



**SMURFIT KAPPA ROERMOND PAPIER B.V.**

**THIRD-PARTY  
REGULATIONS**

SKRP THIRD PARTY REGULATION EN  
Version 05 dated 8/8/2022

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## 1. DEFINITIONS

### Nomenclature:

References to Smurfit Kappa Roermond Papier ('SKRP') mean the entire site, including the port area.

### Contact person:

The employee designated by and on behalf of Smurfit Kappa Roermond Papier to maintain contacts between the contractor and Smurfit Kappa Roermond Papier.

### QESH Manager:

Quality, Health, Safety & Environment Manager; the employee appointed by Smurfit Kappa Roermond Papier to advise on and coordinate all matters concerning quality, working conditions, environmental protection and other designated activities at the site concerned.

### Contractor:

The company engaged by Smurfit Kappa Roermond Papier to perform work.

### Subcontractor:

A company engaged to perform work for a contractor which is in turn engaged by Smurfit Kappa Roermond Papier.

### Supplier:

A company (and its workers) present at the Smurfit Kappa Roermond Papier site to make a delivery in which environmental protection, working conditions and fire safety may play a role during the delivery. If necessary, binding additional agreements are made for each supplier.

## 2. INTRODUCTION

It is part of the policy of Smurfit Kappa Roermond Papier to assure, in an effective and cost-efficient manner, the company's working conditions (safety, health and welfare), to protect the environment and to ensure fire safety at a level that at the very least satisfies current laws and regulations.

The above is in line with the SKG Health and Safety Policy Statement. See Attachment 1.

The objectives of SKRP are 0 accidents for its own employees and third-parties and 0 (environmental) incidents at its business site.

To achieve these objectives:

-We expect third parties to be demonstrably trained and instructed on the subject of safety at work.

This can be demonstrated by means of: Certification under VCA\* and/or VCA\*\*, SCC or equivalent.

-We expect third parties to be familiar with these Third Party Regulations, to communicate them to the third-parties working under their authority and to ensure that they are complied with.

These Third Party Regulations relate to all work carried out by third-parties, being contractors or subcontractors or employees of those third-parties present on the site or in the buildings of Smurfit Kappa Roermond Papier.

The purpose of the Regulations is to protect the environment and all persons, machines and installations of Smurfit Kappa Roermond Papier and to prevent damage being caused by or as a

direct consequence of work performed by third parties and their workers on behalf of Smurfit Kappa Roermond Papier.

It is prohibited for contractors to perform work at the Smurfit Kappa Roermond Papier site if SKRP has not received a statement of acceptance of these third-party regulations duly signed by an authorised person on behalf of the contractor.

### 3. RESPONSIBILITIES

It is the responsibility of contractors, subcontractors and suppliers to:

- Comply as a minimum requirement with current laws and regulations covering working conditions, environmental protection and fire safety. (See section 9)
- Act in conformity with the contents of these Third Party Regulations.
- Safety booklet. All third-parties working at the site must be in possession of the Safety Booklet issued by SKRP. The management of the contractor or subcontractor must ensure that the safety rules and rules of conduct laid down in this safety booklet are complied with.
- Refrain from employing illegal persons; all workers must identify themselves to the contractor, subcontractor or supplier with valid means of identification prior to starting work. They must carry valid means of identification with them at all times and they must hold a valid work permit if they are from outside the European Economic Area (EEA). Workers must carry their work permits with them at all times.
- Ensure prior to commencement of the work that of a copy of the means of identification ('ID') of all persons who will work at SKRP on their instructions is held. The ID must be sent in good time to the Purchasing department of SKRP for filing purposes.
- Ensure (in the case of a contractor and/or subcontractor) that only properly trained and competent workers are engaged for the work and that workers are familiar with the contents of these Third Party Regulations. Workers' competence must be demonstrated on the request of Smurfit Kappa Roermond Papier. Engaged workers must have a command of Dutch, German, English and/or French (at least one of those languages) to a degree that allows instructions to be given and understood in a reasonable manner and enables the exchange of information;
- Ensure (in the case of contracted work performed by a contractor) strict adherence to the 'Locking Procedure'. Only employees of Smurfit Kappa Roermond Papier are authorised to decommission and/or release an installation for use.

