

Policy Owner: NA EHS	Operating Policy No.: <b>NA-SP-05-211E</b>	
Approval(s): Mike Nieman	Effective Date: 09/24/2018	
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1) PURPOSE:

- a) To communicate safe work practices for Contractors and Service Providers performing work at Tower facilities. This standard defines Tower’s minimum requirements for environmental, health and safety performance and is consistent with our commitment to safety and the environment. This document does not replace a Contractor’s or Service Provider’s obligations in accordance with any and all federal, state, and local statutes, laws, regulations, ordinances, orders, common law, and similar provisions currently in existence and applicable and having the force or effect of law, concerning public health or safety, worker health or safety, pollution or protection of the environment.
- b) The nature of Contractor and Service Provider activities has significant potential to affect the safety of our colleagues, environmental performance and regulatory compliance at each Tower facility. All Contractors, Sub-Contractors, Service Providers and Tower employees must work together to achieve the facility's environmental policy, the environmental objectives and targets, and the protection of the environment.
- c) The principal elements of the Tower Environmental Policy are:
  - i) We are committed to complying with all relevant environmental regulation and customer requirements.
  - ii) We are committed to setting environmental objectives and targets aimed at achieving continual improvement in environmental performance and reducing the impacts our business has on the environment.
  - iii) We are committed to pollution prevention and waste minimization.

2) SCOPE:

- a) Applies to all Tower Automotive Operations USA I, LLC facilities in North America.
- b) Throughout this document, the use of the word “Contractor” implies a person or company that has been contracted or issued a Purchase Order to perform work or supply a service at a Tower facility. “Contractor” includes the Contractor’s employees or Service Provider’s employees and all Subcontractor or Subcontractor’s employees hired directly or indirectly by the Contractor or Service Provider.
- c) This standard applies to work or services performed by Contractors, including but not limited to:
  - i) Repairing, maintaining, or installing production machinery or equipment;
  - ii) Facility construction, demolition or maintenance and repair;
  - iii) Any task involving but not limited to; hot work, confined space entry, Lockout, scaffolds, rigging, cranes, hazardous/flammable/combustible liquids, excavations, steel erection, or painting.
  - iv) Providing environmental services such as remediation, waste transport and disposal or recycling services.

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- d) This standard contains the minimum requirements for Contractor performance related to common precautions while at Tower properties and those it deems important to protect employees and the environment. It does not imply substitution or inclusion of all applicable regulatory obligations by the Contractor.

3) REVISION:

4) RESPONSIBILITY & AUTHORITY:

a) CONTRACTOR

- i) Contractor agrees that it shall conduct the removal of the Scrap from each Facility in accordance with any and all federal, state, and local statutes, laws, regulations, ordinances, orders, common law, and similar provisions currently in existence and applicable and having the force or effect of law at the time services are provided, concerning public health or safety, worker health or safety, pollution or protection of the environment, including, but not limited to, the Clean Air Act, 42 U.S.C. §7401 et seq., the Clean Water Act, 33 U.S.C. §1251 et seq., the Resource Conservation Recovery Act, 42 U.S.C. § 6901 et seq., the Toxic Substances Control Act, 15 U.S.C. §2601 et seq., the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9601 et seq., the Occupational Safety and Health Act, 29 U.S.C. § 651 et seq., and related or similar regulations administered by the U.S. Department of Transportation, the Occupational Safety & Health Administration and the U.S. Environmental Protection Agency. Contractor shall comply with, and cause its service providers, employees, agents, contractors and subcontractors to comply with, all reasonable safety policies, procedures and requirements established at each Facility, including those set forth in this standard, a copy of which have been provided to the Contractor. Tower shall give written notice to Contractor of all such operating policies, procedures and requirements and of any additions, modifications or amendments thereto.
- ii) Contractor is responsible for on-site environmental remediation actions resulting from incidents involving their employees. Each Contractor must understand the importance of compliance with relevant environmental, health & safety legislation and regulations, and the consequences of non-compliance.
- iii) Tower requires that the Contractor participate in a Pre-Job Performance Review to communicate the procedures outlined in this standard when working on Tower. Contact phone numbers will be provided to the Project Coordinator.
- iv) The Contractor will comply with all provisions of this standard in addition to relevant local, state/provincial and federal environmental, health and safety legislation, regulations and directives while on Tower property. The primary (general) Contractor will have overall responsibility for the conduct of their employees.
- v) The Contractor is responsible for all applicable training and certification for their employees. Any specific training required by local, state/provincial and federal environmental, health and

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safety legislation, regulations and directives must be valid for any employee working on Tower property.

