

Annex M

OCCUPATIONAL HEALTH AND SAFETY
REQUIREMENTS

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1.0 OH&S Concept and General Requirements

1.1 Occupational Health and Safety Concept

Contractor's work or activities at or near the Job Site under the Contract must be executed or implemented in such a way to:

- (a) Safeguard the health and safety of anyone that is, or potentially could be, impacted by Contractor's work; and
- (b) To protect property

with the clear objective to achieve ZERO incidents.

Contractor shall implement measures and take any actions necessary to prevent injuries, occupational illness and property damage. Contractor shall maintain a safe working environment at all times, taking into consideration the following principles:

- Safety and health are core values, not only the highest priority.
- Safety and health must take priority over all work or activities.
- All incidents can be prevented and therefore avoided.

1.2 General Requirements

AM/NS Calvert LLC is referred to herein as "Owner." Contractor shall fully comply with the requirements set forth in Annex M, Owner's Contractor Safety & Health Field Manual, all of which are subject to change or amendment from time to time, and with all federal, state and local statutes, regulations and standards regarding occupational health and safety which are applicable to the Job Site during the performance of the Contract. In the case of a conflict between the requirements in Annex M and/or the Contractor Safety & Health Field Manual and the laws and regulations applicable to the Job Site, the more stringent shall be required.

Before the start of the work or activities under the Contract at the Job Site;

- Contractor shall meet with Owner and present its safety management system and Contractor's implementation and methodologies to be established at the Job Site in order to achieve excellence in safety performance (including an overview of Contractor's past safety philosophies and performance), and
- Meet ISNetwork pre-qualification requirements

Contractor must comply with, at a minimum, the standards established by law and the Contract.

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Prior to performing any work or activities at the Job Site, Contractor must have a policy and controls implemented to provide and maintain a drug-free environment. Additionally, Contractor must ensure its employees while on the Job Site are not under the influence of alcohol or drugs. The possession of illegal or controlled substances and alcohol products are strictly prohibited on Owner's property, including all parking areas.

1.3 ISNET Requirement

Contractor agrees to maintain, at Contractor's expense, a subscription with ISNetworld (www.ISNetworld.com) for the duration of the Contract. Contractor shall also furnish ISNetworld with any information requested by ISNetworld in connection with ISNetworld's evaluation of the Contractor.

In the event that Contractor's ISNetworld rating falls below an A or B, Contractor shall promptly take all steps necessary to improve the rating so that an A is achieved and maintained. If the Contractor does not improve such rating to an A or B within 30 days after the issuance of the rating by ISNetworld, Contractor may be deemed by Owner, in its discretion, to be in material breach of the Contract.

Owner makes no warranties or representations about the quality of services performed and provided by ISNetworld. Owner's use of ISNetworld shall not constitute or be construed as Owner assuming responsibility or liability for safety under the Contract or at law and does not relieve Contractor from full compliance with its legal and contractual obligations. ISNetworld is an independent contractor, and any acts or omissions by ISNetworld shall not be considered an act or omission of Owner. ISNetworld is not an agent of the Owner.

2.0 Responsibilities

2.1 Contractor is responsible for carrying out the supervision and the performance of the work and services under the Contract, having the highest regard for occupational health and safety at the Job Site, or in the vicinity of the Job Site following the concepts indicated in 1.1 above.

2.2 Contractor shall be responsible for ensuring that all of its agents, Subcontractors and employees fully implement and comply with the requirements herein contained. Therefore, when Contractor or its employees or personnel are mentioned in this Annex M, that reference shall include Contractor's agents, Subcontractors and all associated personnel as well.

2.3 Contractor shall be responsible to:

- (a) Ensure compliance and strict observance of (i) all applicable federal, state and local safety rules and regulations; and (ii) all the Owner's Job Site requirements, procedures and directives. This includes applicable rules and regulations of the Occupational Safety and Health Administration

