

General EHS conditions for contractors

(Safety, Health, Environment)

Positioning:

These general EHS conditions form part of the Aleris Aluminum Duffel BVBA general EHS policy.

Objective:

The EHS conditions are a tool to comply with the agreements between the contractor and Aleris Aluminum Duffel BVBA.

1. INTRODUCTION	3
Safety principles	3
Abbreviations	3
Definitions	3
2. CONTRACTUAL TERMS	4
2.1. Client's obligations	4
2.2. Contractor's obligations	5
2.3. Quotation by Contractor	6
2.4. Prior to the start of the work.....	6
2.5. During the work	7
2.6. After the work	7
3. SAFETY REGULATIONS	8
3.1. General safety regulations	8
3.2. First Aid/fire prevention/fighting/evacuation.....	9
3.3. Reception and factory security	10
3.4. Incident and accident report	11
3.5. Health regulations	11
3.6. Order and neatness	12
3.7. Waste management	12
3.8. Use of sanitary facilities and changing rooms	13
3.9. Use of materials, machines or equipment	13
3.10. EHS audits.....	13
4. SPECIFIC SAFETY REGULATIONS	13
Annexes	13

1. INTRODUCTION

Safety principles

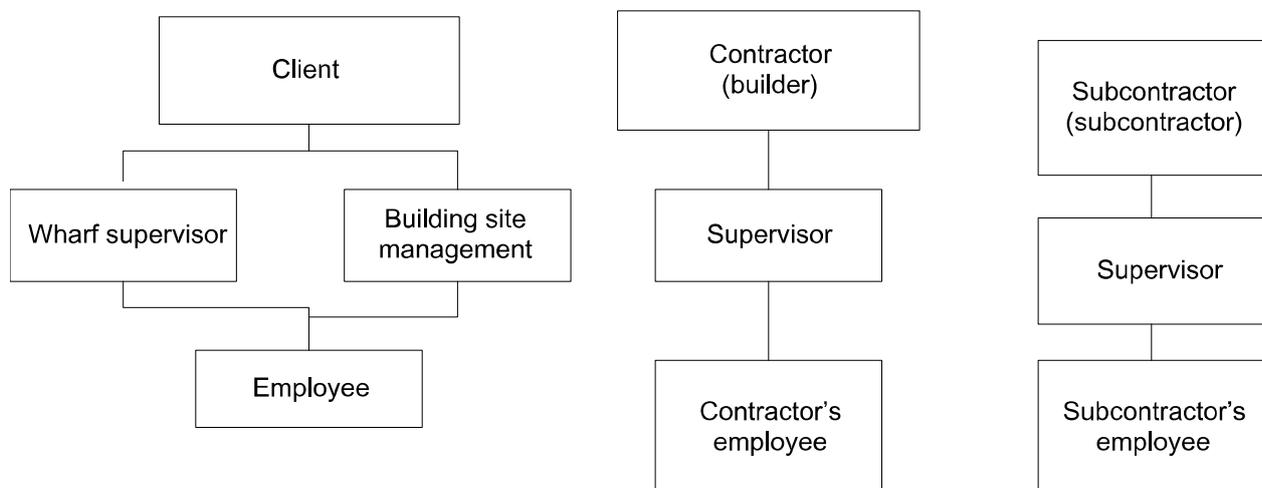
Integration, promotion of safety consciousness, personal involvement and collegial responsibility are common safety principles. Consequently, each contractor and/or his employees can be addressed on this aspect by the Client's employees. This does not imply that authority, supervision and direction are being exercised by the client and his employees. Application of these principles by the contractor and/or his employees who will be working within Aleris Aluminum Duffel BVBA is also expected.

