

UPM **BIOFORE**
BEYOND FOSSILS



**UPM MINIMUM
SAFETY REQUIREMENTS
FOR CONTRACTORS**



UPM MINIMUM SAFETY REQUIREMENTS FOR CONTRACTORS

Contents

1	GENERAL REQUIREMENTS FOR CONTRACTORS.....	4
2	CONTRACTOR AND SUBCONTRACTOR	5
3	SAFETY REQUIREMENTS.....	5
3.1	Site entry	5
3.2	Personnel and identification.....	5
3.3	Safety Induction	5
3.4	Vehicles and traffic	5
3.5	Working time.....	6
3.6	Emergency plan of action.....	6
3.7	Fire protection	6
3.8	First Aid	6
3.9	Permit to Work (PTW) and risk assessment	6
3.9.1	Hot work.....	6
3.9.2	Confined Spaces	7
3.9.3	Working at Height.....	7
3.9.4	High hazard contractor work.....	7
3.9.5	Shared workplace.....	7
3.10	Control of hazardous energy, Lock-out, Tag-out (LOTO).....	8
3.11	Personal Protective Equipment (PPE).....	8
3.11.1	Work clothing.....	8
3.11.2	Eye protection	8
3.11.3	Foot protection – safety footwear.....	8
3.11.4	Hand protection – gloves.....	8
3.11.5	Head protection – hard hats i.e. safety helmets and bump caps.....	9
3.11.6	Hearing Protection.....	9
3.11.7	Other PPEs.....	9
3.12	Designated work areas	9
3.13	Cranes and mobile equipment.....	10
3.14	Incident/accident investigation and reporting	10
3.15	Proactive Safety Reporting.....	11
3.16	Safety Officer	11



3.17	Drug, alcohol and tobacco use	11
3.18	Housekeeping.....	11
3.19	Waste management.....	11
3.20	Chemical Safety	12
3.21	Protection of waterways.....	12
3.22	Scaffolding.....	12
3.23	Noise and emissions	12
3.24	Winter conditions.....	12
3.25	Visitors	12
3.26	Photographing and recording.....	12
4	DISCIPLINARY ACTIONS	12

INTRODUCTION

Our goal in UPM is to be the industry leader in health and safety. Our clear objective is zero fatal and serious accidents. We strive to reduce and eliminate accidents under our control through continuous improvement and effective risk management.

We comply with international, national and local safety laws, regulations and rules. We do this through the implementation and compliance with the UPM Safety Standards and local procedures. Our culture is always to do more than the minimum required to keep our own people, contractors and visitors safe.

Our occupational health and safety practices are based on the UPM Biofore Company vision and values, Code of Conduct and three specific UPM safety principles.

- **Safety First** – safety is fully embedded in our daily activities and is not considered less or secondary than any other interest.
- **Safety Starts with Me** - underlines the importance of good safety behavior and personal commitment to safety. We are all visible role-models in safety and help others to work safely.
- **We Can Prevent All Accidents** – we assess and mitigate health and safety risks in our operations by focusing on learning, training and continuous improvement. We take action to address safety hazards when they are noticed or reported.

1 GENERAL REQUIREMENTS FOR CONTRACTORS

UPM maintains a list of approved contractors. As part of commercial approval, contractors must review this document and agree to its provisions prior to working on site. On an annual basis, this document, with updates as applicable, will be provided to approved contractors.

UPM intends for contracting companies to review the minimum requirements in this document in depth with each individual working on-site. To supplement this review, at a minimum, UPM employees will conduct a safety induction with each contractor employee working on the site. There might be some site-specific requirements that are stricter than those expressed in this document and it is responsibility of UPM sites to explain those requirements to contractors.

The name(s) and contact information of the person(s) responsible for safety and environmental issues within the contractor's organization must be provided to UPM.

Any violation of the OHS&E rules presented in this document or legal requirements may lead to the suspension of work at the contractor's expense, or termination of the contract. Any deviation to a lower standard than that which is expressed in this document may result in immediate removal from site.

