



ND Fairmont, LLC

**Contractor and Visitor Policy**

<b>ISSUED BY:</b>		<b>APPROVED BY:</b>	
_____	_____	_____	_____
Safety Manager Fairmont Division	Date	General Manager Fairmont Division	Date
INTERPRETATION AND PERIODIC REVIEW OF THIS PROCEDURE IS THE RESPONSIBILITY OF:		<b>SAFETY MANAGER</b>	
<b>DISTRIBUTION</b> <ul style="list-style-type: none"><li>• ALL MANAGERS</li><li>• ALL TEAM LEADERS</li></ul>			

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**I. PURPOSE**

ND Fairmont is continuously looking for means to provide a safer workplace for our employees. A safe workplace for our employees is also a safe environment for contractor employees, vendors, and visitors. Our main goal is to prevent injury to all persons on ND Fairmont property. We expect our employees to accept the responsibility of their own safety and to comply with all ND Fairmont policies and OSHA regulations. We also expect nothing less from those visiting or performing work at the facility.

Complying with ND Fairmont policies and OSHA regulations is relatively easy and the cost is minimal when compared with the cost of an accident. All OSHA regulations cannot be reviewed here in their entirety, but ND Fairmont has listed those items that we feel should keep you accident free while on our property. Failure to comply with these listed policies may cause your removal from ND Fairmont property.

All contractors will have this policy reviewed with them prior to starting work at ND Fairmont. The review of this information may primarily be the Contractor Safety & Environmental Orientation presentation. A more in-depth review may be conducted by the Safety Department, if available, or the person responsible for the visitor or contractor.

**II. SCOPE**

- A. This policy applies to all contractors and subcontractors who perform work or provide "hands-on" services on all ND Fairmont premises. This "hands-on" work or service includes all technical services providers, such as chemical, equipment, or process control vendors or consultants; construction contractors; contractors who perform electrical or mechanical maintenance work, etc.
- B. Vendors, such as those who provide uniforms, package or mail delivery, concessions, etc., may be excluded from the pre-qualification requirements of this policy. However, all vendors and visitors are expected to abide by all ND Fairmont safety rules.
- C. The Safety Manager or designee is responsible for oversight of this policy. Implementation of this policy and any site-specific policies and/or procedures is the responsibility of the General Manager.

**NOTE: ND Management reserves the right to make changes to the policy at any time. We also reserve the right to make changes above and beyond OSHA requirements if necessary.**

**III. DEFINITIONS**

- Contract Worker
  - Any person, other than an ND Fairmont employee, who performs work on ND Fairmont premises on behalf of an outside Contractor.

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- Project Manager
  - ND Fairmont employee assigned to supervise an outside Contractor who performs work at the mill site.
- Contractor's Representative
  - Person designated by the Contractor to liaise with ND Fairmont.
- Driver
  - Anyone who delivers or receives materials for transport (raw materials, supplies, packages, finished products, etc.).
- Works Foreman
  - Person designated by the Contractor to supervise the work and ensure compliance with safety rules.
- H&S Coordinator
  - Person designated by the Contractor to be in charge of occupational health and safety matters for the duration of the project.
- Safety Plan
  - Detail document outlining the specific safety requirements to be used for the project.
- Contractor
  - Company that carries out work for ND Fairmont, including any sub-contractors, consultants and suppliers directly or indirectly bound by contract to ND Fairmont.
- ND Fairmont's OSHA Coordinator
  - Person designated by ND Fairmont to be in charge of occupational health and safety matters at the mill.
- Subcontractor
  - A company or individual who was hired by a Contractor who performs any part of the work or services the Contractor was hired by ND Paper to complete on ND Paper premises.
- Vendor
  - a company or individual who provides on-site services but who may only perform limited hands-on work. Examples include those who provide uniforms, package or mail delivery, concessions, etc. Depending on the type and amount of services performed, these may be excluded from the pre-qualification requirements of this policy. However, all vendors and visitors are expected to abide by all ND Paper safety rules. Decisions as to whether the pre-qualification requirements apply to these vendors will be solely in the discretion of the Safety manager for each location.
- Visitor
  - an individual (or group of individuals) who is on ND Paper premises for only a short amount of time and who does not perform "hands-on" work, for example tours or conducting inspections. Examples of hands-on work include, but are not limited to, using tools, entering a confined space and locking out equipment. Visitors must be escorted at all times by an ND Paper employee including both

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entering and exiting the ND Paper facility. All visitors must be wearing proper Personal Protective Equipment.

- Co-activity
  - Work of a same or different nature, performed simultaneously or alternately in a single environment by more than one work team or Contractor.