Abbreviations

ARAB	General Regulations for Labour Protection (Algemeen reglement voor de Arbeidsbescherming)
AREI	General Regulations for Electric Installations (Algemeen reglement op de elektrische installaties)
CODEX	Code on Well-Being at Work
EDPBW	External Department for Prevention and Protection in the Workplace (Externe dienst voor preventie & bescherming op het werk)
VGM	Safety, Health and Environment [EHS = Environment Health Safety]
Vlarema	Flemish Regulation on Sustainable Management of Material Recycling and Waste Materials
Vlarebo	Flemish Regulation on Soil Decontamination and Soil Protection
Vlarem	Flemish Regulation on Environmental Permits
WW	Welfare Act (Welzijnswet)

Definitions

The following definitions are used in the text, please also see diagram 1: Organisation chart. They can deviate from the strict legal definitions.



Client = Aleris Aluminum Duffel bvba

The legal entity who, based on contractual agreements and within its authority, issues orders to the Contractor to carry out certain works or deliver certain services for ALERIS Aluminum Duffel bvba.

Contractor

The natural or legal entity with whom ALERIS Aluminum Duffel BVBA has entered into the agreement.

Construction site management (in larger scale work, temporary and mobile work places)

Every natural or legal entity who, on behalf of the Client, provides design and/or execution of the construction.

Work supervisor or wharf supervisor

The individual who represents the Client at the work site. The Work supervisor is authorised to act on behalf of the Client concerning the execution of tasks, compliance with safety regulations and interventions at the wharf. The Wharf supervisor is the direct contact between the Client and the Contractor. The Wharf supervisor is possibly a member of the Construction site management as defined in the European Guideline: Temporary and mobile work places.

Prior to commencement at the wharf, the name of the Wharf supervisor is forwarded to the Contractor.

Supervisor

The Supervisor is employed by the Contractor and represents the Contractor and Subcontractors at the work site. The Supervisor, commissioned by the Contractor, oversees the works on site and ensures that the work is carried out according to the contractual agreements and the Client's instructions and legal regulations.

Employee of contractor or subcontractor

The employee employed by and under the supervision and authority of the Contractor or subcontractor.

Subcontractor

Every individual or legal entity who, commissioned by the Contractor, performs work within the framework of the order from the Client to the Contractor and/or is an employer who deploys third parties.

Employee

The employee who works under the authority, management and supervision of the Client and reports to the Wharf supervisor with regard to the order.

Temporary and mobile work places

Implementation of a building site where civil-technical or building constructions are carried out.

Safety coordinator

An individual who meets the criteria of the Royal Decree of 25 January 2001 concerning the temporary or mobile building sites (altered on 19 December 2001 concerning the additional training of coordinators concerning health and safety).

Work permit CAT 1: short-term work

- 1 Work with an expected length of max. 5 calendar days **OR**
- 2 Work with just one contractor **OR**
- 3 Urgent technical interventions **AND**
- 4 No work with heightened risks

Work permit CAT 2: long-term work and blanket contracts:

- 1 Work with an expected length of more than 5 calendar days **OR**
- 2 Work with more than one contractor **OR**
- 3 Projects **OR**
- 4 Work with heightened risks **OR**
- 5 Blanket contracts

2. CONTRACTUAL TERMS**2.1. Client's obligations**

The client commits to:

Opportunity to visit the work site

Every approached contractor is offered the opportunity to visit the site where the work will be carried out to enable the Contractor to estimate the specific health, safety and environment aspects, and to evaluate the risks and particulars of the work to be carried out insofar as these are known to the Client.

Information on the internal safety, health and environment regulations

To inform each contractor about the internal safety, health and environment regulations and to provide the relevant information on the specific risks during the execution of the work known to the client.

Organising an introduction meeting (kick-off meeting)

After assigning the contract, an introduction meeting is held. When working with a CAT 1 work permit, the introduction for third parties is held at the work place.

2.2. Contractor's obligations

The contractor commits to:

Take EHS regulations into account when drafting quotes

Third parties, when making quotations, must calculate the costs of the necessary measures to be able to work safely according to their risk analysis, the current legal regulations and the Aleris internal safety regulations. In the absence of this information, the third party shall not be able to charge the Client.

