Guidelines for Subcontractors

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Validity

This policy applies to all natural and legal entities (also called "contractor" or "external company"), who provide a service on the basis of an order from Dr. Franz Feuerstein GmbH, hereinafter also referred to as "purchaser" irrespective of the duration of the assignment. (eg. work, service, maintenance contracts, etc.),
1. Organisation, Access

- Contact person at Feurstein is mentioned in the respective order.

- As a matter of principle, a responsible contact person is to be named by both the client and the contractor prior to the start of the work. All technical, organizational and management matters are to be settled between these persons. Other persons are not authorised to issue instructions in this respect.

- The internal contact person will conduct a safety training briefing for employees of the external company BEFORE starting work. This safety training briefing has to be undertaken for each new order, unless the same activities are repeatedly performed in the same workplace by the same employee of the outside company.

- The staff used by the external company must, in addition to the necessary approvals for work, have a permit to enter the mill plus have an entrance code for the times outside the duty of the porter or be issued with an individual personal entry card. This permit is limited to the duration of the order and will be provided at the Feurstein reception.

- At the beginning of the assignment, the external contact person must register at the porter and provide the details of his order and internal contact person. Before the start of any work the supervisor must register in writing to the responsible foreman from the mill. This registration has to be entered into the check in / check out book (FORM6023 outside companies). After completion of work, the supervisor must check out in writing to the responsible foreman from the mill again. The check-out has to be entered also into the check in / check out book. The check in / check out has to be completed every day!

A daily list of names of onsite workers (including employees from any subcontractors) must be provided immediately to the internal contact person!

- Furthermore, if necessary, a release form for “work on operating facilities” (FORM 6002) must be completed together with the contact person and signed by the person responsible for the facility. The safety equipment available in the control rooms must be used. Contact details are to be filled in on the LOTO form. The key for the security system must be kept in the control room.

- After completion of the work, the foreman must sign out in writing to the responsible foreman. This sign-out must also be entered in the sign-in/sign-out book. Signing in/out must be done daily!

- The logo of the outside company should be clearly visible on the working clothes of external staff.
2. Legal Regulations and Safety

- External companies’ employees as well as hired subcontractors are obliged to observe existing laws and environmental regulations as well as in-house guidelines, safety instructions and mill regulations.

- The defined „general“ and „special“ safety guidelines (for fire protection, usage of safety equipment and personal safety equipment, hot work, working in hazardous areas, working in the field of natural gas, solvents, thermal oil, acids and bases, riding on tanks) and all laws and regulations relating to the protection of employees are to be observed.

- For all maintenance, cleaning and maintenance of plant parts head protection should be worn:
  - helmet or bump cap EN 812
  - during shut down the wearing of helmets is obligatory. Bump cap is not sufficient.

- Hearing protection must be used in the designated areas (noise zones)

- In matters of work safety, technical managers, safety officers, the fire department and the contact person are authorized to give orders. Workers from the external company can be sent off from work if they don’t act according our guidelines. Resulting costs shall be passed on to the external company.

- Electrical switch rooms must not be entered without special permission and appropriate instruction (FORM6022 Electrotechn. Instruction - Certificate of Competence). Class 1 protective clothing must be worn. If the contractor does not have his own, Feurstein will provide one on site.

- The construction area or danger zone must be secured before starting work and during the duration of the contract by the contractor. Removing modifying and rebuilding of safety equipment is permitted only after consultation with the customer and after electrical log out and tag out of the machine.

- Occupational accidents, fire, explosion, collapse, flooding, oil spill, radioactive contamination etc. must be reported immediately to the contact person. The usual emergency telephone numbers of the rescue services in Austria apply.

- In the case of accidents at work, a copy of the accident report must be sent to the internal contact person. Minor injuries (e.g.: cuts) are to be dressed with waterproof, blue, self-adhesive sticking plaster (with metal insert); (ask your contact person).

