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Logan Aluminum Inc.'s Contractor Safety and Environmental Policy

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Logan Aluminum Inc.’s Contractor Safety and Environmental Policy

1. Overview

Safety on Logan Aluminum Inc.’s (“LAI”) premises, including any offsite locations operated or controlled by LAI (“LAI’s Plant Site”), and protecting the environment are of paramount importance to LAI and must be a top priority for its contractors, their employees, and their subcontractors and suppliers. The contractor shall ensure the health, safety, and security of any individuals directly or indirectly employed by them or their subcontractors and suppliers (collectively, “Contractor Personnel”). The contractor is responsible for ensuring that Contractor Personnel perform all work with due regard for the safety of Contractor Personnel, LAI’s employees, and other individuals at LAI’s Plant Site, and according to LAI’s rules, regulations, and policies, OSHA, ANSI, NFPA, all applicable federal, state, and local laws, orders, codes, rules, regulations, and ordinances, and any standards or rules imposed by the contractor, a union, or a government agency (collectively, “Governing Rules”). The contractor is responsible for preparing and maintaining any programs required under these Governing Rules. Upon LAI’s request, the contractor shall provide LAI with documentation of these programs. Additionally, the contractor agrees to comply with and shall ensure that Contractor Personnel comply with this policy, watch [LAI’s Contractor Orientation video](#), and sign Contractor EHS Acknowledgment Form before working at LAI’s Plant Site and after that on an annual basis.

Contractor Personnel should always use the safety equipment provided and/or required for their protection. Contractor Personnel shall immediately report to their direct supervisor any at-risk conditions or practices, all injuries, regardless of how slight, and any spill or environmental incident. The contractor shall promptly notify the LAI Representative, as defined in Section 2. If LAI, in its sole discretion, believes that Contractor Personnel are performing any work at LAI’s Plant Site in an unsafe manner, or creating conditions, circumstances, or an environment that is unsafe for Contractor Personnel, LAI personnel or others, LAI will stop the activity and report the concern to the contractor, who is responsible for correcting any unsafe behavior. Contractor Personnel who

fail to follow any safety provisions, in LAI's sole discretion, may be barred from working at LAI's Plant Site.

This policy does not cover all situations that may arise at LAI's Plant Site. LAI may issue a General Work Permit for work not covered by this policy, including non-routine or out of ordinary work. The contractor and Contractor Personnel must contact the Health and Safety Team Leader, the Environmental Team Leader, the Contractor Team Leader, or their LAI Representative if there are questions about the proper work and safety procedures, or uncertainties about any hazard or environmental issue. If Contractor Personnel are required to contact one of the following individuals but they are unavailable, Contractor Personnel must contact one of the other Team Leaders listed below or the LAI Representative.

Health and Safety Team Leader
270-755-6981
Jason.Fowler@logan-aluminum.com

Environmental Team Leader
270-755-6390
Mark.Pendley@logan-aluminum.com

Contractor Team Leader
270-755-6113
Joseph.Jenkins@logan-aluminum.com

Important Contacts at LAI's Plant Site

LAI Emergency
270-755-6911 or extension 6911

Security
270-755-6696 or extension 6696

Please note that LAI's Plant Site is monitored by surveillance cameras at various locations, and LAI has the right, but not the obligation, at any time, to inspect any vehicles and personal property on LAI's Plant Site, including toolboxes, trailers, and storage containers.

2. LAI Representative

LAI shall designate a person or persons to act as LAI's authorized representative(s) ("LAI Representative") with whom the contractor and Contractor Personnel may confer. Unless stated otherwise, Contractor Personnel shall direct all questions or comments to the LAI Representative. If the contractor or Contractor Personnel have any questions about who the LAI Representative is, contact the Contractor Team Leader.

Before commencing any work at LAI's Plant Site, the contractor shall discuss the scope of the work with the LAI Representative to identify any related potential safety or environmental hazards or impacts to LAI's plant operations. The LAI Representative will provide the necessary instructions,

permits, and mitigation measures, including floor watch, for the Contractor Personnel to abide by while at LAI's Plant Site.

3. Policy Statement

LAI strives for an injury-free workplace, environmental and safety compliance, customer satisfaction, continual improvement, and world-class performance.

Each individual at LAI's Plant Site, including Contractor Personnel, is responsible and accountable to all others at LAI's Plant Site to ensure that no activities are undertaken, or actions tolerated that compromise the environment, the health and safety of any individuals, the quality of LAI's products and services, and LAI's work system philosophies.

4. Contractor's Accountability for Safety

The contractor is responsible for controlling all aspects of occupational safety and health, environmental protection, general safety, and compliance with the Governing Rules for work performed by Contractor Personnel at LAI's Plant Site. This obligation includes correcting known deficiencies in these areas as well as proactively and periodically monitoring, inspecting, and observing the processes, equipment, and policies used by Contractor Personnel to evaluate its performance and detect hazards. In the event Contractor Personnel, vendors, visitors, or LAI personnel could encounter uncontrolled hazards, insufficiently mitigated risks, or noncompliance within the contractor's control, the contractor shall take appropriate steps to ensure the following:

- Effectively notify affected individuals,
- Isolate individuals from the hazard or risk, and
- Implement proper control for the hazard or risk.

If LAI, in its sole discretion, determines the contractor is not complying with this Section, LAI may investigate and require the contractor to effectively address any deficiencies. Upon LAI's request, the contractor shall provide LAI with documentation of the corrective action.

5. Safety Obligations

The following obligations are fundamental safety expectations that LAI expects all individuals at LAI's Plant Site to follow:

- See Something, Say Something (Intervene)
- Accept Interventions and Feedback
- Own Your Decisions: Make defensible decisions and be accountable for your decisions.
- Stop and Think: This applies when working alone or in a multi-employee setting.