Report specific dangers of the Contractor

In case the Contractor's work includes specific risks according to the risk analysis, these specific risks and the mitigating measures must be reported to the Client in the quotation.

By submitting the quotation/order and after the contract is assigned, the contractor commits:

To apply the legal regulations concerning safety, health and environment including ARAB, AREI, WW, CODEX, social legislation, VLAREM and the relevant European guidelines.

Compliance with and application of the Client's internal safety regulations and preventative measures;

To visit the site where the work is to be carried out beforehand;

to acquaint himself with the risks and particulars of the work to be carried out.

To inform the employees involved, before the start of the work, about the client's and the contractor's EHS regulations.

The contractor commits to submitting a signed list of the employees as proof that they have received and understood the necessary instructions to the client.

To demonstrate the occupational health fitness for the contractor's employees prior to starting the work on site. This concerns employees who perform a safety function or a function with raised awareness (definition and regulations in accordance with Articles 2 and 4 of the Royal Decree dated 28 May 2003 concerning the Health supervision of employees), by means of the health evaluation form and/or the VCA booklet.

To submit proof of certified fork lift truck driver, mobile scaffold operator and crane operator. (Booklet or certificate of safety functions) VCA, scaffold erector.

To comply with the Welfare Act, other relevant legislation and the Aleris internal safety regulations. If the contractor does not adhere to the obligations above, Aleris can take the necessary measures in the cases determined in the contract, for account of the contractor.

To forward new information on the measures to be taken and remaining risks prior to starting or continuing the work in the case that he adjusts or is forced to adjust his working method resulting in a change of the remaining risks.

To comply with the obligations concerning the well-being of the employees when carrying out their work, which are inherent to the site at which the employees perform their tasks.

2.3. Quotation by Contractor

The Contractor shall submit the following completed and signed documents beforehand to the Client (to be saved in a database):

- VCA certificate. If this is not available: the Safety and Health Evaluation Questionnaire, see the Appendix;
- General VGM plan and risk analysis;
- Coordinators for occupational accident insurance form, EDPBW and the firm's contacts.

Specific safety regulations in connection with dangers and risks should be reported in the quotation by the Contractor.

2.4. Prior to the start of the work

2.4.1. Introductory meeting/discussion

Objective:

To make clear agreements between the Client and Contractor as recorded in the work permit or 2 min risk analysis.

For work with a CAT 1 work permit, the document is signed by the Supervisor and all (sub)contracted employees at the start of the work.

For work with a CAT 2 work permit, the Client convenes a kick-off meeting with the Wharf Supervisor and the Supervisor.

Contents

- Explanation of the work to be carried out;
- Discussion of this document;
- Discussion of the safety instructions with the Supervisor and recording and signing in the work permit;
- Recording agreements in connection with instruction and training for all the Contractor's employees (in one of the following three languages: Dutch, English and German);
- Agreements in connection with exposure to agents included in RD chemical agents (latest version) and RD health supervision (latest version);
- Agreements in connection with inspection, sanctions and action during the work;
- Explanation of the final evaluation;
- Risks and associated preventative measures brought in by the Contractor.

Other regulations concerning the kick-off meeting are the following:

- If the Supervisor is replaced, a new kick-off meeting shall be convened;
- If the contract is for longer than one year, or the work lasts longer than one year, the Client shall convene this meeting at least once a year;
- If the Contractor works with Subcontractors, the Contractor shall ensure that the Subcontractor receives the same information that the Contractor received from the Client, or has acquired himself. The Contractor shall do everything necessary before starting the work to hold a kick-off meeting with the Subcontractor;
- Wharf meeting: for work with the CAT 2 work permit, wharf meetings will be held;
- The data and list of participants are included in the minutes of the kick-off meeting.

2.4.2. Reception, instruction and training of the employees of the Contractor/Subcontractor

The Client will verify that the Contractor who will carry out work with the CAT 1 or CAT 2 document, has received and discussed the relevant instructions during the kick-off meeting in connection with the health and safety risks to which they are exposed during the work at the Client site.

