

HEALTH AND SAFETY SPECIFICATION

REVISION 2: November 2014

SCOPE

The scope of this documents includes, Rolled Products and Extrusions on both Edendale and Camps Drift sites and is applicable to both construction and non-construction activities.

PURPOSE

The purpose of this document is to inform all contractors of our high risks, standards, requirements, rules in order for the contractors to carry out their activities safely and without risk of injury, harm or impact on the environment.

REFERENCE

OHSACT – Section 37(2)
OHSACT Construction Regulations
OHSACT Asbestos Regulations

HULAMIN GENERAL DOCUMENTATION REQUIREMENTS

The following requirements need to be adhered to, before access will be allowed on site and/or work carried out in the departments:

- 1. Hulamin official order (unless breakdown)
- 2. OHSACT Section 37(2) agreement signed
- 3. Registration with the Workman's Compensation Commissioner
- 4. Letter of appointment as principal contractor signed
- 5. Acknowledgement of SHE specification document
- 6. Safety plan submitted by Contractor
- 7. Risk assessment/fall protection plan for construction type contractors based on risk and scope of work
- 8. General induction(at the gate)
- 9. Access card issued
- 10. Specific contractor inductions/permit to work in the manufacturing area
- 11. Risk assessment/hazard clearance permit based on risk and scope of work

RISK ASSESSMENT/FALL PROTECTION PLAN /ROOF WORK LEGAL REQUIREMENTS

Risk Assessment:

- Identification & evaluation of hazards and risks
- Analysis and evaluation of the risks and hazards
- Documented plan of safe working procedures to mitigate, reduce or control the hazards identified
- Monitoring plan
- Review plan

Fall protection plan: (2 m or more)

- Risk assessment of all work carried out from an elevated position which shall include procedures and methods used to address the risks
- Processes of evaluating the employees physical and psychological fitness necessary to work at elevated positions
- Programme for the training of employees working from elevated positions and records thereof
- Procedure addressing the inspection, testing and maintenance of all fall protection equipment

Roof work plan:

- Planning of roof work
- Roof erectors competency
- No work during inclement weather
- Prominent notices where covers are of insufficient strength to withstand the imposing load
- Barricading of openings
- Suitable platforms, coverings where there is covers of insufficient strength or fragile
- Guardrails, barriers & toe-boards to prevent persons, material or equipment falling

HULAMIN GENERAL SAFETY REQUIREMENTS

- 1. All contractors shall issue their employees with branded overalls
- 2. All contractors shall issue their employees with the necessary PPE and yellow hard hats
- 3. All contractors to smoke in designated areas only
- 4. All contractors to obey our Hulamin Safety Rules (one booklet to be issued to manager)

5. All portable electric equipment shall be tested and checked upon entry and thereafter at monthly intervals

6. All contractors will wear reflective jackets as specified by Hulamin

SECURITY PROCEDURES

1. All contractors shall obey any lawful instruction issued by Security

2. All contractors shall abide to searches & alcohol testing

3. All contractors entering the site with equipment/consumables etc MUST declare these at the contractor gate and complete the equipment tool list. (copy to be kept in possession of contractor)

4. All contractor employees are to be informed of the security offense system

by the contractor management.

HULAMIN RISKS

The following risks have been identified through a formal risk assessment process as the highest risks on site. As contractors, please familiarize yourselves with the risks and associated hazards and ensure that all your employees are taking through this document.

Remelt explosion

We have Remelt facilities on both Edendale and camps Drift sites and the following safety hazards that can cause an explosion linked to contractor activities are as follows: i.e. lancing

Safety hazards:

 Bringing any containers, cigarette lighters or aerosol cans onto site, as if these land up in our scrap bins (yellow) instead on the waste bins (green) and are charged into our furnaces, this could lead to a major explosion.

- All banned items must be handed in at the security gates, but please communicate to your employees that they must not bring these items to our site.
- Contractors working in the Remelt environment MUST attend the Remelt safety video that explains the explosive and other risks in more detail.