6. Safety Essentials

The Things We Must Get Right Every Time. Due to the nature of LAI's operation, the following items are extremely important and require strict compliance without exception to avoid a serious injury or fatality.

- Mobile Equipment and Pedestrian Separation: Pedestrians should give the right of way to all mobile equipment, including cranes, automated guided vehicles ("AGVs"), fork trucks, heavy construction machinery, buggies, and bicycles.
- Personal Protective Equipment ("PPE")
- Confined Spaces
- Lockout-Tagout ("LOTO")/Machine Guarding
- Fall Prevention and Protection

7. General Safety Rules

- Remember "WHEN IN DOUBT, ASK!"
- Contractor Personnel must follow all safety signs, warnings, or notices.
- Yellow tubs are only used to transport and store aluminum scrap to Remelt. NEVER place trash, debris, or other items in the yellow tubs.
- Do not touch aluminum products, as they may be hot. Aluminum is the same color, hot or cold.
- Do not climb, sit, or rest between stacks of aluminum products, including ingots, sows, and baled used beverage cans.
- Do not approach within 15 feet of mobile equipment unless 1) you receive permission from the mobile equipment operator, 2) the parking brake is set, and 3) the mobile equipment is turned off.
- Pedestrians must use the marked walkways when traveling through the plant building on LAI's Plant Site.
- All temporary containers must be labeled per OSHA Hazard Communication requirements.
- If the contractor requires a liquid storage tank on LAI's Plant Site, the contractor must provide secondary containment for the tank.
- Basement or pit access is prohibited unless prearranged and approved by LAI.
- Cell phone usage in any way is prohibited when operating mobile equipment, performing tasks, or walking on the shop floor or in a construction area at LAI's Plant Site.
- When sawing on concrete or masonry, wet sawing must be used.
- Lead-based paint must not be used at the LAI's Plant Site.
- Personal visitors are not permitted at LAI's Plant Site. If there is a family emergency, please have the family contact Security.

8. Safety Badge Policy

Contractor Personnel are required to obtain and wear a LAI-issued ID badge while on LAI's Plant Site. Unless stated otherwise, to get the ID badge, Contractor Personnel must first watch the LAI's Contractor Orientation video and sign the LAI's Contractor EHS Training Acknowledgement Form, and then register with Security at their assigned gate, which will be provided by the LAI Representative, using a government-issued ID photo. Contractor Personnel must watch the video and sign the Contractor EHS Training Acknowledgement Form annually. Contractor Personnel will give the executed Contractor EHS Training Acknowledgement Form to Security. Lost or stolen

badges must be immediately reported to Security to get a replacement. ID badges shall be returned to Security upon job completion.

9. Prohibited Items and Activities

Alcoholic beverages, narcotics, illegal drugs, and controlled substances are not to be consumed or brought into LAI's Plant Site. Anyone showing signs that they are impaired will not be permitted on LAI's Plant Site.

In addition to the items listed above, those listed below are prohibited inside the Secured Perimeter (defined below), at off-site offices and warehouse, and at other manufacturing or industrial sites when conducting business on behalf of LAI. The secured perimeter is the area within the fencing at LAI's headquarters located at 6920 Lewisburg Road in Russellville, KY, which requires a badge for entrance ("Secured Perimeter"). Security will inspect all persons, vehicles, and personal property before entering and leaving the Secured Perimeter. Contractor Personnel are responsible for removing these items before this inspection. Lockers to store these prohibited items (except for firearms, deadly weapons and ammunition) are available at Gate 3 and CM4. Any prohibited items found during the inspection may result in dismissal from LAI's Plant Site.

- Firearms, deadly weapons, or ammunitions, except for on-duty law enforcement
- Unauthorized explosives
- Disposable or butane lighters
- Disposable beverage containers smaller than 64 ounces
- Aluminum cans
- Aerosol cans

Horseplay, running, fighting, gambling, raffles, and solicitation of any nature are prohibited at LAI's Plant Site.

Pocket knives are permitted within the Secured Perimeter but must not be used for work performed at LAI's Plant Site.

Contractor Personnel may not post materials on LAI's bulletin boards, take photographs or recordings at LAI's Plant Site, or share or send said photographs or videos with anyone other than the contractor and LAI, including posting on social media, without LAI's permission.

10. Contractor Vehicle Requirements

While on LAI's Plant Site, all vehicles must be operated at a safe speed, which, unless stated otherwise on signage, is 20 mph on roads and less than 5 mph inside plant buildings.

Vehicles must stop at all intersections and rail crossings on LAI's Plant Site.

All vehicles must have seat belts for each rider, and all riders must wear seat belts while on LAI's Plant Site. Individuals shall not ride in a truck bed.

The following items apply to any contractor vehicles within the Secured Perimeter:

- All vehicles must have the company name displayed on both sides of the vehicle with a durable material for easy identification.
- Contractor Personnel must park all vehicles outside the buildings without blocking doors or entryways into the buildings.
- Contractor Personnel shall not operate any vehicles inside the buildings without obtaining written approval from the LAI Representative.
- Contractor Personnel shall not use cell phone while operating a vehicle on plant site.
- LAI may, at any time for any reason, instruct Contractor Personnel to move the contractor's vehicles to a parking lot, including lots outside the Secured Perimeter.

11. Gates and Work Site

Contractor Personnel shall use their assigned gate to enter and exit the Secured Perimeter. If the wrong gate is used, the contractor or Contractor Personnel may be denied further access to LAI's Plant Site.

