Occupational safety and health protection for external companies

incl. data protection/information security & hazardous substances

voestalpine Automotive Components

voestalpine
ONE STEP AHEAD

voestalpine ONE STEP AHEAD. BU AC Standard	**Occupational safety and health protection for external companies**	**Document File:** GDP_140_Occupational_safety_and_health_protection_external_companies_en **Version:** 02 **Responsible:** Integration Manager BU AC

Changes

Chapter	Changes	Approval
Version	V1	
	Original version	13.10.2021
V2	Site 6 english version Datasecurtity changed to information security in doc.reference an on site 7/ D. Littau	10.07.2023

Legend:

C = External companies / Contractor

SI = voestalpine safety inspector and their respective representatives

PSE = Personal safety equipment



In this document, we have defined the health and safety requirements for the use of contractors on our premises and laid down minimum standards. Additional site-specific information and requirements can be obtained on site and from the respective SI.

We act responsibly, plan, purchase, operate and maintain our machines and installations in such a way that possible hazards are excluded, risks are minimised and operational disruptions are avoided. We are guided by the latest state of the art.

We also fully expect this sense of responsibility and proper and professional handling from our external partners.

We want to contribute to the prevention of personal, material and environmental damage by implementing these guidelines and count on your active assistance.

THE BASIS FOR SAFE AND HEALTHY WORK IS DESCRIBED IN THE OCCUPATIONAL HEALTH AND SAFETY ACT (§ 8) AND THE ACCIDENT PREVENTION REGULATION 1 "PRINCIPLES OF PREVENTION" (DGUV REGULATION 1).

At all voestalpine Automotive Components sites, these as well as other legal and internal site requirements for occupational safety and health apply.

All employees, visitors and contractors staff must adhere to these guidelines. Appropriate PSE is mandatory to be brought along.

If you are not sure which specific PSE is required on site, please contact the SI of the respective voestalpine operational site.

The contractor assumes full responsibility for ensuring that all statutory, official, national and similar regulations, as well as all internal voestalpine guidelines, are complied with in the performance of his services. The contractor is fully liable for all consequences resulting from violation of these regulations. The SI is authorised to issue instructions to the contractor's employees in the event of danger.

- The safety and health of our employees as well as the employees of all companies involved must not be impaired at any time; in particular, mutual endangerment must be excluded. The companies must inform the SI and each other in a suitable manner about the dangers associated with the work.
- Before starting work, measures to prevent hazards must be agreed with the SI.
- A separate hazard analysis for the activity carried out at the respective voestalpine site has to be made available to the SI upon request. This applies irrespective of any further-reaching national regulations. The written form must be observed.
- The contact person of the external company has to provide the SI with the necessary documents about the scope of work, start and end, the working method and the number of persons. Here, too, the written form must be observed.
- The contractor is responsible for ensuring that their employees working on the factory premises or the employees of their subcontractors are in possession of valid work papers.
- If individual trades are carried out by subcontractors, the contractor undertakes to notify the SI of this in writing in advance.
- Der AN hat sicherzustellen, dass nur Mitarbeiter eingesetzt werden, die sämtliche für die Aufgaben erforderlichen arbeitsmedizinischen Vorsorgen erhalten haben und über eine entsprechende Eignung verfügen.
- The supervisors appointed by the contractor to carry out the work are responsible and accountable for the thorough instruction of their employees.
- No employee may start working on the premises of a voestalpine company unless he/she has been clearly and adequately informed about possible dangers and risks and has received instruction.
- The instruction (in the case of access via the general gate, the SI or by the contractor's supervisors) must be carried out prior to commencement of the work and documented in writing by signing the training certificate of each employee. Only after presentation of the signed training certificate will the SI issue access authorisations and other legitimisations for the factory premises.

Occupational accidents

- Marked first-aid stations are available for the provision of first aid. The contractor must immediately report any accidents at work that occur on voestalpine's premises to the SI.

Execution of the work

- Before work is carried out, possible risks and hazards must be assessed. The necessary protective measures must be determined and documented with the SI.
- The providers of services, developments, procedures, methods, etc. must prepare a risk assessment of the working methods, working procedures, etc. in good time. In addition, informative documents on the equipment and substances used must be enclosed. All of this must be made available to the SI before the services are provided.

