



GENERAL SAFETY REGULATIONS FOR SUBCONTRACTORS

SITE DE CERATIZIT LUXEMBOURG

CERATIZIT Luxembourg S.à.R.L.

Version 2.0

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1 Definitions:

Subcontractor: Any supplier providing on-site services.

Operative: Any individual working on behalf of the Subcontractor.

CERATIZIT Coordinator: CERATIZIT employee who originally requests the work. They are responsible for monitoring the work of the Subcontractor.

PPE: Personal Protective Equipment.

CERATIZIT Supervisor: Individual assigned by the Coordinator to supervise the work of the Subcontractor.

2 Mandatory PPE

All Operatives must wear the standard PPE below:



- **Safety Glasses**

Safety glasses must be worn for any on-site work with a projection hazard, or when required by a risk analysis.



- **Work Clothing**

Full-length pants must be worn in all production halls and for any on-site work with a projection hazard. A long-sleeved jacket may also be mandatory depending on the work site and the risk analysis.



- **Safety Shoes**

Safety shoes must be worn in all production halls and for any on-site work where the Operative is at risk of falling objects or of being crushed.

- **A risk analysis** of the required work must be carried out to ensure the **correct PPE**.

It is the responsibility of the Subcontractor to provide the relevant PPE.

3 Site Access Prerequisites

All Subcontractors (and their Subcontractors) must strictly **comply** with all **laws** and **regulations** in force in the Grand Duchy of Luxembourg. Particular emphasis is placed on working hours and **rest periods**, which must comply with legal requirements at all times. Under no circumstances can an individual start work at CERATIZIT if they have exceeded the maximum number of working hours, including services provided to CERATIZIT and any other hours worked for another client. In any event, an Operative cannot work for more than 10 hours a day.

For non-Luxembourg companies, a secondment procedure must be submitted to the relevant authorities and in particular Luxembourg's Inspectorate of Labor (*Inspection du Travail et des Mines* - ITM). See their website: www.itm.lu

The Subcontractor must communicate in writing (for example, via email) to the CERATIZIT coordinator and Purchaser, no later than the day of the start of work, a list of the names of all Operatives who will need access to the site.

Site working hours are Monday to Friday from 7:30 to 16:00.

Site access outside of these hours is only possible if a request is submitted to the CERATIZIT Coordinator no later than one business day before the requested access day and that they or the CERATIZIT Supervisor is present on site for the duration of the work.

4 Site Access Procedure

Since May 2018, the CERATIZIT Luxembourg site has been classified as **Seveso III high threshold**. For these reasons, site access is restricted to non-CERATIZIT personnel in accordance with the following procedure:

For Visitors and Operatives accompanied for the duration of the work at all times:

- Visit the security office with the order number or the price quotation and the name of person of contact written on the order header (The CERATIZIT Coordinator or assigned CERATIZIT Supervisor) for the Operatives.
- Provide the respective license plate number and driver's proof of identity.
- Receive a visitor badge.
- Drive to the visitor parking lot.
- All passengers must sign in at reception and be issued with an individual visitor badge.
- The CERATIZIT Coordinator or assigned CERATIZIT Supervisor then takes over at reception.
- The work is carried out.
- Operatives are taken back to reception by the CERATIZIT Coordinator or assigned CERATIZIT Supervisor.
- Sign out and return visitor and vehicle badges to the security office.

For Operatives who will be unaccompanied during the work:

- Visit the security office with the order number for the Operatives.
- Provide the respective license plate number and driver's proof of identity.
- Receive a visitor-vehicle badge.
- Drive to the visitor parking lot.
- All passengers must sign in and be issued with a visitor badge.
- Operatives must have undergone Health, Safety and Environment training and passed the test. (Appointments recommended by telephone on +352312085880)
- Show identity document and take photo for access badge.
- The CERATIZIT Coordinator or CERATIZIT Supervisor takes over.
- The work is carried out.
- Leave the site after returning the visitor-vehicle badge to the security office.
- For the following services, Operatives will be able to access the site directly via the security office if they have their Subcontractor badge.

For unaccompanied work, the CERATIZIT Coordinator is responsible, together with the urgency and security department, for scheduling an appointment for the health, safety and environment training of the workers after the subcontractor has sent him the list containing the names of all the workers who will have to access the site. If necessary, the CERATIZIT Coordinator will send a request to the urgency and security department for access badges with the accesses required for the work to be carried out. These badges will only be issued after validation of the training.

Operatives must ensure their badges **are clearly on display at all times**.

Operatives cannot stay on the premises after 17:00 without a CERATIZIT Supervisor.