Fire & Explosion in process areas

There are manufacturing areas that have the potential for explosions/fire if hot work is carried out:

Safety hazards:

- Carrying out hot work (welding, grinding, cutting etc) in these below identified areas, without authorization and the completion of the risk assessment/Hazard Clearance permit form
 - a) Alpaste plant
 - b) CCL mixing room/coaters
 - c) LPG farms and pipelines
 - d) Levellers
 - e) Tension levellers
 - f) Basements
 - g) Mills
 - h) Flammable stores
 - i) Slitters
 - j) Any other areas identified by the department

- Please consult with the Hulamin representative before any hot work is carried, as to what safety measures need to be taken.
- Please ensure the risk assessment/hazard clearance permit is completed comprehensively.
- Fire extinguishers must be readily available, if an extinguisher is used, please report this to the safety department.

Confined space entry

This will be defined by Hulamin, but typically will refer to any confined area where there is a potential for oxygen deficiency environment, toxic or flammable vapours presence and persons are required to enter such an area.

Safety Hazards:

- Hot work carried out in a confined space where there is potential flammable vapours or fumes.
- Entry into the basements after Carbon Dioxide has been discharged.
- Entry into any vessel/tank/sewer/pit where there is a potential for toxic vapours.
- Entry into poorly ventilated areas (oxygen deficiency)

Preventive measures:

- A hazardous clearance permit needs to be obtained and issued by a Hulamin Engineer/designated person before any persons is to enter or carry out hot work in the confined space.
- A risk assessment is conducted before any work is carried out

Occupational illnesses

There are numerous hazardous chemical substances on site and there are associated potential health risks pertaining to such substances.

All contractors are to request to be informed of the potential health risks in the departments where they are working.

All manufacturing areas have been declared noise zones; therefore it is compulsory to wear ear protection before entering the area.

Safety and health hazards:

- Handling of hazardous chemicals substances without the necessary PPE.
- Handling of Asbestos piping, seals etc

- Ensure that contractor employees are issued with the suitable PPE based on the potential health risks
- Ensure that the necessary precautions are taken for working with Asbestos as per the OHSACT, Asbestos Regulations

Air pollution

This involves any contractor activity that can potentially harm the atmosphere and can include activities such as, lancing, welding, mixing where dust and/or fumes are released.

Environmental impacts:

- Dust has an impact on the atmosphere in terms of particulate fall out
- Fumes/vapours from lancing, welding, mixing etc can have a negative impact on the surroundings

Preventive measures:

Dust control measures (wetting) can be implemented to minimise the particulate fall out

Motorised equipment

This includes any motor vehicle, LDV (bakkie) , motorcycle, forklift, transfer car, train, tractor or any other similar equipment

Safety hazards:

- Forklifts and tractors they have the right of way on site
- Transfer cars that transport product on tracks
- Locomotive (train) on the Camps Drift site train has right of way
- Speeding of motor vehicles (20km/h maximum)
- Transporting contractor employees in the LDV (Bakkie) in the open load bin standing and/or sitting on the sides

- All forklifts on site are fitted with safety devices (horn, flashing lights, reverse siren and speed governor)
- Tractors are speed governed
- Transfer cars have sirens and flashing lights
- All contractor employees are to be seated flat in the LDV load bin.(no standing allowed)

Non - routine maintenance tasks

This includes specialized work requested by Hulamin, whereby it is outsourced based on skills and competency (e.g. coded welding , rigging, erecting scaffolding etc)

Safety hazards:

- Failure of lifting equipment
- Collapse of scaffolding
- Failure of welding
- Incorrect rigging and slinging methods
- · Use of unsafe equipment
- Entry into a confined space

Preventive measures:

- All lifting equipment to be inspected before use
- Non routine risk assessment to be completed (form provided by Hulamin)
- All specialised welding to be done by coded welders
- All scaffolding to be erected and inspection by competent persons that are trained and certificated by an accredited organization through SETA
- Rigging and slinging to be conducted by competent persons

Lifting machinery and equipment

This includes, cranes ,hoists , beams, hooks, tackle, shackles etc

Safety hazards:

- Failure of lifting equipment due to overloading, shock loading, wear & tear, corrosion, selection etc
- Failure of lifting machinery (cranes, hoists etc) due to lack of maintenance and inspection

- Ensure all lifting machinery, equipment, tackle is inspected by a competent person
- Ensure annual load testing of all hoists used on site