- Subcontractors have to use only electrical equipment with a valid inspection sticker (inspection requirement for portable electrical equipment) throughout the premises of Feurstein.
3. Fire protection

With the acceptance of both lump-sum and direct work in our factory, the external companies undertake to demonstrably bring the fire protection regulations to the attention of all their employees working for us and to demand strict compliance with them by their personnel!

When external companies take over work in the paper mill where there is a risk of fire, the individual persons of the external company must be instructed accordingly before starting work, the fire protection regulations must be brought to their attention and their acceptance or acknowledgement must be confirmed in writing so that the external company is liable for work and personnel.

For the execution of all work on the factory premises, the external companies must appoint at least one reliable person to continuously supervise this work. This person must ensure that their personnel comply with all existing regulations and maintain close contact with the contact person responsible internally at our company.

- A release certificate is required prior to work involving hot work. The contact person of FEU is helpful.
- Escape and traffic routes, emergency exits and fire extinguishing equipment must be kept clear.
- Lifts may not be used in case of fire.

4. Subcontracting

The contractor shall obtain written consent in advance (according to our purchase conditions) for the total or partial transfer of the contract to a subcontractor! All points of the „Guidelines for Externals“ must be brought to the attention of the supervisor of the subcontractor by the contractor and must be produced whenever so required by the client.

5. Traffic, Transport and Storage

- External vehicles may not be parked on the premises without permission. Road traffic regulations apply to the whole site. The maximum permissible speed is 30 km/h. Vehicles shall be parked in the respective signposted areas or as assigned by the porter service. Illegally parked vehicles will be towed at cost. The permitted entrance heights and headrooms must be observed. You may not park your vehicles in protected zones.
- Areas of the stream labelled with “Saugstelle” may not be used as parking zones.
- The storage (temporary storage) of equipment, components, equipment and material must be arranged with the internal contact person. Storage in protected areas is forbidden.

- Fork lifts and cranes may only be used with Feurstein-internal driving licence by trained staff (forklift license, crane license);

- Riding on fork lifts, using a fork lift to reach raised areas or standing under lifting devices is strictly forbidden.

- Travelling on and standing under suspended loads is strictly forbidden.

- When using very toxic, toxic or less toxic, flammable, spontaneously combustible, corrosive and carcinogenic substances, the following applies:
  * Before delivery and starting work, the safety data sheets of the chemicals used must be handed over to the internal contact person.
  * for flammable and self-igniting chemicals the transfer of safety data sheets is only required if more than 1 liter of the substance is used or stored.

- Emergency exits, escape routes, transportation routes, access to electrical equipment rooms, light switches, junction boxes, main switches, and firefighting equipment must be kept clear at all times.

- The permissible and the endorsed floor, ceiling, stage, shelving and scaffolding loads must not be exceeded.

### 6. Behavior on the premises of Feurstein

- The location of construction containers or the establishment of construction sites is to be determined in consultation with the technical department. The name of the external company is to be displayed. After working hours and during absence the containers must be locked and power supply lines must be shut off.

- Audible and visual warning signals and road markings, signs, prohibition and mandatory signs are to be observed. Photographic, film, video, sound recordings, or similar are prohibited on the entire premises.

- The consumption of alcoholic drinks on the premises is strictly forbidden.

- The contractor shall ensure that its employees are not in a physically or mentally affected state, as a result of alcohol, drugs, medicine, or similar. Damages and losses incurred by the external company will be charged.
• Loss, theft of goods and equipment within the plant site as well as damage to operating equipment, other objects and buildings owned by Feurstein are to be reported immediately to the contact person.

• Feurstein is empowered to conduct audits of the external vehicles and private cars of the external employees carried out at our premises or by a corresponding partner (e.g. ÖWD).

7. Order and Cleanliness, Disposal of Waste

• Keep your working places in a clean and proper condition. The sites must be left in a clean condition every day.

• All waste created as a result of the order must be disposed of by the contractor in accordance with legal requirements to protect the environment.

• Combustible waste (e.g. packaging material, wire clippings,…) shall be stored properly and disposed of in regular intervals.