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- (OSHA), the Environmental Protection Agency (EPA), and any other local, state, or federal agencies having jurisdiction over and which are applicable to the Job Site.
- (b) Create and issue documentation which sets realistic job duration(s) and identifies relevant safety plans and work method statements.
 - (c) Conduct frequent inspections at the Job Site to ensure:
 - Hazards are appropriately identified, communicated and corrected.
 - The job scope is clearly defined.
 - Job Site conditions are understood.
 - Contractor's personnel are trained.
 - Contractor's personnel are following the required safety procedures.
 - Contractor's personnel are using all required personal protective equipment.
 - Contractor's personnel have completed the required safety orientations and training before they start work.
 - (d) Assign a trained and competent "Safety Professional or Safety Contact" to be responsible to implement the Contractor's safety program, fire prevention and environmental management activities during the duration of the work or activities at the Job Site. If a competent person(s) is different than the Contractor's Safety Professional or Contact for selected activities, these individuals must be identified to the Owner along with their responsibilities.
 - (e) Enforce safety rules and compliance with regulations, including but not limited to appropriate qualification of its personnel.
 - (f) Complete job safety analysis and Owner's HIRAC Lite (Hazard Analysis Risk Assessment and Controls) for all activities with special attention to operations involving specific hazards.
 - (g) Ensure that equipment is appropriate for each task or activity.
 - (h) Ensure that firearms and weapons of any type are not allowed on the Job Site. Contractor shall take the necessary measures to ensure this requirement is adhered to by Contractor's personnel.

3.0 Specific OH&S Requirements

The following are some specific requirements that Contractor must comply with. However, as noted above, Contractor shall comply with all occupational safety and health laws and not just those mentioned specifically below. Contractor bears sole responsibility for and shall take all necessary steps to ensure the safety and health of its employees and must

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abide by all OSHA, workers' compensation and other provisions applicable to occupational safety and health as required by law and the Contract, regardless of Owner's requirements, guidance and instruction in this respect.

3.1 Job-Specific Hazards

Prior to the performance of any work or services on the Job Site, Contractor shall identify specific job-related hazards and emergency plans applicable to the work or activities under the Contract. Contractor is required to make its own assessment of the hazards involved and risks associated with such work or activities and take the necessary actions to eliminate, neutralize or minimize those hazards. If Contractor cannot eliminate hazards associated with Owner's plant operations, Contractor **MUST** contact Owner's representative(s) to coordinate a plan to address the hazard **PRIOR** to the performance of any work or activities. Contractor is solely responsible for determining whether Owner's plant operations will pose or present a hazard to Contractor's work and activities.

Contractor shall provide Owner with copies of HIRAC Lites, JSAs and any other forms used to identify, assess and control hazards upon request.

3.2 Training and Safety Orientation

321 Contractor shall ensure that all of its personnel working at the Job Site are adequately trained in the type of work to be performed, are knowledgeable in the relevant procedures to be implemented, have the appropriate qualifications or certifications to perform their tasks and are under competent supervision. Records are to be maintained by Contractor of the appropriate training, qualifications and certifications of each of Contractor's personnel and shall be available for review upon request.

If requested by the Owner or Owner's Representative, Contractor shall provide the pertinent evidence that each of Contractor's personnel has been trained and is qualified to perform his or her job.

322 Before the commencement of Contractor's activities at the Job Site, Owner shall provide a safety orientation session to the Contractor's Safety Officer and to Contractor and its employees to provide a general overview of and to familiarize personnel with the Job Site.

323 Contractor shall ensure that all of its personnel who will have access to the Job Site complete the Owner's safety orientation. Access to the Job Site shall be denied to any of the Contractor's personnel which have not completed the safety orientation.

3.3 Personal Protection

331 All Contractor's personnel at the Job Site (including visitors when applicable) must

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use or wear the following personal safety equipment as required by and meeting the specifications of OSHA/ANSI:

- (a) Hard Hat, head protection.
 - (b) Steel toe guarded safety boots.
 - (c) Safety glasses with attached side shields.
 - (d) Suitable protective clothing for task being performed.
 - (e) Any other personal protective equipment required by law, Owner's "Contractor Safety & Health Field Manual" and/or by the Contractor's hazard analysis.
- 332 Hearing protection shall be worn by personnel when dictated by Contractor's requirements, where signs indicate that hearing protection is required or where required due to the tasks being performed.
- 333 Other personal protection items such as gloves, face shields, leather spats, aprons or other such items may be required to be used or worn depending either on the risks associated with the work or by the applicable regulations or the recommendations or instructions given by the equipment or materials manufacturers or suppliers.
- 334 For personnel working at unprotected elevations with a fall potential greater than 4', a fall prevention or protection system shall be used by the Contractor's personnel. Any additional OSHA fall protection requirements also must be met depending upon the task.
- 335 All safety equipment must comply with applicable standards and shall be inspected and maintained in a good and safe condition.
- 336 All Contractor and Subcontractor personnel entering operating mill area(s) are required to wear long pants and long-sleeved shirts, along with other standard PPE.
- 337 Protective gear and clothing, such as hard hats, jackets, and coveralls must be labeled with the Contractor's company name for identification purposes.