The statutory provisions are defined in this context as the provisions of the Dutch Working Conditions Act, Working Hours Act and their implementing decrees, the relevant working conditions information sheets, the relevant provisions of the Commodities Act and the Environmental Management Act and its decrees.

A contact person will be named to enable the contractor to be as fully informed as possible of the situation in, on and around buildings and installations of Smurfit Kappa Roermond Papier.

The contractor and its workers must request the name of the contact person if they do not know who it is.

The contractor must ensure that its presence and the presence of its workers on the site and in the buildings of Smurfit Kappa Roermond Papier does not impede the progress of the work of Smurfit Kappa Roermond Papier or third parties, unless prior permission has been given.

Smurfit Kappa Roermond Papier selects contractors according to criteria that include accreditation and qualification of competence. The attitude of contractors towards environmental protection and working conditions plays a role in the selection process. Contractors are required

to adopt the same approach in relation to their subcontractors. SKRP reserves the right to carry out checks regarding the above matters and to monitor the supervision of compliance.

Workers of contractors and subcontractors are not allowed to go outside the relevant section of the workplace and/or the usual connecting routes.

## **4. REGISTRATION / GENERAL PROVISIONS ON ACCESS TO THE BUSINESS PREMISES**

### **4.1 Registration**

Persons without vehicles must enter and leave the site through the entrance at the gatekeeper's lodge. It is mandatory to register by name, both when entering and leaving the SKRP site.

One-off visitors must be registered in advance and must report to the gatekeeper or reception on the day of the visit. It is the task of the contact person to escort the visitor on the business premises.

Third-parties who have been issued with a badge are regarded to register in and out electronically and have access to the business premises without prior registration.

It is obligatory to provide advance notice of vehicles that require admission to the factory site. Admission will be granted only with the permission of the contact person. The gatekeeper will give vehicle drivers a parking card and will indicate the parking location.

Workers of contractors and subcontractors who are performing work at Smurfit Kappa Roermond Papier for the first time will receive instructions about the company's safety requirements and rules of conduct and will be given a copy of the safety booklet. The worker will be required to sign to confirm receipt of the booklet and familiarisation with its contents. Workers of contractors and subcontractors must carry the safety booklet with them at all times and show it to an SKRP employee on request.

### **4.2 General provisions**

- Carrying and using information carriers (laptop, USB sticks, photo cameras, telephones) is subject to strict SK policies. Their use and application must always be discussed with the SKRP contact person beforehand. They may only be used once permission has been given. Third-parties are not permitted to connect "information carriers" to our network/PCs.
- It is strictly prohibited to bring any alcoholic beverages and/or drugs onto the site.
- Workers of third-parties are not allowed to bring onto the site any explosive materials or other easily combustible substances, unless such occurs with the permission of the contact person and the substances are needed for essential contracted work.
- Regular working hours are on Monday to Friday from 7.30 am to 4.45 pm. Work may only be carried out outside of these times with the permission of the SKRP contact person.
- Workers of third parties must report to their contact person on arrival. On completion of their work, workers of third parties must report to their contact person or his/her deputy.
- A contractor or subcontractor must notify the contact person at least four days in advance of starting work at SKRP, and must provide a list of names with copies of the means of identification of its workers who will work on the contract.

### **4.3 Promotion, collections, etc.**

Other than with the prior written permission of the senior management of Smurfit Kappa Roermond Papier, it is not allowed to conduct any business at the company, to offer signature lists, to hold collections or promote any association or cause whatsoever.

### **4.4 Use of alcohol or drugs**

It is prohibited for workers of contractors and subcontractors to be under the influence and/or in possession of alcohol and/or drugs. In addition, workers may not be under the influence of medication to an extent that jeopardises their own safety and that of others. Violation of this rule will result in their immediate removal from the site and denial of access in future. SKRP has the right to conduct tests in respect of these matters.