**IV. Contractor Responsibilities****A. Pre-Approval**

1. Prior to the commencement of work by a Contractor at an ND Paper facility, a Contractor must be able to demonstrate that it has an acceptable Safety and Health Program and obtain ND Paper's approval. Annually, every contractor and subcontractor must submit documentation for approval, including:

- The contractor's safety performance and prevention programs.
- The Contractor Safety and Health Policy.
- Confirmation that its employees, subcontractors, suppliers, workers, and other persons performing services or work in connection with the Contract:

(a) *have the requisite skill and knowledge necessary to perform such services or work;*

(b) *have received the required training and have passed appropriate testing; and*

(c) *are, as required, fully certified to perform the respective job.*

- Obtain a current certification of all insurance as required in the ND Paper Terms and Conditions, as agreed between the parties. Minimum insurance requirements are defined in the ND Paper Purchase Order Terms and Conditions. Additional coverage may be required depending on the type of work being performed by the contractor.
- Contactor may be required to provide a safety plan for the job. Please see ND Project Management for the requirements.

*If a Contractor fails to submit this documentation as required, ND Paper will provide notice to the non-Compliant Contractor, and the Contractor (or any subcontractor) will not be permitted to return to the premises until such time as ND Paper, in its sole discretion, is satisfied that the Contractor is in compliance with these requirements.*

**B. Designated Safety Coordinators**

1. Every contractor must appoint a Safety Coordinator who is on-site at all times that Contractor employees are present, whether engaged in work or not. Contractors with less than 25 employees on-site can designate a representative to act as Safety Coordinator.

2. Projects involving 25 or more employees require the Safety Coordinator be full-time and dedicated to safety (as opposed to a site supervisor). Safety Coordinators must possess a minimum of 30-hour OSHA Outreach Training card (construction or industry) and 5 years of professional safety experience, or an equivalent credential such as an external safety certification (Certified Safety Professional) or relevant collegiate coursework.
3. Projects with 100 or more employees will be reviewed by the ND Paper Project Manager and Safety Department on a case-by-case basis to determine how many Safety Coordinators are required.
4. Projects that are deemed high risk by ND paper may require use of Safety Coordinator.

**C. Orientation**

1. Every Contractor and Subcontractor employee who will be performing work or services at ND Paper must complete site orientation before starting their work at an ND Paper facility. This site orientation is not intended to meet OSHA regulations but rather constitutes review of site expectations and site-specific requirements. This orientation must be completed every twelve (12) months in order to maintain access to the ND Paper facility. Each facility will maintain documentation of completed contractor employee orientations and will prohibit access of any contractor employee until completed

**D. Conducting Work**

1. Contractors must complete a safety review (i.e., Pre-Job Safety Assessment, Job Hazard Analysis, or other tool) before starting each task, and in no event less than once each day that work is being performed on site. This review is necessary to ensure the identification of hazards associated with the job and to ensure that appropriate control measures have been implemented prior to starting the task. The review must be documented, provided to all affected employees and made available to ND Paper upon request.
2. Contractors must adhere to the ND Paper Personal Protective Equipment (PPE) Policy which provides the minimum requirements for Personal Protective Equipment (PPE) for all ND Paper Divisions. Job-specific PPE requirements may also be required based on the location, safety policy or task as identified in the safety reviews or job safety assessments.
3. Contractors and subcontractors must maintain, and have available for inspection, any required licenses, certifications, or permits for the tasks they are completing. Examples include, crane use, lift truck, hot work and electrical work (MCR entry). ND Paper employees will not use contractor permits.

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4. In addition, site-specific requirements are available via the contractor training program or through communications from the sites. These requirements are expected to be adhered to at all times by all contractor and subcontractor employees

**E. Hazardous Materials**

1. Contractors must notify ND Paper's Environmental, Health and Safety Department (EHS) of any hazardous materials that are intended to be used on ND Paper property prior to bringing such materials to the facility and prior to their subcontractors bringing such materials to the facility. This notification includes the Safety Data Sheet (SDS) and the intended quantity and application. SDSs must be readily available and area personnel (contractor and others) must be protected from these materials during use.

**F. Fire Precautions**

1. Except as otherwise specifically provided, the Contractor shall take all necessary precautions to protect the Work from fire, appoint a person at the Site to be responsible for providing and maintaining fire protection equipment at the Site and designating and training the Contractor's employees in firefighting, and comply with any fire safety rules and regulations issued by the Owner's Representative for the Site.