Initially, the LAI Representative will escort Contractor Personnel to their assigned work site, show them the designated route to the area, and introduce them to the appropriate LAI personnel. The LAI Representative will convey the contractor's scope of work to LAI's personnel to ensure they are fully aware of the contractor's work. Contractor Personnel and the LAI Representative will coordinate the contractor's work with LAI's production and maintenance schedule.

Contractor Personnel will be limited to their assigned work site and the designated route to and from this area. If the route is through a plant building, this passage will only be through marked aiseways. Shortcuts through other plant areas are prohibited without a LAI escort. Contractor Personnel shall contact LAI if they need to visit an area of the plant outside the assigned work site.

Contractor Personnel shall always keep the assigned work site clean. Tools, equipment, and materials are to be stored out of the way of traffic and production needs. These materials should not block fire lanes, aiseways and doors. Spent materials are to be removed as they are generated.

Contractor Personnel shall keep an inventory of all tools, materials, and equipment they bring into LAI's Plant Site and provide a copy to LAI, upon LAI's request.

The contractor must obtain written approval from the LAI Representative before bringing any trailers or storage containers into LAI's Plant Site. Materials stored in those trailers or containers must follow the Governing Rules. The contractor must store all paints, solvents, and other

flammable liquids in approved flammable liquid storage containers and cabinets. All containers used to store chemicals must be labeled as to their contents with a label that meets OSHA's Hazard Communication labeling requirements. Trailers and containers must be clean with covered trash and food scrap containers.

12. Safety Equipment / PPE

Unless stated otherwise herein or in other documents issued by LAI to the contractor, the contractor is responsible for determining and providing all safety equipment and PPE for Contractor Personnel, including any recommendations in Safety Data Sheets or the equipment manufacturer's guidelines and/or instruction manuals. Additionally, the contractor must supply and require the usage of the following safety equipment required by LAI for all individuals within the Secured Perimeter except for certain areas listed below. Safety equipment must meet applicable Governing Rules. The Health and Safety Team Leader must approve any exceptions to the following.

- A shirt or coat with long sleeves and pants. Shorts, sleeveless shirts, and tank tops are prohibited.
- Safety (steel-toed/composite) shoes that meet ANSI Z41.1.
- Safety glasses that meet ANSI Z87.1 with side shields.
- Safety hard hats that meet ANSI Z89.1 for applicable work performed.
 - Stickers on hard hats need to be work and culturally appropriate. LAI may ask Contractor Personnel to remove a sticker or wear a blank hard hat while on LAI's Plant Site.
- Eye protection that meets ANSI Z87.1 and OSHA 1910.133.
 - Minimum eye protection includes industrial safety glasses made of non-metal frames with permanently attached side shields.
- High visibility clothing, such as a high visibility hard hat (without any stickers) or safety vest.
- Hearing protection when inside the plant or performing noise-producing work outside.
- Molten metal clothing in the Melting/Casting area of Remelt.
- NFPA 70E compliant PPE when performing electrical-related tasks.
- Full face protection when working with grinders or any tools that produce sparks.
- Powered Air Purifying Respirators with a high efficiency cartridge or a full-face air-purifying respirator with high efficiency cartridges ("PAPRs") or local exhaust ventilation is required for all welding and lancing. PAPRs is required when performing bag house maintenance activities such as cleaning, changing out bags, or other tasks which provide for dust exposure.
 - Note: Regular fans are not considered adequate ventilation.

Unless instructed otherwise by the LAI Representative, Contractor Personnel are not required to wear hard hats and high visibility clothing in the following areas:

- Office and break room areas
- Control Rooms
- Pulpits
- Cafeteria
- Administration, Gatehouse / Training Center, and designated smoking gazebos
- Covered breezeway between the administration building and the main plant and the covered walkway to the cafeteria.

Additional safety equipment, such as chemical goggles, respirators, arc-rated clothing, and face shields, may be required for certain types of work. If Contractor Personnel are working in Remelt, the contractor shall arrange for LAI to provide flame-retardant garments in advance. Contractor Personnel must wear monogoggles or a face shield with chemical goggles when pressure washing or applying water or chemicals with compressed air.

All safety equipment provided by the contractor must be in proper working and usage condition, and the contractor shall ensure such equipment is inspected according to the manufacturers' recommendations, guidelines and manuals, and in accordance with any Governing Rules. In the event there is a conflict in required or recommended inspection frequency or inspection criteria, the contractor shall ensure the most protective requirements or recommendations are followed.

13. Tobacco Usage Policy

Use of tobacco products, including cigarettes, cigars, pipes, e-cigarettes, and "spit tobacco," on LAI's Plant Site is only permitted in designated gazebos, at least 25 feet outside any plant or building entrance or the back dock of the administration building. All materials used for smoking, including cigarette butts, matches, and spit cups, will be extinguished and disposed of in appropriate containers.

14. Jewelry Policy

No rings shall be worn within the Secured Perimeter, at off-site offices or warehouses, or at other manufacturing or industrial sites when conducting business on behalf of LAI.

All other forms of jewelry, including body piercings and medical alert jewelry, are prohibited on or around the head, face, mouth, neck, hands, and fingers when on the shop floor, in construction

areas, and inside pulpits. This policy applies when performing physical work anywhere on LAI's Plant Site. As a rule, jewelry is not allowed if hard hats and safety glasses are required.

For this policy, jewelry includes neckties, scarves, wristwatches, wallet and watch chains, and similar accessories. Instead of medical alert jewelry, individuals may wear medical alert footwear tags.

15. Medical Treatment

Unless the contractor has made prior arrangements with LAI's Medical Department personnel, Contractor Personnel should contact their direct supervisor for routine first aid or medical care.