Ensure operators are adequately trained to use lifting equipment

Moving machinery

This includes any moving or rotating machinery or equipment that has open drivebelts, drivechains, pulleys shafts, keys, nip points etc

Safety hazards:

- Unguarded equipment brought onto site
- Damaged, loose or inadequate guarding
- Failure to lock out/isolate

Preventive measures:

- Conduct regular inspections on your equipment
- Hulamin safety audits
- Permission needs to be obtained upfront to work on or clean any Hulamin equipment and the specific department will assist in the lock out/isolation practices

Working at heights

This involves any work 2m or more above ground or where a person can fall 2m or more (e.g. pits/basements)

Safety hazards:

- Working with fall arrest equipment
- Working without a method statement and fall protection plan
- Working on structures that are not of adequate strength (roofs etc)
- Failure to barrier off holes, opening and edges etc
- Working on unsafe scaffolding
- Working on unsafe ladders

- Ensure suitable fall arrest equipment is issued
- Compile fall protection plan, method statement and/or roof work plan

Inspect fall arrest equipment

 All scaffolding to be erected and inspection by competent persons that are trained and certificated by an accredited organization through SETA

Inspects all ladders before use

Barrier of openings, holes etc with physical means NOT just

 Ensure that the roof/structure that your employees are working on is of adequate strength or ensure that safety of persons in the event of collapse

Chlorine/LPG leak

Hulamin has two Chlorine plants on site situated at the Remelt facilities on both sites.

We also have three LPG tank farms on site, the biggest farm is situated at camps Drift (4 tanks) and there is a farm at Coil Coating line (2 tanks) and a small tank at Edendale Remelt

Safety hazards:

- LPG leak which could result in a fire or explosion
- Chlorine leak that could cause respiratory problems

- Chlorine/LPG is heavier that air, so all persons will need to move away fro the area until can cannot smell the gas anymore, preferably to higher ground.
- LPG is flammable therefore all ignition sources need to be isolated
- LPG farms have cut off valves and sprinkler deluge systems
- Chlorine rooms have gas detectors.

Stormwater contaminaton

These are normally open drains and are designed to divert rainwater to the river courses

Environmental impacts:

- Hazardous substances spills (chemicals oils etc)
- Dumping of concrete waste into drains
- Pouring of any hazardous substances into drains

Preventive measures:

 Interceptor (catchment) pits on site, designed to skim and pump solubles to the effluent plant

Contractor activities

This is defined under the OHSACT Construction Regulations

Safety hazards:

- Electrical shock through not following standards for temporary power/laying of cables
- Fall from heights
- Trapped in excavations
- Demolition work
- Construction vehicle movement
- Excavation/removal of pipelines wrong line/not isolated

- Permit to work to be issued by Hulamin for any electrical supply (11 KV)
- Fall protection plan for working at heights
- Shoring/bracing for excavation work
- Demolition plan for demolition work
- Inspection/maintenance of construction vehicles
- Permission is required before any work can be carried out on pipelines in order to ensure proper lock out/drainage and the contents of the pipeline

Hulamin will not be held liable for any breach of the above requirements and the Contractor Companies will need to develop their own safe working procedures, standards, plans in order to work safely and also take all reasonable measures over and above these specifications



<u>APPOINTMENT</u>

Update: 7 August 2014

Appointment of Principal Contractor under the Occupational Health and Safety Act in terms of Construction Regulations: Regulation 5(1)(k)

terms of Construction Regulations: Regulation 5(1)(k)
SECTION 1
Responsible Person in terms of the OHS Act, hereby appoint as the Principal Contractor to be in control all of the activities on the Camps drift and/or Edendale sites in terms of sub contractors.
The duties of the principal contractor are addressed in Regulation 5 of the
Construction regulations
SIGNATURE HULAMIN DESIGNATION
14/09/2018 DATE
SECTION 2
ACCEPTANCE OF APPOINTMENT
I, SIMPHING NOW ONDE accept this appointment on behalf of the
principal Contractor and I am familiar with the Occupational Health and Safety Act
and the Construction regulations.
DIRECTOR DISTON
SIGNATURE DESIGNATION
14/09/18 DATE

Whereas the Company has called for the executing of the following work: _ (insert type of work/services being provided), and whereas the Contractor undertook to carry out the work and whereas the Company and the Contractor have agreed to regulate the environmental, occupational health and safety responsibilities between them, now therefore the undersigned agree to:

Section A: Occupational Health and Safety

- 1. The Contractor warrants that all his and his sub-Contractors' employees are covered in terms of the provisions of the Compensation for Occupational Injuries and Diseases Act 1993 (COIDA), which cover shall remain in force whilst any such employees are present on Company premises. The Contractor will only allow sub-Contractors on site with the prior written consent of the Company.
- 2. The Contractor warrants that it is in possession of Public Liability Insurance cover to _ and any other insurance cover in the amount of R10,000,000 that will adequately make provision for any possible losses and/or claims arising from his and/or his sub-Contractors and/or his employees' acts or omissions on Company premises, which shall remain in force whilst he and/or his sub-Contractor and/or his employees are present on Company premises or which shall remain in force for the duration of his contractual relationship with the Company, whichever period is the longer.
- 3. The Contractor undertakes to ensure that he and/or his sub-Contractors and/or their respective employees will at all times comply with all the requirements of the Occupational Health and Safety Act 85 of 1993 (OHS-Act) and that he is an employer in his own regard. The Contractor (Mandatory) therefore and Company therefore enter into this agreement by virtue of Section 37(2) of the OHS-Act, without derogating from this general undertaking, also comply with the following conditions:
 - a. All work being done will be preceded by hazard identifications and risk assessments and these hazards and risks will be eliminated, controlled or mitigated where reasonably practicable.
 - b. All work performed on Company premises must be performed under the close supervision of the Contractor's Appointed Supervisors on site. Such supervisors are to be conversant with the hazards associated with any work that the Contractor performs on the stated premises as well as the mitigating and controlling measures to be implemented.
 - c. Where Construction managers and Construction safety officers are to be registered with the SACPCMP (South African Council for Project and Construction Management Professions) as per Construction Regulations of 2014 such registration will be maintained for the duration of performing work on site.
 - d. Contractor employees must be medically fit to perform the work they are required to perform. Proof of medical fitness and biological monitoring as declared by an occupational medical practitioner is to be provided to the

Safety Act pertaining to any incident involving the Contractor and/or his employees and/or his sub-Contractor/s.

- p. No use shall be made of any Company machinery/article/substance or personal protective equipment without written approval and without ensuring prior and during use it is in a proper condition and as such will not cause any risk to the health and safety of any person.
- q. Work for which the issuing of a permit is required shall not be performed prior to the obtaining of a duly completed and approved permit.
- r. No alcohol or other intoxicating substance shall be allowed on the Company's premises. Anyone suspected of being under the influence of alcohol or any other intoxicating substance (including medicines) shall not be allowed on the premises.
- s. Full co-operation shall be given if and when the Company's employees inquire into occupational health and safety issues.
- t. The Contractor will cease dangerous or unsafe work immediately when requested to do so by the Company or its representatives. The onus still remains on the Contractor to enforce health and safety practices.
- u. The Contractor confirms that he has been informed that he must report to the Company management (in writing) anything that he deems to be unhealthy and/or unsafe. He has informed his employees and/or sub-Contractors in this regard.
- v. The Contractor warrants that he shall not endanger the health and safety of Company employees and/or visitors in any way whilst performing any work on Company premises.
- w. The Contractor undertakes to reimburse the Company for all medical costs incurred relating to any of the Contractor's employees.
- x. The Contractor will ensure that work performed at site which requires the issuing of compliance certificates and/or certificates of manufacture are submitted before final work is handed over to the Company.
- y. Should the Contractor be performing "construction work" as defined in the Construction Regulations of the OHS-Act he is hereby appointed in terms of Regulation 5(1)(k) and/or 7(1)(c)(v) of said regulations. The Contractor will therefore ensure full compliance with said regulations.

ACCEPTANCE **AUTHORISED COMPANY REPRESENTATIVE** Luyanda Madanda 1 PM ordo Não Signature Name: 14/09/2018 Hulamin Place: Date: AUTHORISED CONTRACTOR REPRESENTATIVE Signature Name: SIMPHINE Date: 14/09/18Domicilium (Physical Address): HULAMIN Place: Simphiweindawonde@Vodamaicico.za 0786680401