- vi) Failure to follow this standard, or any other applicable environmental or health and safety legislation, regulations and directives, will result in dismissal from the Tower site of the Contractor’s employees involved and a potential cost penalty assessed to the Contractor. Any injury to Tower employees or damage to Tower equipment or facilities caused by the Contractor’s actions will be subrogated to the Contractor. Continued observations of Contractor’s employees regarding procedural non-compliance or unsafe actions that could lead to risk of injury to Contractor’s employee, Tower employees or damage to Tower equipment or facilities may jeopardize current projects and awarding of future contracts.
- vii) Contractors shall immediately notify the Project Coordinator of any notices of violation, notices of non-compliance or citations received related to its work at a Tower facility. Contractor shall remedy or cause to be remedied all violations or non-compliance whether or not they receive notice of violation or non-compliance from the regulatory agencies or the plant.

**b) PLANT MANAGER**

- i) Ensure that all Contractors are briefed on this standard prior to start of service.
- ii) Periodically review by visual observation, review with Tower employees, incident/near miss reports, or others to determine that Contractor activities adhere to the standard.
- iii) Has the obligation and authority to suspend work or individual Contractor employees from facility if conduct violates this standard or presents risk of injury to persons or damage to the facility or equipment.

**c) PROJECT COORDINATOR**

- i) Coordinate the work being contracted and act as the Tower liaison for all communication. Ensure the Contractor has a copy of this standard, proper insurance certificates, and applicable licenses for the project.
- ii) Conduct the Pre-Job Performance Review to ensure that all Contractors are briefed on this standard, and that all signed submittal forms are completed prior to start of service.
- iii) Periodically review by visual observation, review with Tower employees and a review of Contractor’s injury, incident and near miss reports to determine Contractor activities adhere to this standard. Communicate any observed or reported violation of this standard to the Contractor.
- iv) Has the obligation and authority regardless of actual assignment as Project Coordinator, to stop all work observed to present risk of injury or damage until conditions are corrected.
- v) Investigate and report all incidents to the Plant Manager.
- vi) If a project is contracted at the corporate level, a Project Coordinator will be assigned so activities may be coordinated with a local Plant Project Coordinator.

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d) PURCHASING

- i) Provide copy of these standards and associated forms to identified Contractors with the Request for Quotes (RFQ).

5) DEFINITIONS:

- a) Engineering Survey – An evaluation of the conditions on a project site in preparation for the development of plans and procedures to demolish a structure.
  - i) Is qualified because of knowledge, training and experience to organize the work and its performance;
  - ii) Is familiar with all applicable environmental, health and safety legislation, regulations and directives that apply to the work being performed; and
  - iii) Has knowledge of any potential or actual danger to health or safety in the workplace.
- b) Qualified Person – Those who by possession of a recognized degree, certificate or professional standing or by extensive knowledge, training and experience in industry and has successfully demonstrated their ability to solve or resolve problems relating to the subject matter of the standard.
- c) A Confined Space is:
  - i) Large enough or so configured that an employee can bodily enter and perform work.
  - ii) Has limited or restricted means for entry or exit (i.e. tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry).
  - iii) Is not designed for continuous employee occupancy.
  - iv) A Permit Required Confined Space is a confined space that has one or more of the following characteristics:
    - v) Contains or has potential to contain a hazardous atmosphere.
    - vi) Contains a material that has the potential for engulfing an entrant.
    - vii) Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly covering walls or by a floor, which slopes downward and tapers to a smaller cross- section.
    - viii) Contains any other recognized serious safety or health hazard.

6) REFERENCE DOCUMENTS:

- a) 29 CFR 1926 STANDARDS FOR CONSTRUCTION
- b) 29 CFR 1910 GENERAL INDUSTRY STANDARDS
- c) ANSI A10.6-2006 – Safety & Health Program Requirements for Construction and Demolition Operations.
- d) NA-SP-05-211A – Contractor Method and Assessment Form
- e) NA-SP-05-211C – Contractor EHS Performance Checklist

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7) DETERMINATION AND EVALUATION

- a) A copy of this standard and the associated forms as described below will be issued by the Purchasing Department / Buyer with each Request for Quote (RFQ) as part of the Briefing Packet. The Briefing Package provides information to inform the Contractor of the facility Environmental Policy, Environmental Management System (EMS), insurance and legal requirements, and the requirement to comply with this standard.
- b) All Contractors will complete NA-SP-05-211A - Contractor Method and Assessment Form.
- c) All Contractors will complete, NA-SP-05-211C – EHS Performance Checklist.
- d) For those Contractors performing waste handling and disposal services, NA-SP-05-211D, Construction/Demolition Contractor Waste Transportation and Disposal Agreement provided with the briefing package.
- e) The Contractor must document information related to contracted on-site activities using these forms and return this information to the Project Coordinator prior to start of the project.
- f) The Purchasing Buyer will forward completed Contractor forms so they will be evaluated to identify potential environmental issues and concerns and approved by the EHS Engineer/Manager, Site Manager, or designee. The Project Coordinator will keep approved packages on file.
- g) The Plant EHS Engineer/Manager and Project Coordinator, or designee will documents pertaining to the transportation and disposal of waste materials.
- h) Contractors shall maintain records as specified by the facility’s EMS and by contract requirements.