Any individual on LAI's Plant Site may receive emergency medical treatment from Security and LAI's Fire Department. For an emergency that requires immediate medical attention, call LAI Emergency.

Contractor Personnel must promptly notify the Health and Safety Team Leader of any accidents or injuries that occur on LAI's Plant Site.

16. Emergency Action Plan

LAI has an emergency action plan designed to protect the health and welfare of individuals at LAI's Plant Site in case of an emergency. The LAI Representative will notify Contractor Personnel of their evacuation point in an emergency.

Emergency Radio Call: Plant Channel 1, Code Red

17. Hazardous Material Information

The contractor shall discuss any questions concerning chemicals or hazardous materials with the Health and Safety Team Leader before beginning a job where Contractor Personnel may use these materials. Before bringing these materials onto LAI's Plant Site, the contractor must provide LAI with a list of these materials and a copy of the Safety Data Sheets for LAI's approval. LAI, in its sole discretion, may reject the use of any materials at LAI's Plant Site. Materials containing asbestos and lead must not be utilized at LAI. Upon LAI's request, the contractor shall provide LAI with a copy of their written Hazard Communication Policy.

The contractor will be responsible for reviewing the hazards with Contractor Personnel and taking necessary precautions to protect their health and safety, including wearing PPE recommended in the Safety Data Sheets that meets the most applicable OSHA and/or ANSI, ASTM, NFPA, NIOSH or other applicable consensus and/or governmental standards. The contractors must retain Safety Data Sheets at LAI's Plant Site for all chemicals used by Contractor Personnel. Contractor Personnel may request copies of Safety Data Sheets for LAI's chemicals from the LAI Representative.

18. Ionizing Radiation Equipment Utilized by Contractors

Before bringing any equipment that produces ionizing radiation into LAI's Plant Site, the contractor must contact the Health and Safety Team Leader for clearance. Contractor Personnel shall provide

necessary documentation to LAI, as determined by LAI, to prove proof of compliance with Kentucky law.

19. Medical Device Interference

Some equipment at LAI may generate electromagnetic fields and/or electromagnetic interference, which may cause an exposure above the recommended levels for some medical implants, such as cardiac defibrillators, pacemakers, insulin pumps, and glucose monitors. The contractor shall inform Contractor Personnel of this potential exposure and contact the Health and Safety Team Leader for additional information.

20. Laser Equipment Utilized by Contractors

Before bringing laser equipment greater than a Class II laser into LAI's Plant Site, the contractor must obtain clearance from the Health and Safety Team Leader.

21. Process Hazards

LAI uses several chemicals and substances regularly. The following list is not exhaustive, but it does contain several of these materials.

- Chlorine: Chlorine is a yellow-green gas that is an irritant to the eyes, lungs, and mucous membranes. Exposure to excessive levels of chlorine may be fatal. Chlorine is used in Remelt and DC4 as a fluxing agent in the casting process. There is leak detection equipment in the chlorine building to warn of chlorine leaks. Contractor Personnel are expected to evacuate the immediate area if the alarm goes off, or otherwise notified. Contractor Personnel may not enter Remelt or DC4 Chlorine Building without a LAI escort.
 - Contractor Personnel must comply with regulatory requirements relating to respiratory protection / PPE and security requirements when working on the chlorine system.
- Salt Fluxes: Various Salt Fluxes are used in Remelt. Hydrogen chloride is a by-product of some of the fluxes. At the same time, other fluxes emit Hydrogen fluoride. Special work procedures are in place to prevent exposure. Contractor Personnel working in Remelt must contact the LAI Representative to be advised of the Salt Flux work restrictions. No one may work above holder furnace height in the Remelt Cast Bay when salt is injected.
- Manganese: Manganese powder is used in Remelt as an alloying material. If working on the manganese injection equipment, Contractor Personnel must consult with LAI personnel in Remelt to ensure that proper respiratory protection is utilized.
- Molten Aluminum: Aluminum is melted in Remelt to cast aluminum ingots. Direct contact with molten metal can cause severe burns. Serious and life-threatening burns are possible if molten metal comes into contact with normal work clothing and catches those garments on fire. Contractor Personnel working in Remelt must obtain Vinex coveralls from LAI. Contractor Personnel are not permitted to wear garments over these Vinex coveralls and must wear 100% cotton clothing under these coveralls.
- Combustible Dust: Aluminum dust can be combustible under certain conditions. Unless determined otherwise by LAI, all dust should be considered explosible, and the contractor must contact the LAI Representative before performing housekeeping, hot work, or operating internal combustion engines in areas where dust is present. Cleanup of explosible

dust requires a special permit. LAI has a Dust Cleanup Program that outlines all requirements for cleaning up areas with dust.