- Before starting demolition, maintenance or renovation work, the company carrying out the work is obliged to obtain information from the SI about possible hazard potentials.
- Endangered work areas are to be cordoned off after prior consultation between the SI and the department concerned.
- If there are specially prepared safety-related work instructions for the execution of the work, these are communicated to the contractor by the SI and are to be included in the implementation of the work from then on.
- Work in containers, channels, shafts and pits may only be carried out after the safety measures have been laid down in writing. The safety measures are to be agreed with the SI.
- Work in the vicinity of electrical installations, e.g. overhead lines, may only be carried out if all necessary safety measures have been determined in consultation with the SI before the work begins.
- Earthworks may only be carried out after prior consultation with the SI (possibility of damage to supply lines).
- Pits, shafts, etc. must be secured during work and covered or secured against falling in when leaving. In the dark, the danger zone must be illuminated.
- Work in the area of crane systems may only be started after the working area has been secured in agreement with the SI in such a way that mutual danger is excluded.
- Entering roofs is only allowed with prior permission from the SI.
- If there is a risk of falling at workplaces, employees must be secured in accordance with the applicable regulations (e.g. safety scaffolding, safety nets or safety harnesses).
- Ladders, working platforms, etc. must comply with the applicable regulations and be in perfect technical condition.
- In the case of dusty work where there is a risk of damage to electronic early warning systems, e.g. smoke detectors, these must be secured in consultation with the SI.
- Work with naked flames, soldering work, welding and cutting work as well as flexible work may only be carried out if a permit for this work has been issued in advance. The permit must be applied for in good time via the SI.
    - Fire extinguishers must be kept ready to hand during all the above work.
    - Note: The activation of electronic early warning systems (e.g. smoke detectors) must be approved by the company. The SI is responsible for this.
- Emergency exits, escape routes and fire extinguishing equipment must be kept clear at all times. Fire doors must not be obstructed or wedged. If, due to the work task, it is necessary that such facilities cannot be used temporarily for their intended purpose, this must be agreed with the SI in advance.
- When working outdoors or on construction and assembly sites indoors or under special environmental conditions (wetness, humidity, dust, mechanical or chemical stress, etc.), all hand-held electrical appliances must be operated from their supply point, e.g. in Germany, with an RCD ≤ 30 mA.

- In plants outside Germany, the national rules or regulations for the intended use must be observed. If there are no rules or regulations in this respect in the countries, the German procedure is recommended in the voestalpine plants.
- In the event of special hazards, e.g. increased electrical hazard, fire or explosion hazard, electrical systems and equipment may only be used in compliance with additional regulations, e.g. ATEX, IEC, EN, VDE.
- Work on electrical installations and switching operations of any kind may only be carried out after prior instruction by the SI and exclusively by authorised groups of persons. Electrical cabinets etc. on which work is being carried out must not be left unattended during the work or must be secured against unauthorised use or reconnection.
- At specially marked workplaces (e.g. noise areas or areas where the wearing of safety shoes is mandatory) or if the work requires it, the contractor's employees are also obliged to use the required personal protective equipment.
- When using bolt-setting tools (shooting devices), the technical safety guidelines must be observed. In particular, when carrying out such work, ensure that no persons are endangered (enough safety distance).
- In certain areas, the use of cell phones may result in the false activation of fire protection equipment (e.g. CO2 extinguishing systems) or machinery. The special specifications/instructions must be observed.
- Work on installations that generate electromagnetic fields is generally prohibited and may only be carried out after consultation with the SI and then exclusively by groups of people who are not subject to certain restrictions (e.g. wearers of implants, pacemakers, etc.).
- Special care must be taken when handling hazardous substances! (e.g. highly flammable, corrosive or toxic substances):
  - Highly flammable liquids may only be used after consultation with the SI.
  - If the use of hazardous substances is unavoidable during the execution of work and if health effects on the employees working in the vicinity cannot be excluded, all necessary protective measures (in accordance with national legislation) must be agreed with the SI before the start of work.
  - Hazardous substances may only be stored and transported in suitable containers. All containers must be properly marked and labelled (approved labelling according to applicable national law).

Special groups of people

Persons under the age of 18 and apprentices are not to be left without supervision when working in voestalpine companies and may not be entrusted with work in hazardous areas.

Data protection and information security

- The use of computers that are not part of voestalpine's inventory is only permitted with the prior approval of the SI.
- Before starting the work, the contractor has to enquire about the data protection regulations and agreements of voestalpine and to sign the respective contracts and declarations and submit them to the SI.
- The contractor has to ensure that the data to be processed on behalf of voestalpine are only processed in accordance with voestalpine's instructions. The contractual agreements made prior to the execution of the order as well as the control agreements have to be documented and complied with.
- The requirements of voestalpine apply here, in particular the <<IT Security Minimum Standards for External Partners>> guideline and the instructions for the disposal of data media.
- If the service constitutes commissioned data processing according to national legislation, e.g. § 11 of the Federal Data Protection Act, the necessary contracts must be signed in advance.
- Copies or requests from the voestalpine network, the installation of software or data storage (even temporarily locally on the external computer) may only be made with the prior express permission of the respective IT manager of voestalpine.

