Hydro Extrusion Hungary Kft. the Hungarian traffic regulations apply and Hydro Extrusion Hungary Kft. monitors the compliance.

Major traffic rules at Hydro Extrusion Hungary Kft. are:

- In the area of Hydro Extrusion Hungary Kft. vehicles shall drive only the established routes.
- Vehicles shall use the low beam while driving.
- Vehicles max. speed limit is 20 km/hour outside of production halls.
- The speed limit is 8 km/hour at train intersections and inside of production halls.
- Bicycles shall not ride into buildings or halls.
- Vehicle drivers shall not use hand-held mobile phone while driving.
- NEVER drive under load hanging on crane and NEVER cross the way of materials in motion unexpected.
- Standing vehicles shall be fixed and unauthorized use shall be made impossible.
- Parking and loading activities are only permitted in designated areas.
- During loading, the driver must only be in the designated area outside the danger area!
- Access to the load compartment is only possible with a safe ladder or podium! Chin strap helmet required!
- It is forbidden to climb on goods or climb into a container cargo area, to climb over railings!
- The transport vehicle may only arrive / depart with a stable, fixed load!

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Reviewd by: Török Ferenc

- In passenger cars the use of seat belt / passenger restraint is mandatory on the front seats, and in any vehicle where such system is built in by the original manufacturer.
- Pedestrians shall walk on the sideways or keep left (within a 1-meter line) by direction of travel on traffic roads, also in production halls.
- NEVER use bicycle on snowy or slippery roads.

Gross violation of traffic rules may result in the sanction of banning both the vehicle and driver from the territory of the company.

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Reviewd by: Török Ferenc

HSE POLICY FOR CONTRACTORS AND PROJECT MANAGERS



Version: 2 ID no.:
Date: 2022.04.19. SP-408

seal in case of display

3.19 DISCIPLINARY RULES

While performing business activities inevitably there may be times when disciplining devices are to be used. The key objective is to assist and support the contractor's work, thus any violations shall be discussed with the violating party, who is to be warned to follow the applicable practices. However, certain cases may result in immediate and forever ban from the area. Examples are, but not limited to the cases below:

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- Work performed under the influence of alcohol or under the influence of narcotics;
- Significant speeding (over 40 km / h);
- Causing or work under fatal or serious injury risk (e.g. failure to meet fall prevention requirements above 1.8 m, violation of lock out/tag out rules, causing a fire hazard, etc.);
- Crimes against property being detected;
- · Causing public danger.

If a contractor is detected to commit minor violations other than the above, shorter term ban, e.g. 1-3-6-12 months can be applied. The duration and nature of ban will depend upon the severity of the violation and will be determined jointly by the HSE department and the project manager.

The basic principle is that primarily the violating person should be banned / disciplined, but in case of a series of failures even the contractor's contract can be terminated for non-compliance with the HSE rules. The contractor's manager shall be notified on every ban. If banning is applied either the project manager or an HSE professional will escort the violating person to gate no. 2. where his/her access card will be withdrawn and the ban duration will be set. If the person refuses to cooperate, the assistance of Security Services should be sought.

Even if banning is not applied, the violation shall be reported to COMCEN in an e-mail, to enable them to enter the warning to the system.

4. ANNEXES

Protocol of transfer-and-acceptance of work area TRANSFER-AND-ACCEPTANCE

Drawn up	, MM-DD-YYYY

			Those v	vere pres	ent					
On	behalf of the C	ontract	or		On beh	alf of Hydro	Extr	usion Hungary Kft.		
On-site supervisor					Project manager					
					Area safe	ety representa	ative			
						ntative of prod	ductio	on		
Contract number					Represer					
					naintenan	ce				
Subject:										
Fencing					1					
Method:					SPA					
Other construction	n area:									
Access route										
On foot:					By car	:				
			Pow	er Points	3					
	Electricity	Nat	ural gas	Ste	am	Compress Air	ed	Water		
Connection										
oints:										
Lock out points	1									
Size:	I=	d=		d =		d=		d=		
	V=	p=		p/t =		p=		p=		
Terms of Use of th	ne Interface:									
First aid administr	ration places									
Telephone numbe	er used by the (Contrac	tor:			Place				
		Social	facilities u	sed by th	ne Contra	ctor				
Locke	er room			Toilet				Breakfast room		
Escape route:							•			
		Т	he necessa	ary work	permits					
Hot Work Permit				,	Yes No		Not needed			
Entry/Access perr	mit						No	No Not needed		
Excavation permit						Yes	No	Not needed		
Scaffolding plan, put into service permit					Yes	No	Not needed			