The CERATIZIT Coordinator or assigned CERATIZIT Supervisor must be notified of the work site **BEFORE AND AFTER** the work.

5 Training and Accreditation

- The CERATIZIT safety training and accompanying test are valid for 3 years. In case of a significant update during the validity period, a communication will be made to the persons who have had the training.
- Languages: at least one individual from each team must share a common language with the Coordinator (**English, French, or German**) and be present for the duration of the work.
- Operatives of the Subcontractor must have the relevant skills and **accreditation** for the work.
- The Subcontractor is required to inform its Operatives of the CERATIZIT safety requirements and must ensure that they strictly comply with them. (P.P.S.S., risk analysis, etc.)
- Photographs are only permitted following prior written authorization and in the presence of the CERATIZIT Coordinator or CERATIZIT Supervisor.

6 Driving On Site

- Driving regulations must be complied with throughout the site and at all times.
- Parking is only permitted in authorized parking lots.
- The maximum on-site speed is **20km per hour**.
- Operatives of the Subcontractor are required to use the **authorized parking lots**.
- Only vehicles transporting equipment or tools required for the work may have access within the site. A maximum of 3 vehicles is permitted per company.
- All vehicles accessing the CERATIZIT site must be licensed, serviced and have passed a technical inspection. The vehicle badge issued at the security office must be clearly visible from outside of the vehicle.

7 Documentation to Submit with Price Quotations

7.1 Risk Analysis

Depending on the complexity of the work, a **risk analysis** may be requested alongside the price quotation. This document must be approved by the CERATIZIT Coordinator **BEFORE** the start of on-site work. In the risk analysis, the Subcontractor must indicate any hazardous products used/stored and/or transported on site.

If a risk requires special safety precautions to be taken before or during work, they will be determined by the Operative and CERATIZIT Coordinator.

7.2 Work Practices

The working methods proposed to carry out the work must be presented to the CERATIZIT Coordinator.

8 Documentation Required before Starting Work

The Subcontractor must have all the required authorizations and documentation completed and signed by CERATIZIT before the start of work.

The Health and Safety Prevention Plan (P.P.S.S.) and any additional permits must be displayed at the work site.

The following documentation must also be included:

- Copies of inspection reports for lifting equipment, if applicable
- Safety Data Sheets (SDS) for the chemical products used
- Work schedule
- Copies of permits and authorizations required to carry out the work by the Operatives.

8.1 Health and Safety Prevention Plan (P.P.S.S.)

A Health and Safety Prevention Plan (P.P.S.S.) must be completed indicating all the risks identified for the work in question. It must also indicate the preventive measures recommended for these risks.

A P.P.S.S. is valid if it is completed and signed by both the CERATIZIT Coordinator and the assigned CERATIZIT Supervisor, Department Manager(s) and the individual responsible for the Operatives before the start of work. Please note, the Supervisor and Department Manager can be the same person.

Only the latest version of the P.P.S.S. template drafted by CERATIZIT is valid.

The Subcontractor must also respond to any requests, suggestions and opinions issued by the CERATIZIT Coordinator.

All Operatives must strictly comply with all preventative **measures** imposed by the P.P.S.S. and any additional permits required.

8.2 Safety Data Sheets (SDS)

The Subcontractor must be in possession of the **Safety Data Sheets (SDS)** for the duration of the work. Safety Data Sheets as well as the related preventative measures must be sent to the CERATIZIT Coordinator before the start of any work. In case of doubt, contact the HSE department.

8.3 Fire Permit

A fire permit must be drafted and signed for any work generating heat, a naked flame or sparks (soldering, grinding, cutting with a blowtorch, heating with a heat gun, etc.). A fire permit is only valid in the presence of the CERATIZIT individual authorized to draft a fire permit and is limited to 8 hours. The drafting of a fire permit requires prior inspection of the work site.

It is strictly prohibited to move CERATIZIT fire equipment.

8.4 Checklist for Work in Confined Spaces

A checklist sheet for work in confined spaces must be completed and signed for all work sites involving confined spaces. An enclosed space is defined as a totally or partially enclosed space that is not designed to be occupied by people and may pose a risk to those working within it. This risk may be:

- lack of ventilation
- lack of space to move around normally
- other hazards

Examples (non-exhaustive list): Niro equipment, Hamon equipment, etc.

The analysis will determine the appropriate means: ventilation, access and rescue routes, etc.

8.5 Lockout-Tagout Procedure

As part of the current CERATIZIT lockout-tagout procedure, the individual in charge of the Operatives, based on the P.P.S.S., must secure a padlock on each locked-out component.