8) JOB SITE SUPERVISION

- a) The Contractor shall appoint a competent person as a job site supervisor. This individual will supervise the work site, Contractor employees, and ensure safety audits and briefings of Contractor employees are conducted.

9) PROJECT COORDINATOR

- a) The Tower Project Coordinator is the Tower point of contact for the specific project or service.
- b) The Project Coordinator will ensure purchasing has provided a copy of this standard to the Contractor(s) upon notification for project quote. All forms will be retained for the duration of the project.

10) INSURANCE

- a) The Contractor must furnish proof, type and amount of insurance as specified by Tower purchasing with submittal of project quote.

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11) PRE-OPERATIONS ENVIRONMENTAL, HEALTH & SAFETY REVIEW

- a) The Contractor, Job Site Supervisor and Project Coordinator will review this procedure, Contractors’ site Health and Safety Plan (where required), NA-SP-05-211A Method and Assessment Form and complete the NA-SP-05-211C Contractor EHS Performance Checklist at least 2 days prior to the first day of work.
- b) Contractors who are on site frequently, and are familiar with this policy, will complete this pre-operations performance review at least annually.
- c) Any new employees brought onto the site by the Contractor must be trained on this policy before beginning any work.
- d) Contractors must comply with all site-specific safety rules and procedures as well as all site specific Pedestrian Safety Rules.
- e) All areas where the Contractor is working must be identified and access restricted by use of caution tape, signs, etc. Prior to any construction or demolition work, every aisle, walkway including exterior sidewalk and other public thoroughfare adjacent to or near the affected work areas shall be closed, relocated or protected as specified in section – Signs, Signals and Barricades.
- f) Prior to starting any demolition operation, a written engineering survey of the structure shall be made by a qualified person to determine the type and condition of the framing, floors and walls so that actions can be taken if needed to prevent premature collapse of any portion of the structure. When indicated as advisable, any adjacent structure(s) or improvement should also be similarly checked. Prior to beginning work, all parties involved shall meet to review the Contractor’s Health and Safety Plan.

12) ENVIRONMENTAL

- a) Contractors shall provide adequate spill/release prevention for all bulk materials.
- b) Contractors shall properly label, store, and dispose of all waste materials generated from their activities per facility procedures or guidance.
- c) If Tower employees are required to work adjacent to or with potentially hazardous materials brought on-site by a Contractor, prior approval of the material by the EHS Engineer/Manager is required.
- d) Contractors must be sensitive to the effects of noise, odor, light, fugitive dust emissions, and traffic movement to the facility and in the local community.
- e) Contractors shall be required to prepare and maintain records pertaining to the work performed in accordance with environmental regulatory requirements, including record retention requirements.
- f) Contractors shall ensure protection of the natural environment surrounding the work area.

13) SAFETY MEETINGS

- a) During all construction projects, Contractor supervision must conduct safety meetings with their employees on a weekly basis as a minimum. A written record of attendance and topic of discussion will be maintained by the Contractor for the duration of the project and furnished to Tower at the conclusion of the project.

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14) INCIDENT/INJURY INVESTIGATIONS AND CORRECTIVE ACTIONS

- a) The Project Coordinator is to be informed immediately by the Job Site Supervisor when an incident or injury occurs. Written notification, with immediate and long-term corrective action plans, of the incident or injury must be forwarded to the Project Coordinator and the Plant EHS Engineer/Manager within 24 hours.
- b) Any “near miss” incidents involving contract employees must be investigated in the same manner as an injury or incident involving facility/equipment damage (a near miss incident is an incident in which employees escape injury or property damage is averted). Written notification, with immediate and long-term corrective action plans, of the near miss incident must be forwarded to the Project Coordinator and the EHS Engineer/Manager within 24 hours.
- c) The Contractor and Tower management colleagues will report and investigate all incidents. Refer to the TI-WI-05-002E – NA and TI-FM-05-002H

15) SPILL RESPONSE

- a) Contractors shall not allow discharges to drains and/or sewers without prior approval from the EHS Engineer/Manager.
- b) Contractors shall immediately notify the EHS Engineer/Manager and the Project Coordinator of any spills, releases, or other environmental incidents.
- c) Contractors shall immediately notify the EHS Engineer/Manager and the Project Coordinator of any abnormal conditions found during excavation at the Plant. Visibly discolored soils, soils with a discernible odor, and/or heavily stained concrete must not be removed from the site without prior approval of the EHS Engineer/Manager.
- d) Contractors shall ensure that all employees are properly trained on the proper handling of materials and hazardous material response as needed for the project and related chemicals.