If the Contractor/Subcontractor neglects to inform his employees sufficiently concerning the safety obligations, the Client shall give the instructions and trainings for the account of the Contractor/Subcontractor.

2.5. During the work

The Supervisor monitors that the work is carried out as agreed with the Client.

If the work is stopped due to exceptional circumstances (gas leakage, fire etc.), the individual who ordered the work to be stopped must report to the Supervisor and Wharf Supervisor.

The Building Site Management/Wharf Supervisor have, at all times, the right to monitor whether the Contractor is applying the safety and environment regulations.

The Client holds the right to monitor the Contractor's/Subcontractor's work and to forbid the use of unsafe materials, tools and/or working methods. In that case, the principal can stop the works without this leading to the Contractor/Subcontractor being able to claim compensation or reimbursement. Contractor/Subcontractor remain responsible at all times for the manner in which the work is carried out.

Work which is not performed according to the agreements can be stopped at any time by the Client without this giving the Contractor the right to claim damages. If the Contractor, after having been notified to be in default by registered document, does not rectify the situation, the Client can legally annul the order, without prejudice to his right to claim damages.

The Client considers safety, health and environment to be one of the top priorities during the execution of the work. Principles such as integration, commitment and collegial responsibility are hereby practiced.

2.6. After the work

At the evaluation of the work and the execution thereof, an evaluation shall be made by the Building Site Management or Wharf Supervisor on the Contractor's regulations concerning environment, health and safety.

This evaluation is done through the central database of the Technical Procurement Service of Aleris Aluminum Duffel BVBA. This evaluation shall be forwarded to the Client to allow the Client to judge the Contractor for placing future orders.

3. SAFETY REGULATIONS

The Client's Wharf Supervisor is the contact for the Contractor.

The EHS service (prevention and protection) is available at all times for additional information. (Tel.: 2100)

The supervisor monitors that the work is carried out according to the EHS regulations as agreed in the kick-off meeting.

Furthermore, the Supervisor shall ensure that the Contractor has received and understood the general preventative regulations, chapter II in this document, and the specific safety regulations mentioned in work permit CAT 1 or in work permit CAT 2.

3.1. General safety regulations

It is forbidden

- ❖ To bring DRINK CANS into the company.



- ❖ To wear RINGS, BRACELETS, JEWELLERY, TIMEPIECES.



- ❖ To be at other sites besides the indicated site.
- ❖ To bring PHOTO, VISUAL AND/OR FILM APPARATUS into the company.



- ❖ To work on the ALERIS ELECTRICITY NETWORK.
- ❖ To smoke in offices, social facilities and factory buildings.



- ❖ To short circuit safety devices.
- ❖ To touch moving machine parts.



- ❖ To dump chemicals or other substances in the sewer.

- ❖ To bring alcohol and drugs onto the factory premises.
- ❖ To operate equipment for which you have not been trained.
- ❖ Speed limit within the factory is max. 10 km/h.



- ❖ To have PIERCINGS, CIGARETTE LIGHTERS in the foundry.

It is mandatory

- To turn on vehicle LIGHTS at the company premises.
- To respect the smoking areas. These are indicated with pictograms. These are the only locations where smoking is permitted.
- To place barriers and signalling around wells and/or dangerous differences in heights, and around work on mobile scaffolds.
- To ask permission of the client or his representative for placing, connecting and disconnecting utilities.
- To submit valid certificates prior to use of installations and materials to be certified to the client or his representative.
- To keep clear of passages and entries of garages, fire hydrants, fire brigade hose cabinets, eye and emergency showers and other safety equipment.
- To allow oneself to be treated by the medical service for every injury incurred during the work. Outside of working hours (8:00 AM to 4:30 PM) one can contact the security guard, tel. 2222 or mobile 0477 29 15 06.
- To report all unsafe situations, incidents and near-misses to the wharf supervisor.
- One must use the safe roads, the indicated paths and zebra crossings.