2 CONTRACTOR AND SUBCONTRACTOR

Supplier or contractor (later “contractor”) is a company which provides services or equipment to UPM as agreed. This includes service activities for UPM and outsourced activities in UPM Site. The contractor is responsible for the deliveries, work, actions and omissions of its subcontractors and their subcontractors as for its own.

Tasks related roles and responsibilities are to be clarified between Contractor and UPM.

Contractors must inform UPM of all subcontractors entering the premises prior to entry on the site. **UPM will appoint a contact person for each contractor.**

3 SAFETY REQUIREMENTS

3.1 Site entry

All contractors will check in and out at the reception area during normal office hours. If working outside normal office hours or if the site doesn't have a separate reception area/gate, contractors should sign-in with a designated UPM contact person. Under no circumstances is a contractor allowed access to the site without signing in.

3.2 Personnel and identification

The contractor shall provide UPM with a list of its employees and responsible personnel according to the local requirements. The list shall be provided before the first entry to the site. All employees shall be able to verify their identity. Contractor is responsible to ensure that every employee is qualified to work safely.

All the supplier's employees shall have required valid documentation of work safety related certificates (e.g. occupational safety card, hot work card).

3.3 Safety Induction

Before accessing to UPM site, contractors need to get UPM general and site specific safety induction according to local procedures.

<https://www.upm.com/about-us/for-suppliers/safety-induction/>

<https://www.upm.com/siteassets/asset/about-us/for-suppliers/documents/upm-safety-portal-instructions-for-contractors.pdf>

3.4 Vehicles and traffic

Vehicle access to UPM sites is allowed only with separate permit. UPM reserves the right to inspect the vehicles when entering and leaving the UPM premises.

Normal traffic rules apply throughout the UPM premises. The site-specific maximum speed must be observed. Rail vehicles always have priority.

3.5 Working time

Working time will be according to the normal work time scheme or separately agreed with UPM.

3.6 Emergency plan of action

Contractor is expected to familiarize with exits from the facility in the area where they are working. In the event of a serious fire or similar emergency, contractor is to evacuate to the assembly point to take a head count and wait to receive further instruction.

More detailed instruction how to act during an emergency will be given in site specific safety inductions.

3.7 Fire protection

All the contractor's employees must be familiar with the location and use of extinguishing equipment and alarms to be used in case of an emergency. The contractor will provide their own fire extinguishing equipment and fire guards when work involves hot work.

Flammable material brought onto the UPM site must be stored in appropriate way. Safety data sheets (SDSs) for these materials must be available on-site.

3.8 First Aid

Contractor shall ensure that there are enough employees with valid first aid skills. All injuries, no matter how minor, must be reported to UPM and must receive first aid treatment.

3.9 Permit to Work (PTW) and risk assessment

The purpose of a permit to work system (PTW) is to ensure that it is safe to carry out the planned work at the plant, equipment or unit.

All tasks or jobs performed by contractor require a PTW. Prior the PTW is issued an assessment of any associated hazards or risks shall be carried out. Controls and precautions shall be identified on the permit to remove or reduce all hazards and risks as low as reasonably possible. A Permit to Work shall not be issued until the issuer is satisfied that it is safe for the work to proceed.

At a minimum, all contractor work will require completion of a simple risk assessment. The simple risk assessment may be documented on the Permit to Work form including the simple risk assessment or form or on alternate documentation based on individual UPM site practices. The risk assessment is to be used to identify hazards and controls related to contractor work that (1) does not require issuance of other permits or (2) to cover hazards and controls not addressed in other permits.

3.9.1 Hot work

No burning, welding, use of fire or use of spark producing tools shall be performed on company property without a proper hot work permit except when performed in designated, permanent welding rooms. Appropriate fire-fighting equipment is to be supplied by the contractor and kept available near of any welding or cutting operations at all times.

3.9.2 Confined Spaces

Any employee whose work assignment involves entering a confined space must be trained and obtain a confined space permit. Issuance of the permit is to assure that the confined space is prepared for safe entry and the employees entering the confined space are informed of safe procedures to follow.