- Carbon Dioxide (Cardox Systems): The Cardox Fire Suppression System generates carbon dioxide as a gas. It is used in large quantities to extinguish fires in the Hot Mill, all Cold Mills, and the Finishing coating and mix rooms. Carbon dioxide is stored in large storage tanks around the mills in a liquid state and is discharged in a gaseous state for application. Carbon dioxide puts out the fire by removing oxygen. The area around a carbon dioxide discharge will be oxygen-deficient and potentially lethal. Carbon dioxide will settle in low places and fill basements and tunnels after discharge because it is heavier than air. Contractor Personnel are expected to evacuate the area and report to the designated staging area when there is a carbon dioxide discharge in the area where they work. LAI's Fire Department will inform them when they can safely return to the area.
- Mill Coolants: The Hot Mill uses a water-based coolant, and the Cold Mills use an oil-based coolant. All coolants may cause skin irritation and rashes if not promptly removed from the skin upon contact. Contractor Personnel must wash all coolants off their skin when in contact with them and change any clothing soaked in coolant. Also, prolonged contact with general oils and lubricants may cause skin irritation and rashes. Contractor Personnel shall request from the LAI Representative the Safety Data Sheets for the specific coolant used in a mill before commencing work in the area.
- Biocides: Biocides are used in the coolant systems. These materials are very corrosive and may cause serious chemical burns. They also present toxicity concerns. Consult the Safety Data Sheet for these materials when exposure is anticipated.
- Acids and Bases: Caustics and acids are present in the coating line wet section, the water treatment area, the Level Clean Line, the Hot Mill Anodize Room, labs, and other areas of the plant. Acids are also present in some refractory materials. Contractor Personnel shall request from the LAI Representative the Safety Data Sheets for any material labeled as caustic or acid.
- Fluoride Contact Exposure: The coating line RODIP process incorporates a product containing a chemical that presents skin contact concerns. If the chemical comes into contact with one's skin, a special ointment must be applied to the skin.
- Ionizing Radiation: There are measurement gauges on most production equipment in the plant. These gauges produce ionizing radiation. Do not enter areas marked with the radiation symbol without de-energizing or ensuring the source shutters are closed. Consult the LAI Representative for instructions on when these areas may be entered.
- Lead Paint: Lead paint is present in the surface paint of Pushers 1 and 2. To ensure that no exposure concerns exist in relation to surface work on Pushers 1 and 2, special work practices and PPE requirements have been implemented. Contractor Personnel shall contact the LAI Representative before working in the Hot Mill Pusher area.
- Cleaners: LAI uses many types and brands of cleaners. Depending on the specific product, various hazards may be presented when working with these materials. Some cleaners are petroleum-type cleaners, while others are corrosive. Contractor Personnel must consider the specific product's hazards before use.
- Flammable/Combustible Liquids: LAI uses several flammable and combustible products and chemicals in different areas of the plant, such as finishing's coating line, tension leveler, the level clean Line, and the slitters. Preventative measures must be followed, such as keeping all ignition sources out of the area.

- Refractories: LAI uses refractory materials in Remelt, Hot Mill Preheats and Pushers, the Finishing Incinerator, DC4, and Cold Mill Annealers. These materials are used as insulation for high-temperature applications. The types of refractory vary, depending upon location. Chronic exposure to refractory dust is generally associated with respiratory damage and may cause cancer if it contains crystalline silica. Contractor Personnel installing, removing, demoing, or otherwise creating refractory dust must comply with the manufacturer's PPE requirements.

General Product/Chemical Usage: Contractor Personnel shall not use products that present an inhalation hazard in confined locations unless approved by the LAI Representative.

22. Spill Prevention

While at LAI's Plant Site, Contractor Personnel shall contact the LAI Representative for disposal instructions. Contractor Personnel shall not dump oil, contaminated water, chemicals or products, or waste material into storm drains, on the ground, into dumpsters, or other undesignated areas.

In the event of a spill, Contractor Personnel shall immediately contact the Environmental Team Leader. In an environmental emergency, such as a spill near a storm drain or a spill of a hazardous material, Contractor Personnel must immediately call LAI Emergency.

All bulk portable containers, tanks, and totes, such as fuel tanks, must comply with LAI's spill prevention and containment requirements, which include the following. The Environmental Team Leader must approve these containers before delivery to LAI's Plant Site.

- These containers shall not be stored near water conveyances, such as storm drains, storm ditches, or bodies of water, without prior approval from the Environmental Team Leader.
- All fuel tanks must be double-walled (or located inside containment), on level ground, close to a fire extinguisher and spill materials, and bonded and grounded.
- When equipment is refueled daily by a mobile refueler, the tanker must have an attendant present at all times while transferring fuel and spill materials readily available if needed.
- Any leaking equipment (oils or fuel) should not be brought to LAI's Plant Site.
- If equipment starts leaking onsite, Contractor Personnel shall immediately contact the LAI Representative.

23. Stormwater Pollution Prevention

The contractors involved in earthwork at LAI's Plant Site must meet with LAI's Environmental and Facilities teams to review erosion controls, stormwater pollution prevention, and best management practices for the project. The Environmental Team Leader must approve all earthwork projects

before starting. The contractor is responsible for acquiring any necessary regulatory permits for the earthwork.

Work involving drilling for foundations must have specific runoff controls, including oil absorbents, inlet filters at storm drains, and possibly frac tanks to settle out solids and recover lubrication oils from the drilling bit.

The contractor must make arrangements with the LAI Representative to properly dispose of concrete washout wastewater.

Unless otherwise agreed to with LAI, the contractor is responsible for retaining an inspector certified in Erosion Protection and Sediment Control to perform regulatory inspections and recordkeeping for projects larger than one acre. A written Stormwater Pollution Prevention Program may also be required by LAI or a regulatory agency. Impact on streams, storm ditches, and ponds is prohibited. The Environmental Team Leader must approve any modifications to existing storm conveyance systems.

24. Air Pollution Management

Mobile equipment brought on-site must have minimal visible emissions during operation. Contractor Personnel shall turn off all mobile equipment when not in use.

Due to our critical emissions limitations, Contractor Personnel must report any portable combustion sources, open-air cutting or burning, or burning with a lance to the LAI Representative prior to delivery on-site or use.

Visible emissions at LAI's Plant Site should not cross any property boundaries. In the event of dry weather during earthwork, Contractor Personnel shall consult with the LAI Representative on ways to reduce fugitive visible emissions and dust.