### **4.5 Removal of goods from the premises**

A permit is required to remove from the site any goods that are or were the property of Smurfit Kappa Roermond Papier. Such permits will be issued by a person in authority at the department or by the project manager. When leaving the SKRP site the permit must be handed to the gatekeeper. The gatekeeper is authorised to check vehicles and persons for the unauthorised removal of SKRP goods or property.

### **4.6 Inward and outward movement of goods**

Loading and unloading must be performed by warehouse employees during their normal working hours (Mondays to Fridays from 7:30 am to 12.00 pm and 12.30 pm to 4 pm). Loading and unloading on Thursdays should be avoided in connection with the weekly shutdown. If there are other shutdowns the warehouse will contact the Purchasing department or the supplier.

In principle there must not be any loading or unloading outside normal hours.

### **4.7 Unscheduled loading/unloading**

Any loading or unloading necessary before 7:30 a.m. or after 4 p.m. must be reported to the gatekeeper. Outside of working hours this must be reported to the gatekeeper.

### **4.8 Private vehicles**

It is prohibited to use private vehicles, including mopeds and bicycles, motorcycles and cars on the business premises.

A parking card may be issued under certain conditions.

Parking is allowed only at designated parking places.

## **5. WORKING CONDITIONS, ENVIRONMENTAL PROTECTION AND FIRE SAFETY**

### **5.1 General provisions**

#### **5.1.1 Liability**

The contractor will be liable for the consequences of failure by its workers and subcontractors to comply with legal and other requirements and with issued instructions. This matter will be governed by Dutch liability law.

The foregoing does not affect a worker's personal responsibility under prevailing legislation.

#### **5.1.2 Supplementary instructions**

Supplementary instructions that the contact person issues in respect of working conditions, environmental protection and fire safety must be followed in all instances.

### 5.1.3 General safety requirements

- Jewellery such as bracelets, rings and chains may not be worn while performing work.
- Long hair must be tied up to rule out the risk of it becoming caught up or pulled in by moving parts.
- Watch out for forklift trucks. They may have a long braking distance.
- Machines/installations of Smurfit Kappa Roermond Papier used for production and other purposes may be switched on and off only by the company's own employees.
- Everybody must comply with the instructions given on signs on the company's site and in its buildings.

### 5.1.4 Hazardous substances/materials

In cases where substances and/or materials presenting an enhanced risk are used, measures must be taken to ensure that they can be safely and correctly transported, used, stored and disposed of. Hazardous substances are substances that could be harmful to people's health and/or to the environment. The use of these substances must be reported to the contact person.

The labelling of the hazardous substances (for the definition, see: The Environmental Management Act) must be in conformity with the GHS labelling directives. It is the responsibility of contractors or subcontractors to remove their unused substances and/or materials.

Additives/chemicals and similar may be used only after submitting safety data sheets to the contact person and after he/she has given permission.

### 5.1.5 Hazardous and nuisance--causing activities

For work involving a certain risk or level of complexity the contractor should ensure that a risk assessment/SHE plan is formulated before the work is carried out. This must be presented to SKRP for consultation and approval. The work may not be started until approval has been given.

As used in these Regulations, 'hazardous and nuisance--causing activities' include:

- welding and cutting and all activities that produce heat and/or sparks. These activities must be performed in accordance with the Safe Working Permit (SWP);
- activities with a risk of serious injury due to the starting (unexpected or otherwise) of an installation or parts thereof (see the electrical release list);
- activities capable of causing nuisance noise or vibrations for people in the vicinity;
- activities capable of interfering with electronic equipment (control and other equipment);
- activities that cause or are capable of causing the failure of gas, water and/or electricity supplies;
- activities on steam lines (steam line shutdown procedures 7 and 17 bar);
- activities in enclosed spaces. (The contact person will state whether a gas explosion test is required);
- activities in an explosion zone (Ex-zone);
- activities on fire--related technical facilities that temporarily or otherwise impair the functional requirements of the facilities;
- digging (digging permit);
- maintenance work such as cleaning, repairing, inspecting, assembling and disassembling a machine and/or installation. These activities are subject to a Locking Procedure. The procedure is obtainable from the contact person.