Contractor has the sole responsibility for providing their employees with the required safety equipment (including personal protective equipment and air monitoring) and training by a competent person in accordance with the local regulations. The contractor is responsible for the safety of their employees performing work in confined spaces.

Contractor shall provide attendant that is to remain outside the confined space and observe working conditions and support the person entering the confined space.

3.9.3 Working at Height

If risk of falling, the minimum starting height from which fall arrest equipment is mandatory is 2 meters, or stricter if there is risk of injury or according national or local regulation, if stricter.

All employees who work at height shall be initially trained on proper use of fall protection equipment.

Ladders are not considered as working platforms, but as a means of access from one level to another.

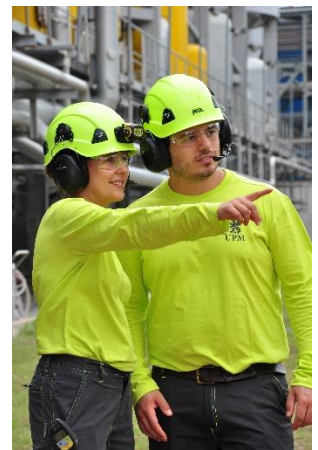
3.9.4 High hazard contractor work

In addition to the work permits referenced above, certain contractor work classified as high hazard will require additional safety planning. High hazard contractor work is generally defined as requiring issuance of one or more of the work permits referenced above. The need for high hazard contractor work safety planning will be determined by UPM prior to initiation of the work. The safety planning process will involve conducting a formal risk assessment, holding a safety discussion meeting and issuing applicable work permits.

3.9.5 Shared workplace

UPM must exchange relevant hazard/risk information with its contractors before work is started. During the course of work, risk information must be updated in case of changed plans or site conditions. All risks identified by UPM or the contractors must be assessed and controlled to an acceptable level. It is the responsibility of site or project management to establish an effective communication and coordination system between UPM and its contractors that ensures:

- UPM workers are aware of the hazards that may arise from the work being done by contractors. Contractors shall assess their job-specific risks and provide input into the risk assessment for the contracted work.
- Contractors are aware of the UPM employee activities and other contractor's activities working in the same area that may impact the contractors' workers.



3.10 Control of hazardous energy, Lock-out, Tag-out (LOTO)

When an employee will potentially be exposed to the unexpected startup of machines or equipment or other forms of hazardous energy, the energy source(s) need to be isolated and reduced to a zero-energy state.

Locking out of energy and/or isolating devices shall be done by each employee working on a device with their own personal lock and contact information. Each employee must have exclusive control of the keys for their locks.

Contractors must notify their UPM contact of their need to lockout/tagout equipment.

Contractors will provide and install their own individual locks prior to performing maintenance or service activities on equipment.

3.11 Personal Protective Equipment (PPE)

The following requirements define the minimum level of PPE required while working on the site. All PPE must be routinely inspected (condition and fit) by the user prior to use. Permit to work process, done together with contractor and UPM, shall identify needed additional protective equipment.

3.11.1 Work clothing

Work clothing provided by employer with sufficient protective properties is required when working in the units. Work clothing provides a first level of protection against accidental contact of the body with sources of physical and mechanical hazard and acts as a barrier to accidental contact of the skin with chemical, biological and temperature related hazards. Company work clothing also enables the identification of UPM and contractor employees.

The minimum requirement for everyone working in the operational area is to have sufficiently protecting work clothing with long trousers and long sleeves and fulfilling UPM or local specifications for work clothes.

3.11.2 Eye protection

Safety glasses shall always be worn on the working site.

The following areas can typically be exempted: offices, classrooms, enclosed control rooms or vehicles, lunchrooms, restrooms, locker rooms.

When handling chemicals, approved chemical goggles or safety glasses with side shields or a face shield shall be worn.