8.6 Authorization to Switch Subcontractors

If the Subcontractor assigned by CERATIZIT decides to employ its own subcontractor, it **must obtain prior written authorization** (for example, via email) from CERATIZIT. In this case, the direct Subcontractor (First-Tier Subcontractor) is required to submit the list of Operatives of the Second-Tier Subcontractor to CERATIZIT. The Second-Tier Subcontractor is bound by the same regulations (drafting of P.P.S.S., possession of permits, etc.) as the First-Tier Subcontractor.

9 Working at Height

In the absence of collective fall protection, it is prohibited to work at a height of more than 2 meters from the ground and less than 2 meters from an edge without wearing a safety harness.

The use of means for accessing heights is set out in accordance with the requirements of Luxembourg's Accident Insurance Association (AAA- *Association d'Assurance Accident*). (www.aaa.lu)

- The **use of aerial work platforms** must comply with the following regulations:
 - o Operatives must hold a valid permit.
 - o The work platform must have been inspected within the last 6 months.
 - o A safety harness must be worn for any work platform and training on its use is mandatory.
 - o When working indoors, a second individual must be present to supervise. They must be trained and available. They can also be requested for any work outdoors, in accordance with the risk analysis.
- The **use of scaffolding** must comply with the following regulations:
 - o Scaffolding must always be assembled and adjusted by a trained individual.
 - o It is prohibited to access scaffolding that does not bear a delivery receipt.
 - o Operatives must be trained.
- The **use of ladders** must comply with the following regulations:
 - o Ladders are primarily a means of access.
 - o The use of ladders as a workstation should only be under special circumstances for all work.
 - o If the drop height is greater than 2 meters, the Operative must secure themselves via an anchor point or carry out an additional risk analysis with the CERATIZIT HSE Department.
 - o Damaged ladders must be removed from the work site immediately.
 - o Only one individual is permitted on the ladder at a time.
 - o The ladder must extend one meter above the top support point.
- **Roof Access**
 - o Roof access is restricted to Operatives who possess a valid Health and Safety Prevention Plan (P.P.S.S.), stipulating roof access, and an access key available from the Infrastructure or Security Departments.

10 Use of Equipment

10.1 Logging Equipment

It is prohibited to work on moving equipment. Equipment and energy sources (electrical, pneumatic, hydraulic and mechanical blocking) must be logged out before any work, unless a work sheet or operating procedure with a risk analysis for specific work exists and the compensatory measures have been taken to prevent the risks.

10.2 Loaning Equipment

It is prohibited to use CERATIZIT handling equipment or tools (forklift, work platform, etc.) without **official written authorization**. In addition, Operatives must possess valid **training** and a medical certificate stating that they are fit to use the equipment in question. Operatives must be able to present their permit on site at any time. In the event of a loan, Operatives must ensure that the equipment or tool shows no signs of defects. If any defects are found, they must be immediately reported to the individual who originally provided the equipment or tool.

A safety belt must be worn when the machine is equipped with one.

10.3 Gas Cylinder Storage

Gas cylinders must be appropriately **secured** at all times. Gas cylinder connection pipes and accessories must be in perfect condition and inspected annually.

Stock should be limited to the minimum requirement for the work.

10.4 Power Tools

Hand-held **power tools** must be **compliant** (for example, no adhesive tape on cords).

10.5 Subcontractor Equipment

For lifting equipment and accessories, a copy of the latest inspection report from an inspection body authorized in Luxembourg must be available on site.

A safety belt must be worn when the machine is equipped with one.

10.6 Loss of Equipment

The Subcontractor assumes full responsibility for its equipment in the event of damage or theft.

11 Collective Protective Equipment

The Subcontractor must ensure that the collective protective equipment is suitable for the risks involved and guarantee that it is installed and used in accordance with instructions. It must ensure that it is kept in good condition for the duration of the work.

Demarcation and protection must be put in place against all risks generated by the work, including, for example, falls from height (roofs, floors, openings in the ground, excavations, etc.), as well as falling and flying objects.

12 Environment

The Subcontractor is responsible for any environmental damage as a result of any pollution or contamination that it has caused.

12.1 Chemical Product Storage and Labeling

All chemical product containers must be **identified** and labeled in accordance with CLP legislation.

12.2 Order and Cleanliness

The Subcontractor is required to keep the surrounding area clean for the duration of the work and clean it thoroughly upon completion of the work.

12.3 Environmental Pollution

The provided or leased equipment used for the work must prevent environmental pollution (noise levels, dust generation, fuel consumption, etc.) and comply with the relevant regulations.

12.4 Liquid Waste Disposal

It is strictly prohibited to discharge liquid waste to the sewer system. The Subcontractor must fully comply with all relevant regulations and shall be entirely liable.

