

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

I. Purpose

ND Paper Company's goal is to prevent injuries to all persons on ND Paper property. The purpose of this policy is to establish minimum safety and environmental requirements for ND Paper's selection, use and performance of third-party contractors. Individual ND Paper facilities may set policies that exceed these requirements.

II. Scope

This policy applies to all contractors and subcontractors, whether hired by ND Paper directly or who are hired as subcontractors by contractors hired by ND Paper, who perform work or provide "hands-on" services at ND Paper premises. This work or "hands-on" service includes construction contractors; contractors who perform electrical or mechanical maintenance work as well as all technical services providers, including, but not limited to, chemical, equipment, or process control vendors or consultants.

Contractor safety rules, work practices and procedures must be compatible with the policies and procedures of the ND Paper facility where work is being performed.

ND Paper General Conditions (Contractors), General Conditions (Services) and Purchase Order Terms and Conditions are incorporated into this policy by reference.

III. Definitions

Contractor – Any person or entity, other than an ND Paper employee, who performs work at an ND Paper facility. This includes construction teams or crews, chemical suppliers, equipment installers, consultants, advisors, etc. *Contractor* may refer to the company or the employees of the contracting company.

Driver – anyone who delivers or receives materials for transport (raw materials, supplies, packages, finished products, etc).

ND Paper Project Manager – The ND Paper employee who is designated by ND Paper to act as a liaison and ND Paper's point of contact for the Contractor's safety and work performance.

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.

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

Vendor(s) – 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 entering and exiting the ND Paper facility. All visitors must be wearing proper Personal Protective Equipment.

IV. Contractor Requirements

Pre-Approval

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:
 - have the requisite skill and knowledge necessary to perform such services or work;
 - have received the required training and have passed appropriate testing; and
 - 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.

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.

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

Orientation

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.

Designated Safety Coordinators

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.

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.

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.

Conducting Work

At all times during the performance of work, Contractors and subcontractors shall keep the site neat, clean and free of accumulation of waste materials and rubbish.

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.

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.

Any work on Process Safety Management and/or Risk Management Plan covered processes may require additional training and job safety pre-planning per site-specific requirements. Additional training is provided by the relevant location (Old Town Mill, Rumford Mill).

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

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.

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.

Hazardous Materials

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.

Fire Precautions

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.

Equipment

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.

Accountability

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

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

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.

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.

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.

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.

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.

Incident Management

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.

Environmental Compliance

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

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

conjunction with facility Environmental personnel. Any deviations require approval of the site Environmental or EHS Manager prior to generating the waste.

Drugs and Alcohol

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

Regulatory Enforcement Activities

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.

Security

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.

V. Visitor Requirements

Visitors must remain escorted at all times by an ND Paper employee (including both entering and exiting the mill);

All Visitors must comply with all relevant site Health, Safety and Environmental rules, including ALL PPE requirements.

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

	Contractor Safety, Environmental and Security Policy		
	Number EHS-01-03		Distribution ND Paper
	Original Issue Date Sept 6, 2019	Revision Date June 2, 2020	Revision Rev. 1

emergency evacuation procedures, escorting requirements, hazard briefing and smoking rules. (NOTE: This does not substitute for Contractor safety training);

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

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.

VI. Driver and Vendor Requirements

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.

All Drivers and Vendors must comply with all relevant site Safety, Health and Environmental rules, including all PPE requirements.

Revision Tracking			
Revision Number:	Date:	By:	Description:
0	9/6/2019	Kathy Wiedeman	New Policy
1	6/2/2020	Kathy Wiedeman	Modified policy number
Approval			
Name	Title		Date
Paul Einarson	Senior Vice President - Management & Technology		6/2/2020