The above activities that may endanger persons and/or goods of SKRP may be performed only after a Safe Working Permit (SWP) has been issued by the contact person or project

leader in accordance with the prevailing company requirements. The issued SWP is valid for a predetermined period of time.

An issued SWP states which safety measures are to be put in place.

Work on the electricity network may not start until the person responsible for the work at SKRP has issued instructions, has safeguarded the installation and made sure that the power supply has been switched off.

Depending on the nature of the work on the electricity network, it is obligatory to wear the appropriate personal protective equipment in accordance with standards NEN 3140 and NEN 3840.

Third parties that work on the electricity network must have been qualified for such work under NEN 3140 (low voltage) and/or NEN 3840 (high voltage). Third parties that provide persons to work on the electricity network must submit to SKRP a signed 'Statement of equivalence' before they start work, a request must be made prior to the work from the SKRP project leader responsible for the work.

After work on a fire wall involving making holes in the wall, the holes must be repaired (temporarily) before the end of the working day by means of material that is the same as the material of the fire wall in terms of fire safety.

Tie-ins (electrical/mechanical) on existing installation components may only be used with the express approval of the SKRP contact person. These components must always be made safe before the work is carried out.

Connections to the water or electricity mains may be made only with the prior permission of the departmental manager or project manager.

Machines and/or installations and testing facilities owned by or leased by the contractor or subcontractor must be in conformity with the currently working conditions and environmental laws; the contractor or subcontractor in question is responsible for arranging the required permits and/or inspection certificates. These must be presented at the request of the client or its authorised representative.

Equipment and/or installations (including test installations) must not be started up until they have been inspected and approved by the contact person.

#### 5.1.6 Orderliness and neatness

SKRP will designate a location for a building site if one is required for the work of the contractor or subcontractor. The contact person is responsible for designating the building site. The contractor or subcontractor may deny a person access to the building site for stated reasons.

The contractor or subcontractor must ensure maintenance of orderliness and neatness. At the end of the work period, the contractor or subcontractor must make sure that the building site or workplace has been cleaned up and sealed off/safeguarded and that adequate measures have been taken to prevent unauthorised use of machines, hazardous substances, equipment and materials. Gas cylinders must be closed and stored at a designated place and the electrical power supplies of all devices must be safeguarded.

Other matters that must receive attention include:

- keeping free walkways, roads, emergency exits and operating equipment;
- keeping free and maintaining easy access to first aid materials, water hydrants, fire hoses, fire valves, small extinguishers, manhole covers, emergency showers, transport routes and passages;
- preventing the risk of persons slipping and stumbling;



- making sure that no materials like bolts, nuts and tools are left behind in/on machines. If they are left behind there is a great probability of damage being caused to rollers, tighteners, coverings and similar;
- making sure that no materials are left lying around on beams, edges and ledges, as these may fall off. NB: danger of falling.

The contractor or subcontractor is responsible for ensuring that the agreements made are kept.

Breakfast, lunch, coffee, etc. are permitted only in site huts and in the designated canteens/company restaurant.

It is not permitted at these places to wear clothing that is dirty and/or gives off dirt.

Presence in a canteen or staff restaurant is permitted only during the agreed opening hours.

Use of the bathroom during normal working hours is allowed only with the permission of the contact person.

#### 5.1.7 Walking on ceramic materials and leaving behind materials

It is not permitted to walk on the wet and dry pistons of the wire part of the paper machines and other components fitted with ceramic coverings (files, vacuum plates). It is not permitted to leave tools and materials behind on ceramic parts.