3.11.3 Foot protection – safety footwear

Employees and contractors, except those restricted to office areas and those who simply walk through the mill using dedicated safe visitor routes, are always required to wear safety shoes or boots.

Chemical resistant boots are required when handling/applying/transferring large quantities of chemicals where splashing/spraying may occur.

3.11.4 Hand protection – gloves

Employees shall wear appropriate gloves on both hands when there is a foreseeable risk which can be mitigated by wearing of such gloves. Examples of where gloves should be worn include:

- Handling sharp objects
- Handling dangerous chemicals
- Handling hot objects

Employees required to wear protective gloves must routinely inspect and properly care for their gloves unless the gloves are disposable.

3.11.5 Head protection – hard hats i.e. safety helmets and bump caps

Head protection shall be used in the operational or working areas. Based on the risk assessment sites can identify where and when head protection is not needed taken into account country specific rules and law.

The need to wear safety helmet shall be considered in the work permit or in the work specific risk assessment.

Safety helmets are compulsory in the following circumstances:

- When entering or working in work areas where the use of helmets is defined
- When defined as a requirement by some other instruction or permit
- Active Forestry sites

3.11.6 Hearing Protection

Hearing protection must always be worn if it has been defined in site instruction or manual and in areas where noise exceeds 85dB and as defined by local signage. It is recommended always to use hearing protection when working in noisy environment.

3.11.7 Other PPEs

The selection of other personal protective equipment (for example respiratory equipment, gas meters etc.) is based on risk assessment done for the respective work/task/area.

In case of personal health hazard stricter PPE requirements can be specified based on medical expert's examinations and recommendations.

Mill & site-specific information must be given about:

- Areas requiring specific protection equipment
- Special circumstances in the workplace



3.12 Designated work areas

When practicable, contractors' work areas must be clearly marked and identifiable. To prevent unauthorized access, or to contain noise and dust, it may be necessary to use fire-resistant sheeting around the site.

It is the contractor's responsibility to insulate the work area with suitable barriers/equipment. Restrictions regarding access, routes, fire, dangers and protective equipment must be clearly indicated with appropriate signage.

If a temporary working area is needed for tasks to be carried out on-site, then this must be agreed with the UPM contact in advance. Any tools, equipment or materials that are to be left overnight must be kept secured, safe and tidy, within this designated work area.

3.13 Cranes and mobile equipment

Only trained and qualified person are allowed to use cranes, mobile elevating work platforms and forklifts. The training includes both theoretical and practical training to equipment on site.

Walking and working under hanging loads is prohibited.

It is the contractor's responsibility to provide all tools, equipment and materials in good condition to perform the job. Under normal conditions, no items will be supplied or loaned by UPM. In extreme circumstances, should contractor be allowed to use UPM equipment, the contractor is then responsible for the proper and safe use of whatever he uses. The contractor is responsible for all loss or damage due to use.

All tools like jacks, winches, tackles, ropes, chains etc. and lifting equipment must have documentation of their test and inspection. The user must inspect the equipment daily before use. This equipment is subject to on-site inspection at any time. The contractor is responsible for the safe use, storage and security of their equipment at all times. Compliance against national legal requirements is to be followed all times.

3.14 Incident/accident investigation and reporting

UPM is committed to accident prevention, which includes transparent reporting of all incidents. Responsibilities related to contracted work include:

- in cases of accidents and near misses that can be limited to the contractor's work, the contractor must carry out his/her own accident investigation and submit the information to UPM's ordering organization for review and approval;
- in cases involving serious accidents / environmental deviations (Cat 3-5) and high risk near misses, and those incidents impacting a contractor's work, UPM shall carry out its own investigation separately or with the contractor, and will incorporate the contractor's investigation results into UPM's investigation report;
- implementation of actions by the contractor, resulting from the investigation, are verified by a UPM representative, when the actions impact UPM's operations.

Relevant information from the investigation will be summarized in the investigation report. Investigation report requirements depend on incident severity, but always include following information:

- Description of the incident
- Causes of the incident
- List of follow-up actions

- Learnings for others.