3.2. First Aid/fire prevention/fighting/evacuation

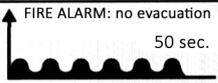
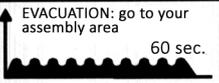
Emergency numbers

FIRE **999 or 0479/95 18 17**

Accident **777 or 0477/29 15 06**



Alarm signals

Alerts	local fire	evacuation	end of alarm
sound alert			
nature and condition	warning: there is a fire somewhere in the company	danger looms somewhere in the company	the danger has passed
desired action	none, unless it is in your own department	evacuation of the zone is immediately imperative	everyone return to work
During evacuation, leave the buildings according to the plans placed at strategic points.			

Actions upon noticing a starting **fire**:

- **Extinguishing** by staff in the neighbourhood, and at the same time sound the **fire alarm**:
by tel. **999** or **fire alarm buttons**: indicate the location clearly



Only fight the fire with portable extinguishers.

- On arrival of the fire brigade, leave the fire fighting to them.

Actions upon hearing a **fire alarm**:

- Remain at your place of work insofar as you are not prevented from doing so by the fire.
- Inform persons working in remote locations (on the roof, in cellars, in cable tunnels etc.) whether they can continue working.

Actions upon hearing the **evacuation alarm** :

- End your work in a safe manner
- Stop the machines
- Close windows, doors, rolling gates and ventilation hatches
- Only take personal belongings (such as jacket, handbag or briefcase) from the place of work with you.
- Leave the building via the closest safe exit (see *evacuation plan*) or follow the rescue signs in the company (using lifts is prohibited)
- Move to the muster area of your zone (see *evacuation plan*)



Actions upon hearing **End of alarm signal**

- Return to your place of work to continue the work.

3.3. Reception and factory security

- Each contractor collects a valid badge at reception.
- Private cars are not permitted on the principal's premises unless you have an entry permit for such. The visitors' car parking spaces may not be used.
- Tools etc. may be brought by car to the place of work.
After unloading these, the cars must immediately be placed outside of the factory fence.

- Wharf vehicles, containers and/or rolling stock can be brought to the wharf in consultation with the wharf supervisor if one has an entry permit. Vehicles within the factory must have an inventory list.
- The Client retains the right at all times to inspect the cab or cargo space of vehicles entering and/or leaving.
- Upon leaving the Client's premises, exit inspection is possible. On request of the Client, the contents of carry bags or parcels must be shown.
- In the case of a collision with internal transport, and with every damage to the Client's property or property on the Client's premises, a European collision form must be completed together with the wharf supervisor.

3.4. Incident and accident report

Every accident must be investigated.

In the case of an incident, near-miss, unsafe situation or action, an investigation must be started according to the following criteria.

Who is responsible for investigation?	Contractor
When is investigation necessary?	With Kinney $E \geq 3$ or $R \geq 70$
How?	Preferably via fact tree analysis or RCFA
Advice	Prevention service for Contractor and Client

3.5. Health regulations

Dangerous substances and preparations

- Are reported in writing beforehand to the Client, accompanied by a Safety Data Sheet (SDS).
- May only be used after approval by the Client's prevention advisor – occupational health physician.
- Products are accompanied by the necessary information and safety sheets and are available for the users.
- The chemical receptacles must be clearly marked with the product name and chemical formula. The label must be according to the valid standards.
- The Client's employees may not be hindered by the products.
- The products may not cause damage to the Client's property.
- Unless otherwise mentioned in the contract, the Contractor must remove all chemicals (including remaining quantities), used products and empty receptacles.
- The storage of hazardous substances and preparations on the ALERIS premises should be avoided as much as possible. If this cannot be avoided, the quantity to be stored should be kept as small as possible.