Outdoor acti	vity at elevated	height						
- approved					es	Not Ap	plicable	
- Allowed at tempe	eratures below 0 de	grees C.			Yes	No	N/A	
	enter (COMCEN) co		ng					
	of starting to work				ator's signa			
	of completing wor	k		Opera	ntor's signa	ture		
Fire hydrants, fire								
Contractor's fire e	xtinguishers:			T				
Safety Plan:					Yes	No	Not nee	ded
Equipment provide	ed by Hydro Extrus	ion Hunga	ry Kft.:					
Terms of Use:	Terms of Use: The location of contractor's vehicles:							
To be seed.	<u> </u>		Chemicals		:-4	V	A / -	Matria
To be used:		Yes	No	<u> </u>	₋ist	Yes	No	Not needed
ANTSZ operating I		s No	Not needed					
Place of connection	on to sewer				Method:			
			Waste					
	Hazardous Waste	е		Non-hazardous waste				
Type Placing Quantity								
			Training					
Date of last trainin	g							
Date and time of the	ne on-site, specific	training						
	Tools sub	ject to stat	tutory period	ic safe	ty reviews	3		
Type:				Date	of last revi	iew:		
Valid shock protect	Valid shock protection tests of used equipment:							
P	Comments							
		S	ignatures:					
			_					
		Dat	ted as above					

RETURN - AND-ACCEPTANCE Concerning the work area, equipment and their environment the Contractor - Cleaned up: - Hazardous waste in the designated containers, and handed it over to the representative of HYDRO Kft.; - Disposed the non-hazardous waste; - Did not leave behind any tools or parts in the work area. Concerning the temporary construction / prefabrication / mounting area, - It will not be used nay longer; - It will be used up to tools, that were provided by the Customer, were returned in good/operating condition. Contractor(s) declare that the equipment is returned to the equipment owner in a condition suitable for operation. The equipment was tested for electrical shock protection; the test outcome is acceptable. Shock protection test report no. Attached; will be transferred later (only when a work copy is available) Contractor Contractor Contractor 20..... Hour...... Min..... Equipment owner/area owner takes back the area/equipment:

20 Hour Min	
technical inspector or machine/area owner	
(or representative of the project manager)	

It is not a substitute for safety walk through, re-start or put into service.

It is a necessary but not sufficient condition for the transfer after the completion of work.

Hydro Extrusion Hungary Kft., (Manufacturing units, resource unit)

SIMPLIFIED TRANSFER-AND-ACCEPTANCE OF WORK AREA

TO STANDARD WORK UNDER FRAMEWORK AGREEMENT

Project Title:
■ Location:
■ Equipment
■ Task
Name of person in charge of transfer of work area:
Contractor receiving the work area:
Contractor's on site supervisor:
Energy Lock Out (check in) not needed needed, requested: electrical power off, de-energization, pneumatic power, hydraulics, natural gas water, other (to be listed). Mechanical support.
Hereby I confirm that lock out (shut off) has been made Signed by:
The following required work permits are available (check the box fire hazardous activity (hot work); Work permit for confined electrical control rooms; Drilling, digging; Scaffolding put into service; Permit for disconnect a sensor of fire alarm system
Work at elevated height outdoors Approved: ☐Yes ☐ No ☐Not Applicable Work below 0 C approved: ☐Yes ☐No ☐ N/A
Communication Center (COMCEN) countersigning
- Date-and-time of starting to workOperator's signature:
- Date-and-time of completing workOperator's signature:
Transfer-and-acceptance Date-and-timeYear Month
Declaration of recipient's representative: herewith I take over the work area; we will post the required signs as per the safety plan and will adhere to the safety requirements specified by Hydro Extrusion Hungary Kft. Name/ Signature of Contractor's on site supervisor (receiver):
Return -and-acceptance Date-and-timeYear Month Day Hour
The work is complete; herewith I return the work area safely and free of debris/waste. We removed the tag out cards; lock out can be released.
Name/ Signature of Contractor's on site supervisor (transferrer):
I took back the work area: Name/ Signature of person tacking back the work area:

SAFETY PLAN RISK ASSESSMENT SHEET

PROJECT TITLE:		CONTRACT NUMBER
COMPILED BY	APPROVED BY:	DATE:
ACCEPTED BY on BEHALF OF HYDRO project mana	HSE DPT	
MANDATORY GENERAL PROTECTIVE EQUIPMEN	Т:	

WORK PROCESS STEPS		POTENTIAL H	AZARDS	MEASURES TO ELIMINATE RISK	
Process description by steps in the order of production process	Potential incide Struck by	nts or risks of the Pinching	work steps are: Caught between	Measures: behavioral, administrative and engineered control. Use of personal protective equipment	
	Struck against Contacted by Contact with	Same level fall Overexertion Caught on	from different level Exposure	Fall	

Detailed requirements for the content of the safety plan:

A Safety Plan shall address the risks of the work to be completed based on the performed risk assessment and consider the aspects below, as applicable:

- · Nature and description of work to be performed by a contractor, chronological scheduling of tasks
- On-site supervisor name
- Work process as a whole (workflow, equipment, description of materials, headcount required, individual and collective protective equipment)
- A brief description of each operation, including risks and hazards to determine the exact circumstances causing the risks
- Precise identification of risk elimination/reduction methods
- Shut-off or restriction requirements affecting the work area, production or jobs outside the scope of this project
- Identification of the necessary work permits
- Application of lock out/tag out procedure
- · Scaffolding plan, including the detailed assembly instructions
- Propping plan, including the detailed operating instructions
- Method of entering into the work pit, provision of protection against fall in
- Method and assets of barricading the excavation area and warning signs to be posted
- · Description, hazards, and use requirements for chemicals used
- Types, quantities, treatment, waste disposal method of wastes generated
- Method of protecting the work environment from pollution generated by the activity
- Ensure the cleanliness of the atmosphere from exhaust gases emitted by vehicles into production halls
- List of flammable materials, their location and fire prevention measures
- · Location of temporary buildings, the rules of use
- Emergency plan (e.g., rescue from elevated heights or depths)
- Quantity of back-up personal protective equipment available on the site
- · Other special topics
- Delivery and lifting plan for the site (supplying vehicle data, stack location, items to be lifting incl. weights and center of gravity, route, method of fencing and securing the area, lifting equipment, lifting equipment specifications / type, capacity, boom radius, etc. / place of footing, type of suspension device, operating instructions for load fastening, lifting equipment control method / communications with the operator/).
- For activities involving a risk of falling details of ensuring protection against falls should include the specific anchorage points for the specific person and scaffolding.

KÜLS	SŐ KIVITEL	E	ZŐK S	SZ	ZEMÉLY	'I ADA	٦T	LAPJA
Új belépokártya igényléshez			Belépokártya hosszabbításhoz					
<u>Cé</u>	<u>ég:</u>							
A munka	végzés idotartama:							
<u>Proje</u>	ekt vezeto neve:	<u>Tö</u>	rzsszáma:		Szervezeti eg	<u>ıysége:</u>	<u>Tel</u>	efonszáma:
A munkavégzés helye:			Munkavégzés tárgya:					
A szerzode	<u>és száma:</u>							
A kivitelezo helyi vezetoje: Telefonszáma:								
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				_				

KÜLSŐ KIVITELEZŐK JÁRMŰ ADATLAPJA							
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A munka	végzés idotartama:						
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Leadott belépok sorszáma c		db	Átadó		Atvevo COM	CEN operátor	Dátum

STEPS OF LOCK OUT/TAG OUT PROCEDURE

The steps of the activity:

- Contractor request the Lock Out with an entry to the Construction Log from the project manager.
 Contractors may be obliged to ask for lock out as applicable by the approved Safety Plan and work area transfer-and-acceptance protocol.
- As a first step, energy shut-down, lock out and release of stored energy of the equipment/energy system shall be performed. Energy lock out devices shall be physically locked with a padlock. Exclusively Hydro Extrusion Hungary Kft. employees are authorized to apply the lock out/tag out procedure.
- Hydro Extrusion Hungary Kft. employees shall attach the equipment card (yellow) to the energy lock out devices and/or the operating panels.
- Hydro Extrusion Hungary Kft. employees shall attach the red group card when the group lock / tag out procedure is applied (center method).
- The person performing the lock / tag out procedure shall make an entry on the application of the procedure to the Construction log with reference to the accurate place, date and time.
- Subsequently each Contractor employee, who will work in the danger zone, shall attach his/her personal padlock, in the function of the method used, to the:
 - Energy lock out device (collective padlock) or
 - Center box (at center method).
- Simultaneously with using the personal padlock the white tag shall be attached to:
 - Personal (tied)
 - Center box (only at center method)
- Contractors shall receive sufficient number of white personal cards in the area transfer-and-acceptance
 process, where the project manager transfers them to the contractor. The transfer date, transferrer's
 name, signature, the recipient's name and signature, and the amount received shall be recorded in the
 construction log.
- Contractors shall provide the personal padlocks.
- Contractors shall only commence the work when the personal padlocks and cards are attached to the specified location.
- Contractors personnel are required to remove their personal padlocks and cards when the job is finished, the shift ends or the work area is transferred.
- Then only the tag out cards attached by Hydro Extrusion Hungary Kft. may remain.

,	WASTE TRANSFER CER	TIFICATE				
Contractor name:						
Project Title:						
Place (plant)						
Cost Center:						
Technical supervisor:						
Description and quantity (kg) of waste transferred:						
Date:						
	Transferred by	Received by				