**G. Equipment**

1. ND Paper personnel will not service, modify, or directly wire or connect equipment for Contractors. When Contractor equipment or systems must tie directly into ND Paper's systems, the linkage will be performed by a combined team of ND Paper and Contractor representatives. ND Paper safety equipment cannot be loaned to Contractors (excluding basic forms of Personal Protective Equipment (PPE) such as earplugs and safety glasses). Contractor use of ND Paper equipment is not permitted without specific approval.

**H. Accountability**

1. The Contractor is expected to maintain good order and discipline among its employees and those of its subcontractor(s). The contractor is expected to immediately remove any employee from ND.
2. Paper property who is incompetent, disorderly, intemperate, or who otherwise violates ND Paper safety rules or who interferes with the property in an unauthorized manner.
3. Additionally, safety inspections will be conducted periodically by ND Paper, and those findings and corrective measures will be recorded. ND Paper will determine the proper remedy for findings that are not compliant with these policies and can include counseling/training (ranging from topic-specific to full-scope retraining) up to suspension from ND Paper facilities. ND Paper has sole discretion over remedies for non-compliant findings.

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4. Serious infractions, including but not limited to issues including lockout, fall protection, confined space and hot work, or purposeful/intentional issues may result in violator access suspension for 1 year or even permanent disbarment from work for ND Paper. Contractors (or their subcontractors) who have an employee removed for 1 year will be reviewed and accountability to the company will be assessed accordingly. This may include a probationary period or permanent dismissal for that company. Contractor accountability is determined by Senior Facility Leadership.
5. Any inspection findings will be directed to the ND Paper Project Manager and Safety personnel for ND Paper at the facility, who along with appropriate department managers and EHS will manage Contractor employee accountability (access revocation or retraining). EHS and the Procurement Department will monitor findings and oversee Contractor accountability (probationary reviews, business relationship changes, etc.). Professional judgment will be used in all determinations, with violator intent and contractor responsiveness taken into consideration.
6. Costs incurred as a result of not complying with a regulation, failing to correct a situation within the prescribed time limit or employee dismissal shall be borne by the Contractor.

**I. Incident Management**

1. Contractors must report all near miss, property damage and injury/illness incidents to the ND Paper Project Manager and Safety Personnel at the facility as soon as possible upon discovery and in all instances within twenty-four (24) hours of the incident or illness in question. Written reports are required within 24 hours of the incident or illness in question. ND Paper Medical Facilities and Staff (if available) will be limited to acute and life-threatening situations. Routine services are not available to Contractors or Visitors.

**J. Environmental Compliance**

1. Contractor activities, waste generation, and waste disposal must comply with federal, state, and local requirements. The Contractor shall remove all waste materials and rubbish to areas designated by the facility Environmental personnel and shall dispose of them as required by law or as directed by the ND Paper Project Manager. Hazardous or regulated waste disposal generated by the Contractor is the obligation of the Contractor and must be coordinated in conjunction with facility Environmental personnel. Any deviations require approval of the site Environmental or EHS Manager prior to generating the waste.

**K. Drugs and Alcohol**

1. Contractors must have a Drug and Alcohol Policy. Suspected use, possession, and/or working under the influence of alcoholic beverages or illegal drugs on ND Paper property must be reported to Security immediately. ND Paper reserves the right to inspect baggage, personnel,

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vehicles, or other personal property, require additional drug and/or alcohol testing and permanently dismiss individuals or companies for violations.

**L. Regulatory Enforcement Activities**

1. Any contractor or subcontractor contacted by OSHA, USEPA, Federal/State/Local Health Departments or law enforcement regarding activities at the ND Paper facilities must notify the mill manager at each site immediately. Any contractor or subcontractor asked by OSHA, USEPA, Federal/State/Local Health Departments or law enforcement to allow access onto ND Paper property should contact The ND Paper Safety Department at that location immediately. ND Paper is required to be the sole source of tours, inspections or information regarding ND Paper facilities.

**M. Security**

1. The security and safety of the people and ND Paper property on ND Paper premises is of utmost importance. Contractors are expected to follow all site security requirements, including; gate and badge entry policies, firearms prohibitions, and vehicle use. ND Paper reserves the right to inspect baggage, personnel, tool boxes, vehicles, or other property as deemed necessary. ND Paper reserves the right to have security cameras recording footage on its facilities where appropriate. Taking videos, pictures or recording is prohibited unless written permission is obtained from the site General Manager.