Personal protective Equipment (PPE)

- Each Contractor must take care of his own PPE according to the risks associated with the works.
- The mandatory work clothing and PPE for Contractors consists of:
 - Safety shoes
 - Safety helmet
 - Safety glasses
 - Work clothing with long sleeves and long trouser legs or fluo vest (not with hot work).

3.6. Orderliness and cleanliness

- The working environment must be cleaned at the end of the working day or as often as necessary to guarantee the health and safety of the employees.
- At the end of the work, everything must be cleaned.
- Unused and superfluous materials must be removed in the correct manner. Contact the wharf supervisor for this. Please also see 3.7 Waste management.

3.7. Waste management

- The Contractor takes care of removing the waste materials such as is agreed beforehand with the Client.
- For the collection and processing of the produced waste, the VLAREA regulations must be taken into account. The Contractor can only work with certified collectors and processors. The necessary proof documents and removal certificates must be submitted to the environment service through the Wharf Supervisor.
- In the case that a temporary waste storage is needed to achieve an organised transport, codes of good practice must be observed.
- The Contractor is responsible for all consequences of not adhering to the environmental regulations.
- In the case of an incident with chemicals or other accidental spills, the environment service must be contacted via tel. 015 30 21 23 (Environment coordinator) or tel. 015 30 22 22 (security).
- Prior consultation between Contractor and Wharf Supervisor is necessary in the case of rinsing or waste water being released during cleaning. The manner in which this water will possibly be collected and filtered internally will be determined in consultation.
- There is an absolute ban on dumping fluids on the factory premises or in the sewer.
- During possible earthwork, prior consultation must take place between the Wharf Supervisor and the Contractor to ensure compliance with the VLAREBO regulations.
- All transport of waste must be reported beforehand to the EHS service, and it needs to be weighed.

3.8. Use of sanitary facilities and changing rooms

- The sanitary facilities are at the disposal of the Contractor and may be used as long as the internal house rules are respected.
- The changing rooms may only be used upon allocation and as long as the internal house rules are respected.
- For larger contracts, own facilities must be provided.

3.9. Use of materials, machines or equipment

- NO materials, machines or equipment of the Client may be used without the Wharf Supervisor's permission. The Contractor's employees must inspect the materials regarding their suitability for use. The Client is not responsible for any accidents which might occur.
- The forklift trucks, overhead crane or aerial work platforms may only be used after:
 - Prior notification to the wharf supervisor
 - Permission from the wharf supervisor
 - Submission of competence certificate to the wharf supervisor
- Electricity connections are requested via the wharf supervisor.
- Use of fax and telephone is requested via the wharf supervisor.
- Securing the Clients machines and installations shall be carried out by the ALERIS staff member according to LOTO procedure.

3.10. EHS audits

Both the Contractor and the Client can carry out EHS audits during the works. The report is taken added into the EHS file.

4. SPECIFIC SAFETY REGULATIONS

- The specific safety instructions mentioned in the CAT 1 or CAT 2 work permit should be followed.
- The CAT 1 work permit is signed by all the Contractor's employees.
- The CAT 2 work permit is signed by the Contractor to confirm that his employees have received and understood the necessary information.
- CAT 2 work permit can be supplemented with a separate CAT 1 work permit per job when need be.

Annexes

- Work permit CAT 1 – PB07_04_01
- Work permit CAT 2 – PB07_04_02
- Questionnaire Safety Audit – FV104G
- Coordinators and occupational accident insurance contractor

ALERIS ALUMINUM Duffel BVBA

Attn.: Preventiedienst
A. Stocletlaan 87
2570 Duffel

Re: Occupational accident insurance

Contractor's coordinator

.....

Name:

Address:

.....

Tel./Fax:

Name and address of the (inter) company medical service

Name:

Address:

Tel./Fax:

Name and address of the occupational accident insurance

Name:

Address:

Tel./Fax:

Policy number:

Contact in the case of an accident

During normal working hours:

Contact: Tel.:

Outside of normal working hours:

Contact: Tel.:

Please return this document, completed, to the address above.