Vehicles

- The legally valid traffic regulations of the respective country, e.g. STVO, apply on the factory premises.
- Unless otherwise regulated, the general speed limit is walking speed. In the event of violations, after a one-time warning, the employee will be expelled from the factory premises.
- Loading and unloading of goods on the factory premises is only permitted if the vehicle drivers wear the prescribed personal protective equipment - safety shoes and high-visibility waistcoat. Furthermore, tension belts and anti-slip mats must be kept in the vehicles to secure the load.
- The principle of "caution and mutual consideration" applies in the factory halls.
- The traffic routes must be kept clear, stopping/parking is only permitted on marked parking spaces.
- A lane must always be kept clear for rescue and fire brigade vehicles during loading and unloading operations.
- No parking is allowed in closed areas.
- Emergency exits and access routes to fire protection facilities must not be obstructed by parked vehicles or materials.

Auxiliary and operating materials

- In principle, all auxiliary and operating materials may only be used if they comply with voestalpine's specifications (declarable and prohibited substances). This must be clarified with the SI.

- The contractor has to keep a current version (not older than 3 years) of the safety data sheets of all auxiliary and operating materials required for the performance of the activity at the place of use.
- Should it be necessary to temporarily storage auxiliary and operating materials on the premises of voestalpine, the SI must be informed in advance and his written consent must be obtained.
- The contractor has to be informed or instructed at the latest on site about the respective dangers and risks of substances used by voestalpine as well as about rules of conduct and necessary protective measures within the scope of the general instruction.

Noise protection

- Only soundproofed tools and machines may be used.
- Work in the evening and at night or at weekends may only be carried out with the prior approval of the SI.
- For sites in residential and mixed-use areas, the country-specific regulations must be complied with.

Minimum requirement for a risk assessment

- Setting up a workflow plan
- Determine who is allowed/must work where with what work under what conditions within what time
- Definition of hazardous areas
- Coordination of safety measures before the start of the respective work
- Information to affected and possibly neighbouring areas
- Determination of measures for the event of a malfunction/emergency
- Checking compliance with the established work flow plan and safety measures
- Immediate adjustment by voestalpine and contractor in the event of any plan changes
- Escalation process
    - Safety regulations and protective measures are disregarded,
    - unforeseen situations cannot be handled by the contractor or third parties,
    - contractor is not up to his tasks.
- Create schedule of service
- Determine rules
- Establish working rules:
    - Access prohibitions
    - Wearing of PSE
    - Operational emergency organisation

  - Exclusion of untested work equipment
- Conclude contract
  - At the latest when the contract is awarded, the subject matter of the contract must be specifically defined in the contract for work and services and the services must be described in detail.
  - Orders and framework agreements are placed exclusively by voestalpine's purchasing department, exclusively in writing and generally with ERP order reference. Exceptions are only permissible in justified cases, e.g. in the case of settlements with written approved verification. The list of services and the rules for contractors are a binding part of the contract.
- When placing the order, the contractor names and submits a responsible contact person and their representative, including contact details. These persons monitor the work to be carried out on site at all times.
- Inform contractor
- Voestalpine will instruct the employee on the general conditions of the company before the start of work. Within the scope of this instruction, the possible dangers with regard to occupational health and safety for the field of activity will be dealt with and special dangers and focal points of danger as well as protective measures and rules of conduct will be pointed out.
- This instruction must be confirmed in writing and archived.
- Employees of the contractor and other external persons are to be identified with a visitor's pass and warning vests.
- Documentation
  - Coordination of occupational health and safety measures and mutual hazards has to be documented in writing and signed by both parties.
- Debriefing and feedback
  - After the work is done, we consider it important and sensible to jointly record what was good in the past project and what did not run optimally. From this, we would like to identify potential for improvement together with our partners and constantly improve and advance the process of using external companies.

Employees

- All employees and agents of the contractor are subject to the operating, control and order regulations of the respective voestalpine plant. This also includes the regulations on entering and leaving the plant during working hours.
- The employee is issued with an access authorisation in the form of a visitor's or business partner's pass to enter the factory (subject to prior and written confirmation of safety instruction). This must be worn in a clearly visible manner. The employee may nevertheless still be subject to entry and exit checks.
- On Sundays and public holidays, contractor's employees are only permitted to enter the factory premises if the necessary permits have been obtained from the SI.