**N. Visitor Requirements**

1. Visitors must remain escorted at all times by an ND Paper employee (including both entering and exiting the mill);
2. All Visitors must comply with all relevant site Health, Safety and Environmental rules, including ALL PPE requirements.
3. Visitors must be provided safety orientation which may include site-specific “Visitor Safety Video”, Visitor Safety Brochure or a site safety briefing. At a minimum this should include fire and emergency evacuation procedures, escorting requirements, hazard briefing and smoking rules. (NOTE: This does not substitute for Contractor safety training);
4. Visitors must sign the visitors log (both when entering and exiting the facility). Any Visitor’s vehicles entering the facility must be approved in advance and will be subject to inspection; and
5. If Visitors are carrying out “hands-on work” while they are on ND Paper premises they are no longer considered a Visitor and must complete the Contractor safety process including pre-approval and Safety Orientation.



**O. Driver and Vendor Requirements**

1. Drivers and Vendors must review site-specific safety videos or be provided a site safety briefing which shall at a minimum include fire and emergency evacuation procedures, escorting requirements, hazard briefing and smoking rules.
2. All Drivers and Vendors must comply with all relevant site Safety, Health and Environmental rules, including all PPE requirements
3. Vendors may be required to complete a safe work permit to be permitting to complete work in the operating areas. Vendor who have a current system in place for PJRA will be permitted to use their company forms. This must be approved by ND Paper.

**II. Training Requirements**

- A. We emphasize to the contractor that it is the contractor's responsibility to convey to its employees any safety information provided by the company to the contractor.
- B. The contractor must:
  - i. Train all workers on all safety and health hazards and provisions applicable to the type of work being done and provide documentation of such training to this company's designated representative.
  - ii. Train employees on where to obtain first-aid and medical services.
  - iii. All training will be provided to project manager prior to beginning work.

**V. Recordkeeping Requirements**

- A. The contractor will:
  - i. Keep records of all documentation provided to the contracting company regarding such training.
  - ii. Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
  - iii. Have copies on-site of all material safety data sheets (SDS's) or other required information about chemicals relevant to the work on-site.
  - iv. Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.

**VI. Accountability**

Any contractor that fails to follow procedures set in this policy will be subject to disciplinary actions and could result in removal from location.



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Appendix A

**Contractor Safety Policy Review**

I acknowledge that I have reviewed the ND Fairmont Contractor Safety Policy and the Environmental Policy. I understand that it is my responsibility to comply with all policies. I will notify a representative of ND Fairmont if I am faced with a situation where non-compliance with ND Fairmont policies or OSHA regulations is present. I also understand that failure to comply with these policies or OSHA regulations may be just cause for my removal from ND Fairmont property.

Please Print Legibly:

**Contractor Information Section**

Date: \_\_\_\_\_

Last Name: \_\_\_\_\_ First Name: \_\_\_\_\_

Company Name: \_\_\_\_\_

Signature: \_\_\_\_\_



Appendix B



**Visitor Safety/Environmental Policy Review**

I acknowledge that I have reviewed the Visitor Safety and Environmental Policy and I understand that it is my responsibility to comply with all policies. I will notify a representative of ND Fairmont LLC if I am faced with a situation where non-compliance with ND Fairmont policies or OSHA regulations is present. I also understand that failure to comply with these policies or OSHA regulations may be just cause for my removal from ND Fairmont property.

By signing below, I further acknowledge that I have also received a copy of the ND Fairmont LLC Brochure.

Please Print Legibly:

**Visitor Information Section**

DATE: \_\_\_\_\_

Last Name: \_\_\_\_\_ First Name: \_\_\_\_\_

Company Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**ND Fairmont LLC Representative Section**

PPE Loaned (check appropriate boxes)									
<input type="checkbox"/>	Vest	<input type="checkbox"/>	Hard Hat	<input type="checkbox"/>	Safety Glasses	<input type="checkbox"/>	Gloves	<input type="checkbox"/>	Slip on Steel Toe

All PPE Returned  Yes  No

Last Name: \_\_\_\_\_ First Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**Revision History**

<b>Author</b>		<b>Approval</b>		<b>Location Affected</b>	<b>Date</b>
<b>Justin Darrah</b>		<b>Steering Committee</b>		<b>All</b>	<b>11/01/2018</b>
<b>Revision History</b>					
<b>Rev</b>	<b>Date</b>	<b>Made By</b>	<b>Page(s) Affected</b>	<b>Comments</b>	
00.00	11/01/18	J. Darrah	All	New Policy	
00.01	07-01-19	J. Darrah	All	Updated require for 3 <sup>rd</sup> safety monitors Removed site Specific Prevention Plan requirements	
01.01	06-10-20	J. Darrah	ALL	Updated to include Corporate requirements and changes.	