#### 5.1.8 Environment

It is obligatory for the contractor to comply with environmental laws, including the environmental licence of SKRP. In particular the contractor and subcontractor must devote attention to:

1. Noise: Work may be performed outdoors on the site in the evening and during the night (i.e. between 10:00 p.m. and 6:00 a.m.) only if it does not cause excessive noise. Among other things this means no noise from radios, no hitting of empty tanks or pipes, no grinding of steel and no blast cleaning without prior consultation with the contact person.
2. Waste: Remnant substances must be separated into industrial waste and hazardous waste. Unused residual substances must be removed by the contractor in accordance with legal requirements (if the contractor holds a licence for such removal), unless different arrangements have been agreed in writing with the contact person. Residual substances and waste may not be left behind or discarded in sewers, wells and drains. Waste containers used or present at the workplace must be emptied periodically.
3. Soil: Liquids in cans, drums, etc., must be used and stored above a leak tray that can hold 100% of the volume of the largest can/drum (generally a container) plus 10% of the volume of the maximum number of other containers present. Every leak occurring during storage must be cleaned up by the workers of the contractor or subcontractor, and reported immediately to the contact person. If necessary the earth/soil must be cleaned or tidied up at the expense of the contract or subcontractor. The labelling requirements stated in section 9.1.3 also apply in respect of these matters.
4. Sewers: It is not permitted to rinse away spilt chemicals and/or additives into the company's sewer system. In the event of a contingency arising (leakage via sewer or soil) the contractor or subcontractor must immediately alert his contact person.

## 5.2 **Personal protective equipment and industrial clothing**

- Third-parties must wear appropriate industrial clothing of their own to carry out the work. This industrial clothing must feature a visible and recognisable company name and/or logo.
- Safety clothing is worn on all business sites.
- The obligatory wearing of other personal protective equipment – such as helmets, ear protectors, **safety glasses** and prominent clothing like safety jackets – will be indicated by pictograms, made known at the time of contracting the work, or be a legal requirement. Any other unnamed personal protective equipment required will be decided in consultation between the client and the contractor.
- The contractor or subcontractor must instruct its workers in how to use the prescribed personal protective equipment.
- Contractors and subcontractors must make available the personal protective equipment required by their workers.
- The use of an item of personal protective equipment may be indicated by safety signs, stated in a work permit or prescribed by the client.
- The wearing of safety shoes with steel caps, which are at least in conformity with the S2 standard, is obligatory for all persons present at the place of such work as maintenance, assembly/disassembly, new construction, demolition, digging and similar.
- The contractor must ensure the correct use and wearing of protective equipment by its own workers and also those of its subcontractors.

### **5.3 Equipment and tools**

The contractor or subcontractor must ensure the presence of adequate equipment and tools. The equipment and tools used to perform work must satisfy the applicable legal requirements. They must be approved in good time (in accordance with legal requirements) and must be provided visibly with an approval sticker showing a re-inspection date. Equipment and tools that the client or its representative deems unsound, unsafe or not approved on time must be removed from the Smurfit Kappa Roermond Papier site. Borrowing SKRP tools is only allowed with the permission of the SKRP contact person. All building site electricity supplies (for electrical hand tools and mobile lighting) must be equipped with 30 mA earth leakage safeguards on the final terminal groups. An additional separate earth leakage circuit breaker is compulsory if those safeguards are not available.

#### **5.3.1 Working at heights**

The contractor and subcontractor and/or their workers must have received systematic and demonstrable training in working on and operating elevated platforms. Ladders, scaffolding and elevated platforms and their usage must satisfy legal requirements.

#### **5.3.2 Forklift trucks and other vehicles**

Persons driving a forklift truck must hold the required proficiency certificate. Forklift trucks intended for handling bales of waste paper and rolls of paper must not be used by third parties. If a forklift truck is equipped with safety belts, these must be used in the intended way.

It is strictly prohibited to carry people – other than the driver – on vehicles without special facilities for that purpose.