16) PERMITS

- a) The Contractor is responsible for acquiring all necessary job-site permits, including a general work permit (NA-SP-05-211C), issued by the Tower Project Coordinator in concert with the various departments, as they are needed. Such permits are, but not limited to, hot work, line breaking, confined space entry.
- b) The Contractor is responsible for reviewing with the Tower Project Coordinator and/or the EHS Engineer/Manager all necessary governmental permits during the initial project review to identify applicable permits as needed. Such permits are, but are not limited to, municipal water permit to construct or install, Storm Water Pollution Prevention, Wastewater, Indirect Discharge, Air permit Install and operate, and any local construction/demolition permits, asbestos abatement, etc.
- c) The Contractor shall make all notifications and shall receive confirmation as needed for underground utility locations prior to start of any digging on the property. As part of the Pre- Job Performance review, all applicable utility plans/prints will be reviewed with the Project Coordinator.

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- d) Hot Work permits and Confined Space Entry Permits shall be obtained through the Maintenance Manager or Supervisor, or EHS Engineer/Manager during the shift needed.

17) MEDICAL/FIRST AID PROCEDURES

- a) Contractors are responsible for providing medical and first aid services for their employees. Contractors must make their own arrangements with the local medical community for medical attention. Provisions must be made prior to the beginning of a project.
- b) The Contractor, in concert with the Tower Project Coordinator, may arrange to use the plant medical facilities if agreed upon by the Plant.

18) HOUSEKEEPING

- a) Housekeeping is an individual responsibility, and hazards caused by poor housekeeping will not be tolerated. Contractors are responsible housekeeping in the areas where their work is underway. The following rules will be enforced at all times:
  - b) Keep the work area neat and orderly.
  - c) Keep exits and emergency escape routes clear.
  - d) Materials are to be stored safely.

19) PERSONAL PROTECTIVE EQUIPMENT

- a) Personal protective equipment (PPE) is to be provided by the Contractor for their employees. Use and care of such equipment is the sole responsibility of the Contractor. The plant EHS Engineer/Manager or Project Coordinator will outline plant specific requirements prior to beginning work. A variety of PPE may be required by facility policy or dictated by the work being performed.
- b) All personal protective equipment must be approved by the American National Standards
- c) Institute (ANSI), Canadian Standards Association (CSA) or by a similar recognized body.
- d) Standard personal protective equipment may include, but is not limited to:

20) Respiratory Protection

- a) Contractor employees must wear approved respiratory devices when working with or exposed to gases, fumes, vapors or dusts above the current permissible exposure limit (PEL), welding in Confined Spaces or when a potential for oxygen-deficient atmosphere exists. Selection, fit and care of respirators must be done in accordance with current standards.
- b) Evaluation of any job performed where respiratory hazard potential exists for Tower colleagues will be completed by the EHS Engineer/Manager prior to starting work.



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21) Eye/Face/Head Protection

- a) American National Standards Institute (ANSI), Canadian Standards Association (CSA) approved or approved by a similar recognized body approved hard hats may be required on certain jobs.
- b) Alteration of hard hats or metal hard hats will not be allowed. Hard hats will be worn correctly with visor in front unless the hard hat is designed for welding shield. Hard hats shall not be painted.
- c) Eye protection is required in all areas of the plant and warehouse areas at all times (excluding offices, restrooms, and cafeteria unless considered as work area for project).
- d) Eye protection is required in all areas of the plant and warehouse areas at all times (excluding offices, restrooms, and cafeteria unless considered as work area for project).
- e) Approved dark safety glasses are to be used by helpers on electric welding jobs.
- f) Burning goggles/mask is to be worn on all cutting and burning.
- g) Goggles and safety glasses are to be worn when sawing, chipping, drilling overhead, blowing dust particles, and handling corrosive materials.
- h) Face shields and safety glasses must be worn when grinding, handling chemicals and molten materials. The face shield must be of the type that attaches to a hardhat if the work is done in a hardhat area.

22) Hearing Protection (where noise levels exceed 85 dBA)

- a) Hearing protection must be worn in all designated areas of the plant. If the tools used by the Contractor cause a sound level exceeding 85 dBA, hearing protection must be worn.