25. Waste Management

Before beginning work at LAI's Plant Site, Contractor Personnel shall contact the LAI Representative to identify the types of waste that Contractor Personnel may generate while at LAI's Plant Site, how to separate the different types correctly, and then develop a waste management process. Unless stated otherwise in a purchase order issued by LAI, LAI owns all recyclable materials and will manage the sale of all recyclables.

Unless previously agreed to by LAI's Environmental Team Leader, Contractor Personnel must return any unused chemical product to their inventory and remove it from LAI's Plant Site.

26. Welding and Burning

Before performing any work at LAI's Plant Site that may produce sources of ignition, such as welding, burning, and grinding, Contractor Personnel must receive a Hot Work Permit from the LAI Representative. A High Hazard Hot Work Permit may be required depending on the area.

For Hot Work jobs, Contractor Personnel shall use portable shields in the production areas of LAI's Plant Site and have fire extinguishing equipment available that is rated for the potential hazard.

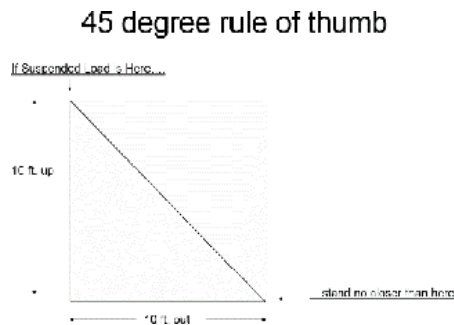
Also, a fire watch is required for all Hot Work jobs. Contractor Personnel must immediately call LAI Emergency if a fire starts during a Hot Work job.

27. Mobile Equipment

Contractor Personnel shall not operate mobile equipment at LAI's Plant Site without prior authorization from the LAI Representative. Before Contractor Personnel operates mobile equipment at LAI's Plant Site, the contractor must provide proof of training and certification for any Contractor Personnel who may operate the mobile equipment and contact the LAI Representative for any necessary LAI permits. All mobile equipment brought into LAI's Plant Site by the contractor must meet all manufacturer specifications and requirements, as well as any requirements set forth by the Governing Rules.

28. Suspended Load

Never pass under a suspended load handled by any mobile equipment, including cranes, fork trucks, and AGVs. When near a suspended load, Contractor Personnel must maintain a distance from the area directly under the suspended load equivalent to the height of the load, which is also known as the 45-Degree Rule, see below. Contractor Personnel must also remain hands-free for any suspended load above the knee. Keep hands off the load until out of the suspended load line of fire. If needed, ask your LAI Representative for hands-free devices.



29. Overhead Cranes

When working on or around overhead cranes, including on or above crane rails, between the inside columns of the crane rail support steel, or at or above an elevation of 10 feet below the crane rail, Contractor Personnel must use the safety precautions detailed below.

- Follow the 45-Degree Rule at all times to account for the hook and body of the crane.
- Provide a floor watch to look out for overhead cranes, fork trucks, aerial lifts, and other vehicles in the area.
- Notify the LAI Representative before performing any work. Contractor Personnel shall not begin working until the LAI Representative has evaluated and coordinated the work in the unit.
- Personally notify adjacent overhead crane operators of their presence and their work intentions.
- Ensure that any cranes in the way are locked out.
- Place barricade tape across the bay at crane cab height to warn adjacent crane operators not to invade the air space. If this placement is not feasible, red/white barricade tape

can be installed from machine to machine but must be in plain view of those operating cranes in the area.

30. Automatic Guided Vehicles

LAI uses AGVs to transport ingots, coils, and work rolls through production. AGVs are computer-operated along a predetermined path with sensors to shut the equipment down if an object or person is in its path at floor level. This equipment cannot detect people or equipment above floor level, and the AGVs do not have an operator to stop the equipment if necessary. The AGV path is outlined with orange paint on the plant's floor. Contractor Personnel must not work or leave equipment in or above the orange path without consulting with their LAI Representative.

31. Ladders

All ladders brought into LAI's Plant Site shall be in good condition and comply with the Governing Rules. While at LAI's Plant Site, Contractor Personnel may only use OSHA-compliant fiberglass ladders with safety feet and a minimum capacity of 300 lbs. (Type 1A).

Contractor Personnel shall not use drums, buckets, or chairs as work platforms.

Contractor Personnel shall place any ladders on substantial firm foundations, secured per OSHA requirements.

Contractor Personnel must place all ladders, so they do not interfere with mobile equipment. Contact the LAI Representative if a ladder must be in or near a mobile equipment travel pattern.

32. Scaffolding

LAI must inspect and approve all scaffolding before use at LAI's Plant Site, every work shift after that, or at any time the scaffolding is disassembled or modified in any way. The permit must be attached to the scaffold. If the permit is not attached, the scaffold shall not be used.

33. General Tools and Equipment

Contractor Personnel's tools and equipment must be in good working order and appropriate for the work performed at LAI's Plant Site. All safety components must be in place and active as directed by the manufacturer. Contractor Personnel must inspect all tools and equipment before using them at LAI's Plant Site. Contractor Personnel must be trained to operate all tools and equipment and provide documentation of said training to LAI upon request.

34. Powder-Actuated Tools

Contractor Personnel may not use powder-actuated tools in Remelt without prior written consent from the LAI Representative. All unused and spent powder charges must be accounted for when powder-actuated tools are used in Remelt.

35. Gasoline-Powered Equipment

Contractor Personnel cannot use gasoline-fueled equipment in Remelt or DC4 without prior approval from the LAI Representative. Contractor Personnel must use said equipment in well-

ventilated areas and avoid using it in or near confined areas due to the potential for carbon monoxide generation. Contractor Personnel must shut off all gasoline-powered equipment and allow it to cool before refueling. Only properly labeled Factory Mutual or Underwriters Laboratories approved safety cans may be used for gasoline.