The findings of the incident investigation will form the basis of an investigation action plan to prevent the incident from reoccurring and for improving overall risk management.

All accidents should be reported to the supplier's UPM contact. Accidents must be reported immediately.

3.15 Proactive Safety Reporting

Near-misses and safety observations are an integral part of improving safety at UPM sites for contractors and for UPM employees. Please be observant and report all near-misses and safety observations via the One Safety website. All reports can be made anonymously through the web address below:

<https://onesafetyanonymous.upm.com>

3.16 Safety Officer

The contractor, in consultation with UPM, must name the required number of safety officers and communicate the names to the person responsible for the order.

3.17 Drug, alcohol and tobacco use

Bringing, storing, or using alcohol or other intoxicating substances is forbidden at all UPM sites.

Smoking and vaping is only permitted in designated areas while on-site. All tobacco use must be restricted to designated smoking areas.

Non-compliance will result in termination of duty.

3.18 Housekeeping

The contractor shall maintain a permanent order and cleanliness of the places where it is working. Clean work place is a prerequisite for safe working. In case the contractor fails to comply with its obligations concerning the maintenance of order and cleanliness of the workplace, UPM reserves the right to mobilize a team to do the job of cleaning and charge the cost to the company contracted.

3.19 Waste management

Generated waste shall be sorted and disposed according to the local instructions and regulations. The contractor must inform UPM prior to initiating any activity or using any chemical that may result in generation of hazardous waste or used oil. These are waste streams whose handling, storage, disposal and transport on public roads are regulated. The contractor and UPM must plan in advance for appropriate management of these regulated wastes. Contractors are not to remove hazardous waste or used oil generated from the UPM site without approval by the UPM contact.

The contractor is responsible for the proper disposal of empty containers, and any contaminated materials and hazardous chemical waste generated.

3.20 Chemical Safety

Contractors are required to inform their UPM contact of all hazardous substances which may be brought on to the UPM site including providing the most current Material Safety Data Sheet (MSDS) for each substance. All substances brought onto the UPM premises including secondary containers must be labeled in accordance with regulations.

Flammable liquids should be stored separately, and flammable chemicals should be kept in a secure manner during use.

3.21 Protection of waterways

It is the contractor's responsibility to prevent emissions or releases of chemicals (including petroleum products) with the potential to cause detrimental impacts to process wastewater, soil quality, surface water or groundwater. Spills should be addressed immediately to minimize damage using appropriate safety measures. Contractors are authorized to summon local emergency responders as needed by calling emergency number to address serious spills or other emergency situations.

3.22 Scaffolding

Shall be designed by a qualified person and constructed by authorised personnel. All scaffolds shall be tagged with the appropriate color tag indicating it is safe or not to use and should also indicate max load info and signature of responsible person. Scaffolds when possible shall always be built with handrails, kick plates, and access stairs.

3.23 Noise and emissions

UPM contact person must be advised by any contractor bringing onto the site any equipment that may cause UPM employees to be exposed to levels of noise exceeding 85 dBa.

3.24 Winter conditions

Contractor is responsible to make its working place safe for working also in winter conditions. Snow removal and graveling needs to be done according to the contract or purchase order.

3.25 Visitors

Permits for visits and tours are to be obtained from UPM's permission handler. UPM's safety rules for visitors need to be followed.

3.26 Photographing and recording

Photography or recording, via any device including cell phones, is not allowed on the UPM premises.

4 DISCIPLINARY ACTIONS

Everyone is expected to follow the safety rules and safety instructions. If a safety violation is detected, a safety discussion should take place to correct the situation. The goal is to review and discuss the unsafe act to ensure that it is clearly understood. If it is needed special training shall be arranged. If, in any case, a disciplinary action is deemed to be appropriate it shall be conducted in timely manner following the local process.

Examples of disciplinary actions

- Discussion with the contractor's responsible person at the site

- Discussion with the contracting party
- Temporary removal of contractor from the site
- Termination of the contract



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