23) Body/Hand/Foot Protection

- a) While performing any Hot Work, a welding jacket, and welding sleeves will be worn. Leather work gloves must be worn when handling rough, sharp-edged, abrasive material, or where work subjects the hands to lacerations, punctures, burns or bruises. Gloves shall not be worn around saws, lathes, drills, and similar machinery in which the gloves are likely to become entangled.
- b) Cut resistant gloves and sleeves shall be worn while handling any steel or aluminum product piece.
- c) Special gloves are required for work with solvents, chemically treated material and corrosive chemicals. American National Standards Institute (ANSI), Canadian Standards Association (CSA) approved or approved by a similar recognized body approved foot protection should be worn in the work place. Sturdy, serviceable leather work shoes or boots are minimum requirements.

24) Fall Protection

- a) Body harness and lanyard tie off is required when working on:
  - i) The roof without handrails and within six feet of the edge or a roof opening.
  - ii) Any suspended platform or stage.
  - iii) While elevated in any man lift, scissor lift, or similar powered vehicle.

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- iv) Work areas elevated greater than four (4) feet (except for ladders) unless employees are protected from fall by standard handrails.
- v) Harnesses and lanyards must be inspected prior to each use. In instances of excessive wear, chemical deterioration or heat exposure, the device must be replaced.

25) Normal Work Clothing

- a) Shirts that cover the shoulders and upper torso must be worn during all construction projects (i.e., no tank tops).
- b) Full-length trousers are required during all construction projects. Tyvek overalls or suits may be used to supplement normal clothing.
- c) Appropriate long sleeved shirts or welding sleeves are required when welding.
- d) Jewelry of any type must not be worn during construction projects.

26) LOCKOUT PROCEDURES/POLICY

- a) The Contractor must comply with the Tower Control of Hazardous Energy (Lockout) Standard before locking out machinery or equipment.
- b) Repairing, maintaining and setting up machinery and equipment can be one of the most hazardous jobs that our employees do. The only safe way to work on machinery and equipment is to make sure that all sources of power are turned off and secured with a lock and any parts that could unexpectedly move are blocked.
- c) The Lockout program applies to all work where employees, including Contractors or Subcontractors, must repair, maintain or set up machinery or equipment as part of their job duties.
- d) Only authorized employees/Contractors are permitted to Lockout machinery and equipment and restore it to service.
- e) The Tower Plant Project Coordinator or designee will inform all Contractor’s employees working on machinery or equipment of the Lockout procedures and shall obtain from the Contractor or servicing employees the Lockout procedure they will use on the premises.
- f) Tower colleagues will be provided with information and instruction on the Contractor’s lockout procedures to enable them to work safely in adjacent areas where Contractor’s employees are working.
- g) Tagging or “tagout” is not an acceptable form of energy control at Tower.

27) TOOLS, MACHINERY AND EQUIPMENT

- a) Hand Tools
  - i) All hand tools will be inspected before use. The use of defective tools is prohibited.
  - ii) Tools subject to impact (chisels, caulking irons and star drills) will be dressed to avoid flying spalls from “mushrooming”

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- iii) Tools will not be forced beyond their capacity nor will “cheaters” be used to increase their capacity. Tools must not be used as “pry bars”.
- iv) Tools will not be left on scaffolds, ladders or overhead working surfaces unattended.
- v) Tools will not be thrown from one location to another, from one employee to another or dropped to lower levels.

b) Portable Power Tools

- i) Only trained employees will operate portable power tools.
  - (1) Electrical power tools will be double insulated or shall be of an approved system that contains an electrical ground.
  - (2) OSHA (or applicable legislation) requires the use of a ground-fault circuit interrupter or an assured grounding program. Inspection and testing of electrical tools must be done according to local, state/provincial and federal environmental, health and safety legislation, regulations and directives.
- ii) Serviceable guards or shields will be installed on all power tools before use.
- iii) Electrical tools will not be used in explosive atmospheres unless the tools are approved at those locations.
- iv) Pneumatic tools are to be positively secured to the hose to prevent the tool from becoming accidentally disconnected.
- v) Operators of powder-actuated tools must be authorized and must possess valid credentials.
- vi) Power tools shall not be raised or lowered by the power cord. The grounding prong shall be present on all plugs. Defective power tools will be taken out of service immediately.
- vii) All power saws shall be inspected before use for loose or defective chains or blades.
- viii) Any signs of excessive wear or defect will be discarded and replaced. Chains should be kept tight and sharp. No saw will be used without approved guarding devices.