36. Compressed Air and Gases

All compressed air and gas cylinders must be secured from falling and be capped when not in use. Contractor Personnel shall only transport these cylinders in a secured cart designed for this purpose. Contractor Personnel shall not use compressed air to remove trash, clean up dust or in areas where dust is present debris, or remove dust or dirt from an individual's clothing or body.

37. Electrical Safety

Any work involving electrical hazards and components must comply with OSHA and NFPA 70E. Before beginning any such work or work where Contractor Personnel may be exposed to electrical hazards, Contractor Personnel must discuss the scope of work with the LAI Representative.

Contractor Personnel expected to perform electrical work shall have the skills and knowledge related to the construction and operation of electrical equipment and installations relating to same, and shall be trained to recognize and avoid the related hazards.

38. Electric Tools

All electric tools, extension cords, and appliances used at LAI's Plant Site shall:

- Comply with OSHA and NFPA 70E,
- Comply with any manufacturer requirements,
- Have a proper ground or be double insulated (unless the manufacturer requires both), and
- Have appropriate ground fault protection.

Contractor Personnel shall inspect said tools, cords, and appliances before use. Upon LAI's request, Contractor Personnel shall provide LAI with documentation of these inspections. Contractor Personnel shall not use any damaged electric tools, extension cords, or appliances.

Contractor Personnel must follow the manufacturer's instructions and recommendations when operating all electric tools, extension cords, or appliances at LAI's Plant Site. Specifically, Contractor Personnel shall not operate grinders at a higher RPM than that recommended by the manufacturer, and grinder stones shall be evenly dressed. Contractor Personnel will not remove any safety devices, including guards, provided with the tools and appliances and, before use, will confirm that any safety devices are correctly adjusted.

Contractor Personnel shall not use LAI's electric tools, extension cords, or appliances without prior authorization from the LAI Representative. Contractor Personnel shall place all electrical tools, extension cords, and appliances above the work area and keep them out of walkways, stairways,

doors, and general work areas. Contractor Personnel must disconnect all electric tools and appliances from their power source before making adjustments or tooling changes.

39. Utilities Connections

Contractor Personnel shall not tie into any energy source at LAI without prior authorization from the LAI Representative, including electricity, air, water, steam, natural gas, and propane.

40. Excavation and Trenching

Before starting an excavation at LAI's Plant Site, Contractor Personnel must get prior approval and an excavation permit from the LAI Representative to determine the potential location of underground sewers, water lines, telephone service, fuel lines, and electrical service. Precautions must be made to protect these installations. Excavation greater than 4 feet will require additional safety measures to be determined by the LAI Representative.

LAI shall inspect excavations and trenches daily and after each rainfall. LAI may, in its sole discretion, require the Contractor Personnel to take additional precautions before any work is done around an excavation.

Contractor Personnel must store all excavated materials and materials to be installed at least 2 feet from the edge of trenches and excavations. Contractor Personnel must take all necessary steps to prevent materials from falling in the trench or excavation.

When Contractor Personnel operates mobile equipment near trenches or excavations, Contractor Personnel must install barriers and stop logs of adequate size to prevent accidental entry. All trenches, excavations, or similar ground openings shall be barricaded or covered if there is a possibility of individuals falling into the opening.

Contractor Personnel shall not be allowed under loads handled by shovels, backhoes, cranes, hoists, or near vehicles being loaded by such equipment. Contractor Personnel must use caution when working around heavy equipment to avoid injury.

Contractor Personnel shall keep any dust conditions caused by such work to a minimum.

41. Confined Space Entry

LAI has confined spaces, including coolant tanks, coating tanks, sewers, incinerators, casting pits, mill tunnels, and water treatment tanks. All confined spaces at LAI's Plant Site require a permit for entry. Contractor Personnel shall not enter confined spaces without prior authorization from the LAI Representative. Contractor Personnel cannot function as confined space attendants.

If Contractor Personnel need to enter a confined space to perform work, the Contractor Personnel must attend a pre-entry meeting with the confined space attendant and follow all safety procedures

and precautions discussed during this meeting. Contractor Personnel are responsible for adhering to the confined space attendant's instructions.

42. LOTO/Hazardous Energy Control

All equipment's energy sources must be de-energized and locked out at the energy source before being worked on. Contractor Personnel must contact the LAI Representative to determine all energy sources that need to be shut off and locked out before initiating a lockout. Contractor Personnel is responsible for working with the LAI Representative to verify that the lockout covers the scope of the work the Contractor Personnel is performing.

If a LOTO is necessary, LAI will lead the process. LAI will provide all locks for a LOTO in the following specific colors for different units.

- Blue – LAI employees
- Red – ESM and Fluor Enterprises, Inc.
- Green – Contractor Personnel (other than Fluor)

LAI will provide the green locks for Contractor Personnel. Contractor Personnel are responsible for their individual key and lock during a LOTO. Contractor Personnel must legibly write their name on the group LOTO card or a tag on the lock. If someone loses their key or leaves LAI's Plant Site without removing their lock, that individual is responsible for contacting the LAI Representative.

43. Fall Prevention and Protection

Fall protection equipment is required for any work at heights or where Contractor Personnel may be exposed to a fall of 4 feet or greater. Before commencing such work, Contractor Personnel must discuss the scope of work with the LAI Representative. The fall protection may include wearing self-retracting lanyards with a full-body harness.