• Waste oils, solvents and other liquid chemicals are generally to be kept properly in accordance with the legal requirements and disposed of at regular intervals. The emptying into drains is strictly forbidden.

• Follow-up costs incurred from non-performance or non-compliance with these guidelines shall be charged to the originating contractor.

8. Corporate Policy

The corporate policy of Dr. Franz Feurstein Gesellschaft mbH includes all implemented management systems, e.g. environment and energy, occupational health and safety, product safety and sustainability.

Feurstein’s current policy is to be found on the internet under www.delfortgroup.com/papermills/Feurstein.

9. Hygiene Regulations

The following hygiene rules must be observed by all external companies:

• Eating and drinking is forbidden in all production halls, warehouses and outdoors. Your internal contact person will show you where eating and drinking is allowed. Waste and food must be disposed of in waste bins. Glass and glass bottles are prohibited.
You are not knowingly suffering from any of the below listened diseases or conditions and also that, within the past 4 weeks, you have not had recently and contact with other persons who suffered from one of these diseases or conditions: Severe skin infection, Stomach/Intestinal infection, TBC, Diphtheria, Malaria, Plague, Hepatitis, Yellow fever, Cholera, Meningitis, Measles, Scarlet fever, German measles, Dysentery, Anthrax, Typhus, Leprosy, Smallpox, Polio or other severe contagious diseases.

Smoking is prohibited throughout the site, except areas marked with purple lines. Subsequent hand cleaning is required. Waste shall be disposed of in the established fire-retardant bins.

Usage of knives with breakable blades is forbidden in the production.

During production the following points are additionally to be obeyed:

- Before entering the High Care Area (blue line on the ground) hands shall be cleaned in the sink or at disinfection stations.
- The wearing of jewelry, watches and piercings is not permitted.
- Use suitable working clothes: upper body must be covered, no outside pockets on the upper body, snaps are allowed.
- Use a cap in the high care areas

10. Drilling, Excavation and Hot Work

- Before the start of drilling and excavation work (including driving a bolt into the floor) a permit from Feurstein is necessary. After necessary inspections a written report is to be completed.
- Common work must be indicated separately before beginning of the work and released by Feurstein. Without this permission taking up of the works is not permitted.
- Before starting hot work a written permission from the internal contact person is to be sought.
- Before starting work in explosion-protected zones (see labeling and display) a written permission from the internal contact person is to be sought.
- Before working in containers or tanks a written permission from the internal contact person is to be sought.
11. Emergency Information, Important Telephone Numbers

The supervisor must inform about the location of the construction site, so that in an emergency case ambulance and fire brigade can quickly be notified and instructed. Emergency call signs including the necessary information is to be found near all telephones or in the working rooms.

<table>
<thead>
<tr>
<th>Emergency Calls:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire brigade:</td>
<td>0-122</td>
</tr>
<tr>
<td>Rescue:</td>
<td>0-144</td>
</tr>
<tr>
<td>Police</td>
<td>0-133</td>
</tr>
<tr>
<td>Accident with natural gas</td>
<td>0-128</td>
</tr>
</tbody>
</table>

Poison Information Centre in Vienna: 01 / 406 43 43-0

12. Access to external persons

During the porter service hours (06.00 - 17.00, Friday 06.00 - 13.00)

External persons who have no access authorization code or personal access card must register with the porter. It is not permitted to drive through without reporting to the porter. The porter must be informed of the name, company and the car number of the visitor.

Before leaving the company premises, the visitor must sign out with the porter. It is not permitted to drive through the gate behind other vehicles.

External companies with access authorisation must generally report to the responsible internal contact person before starting work. For security reasons, it is necessary to know which external persons are on the company premises.

Entrance before 06.00 or after 17.00 (Friday after 13.00)

If entry or exit before or after this time is necessary, the internal contact person must be already at the site. He can provide the external company with the valid visitor code.

- Enter the code an press # - button
- Barriers and gates open
Applicable Documents

- Fire protection regulation
- FORM 6023 „Contractors log on / log off book“
- Corporate Policy