c) Extension Cords

- i) Extension cords must be of the grounded-wire type and connections, cables, etc. must be kept away from water or damp surfaces. Grounding adapters are not allowed.
- ii) Multiple runs of extension cords, (piggybacked) shall be prohibited.
- iii) Extension cords and cables must be protected from vehicle traffic and sharp corners. Cords shall be continuous without slice, missing insulation, nicks or cuts, etc.
- iv) Extension cords must be kept out of walkways and other areas where they present trip hazards.
- v) Electrical inspection and testing of cords shall be performed as required by local, state/provincial and federal environmental, health and safety legislation, regulations and directives. Grounding prongs shall be present and in good condition for any cord to be used.
- vi) Portable, in-line ground-fault circuit interrupters (GFCI) must be used in wet environments.

d) Equipment

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- i) Each Contractor has the responsibility to provide all equipment as specified by this policy for the project.
- ii) Each Contractor employee has the responsibility to inspect equipment before use.
- iii) Use of defective equipment is prohibited and must be removed from service.

e) Ladders

- i) Metal ladders or defective ladders are not permitted.
- ii) Extension Ladders are to be positioned with a 4:1 ratio.
- iii) Ladders must have safety feet and used on level surface at all times.
- iv) Stepladders must be fully extended and locked in place when in use.
- v) Stepladders will not be used for other than their designed purpose.
- vi) Ladders must extend at least 3 feet above landing area, platform, or roofline and be secured at the top.

f) Scaffolds / Raised Platform Equipment

- i) Scaffolding must be erected on sound footing and under the supervision of a Scaffolding Competent Person.
- ii) Scaffolding with a work surface higher than ten (10) foot must be equipped with standard guardrails, toe boards, and full decking.
- iii) Straight planks must extend six inches (minimum) over both end supports. All boards are to be cleats on each end and be scaffold-grade lumber.
- iv) Safety harnesses and lanyards must be worn on any scaffold greater than six feet high if it is not equipped with standard handrails.
- v) Where possible scaffolds must be tied off every 30 feet of height, and 20 feet horizontal.
- vi) Suspended scaffolding, such as swinging stages, boatswain chairs, floats and needle beams, require special approval from the plant EHS Engineer/Manager prior to use.
- vii) Employees are not allowed to work under scaffolds or raised platform equipment without approved hard hats.

28) POWERED INDUSTRIAL VEHICLES AND EQUIPMENT

- a) Contractors are prohibited from using Tower vehicles, forklifts, booms, cranes, etc. without prior written consent from the Plant Manager.
- b) Contractor must have a means of preventing unauthorized use of their powered industrial vehicles and equipment.
- c) Contractors must provide proof of training prior to the start of any work that would include use of powered industrial vehicles and equipment. Only trained and authorized employees are allowed to operate such equipment on Tower property.

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- d) Operators must comply with all safety rules when operating lift trucks on Tower property. All forklift trucks must be equipped with a roll cage. The use of seatbelts when operating a powered industrial truck is mandatory.

29) TRUCKS AND AUTOMOBILES

- a) Seatbelts must be worn if the vehicle is so equipped.
- b) Pedestrians have the right-of-way while driving in or on Tower property.
- c) Dock trailer restraint use or wheel chocks are required for all truck loading and unloading operations.
- d) All engines will be shut off as soon as practical to limit exhaust concentrations inside the building. If an engine must be run, an exhaust hose will be installed to route the exhaust from the facility.

30) COMPRESSED AIR

- a) Hoses and couplings must be checked daily before use. All hose couplings must be provided with a positive locking device.
- b) Compressed air for cleaning must not exceed 30 psi., and will not be used for cleaning employees.
- c) Hose sections ½ inch in diameter or greater supplied by a pressure greater than 50 psi, must be wired together at each coupling connection.
- d) Oxygen WILL NOT be used as compressed air.

31) SIGNS, SIGNALS, BARRICADES AND AREA ACCESS

- a) Where a potential hazard exists from interaction between Tower colleagues and Contractor employees, the Contractor will post and maintain signs, warnings, barricades or flagmen to detour passage of vehicles or people.
- b) Where appropriate to ensure confinement of dusts, weather, noise or other concern a partition may need to be erected to physically separate the work area for active production areas. All structural demolitions will require a partition to be erected to separate the work area from any adjacent production area. Any door or gate shall be constructed to swing into the site and not into the travel path of adjacent traffic or pedestrians.
- c) Where access to office or other locations are required to be provided through the work site, a protective “sidewalk shed” shall be erected to allow for the safe transition of Tower colleagues to and from the destination. These sheds shall meet the construction criteria of the ANSI A10.6 –2006 standard.
- d) Appropriate warning and/or restricted access signage shall be posted in areas where unauthorized individuals could enter the work area.
- e) All travel ways shall be kept clear, clean and unobstructed at all times.
- f) Provisions for egress pathways shall be established and maintained at all times.
- g) Barricades must be substantial and kept back six feet or more from the edge of excavations. When pedestrian traffic is required around the exterior of the construction/demolition area, a distance shall

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be established not less than 15 feet from the perimeter of the site. A temporary walkway may be constructed in lieu of a sidewalk shed and be clearly marked and consist of a continuous fence on the side adjacent to the construction/demolition area. If a hazard exists, a railing shall be provided along the opposite length of the walkway. Moveable sections may be used if they are affixed in place when not needed.