Liquid waste can be discharged to the CERATIZIT wastewater treatment plant following prior HSE approval.

12.5 Waste Processing

All **recoverable waste** (wood, metals and plastic) must be **sorted** in accordance with the relevant recycling category and may be taken to the CERATIZIT recycling center in accordance with the terms of the contract between the Subcontractor and CERATIZIT. Or, the Subcontractor must remove (or arrange the removal of) all other waste, in compliance with legislation in force. Any specific case will be defined in the contract between the Subcontractor and CERATIZIT.

By agreeing to the work, the Subcontractor undertakes to comply with the CERATIZIT waste sorting procedure in the break rooms and catering premises.

13 Emergency Situations, Accidents, Incidents and Contamination

In the event of a medical emergency, accident or contamination incident, call **411** immediately from a CERATIZIT telephone available at several on-site locations or dial **+352 312085411** from an external telephone. The CERATIZIT Coordinator or CERATIZIT Supervisor must also be notified.

13.1 Emergency Situations

If a potential or imminent dangerous situation arises when work is being carried out, Operatives of the Subcontractor are required to stop all work and notify the CERATIZIT Coordinator.

In the event of an obvious or serious risk when the Subcontractor is off-site, CERATIZIT will take the necessary emergency measures. The costs incurred will be charged to the Subcontractor.

The Subcontractor must find out in advance the specific emergency procedure (warning signals, location of the safety shower and meeting place, etc.) for the work site from the Coordinator.

13.2 Accident, Incident and Contamination Analysis

Following all **work accidents, incidents, contamination and anomalies**, the **Subcontractor** must analyze the causes with the CERATIZIT Coordinator and HSE Department.

14 Regulations for ATEX Zones

ATEX Zone: Workplace where an explosive atmosphere (gas or dust) can form.

- Safety shoes and work clothes must be anti-static.
- Any work in areas with explosive atmospheres must be carried out by personnel trained in ATEX hazards.
- The use of cell phones is strictly prohibited in ATEX zones (except for ATEX-certified cell phones). Any work must be carried out in accordance with the terms of the relevant authorizations and permits (for example, using explosion-proof equipment, etc.)

15 For Subcontractors with a Specific AUTHORIZED On-Site Area:

- Water, compressed air and other utilities may be supplied by CERATIZIT from existing sources following prior and formal authorization and subject to certain conditions.
- Electrical appliances and lighting must be switched off at the end of each working day; water and air supplies must be closed.
- The area must be **clean** and **tidy** at all times.
- All chemical products must be stored on containment trays and clearly identified.
- Safety Data Sheets (SDS) for chemical products present must be available nearby.
- A sufficient number of **extinguishers** must be present. They must be suitable for the risks involved and **up-to-date** with the relevant regulatory inspections.
- The **electrical system** of the facility must be **compliant**.
- CERATIZIT has the right to visit the assigned areas.

16 Management of Subcontractor Employees:

16.1 Medical Conditions

The CERATIZIT Coordinator reserves the right to remove from the site any Operative with a medical condition, presenting a risk to themselves or a threat to CERATIZIT personnel, for consultation with a physician.

16.2 Employee Conduct

- It is **prohibited** to consume alcoholic beverages.
- It is **prohibited** to supply and use narcotic substances on site, or to be intoxicated or under the influence of drugs.
- It is **prohibited** to smoke or eat in areas other than those provided for this purpose (smoking room, etc.).
- It is **prohibited** to litter. Trash cans are provided for this purpose.
- All doors, gates, etc. **must** be closed after using the premises.
- Operatives that do not comply with the safety regulations and/or code of conduct may be subject to immediate dismissal. The local authorities may be contacted for gross misconduct (theft, use of illegal products, etc.).

17 Inspections and Sanctions:

CERATIZIT reserves the right to carry out on-the-spot inspections at any time on Operatives, vehicles and authorized areas to ensure compliance with regulations.

Any violations may be subject to various warnings and sanctions depending on the severity:

- **Verbal warning**, Purchasing and HSE Departments + Subcontractor Management Team are notified.
- **Official letter** from Purchasing Department to Subcontractor + action plan to be provided.
- Temporary or permanent **dismissal** of Operative(s) involved + confirmation via email to Subcontractor with indications of duration + action plan to be provided.

All warnings and sanctions will be taken into account in the **annual appraisal** of suppliers, conducted by the Purchasing, Maintenance and Infrastructure Departments.

18 Final Provisions

If you have any questions, please contact:

HSE Department: ctlu_hse@ceratizit.com

Purchasing Department: Mr. Berns Emmanuel: emmanuel.berns@ceratizit.com

If you do not respond within 10 working days of receiving this document, we will assume that you agree to these requirements.