Applicable agreement and annex(es)

IT security minimum standards for external partners

Regulatory Guidelines

- Tools, devices, materials, etc. may only be brought onto the factory premises if they comply with the applicable regulations, are in perfect technical condition and are guaranteed to be used as intended in accordance with the operating instructions. The contractor is alone responsible for his property; voestalpine assumes no responsibility in the event of loss or damage.
- The use of voestalpine equipment, machines, materials, etc. is only permitted after prior approval by the SI.
- Any use of fire extinguishing equipment must be reported immediately to the SI.
- The storage of building materials and materials as well as the installation of recreation rooms and the associated selection of space must be clarified with the SI.
- The storage of flammable substances and materials (rubbish containers, wooden pallets, plastic waste, etc.) directly on the outside walls of buildings is not permitted.
- All warning signs, no-passage signs and mandatory/prohibition signs in the company must be observed and complied with.
- Guide signs must not be removed, covered or obstructed.
- Construction and installation sites must always be kept in a proper condition and must be tidied up cleanly after completion of the work.
- Work on traffic or work routes must be secured by suitable safety measures in such a way that no additional hazards can arise. If escape and rescue routes or access to assembly points are affected by the work, the SI must be consulted prior to the start of the work to determine the extent to which alternative measures, e.g. temporary diversions, must be introduced.
- There is a general ban on photography and filming on the factory premises; this also applies to smartphones, tablets and the like. Exceptions to this will only be granted by the management.
- Smoking in buildings or halls is generally prohibited and only permitted in specially designated areas. Smoking accessories or remains (e.g. cigarette butts, ashes, etc.) may only be disposed of in the containers provided for this purpose.
- Damage to voestalpine facilities and installations has to be reported to the SI without delay. In addition, a joint damage report is to be drawn up. Damage settlement must be initiated without being requested to do so.
- Work equipment (e.g. industrial trucks, lifting platforms, etc.) of voestalpine may only be used by the contractor's employees after the SI has provided instruction/instruction and, if applicable, the respective certificates of competence of the contractor's employees in question have been shown to the SI.

- When using own industrial trucks and lifting platforms, the certificates must be carried and presented on request.
- The consumption of alcoholic drinks and the abuse of drugs and medication is prohibited.
- The private sale of alcohol or similar intoxicating substances to voestalpine employees is prohibited.
- Contractors must not call on employees who have put themselves in a condition in which they could endanger themselves or others to carry out work.

Safety guidelines

- Entering parts of the company that are not mentioned in the work order is generally prohibited. The use of social rooms must be agreed with the SI.
- Entry into areas where access is prohibited or areas with special conditions (e.g. KTL, installations, etc.) is only permitted after prior consultation with the SI. Work may only be carried out after the necessary protective measures or special instructions or briefings have been given.
- Work sites must be visited and left by the shortest and safest routes before starting work and after finishing work.

Handling with wastes

The principle of waste disposal is called:

Avoid - Reduce - Recycle or Eliminate.

- All packaging materials and material waste must be taken away by the contractor after completion of the work.
- If, in exceptional cases, waste is disposed of via the waste containers available at the site, the regulations applicable there are binding. The allocation of waste containers/disposal routes will be made by the SI.

Handling liquids hazardous to water (e.g. emulsions, oils, etc.)

- The handling and storage of substances hazardous to water must be carried out in such a way that soil, water and groundwater contamination can be ruled out.
- Liquids hazardous to water must not be poured into drains, toilets, wash basins and other unsuitable places!

Behaviour in case of leakage

In the case of a leakage (e.g. tipped over or defective container, burst hose, etc.), the following steps must be carried out immediately:

- First emergency measure: Prevent the spread of the liquid, e.g. use oil binding agents, seal gullies and drains, etc. and immediately involve the SI.

Water sampling from hydrants

Water sampling from hydrants is only permitted after consultation with and approval by the SI.

Summary

- The use of contractors generally takes place under a contract for work and labour or a contract for services.
- In this context, all involved parties are obliged to cooperate in the implementation of the safety and health protection provisions and to coordinate measures to avert hazards, to inform each other about them and to instruct their own employees in this respect. voestalpine will support the contractor in the risk assessment with regard to its company-specific hazards.
- The contractor is responsible for ensuring that his employees receive appropriate instructions with regard to the hazards during their work on our premises.
- If contractors are to carry out activities involving hazardous substances, voestalpine may and will only commission contractors who have the necessary specialist knowledge and experience.
- If, when handling with hazardous substances, the risk to employees of different contractors cannot be excluded, all affected contractors must cooperate in carrying out their risk assessments and agree on protective measures.
- This cooperation has to be documented.
- All contractors must register with and deregister from the SI and obtain the information relevant to the contract at the latest before the start of performance of the services.