- h) Only those Contractor employees necessary for the performance of the operations shall be permitted in the work area while operations are being performed. The Contractor representative will escort tower colleagues with specific need to be in the area at all times.
- i) The plant EHS Engineer/Manager, with the Tower Project Coordinator and Contractor will outline project specific signs, signals and barricades prior to beginning work.

### 32) FIRE PROTECTION AND EVACUATION ROUTES

- a) The Contractor must be familiar with the plant alarm system and the local evacuation plan. Each Contractor employee will be briefed on the emergency actions to take and locations of evacuation assembly areas and weather shelters.
- b) The Tower Project coordinator will be responsible for fully explaining the system and exit routes. The Contractor representative is responsible for informing their employees.

### 33) CRANES & RIGGING

- a) Trained and authorized Contractor employees will only operate Cranes. A spotter shall be present during the use of all mobile cranes to ensure clearance prior to movement.
- b) All cranes and riggings shall be used within the limits specified by the manufacturer. The design capacity posted on as listed for the equipment shall not be exceeded.
- c) The swing radius of mobile cranes will be barricaded.
- d) The required clearances shall be maintained from all energized power lines, and wiring conduits inside and outside the plant.
- e) Outriggers must be fully extended and on firm ground.
- f) Inspect all Contractor operated hooks, shackles, beam clamps, attachment hardware, and slings before each use for general condition to include but not be limited to frays, kinks, or worn spots.
- g) Safety latches are required on all hooks.
- h) Suspended load tag lines will be used as appropriate and loads will not be left unattended.

### 34) HOT WORK (CUTTING, BURNING, OR WELDING)

- a) A hot work permit is required before starting any hot work activities in the plant. Hot work operations must be monitored continuously and completed in a safe manner.
- b) Only approved torches with anti-backflow devices shall be allowed for use. Periodic testing shall be done to check for leaks with soapy water or equivalent. Qualified persons shall complete repairs immediately.

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- c) The hot work permit will be issued and verified by the maintenance supervisor. The maintenance supervisor, the Contractor supervisor, and the contract employee(s) doing the actual hot work will sign the permit.
- d) The permit must be posted and readily visible in the area where the hot work is being performed.
- e) The permit is valid for one shift, one day only.
- f) Fire-watch is to be maintained within 15 feet of the hot work area.
- g) The firewatcher must remain at the area for at least 60 minutes after hot work is complete.
- h) Protective screens/blinds must be used around all welding or grinding in process or as required by Tower.
- i) All flammable or combustible materials will be removed from within 35 feet minimum of any hot work operation.
- j) All combustibles that cannot be removed must be shielded by noncombustible tarp or equivalent during any hot work operation.
- k) The Department Supervisor will be notified if operations are conducted in the vicinity of Tower colleagues.
- l) A fire extinguisher of appropriate type will be located within 10 feet of any hot work operation.
- m) Compressed gas cylinders will be capped and secured and kept as far from any Hot Work to prevent sparks, hot slag, or flames from reaching them.
- n) Safety caps shall be used and cylinders shall be locked or chained for storage and transport.
- o) No compressed gas cylinder will be allowed to be transported horizontally, including LPG cylinders for forklifts.

35) SMOKING

- a) Except for specifically identified areas, smoking is prohibited on Tower property.

36) FLAMMABLE/COMBUSTIBLE LIQUIDS

- a) Flammable liquids must be stored properly. The storage area or building must be identified and have proper No Smoking signs posted. Contractors are responsible identifying and storing properly, all flammable liquids and compressed gas cylinders.
- b) Flammable liquids of more than one days use must be stored in a FM Global or NFPA approved cabinet supplied by the Contractor.
- c) Flammable liquids in use must be stored and handled in FM Global or NFPA approved safety cans and properly marked as to its contents.
- d) Drum dispensing stations will be provided with grounding and bonding equipment and the drums fitted with self-closing valves.
- e) Compressed gas cylinders shall be stored according to type of gas. Oxygen and any fuel as with Acetylene will be separated by at least 20 feet.
- f) A suitable fire extinguisher must be readily accessible in the area where flammable and combustible liquids are stored or handled or stored.