Before accessing the roof of any building on LAI's Plant Site, Contractor Personnel must contact Security. Contractor Personnel must also contact Security before coming off the roof.

44. High Bay Work

High bay work is any elevated work that puts the Contractor Personnel in the path of overhead cranes and close to energized collector rails. Before beginning any such work, Contractor Personnel must discuss the scope of work with the LAI Representative.

45. ISO 14001

LAI has an environmental management system certified to the ISO 14001 standard. To obtain this certification, LAI reviewed the environmental aspects at the plant and determined which were significant. Part of the certification requirements includes informing individuals working on a job that may impact a significant environmental aspect of the importance of completing the job correctly. Listed below are activities and processes that LAI considers significant and why Contractor Personnel's work is important to the environment.

- Chlorine at Remelt and DC4 is classified as a significant aspect at the Chlorine Building and filtration units. Chlorine gas is poisonous. Breathing significant concentrations of chlorine

can result in serious injury and possibly death. LAI controls chlorine by monitoring its usage. Only Remelt and DC4 GT's complete tank changes.


- Energy Consumption is a significant aspect of LAI. Energy consumption includes natural gas and electricity.
 - Natural Gas Usage (Melters and Holders) has been determined to be a significant aspect, which LAI controls by monitoring the natural gas usage for the melters and holders to determine if the usage is under control.
 - Natural Gas Usage (Preheaters) is a significant aspect of the Hot Mill. By properly managing the preheater burners, LAI can save natural resources and money. LAI controls this by monitoring natural gas usage, ensuring the burners operate properly, and putting the burners in low-fire mode during downtime.
 - Electricity Usage is a significant aspect of the Hot Mill. LAI controls this aspect by turning equipment off during downtime and monitoring peak loads during normal operations.
- Waste Coolant is a significant aspect of the Hot Mill, which LAI controls by monitoring the flows from the waste sumps and by monitoring the coolant to determine when a dump should be completed.
- Coatings and Solvents are significant aspects of Finishing, which LAI has developed procedures to control. Failure to use the procedures can result in a spill of the materials that can lead to an incident requiring reporting. Any work completed that concerns coatings and solvents must be approved by the LAI Representative.
- Sanitary Package Plant have been identified as a significant aspect of Water Services. Potential soil contamination from overflows and bypasses is an area of concern. Proper operations and monitoring are necessary to maintain compliance and prevent a release.
- Cross-Connections to the potable water supply are significant at LAI's Plant Site. Cross-Connections between process equipment/activities and the potable water supply are strictly prohibited. LAI has a filtered water supply for all process activities. If water is required to complete work activities, contact the LAI Representative to locate a filter water hookup.

46. ISO 45001

LAI has a management plan that is certified to the ISO 45001 standard. To obtain this certification, LAI reviewed the hazards at the plant and determined which were significant. A segment of the certification requirements includes informing individuals working on a job that may expose them to potential hazards and the importance of completing the job properly. Listed below are significant hazards that LAI has identified through the risk assessment process. LAI controls the hazards identified at LAI's Plant Site by implementing standard operating procedures, employee and contractor training, work practices, machine safeguards, and plant-level programs.

- Line of Fire: Employees can expose themselves to a line of fire risk by placing themselves between two moving objects or in the pathway of an object that could release and strike them.
- Falls: Employees are exposed to same-level falls, such as walking on a flat surface, or different-level falls, which occur when individuals fall while ascending or descending stairs or ladders.
- Pinch Points: A pinch point is any point at which one can be caught between the moving parts of a machine, between the moving and stationary parts of a machine, or between the material being worked and the moving parts of a machine.

- Over-extension: Some of the activities and tasks that are performed within the facility can lead to over-extension.
- Molten Metal: Molten metal is a result of melting aluminum. The temperature of the product is greater than 650C. This product is present in both the melting and casting operations.
- Pushing/Pulling/Twisting: Pushing is the process of exerting force against an object to move it away from the source of the force. Pulling is the process of exerting force against an object to move the object toward the source of the force. Twisting is the process of exerting force to move an object in a different direction, toward or away from the source of the force.
- Hot Surfaces: A hot surface is a surface that is at a high enough temperature to give off heat and cause a burn to an individual.
- Ascending/Descending: Many areas and tasks in the facility require ascending and descending steps and stairs as part of the activities associated with processing aluminum. Ascending is the process of going upward, and descending is the process of going downward.
- Suspended Loads: Moving work rolls in the mills, process materials, and other equipment with overhead cranes creates exposure to suspended loads.
- Slippery Surfaces: Slippery surfaces are inherent to the aluminum rolling processes. This exposure is mainly due to the coolant used in the rolling process.
- Lifting Weight: The activities associated with the maintenance of an aluminum rolling mill can expose employees to injury from lifting weight.
- Sharp Edges: The process of coating, slitting, and packing aluminum can expose employees to sharp metal edges.
- Rushing Pace: Exposure to this hazard can occur when employees rush to accomplish tasks.
- Unleveled Surfaces: These may include door thresholds, stairs, sloped flooring, and level changes.
- Combustible Dust: This is created by shredding, sawing, and transporting scalper chips and aluminum scrap.

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Prepared By:	Randi Embry	Approved By:	ESS Business Unit Manager
Title:	EHS Training Acknowledgment Form	Revision:	7

**I have watched and understand the Logan Aluminum visitor or contractor video.
(Please print)**

Name: _____ Cell Number: _____ Home Number: _____

Company Name: _____ Supervisor Name: _____

Supervisor Cell Number: _____ Supervisor Home Number: _____

Emergency Contact: _____ Cell or Home Number: _____

Logan Sponsor/Contact: _____

Signature: _____ Date: _____