3.4 Equipment and Hand Tools

- 341 Contractor shall ensure that all equipment and hand tools brought into or used at the Job Site are:

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- (a) Appropriate for the type of work to be performed and in good working condition.
 - (b) Inspected, tested and tagged in accordance with applicable regulations and Owner's requirements.
 - (c) Properly maintained or repaired.
 - (d) Ground fault protection is required for use of electrical devices.
- 342 Contractor shall keep on the Job Site the records of any type of equipment (i.e. cranes, generators, excavators, etc.) used at the Job Site to perform its obligations under the Contract as required by the Contractor Health and Safety Field Manual.

3.5 Hazardous Substances

- 351 Hazardous substances shall be understood as any substance or material specified in applicable legal regulations as being hazardous or flammable.

Prior to any hazardous substance or chemical being brought onto the Job Site or produced on the Job Site, Contractor shall supply Owner or Owner's Representative with the following:

- (a) List of chemicals and Material Safety Data Sheets (MSDS) or Safety Data Sheets (SDSs) for each chemical product.
 - (b) Intended use or application.
 - (c) Safe storage and containment for both new and waste materials.
 - (d) Safety requirements and environmental pollution prevention.
- 352 Prior to using any hazardous substance or chemical on the Job Site, it must be approved through the New Chemical Approval Process.
- 353 Contractor shall comply with Annex N "Site Environmental Requirements."

3.6 Risk Areas

Contractor shall implement and maintain the marking, posting and signaling related to hazards or risk created on the Job Site. Such marking, posting and signaling shall be in accordance with the applicable law, industry standards and any additional requirements set by Owner.

3.7 Safety Reporting and Record-Keeping

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Contractor shall notify Owner immediately after the occurrence of any incident, accident, near-miss, non-conformance or other activities resulting in the potential or actual injury or illness of Contractor's personnel or any other person, or of damage to property or to the environment at the Job Site.

Contractor shall immediately investigate and prepare Owner's Incident Analysis Report, as well as, Contractor's required Incident Analysis Report.

A copy of the initial investigation reports shall be provided to Owner as soon as possible (the goal is within 2 hours of the incident). A copy of the final investigation report shall be provided to Owner within 24 hours of the incident; however, with the understanding that complex investigations may take longer. If the investigation is to take longer, Owner shall be notified.

Contractor is also responsible for complying with OSHA and other legal reporting, record-keeping and posting requirements.

In the event of an onsite OSHA inspection of Contractor, Contractor shall immediately notify Owner of the visit prior to allowing on site and, following the inspection, have a meeting with Owner to report anticipated citations and corrective actions, if any. Contractor shall provide copies of citations once received.

3.8 Safety Statistics

Contractor shall prepare and maintain a "Safety Performance Statistics Report" for its activities at the Job Site.

3.9 Visitors to the Job Site

All of Contractor's visitors who have the intention to visit the Job Site must obtain authorization of the Owner prior to visiting the Job Site. Contractor bears the sole responsibility for guarding the safety of its visitors and must take all steps necessary to that end. The following are some specific requirements by Owner, which must also be observed by Contractor, in addition to any requirements in the Owner's Contractor Safety & Health Field Manual:

Any visitors to the Job Site shall complete Owner's visitor safety orientation prior to being allowed access to the Job Site.

All visitors who enter the Site must comply with the following requirements:

- (a) Use at all times a Hard Hat and Safety Glasses (to be provided by Contractor).
- (b) Wear adequate footwear (no open toe shoes, thongs or sandals) and suitable clothing (long pants and long sleeve shirt).

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- (c) Obey all safety signs and access restrictions (including bunting and barricade tape).
- (d) Do not enter any restricted area at the Site unless expressly authorized by Owner.
- (e) Obey all verbal directions or instructions given.