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- g) Large stores of acetylene, propane and other flammable compressed gas cylinders will be located and stored outside in a safe, secure manner.
- h) Trash, rags and other materials contaminated with flammable or combustible liquids are to be properly disposed of daily. Temporary storage may be made in properly labeled; FM Global or NFPA approved metal containers with lids.

37) HAZARD COMMUNICATION PROGRAM

- a) The Contractor will be briefed on the Tower GHS program. SDS's/MSDS's will be made available for review as requested.
- b) Routine or post project cleanup will be performed using non-hazardous materials as much as possible.
- c) Contractor management will provide Safety Data Sheets (SDS)/Material Safety Data Sheets (MSDS) on all chemical products or materials it brings on to the property. Copies will be forwarded to the plant EHS Engineer/Manager prior to project start.

38) WASTE DISPOSAL

- a) The disposal of solid waste generated, as a result of contracted operations is the responsibility of the Contractor and will be accomplished in compliance with all local, state/provincial, and federal requirements.
- b) Contractor will document type and quantity of waste generated during the project and will furnish documentation to the Tower Project Coordinator of waste generated during the project and will furnish documentation to the Tower Project Coordinator at the conclusion of the project. A copy of all waste manifests will be provided to the plant EHS Department.
- c) Any hazardous waste generated by the Contractor will be removed from Tower property at the end of the project or according to local, state/provincial or federal waste regulations. Disposal of any chemical waste on Tower property is prohibited.
- d) Contractors shall properly label, store, and dispose of all waste materials generated from their activities per facility procedures or guidance.

39) ARC FLASH HAZARD

- a) A flash hazard analysis shall be done in order to protect employees from the possibility of being injured by an arc-flash. An approach boundary is the distance from exposed live parts within which a person could receive a second-degree burn if an electrical arc-flash were to occur. Whenever work is to be done on or near exposed parts not in an electrically safe work condition within the flash protection boundary (FPB), the worker(s) must wear the proper PPE for the potential arc-flash hazard. For systems 600 V or less, that have not had an Arc Flash Analysis conducted, the default boundary is 4 feet.



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- b) Contractor shall establish and visibly mark with barriers, cones or caution tape, the approach boundary anytime work, including trouble shooting, is being conducted on live components or inside of an energized electrical enclosure.

40) CONFINED SPACE/VESSEL ENTRY

- a) A permit from the plant EHS Engineer/Manager or Maintenance Manager is required prior to entry into any confined space as defined in the applicable legislation, regulations or directive.
- b) Tower Lockout procedures will always be used with the confined space entry procedures as applicable.
- c) All confined spaces will be marked as either “Non-Permit Required Confined Space”, or
- d) “Warning-Permit Required Confined Space”.
- e) Standard Entry Procedures
  - i) Contractors will confirm and ensure all entrants have appropriate training and an understanding of all hazards associated with any confined space entry prior to such entry.
  - ii) The Contractor will coordinate all operations with the maintenance supervisor of each shift prior to work.
  - iii) The Contractor will ensure all confined space operations are conducted according to local, state/provincial and federal environmental, health and safety legislation, regulations and directives.
  - iv) The plant EHS Engineer/Manager must be notified before entering any permit required confined space.

41) COMMUNICATION & TRAINING:

- a) This Standard will be communicated to the Contractor with the quote package to be sent by the Tower Purchasing agent.
- b) Contractors that are hired routinely may conduct this review on an annual basis if a plant can provide specific procedures to track and retains documentation of briefings and environmental reviews.
- c) The Plant EHS Engineer/Manager will complete an annual review of the plant Contractor program to update, revise, and maintain current list of Contractors, and evaluate potential impact to operations and environmental aspects. The Plant EHS Engineer/Manager shall retain evaluation documentation.
- d) All Tower colleagues will be briefed on the general scope, potential hazards, and chemicals used for all construction/demolition or major equipment installation/repair projects prior to the start of the project. This briefing shall be documented and retained with the Project Coordinator. Department supervisors, Project Coordinator or EHS Engineer/Manager as appropriate, may complete this briefing.
- e) Records shall be maintained consistent with environmental procedure EP-530 (Environmental Records)

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- f) Contractor shall provide training documentation to Tower for associated tasks to be performed within the scope of the project. Examples of this would be: Forklift license, crane operator license, confined space entry, HAZMAT certification, Welding/Cutting, Fire Extinguisher training, etc.).
- g) The Environmental Management Representative will make a copy of the Plant Environmental Management System manual available upon request.

42) ATTACHMENT(S)

- a) None.