#### **5.3.3 Lifting**

The contractor and subcontractor and/or their workers must have received demonstrable training in performing lifting work.

## 5.4 Marking/cordoning off unsafe situations

Every contractor and subcontractor is required to take measures to cordon off hazardous situations and/or activities in the proper manner. Unsafe situations and/or work include:

- The chance of being struck by falling objects,
- Openings in the roads or paths,
- Working with open voltages (this to be judged by the person in charge of the work),
- Working in the vicinity of rotating and moving parts

Work on electrical installations must be performed in accordance with standards NEN 3140/3840 and those of the company with regard to the release of equipment for usage and the removal of fuses. The release lists must be filled in accordingly by or on behalf of the contractor or subcontractor.

If the risk for which the cordoning off is intended is unclear, it must be indicated nearby by pictograms and/or texts.

## 5.5 Traffic

The entire outdoor site is open to pedestrians, except for zones indicated by pictograms. The wearing of a safety jacket is obligatory at all outdoor sites where transport movements may occur and in the rooms/areas where paper is handled.

General road safety laws apply on the company's sites.

The parking spaces for vehicles used solely for transporting persons will be designated by Smurfit Kappa Roermond Papier or by the contact person.

It is not allowed to park motor vehicles on the Smurfit Kappa Roermond Papier site without a parking card. When transporting materials and/or when carrying out work, where the immediate availability of the motor vehicle on location is necessary, it is possible to request a parking ticket via the contact person.

Parking is allowed only at the designated locations on the site with a parking card. The parking card must be placed visibly behind the windscreen. SKRP cannot be held liable for damage caused to the vehicles of third-parties. These vehicles are placed on the business sites of SKRP at the owners' own risk.

Bicycles, mopeds and motorcycles must be parked in the designated racks/sheds near the entrance.

The general maximum speed limit for vehicles on the Smurfit Kappa Roermond Papier site is 20 km/h.

Any deviations from the rules stated above must be discussed with and approved in writing by the contact person.

## 5.6 FIRE SAFETY

### 5.6.1 Smoking ban

A smoking ban is in force throughout the Smurfit Kappa Roermond Papier site, with the exception of the smoking cabins provided. You are expected to minimise the amount that your people smoke and only to permit smoking during the breaks.

### 5.6.2 Fire prevention

Measures must be taken to rule out the possibility of a fire breaking out and/or an explosion occurring during all work that involves use of naked fire. These measures must at the very least include the presence at the location of sufficient approved small extinguishers suitable for putting out a potential fire and, if possible, a rolled-out pressurised fire hose (preferably before the commencement of work). It is obligatory to consult beforehand with the contact person on the use of naked fire and the work must not take place unless a valid Safe Working Permit (SWP) has been issued for it.

Canteen huts, work containers and similar must be provided with sufficient fire extinguishers and first-aid boxes.

It is strictly prohibited for the contractor or subcontractor to use the factory's extinguishing water network, unless prior permission has been obtained from the contact person or project leader of Smurfit Kappa Roermond Papier.

### 5.6.3 Fire reports and alarms

Contractors and subcontractors are expected to sound the alarm in the event of fire or serious accident by calling the internal emergency number (0475-384(300))

State the building and the floor where you are located and, if possible, give a more detailed description of the place where fire has broken out.

Watch out for your own safety. Be sure not to get trapped by fire or smoke.

- Read the directions for use on the extinguishers that are present.
- Try to put out the fire.

All initial fires, even if they have been extinguished, must be reported to the contact person.

For the **fire alarm**: An uninterrupted siren will sound on the site.

For the **evacuation signal** an interrupted siren will sound. All personnel must report to the assembly area (company restaurant).

A test alarm takes place on the first Monday of every month at 12:00 noon.

### 5.6.4 Training requirements (use of small extinguishers)

If the work is capable of causing a fire, the persons who will perform the work must have been instructed by or on behalf of the contractor or subcontractor in the use of small extinguishers.

### 5.6.5 Insurance

It is obligatory for the contractor and subcontractor to take out fire insurance for their own property, including cover for valuable items required for the contracted work.

## 5.7 **First aid**

The company's first aid stations indicated by a pictogram may be used to treat injuries.

Accidents must be reported to the contact person or gatekeeper.

Assistance can be sought using the central emergency number 0475-384 (300) in the case of serious accidents.

## 5.8 Miscellaneous

The following subjects will be discussed if necessary during talks on the order, contract or project:

- use and location of places to take breaks, toilets and restaurant facilities
- use of personal protective equipment
- compliance with relevant health and safety at work legislation
- essential deviations from the standard SKRP rules may be discussed and any arrangements agreed in that respect must be confirmed in writing by the client

Regular progress meetings will be held at the discretion of the contact person. The frequency of such meetings will be agreed by the parties concerned.

## 6. RECOVERY OF LOSSES

Any damage arising due to failure to comply with these rules of conduct will be recovered from the contractor. This same applies to losses caused by unlawful acts of workers of the contractor or subcontractor.

## 7. UNFORESEEN CIRCUMSTANCES

Deviations from the general rules of conduct require the prior permission of the contact person. In case of doubt or situations not covered by these Regulations, it is obligatory to contact the contact person and/or QHSE Manager. Failure to do so will relieve Smurfit Kappa Roermond Papier of all liability for any damage that may occur.

## 8. STATEMENT OF ACCEPTANCE

Note:

Future amendments will be given in an annex. We request that you sign this annex for receipt. By signing the annex you declare that you agree to the content of these Third Party Regulations and its accompanying annexes.

The undersigned confirms approval of the "Third Party Regulations" version 05 dated 8-8-2022 of Smurfit Kappa Roermond Papier B.V. :

Name:

Company stamp:

Date:

Position:

Signature:

Return to the Procurement department:  
Smurfit Kappa Roermond Papier B.V.



June 2018

Smurfit Kappa

# Health & Safety Policy Statement

## Our Vision

Every Smurfit Kappa employee must return home safely to their families.

At Smurfit Kappa, we promote a Health and Safety **culture** founded on **authenticity, empowerment and accountability.**

We operate with **Health & Safety** as a **core value**, not just a priority.

We believe that operating **safely is non-negotiable** and no task is so important it can't be done safely.



**Tony Smurfit**  
Group CEO



**Saverio Mayer**  
CEO Europe



**Jo Cox**  
Cluster CEO



**Wouter Lap**  
MD Roermond



## Our Principles

It is Smurfit Kappa policy to:

- Promote a culture of openness, involvement and dignity in the workplace; we are all responsible for the health & safety of each other.
- Provide constructive feedback to success and setbacks in equal measure. We care for our employees and expect them to care for each other by speaking up when walking past anything they feel is unsafe.
- Review workplace incidents so there is consistent reporting, investigation and where appropriate identify improvement opportunities that strengthen our health and safety management systems.
- Comply with all applicable legal requirements and implement good Health and Safety practice by effective deployment of our Health and Safety Management Systems.
- Ensure that all line managers:
  - Take responsibility for Health & Safety implementation, communication and compliance.
  - Foster a work environment where every member of the workforce understands their role in health and safety and delivers on their individual responsibilities.
  - Lead competent employees and contractors who are trained to work safely.
  - Have processes in place to identify our health & safety hazards so that risks are assessed and controlled to acceptable levels to prevent the occurrence of injury and ill health to our employees, contractors, partners and visitors.

## Our Commitment

We are committed to continuously reviewing and improving our Health & Safety practices and performance to progress towards our vision. We know that doing the right things, in the right way and with integrity and respect is required to engage our employees and create a successful business based on trust.

Accountability for health and safety starts at the top, in fully supporting and endorsing this policy we are committed to not only being visible in its delivery, but also being involved and party to the implementation of it.

This policy is communicated to all employees and is available to all interested parties. Smurfit Kappa is committed to reviewing this policy regularly in line with good industry practice.

