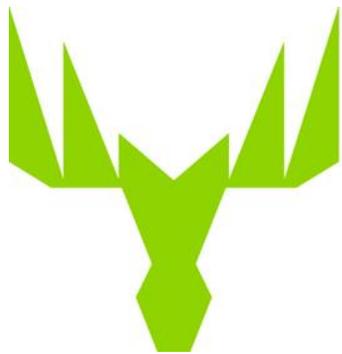


Safety Management Standard for Metsä Group Service Providers



Metsä

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1. General

Metsä Group aims to ensure a safe and operationally reliable working environment every day. This goal applies to Metsä Group's personnel as well as all service providers and their subcontractors working at Metsä Group's mill areas or properties (hereinafter the "shared workplace"¹). This standard sets the minimum requirements for the safety of service providers at Metsä Group. Business-area-specific or mill-specific instructions may be stricter than this standard's requirements which service providers must also comply with.

The standard applies to:

- Companies operating in a mill area on a permanent basis
- Companies involved in daily process operations
- Companies that participate in maintenance shutdowns
- Companies that participate in project work

The standard does not apply to truck drivers or the drivers of delivery vehicles. Truck drivers complete a heavy vehicle safety induction.

2. Basic requirements for cooperation

Before starting work, everyone working in a mill area must complete Metsä's general safety induction. Service provider companies are inducted for work in Metsä's areas by Metsä or a representative of Metsä. The service providers organise the induction of their own employees for the work to be carried out on the basis of the aforementioned induction and their own safety plan, for example. Service providers are obligated to participate in safety inspections and risk assessments in accordance with the requirements set by Metsä Group.

Service providers must comply with laws, decrees and regulations issued by the authorities, as well as the standards, guidelines, requirements and site-specific regulations provided by Metsä Group. Furthermore, service providers must ensure that their company and its subcontractors have all qualifications related to the deliveries and tasks in question, as required by all applicable laws and regulations. All deviations are agreed on and recorded separately.

Service providers are entitled to use subcontractors. Service providers are obligated to change a subcontractor they use on reasonable request by Metsä. Service providers are responsible for ensuring that the machines and equipment used for work are in order and suitable for the work being performed.

All work requires a permit from Metsä or a representative of Metsä.

2.1. All service providers

For shutdowns, service providers draw up a risk assessment and safety plan based on their work; these plans are delivered to Metsä or a representative of Metsä.

- The safety plan can be a service provider's own or one drawn up in accordance with Metsä Group's safety plan template. The safety plan must cover the risks associated with the execution of the work and their management, work phase by work phase.
- The need to draw up risk assessments and safety plans for work carried out during production is agreed with Metsä's contact person or a person representing Metsä, accounting for the extent of the work.

¹ As referred to in the Occupational Safety and Health Act

All work carried out in mill areas must comply with Metsä Group's standards.

Service providers are obligated to:

- make safety observations;
- participate in Metsä Group's safety walks;
- participate in risk mapping;
- hold safety talks with their personnel;
- carry out personal hazard identifications when starting jobs.

Metsä Group prepares safety communication material for service providers. The service providers are obligated to communicate this material to their employees operating at Metsä's locations.

Personnel working at such locations may only access areas necessary for their work. There must be at least one person in every team who speaks the language of the destination country or English.

2.2. Service providers working for Metsä on a permanent basis

The service providers draw up safety plans based on the risk analysis concerning each service package. These safety plans are delivered to Metsä or a representative of Metsä at the beginning of the calendar year.

Those operating in the shared workplace must commit themselves to performing proactive safety work in accordance with the jointly agreed objectives. The objectives are determined annually and whenever entering into a contract.

- A service provider's performance in safety verifies that it performs proactive safety work, and that the results are monitored and the corrective measures required to achieve the set objectives are taken.

Service providers working for Metsä on a permanent basis are obligated to carry out proactive safety work. Proactive safety work includes:

- safety observations;
- safety talks;
- safety walks.

Metsä Group sets detailed objectives for proactive safety work with permanent service providers, which are obligated to report the actualised results to Metsä no later than on the 3rd working day of each month. Permanent service providers' safety performance is monitored regularly in meetings and reported to Metsä on a monthly basis. Service providers' performance in safety is audited at regular intervals.

3. Supervision and monitoring

Service providers are responsible for supervising the work assigned to them, and for the monitoring and induction of their employees at the workplace, unless otherwise agreed in writing. Service providers must provide their supervisory staff with sufficient resources to ensure safety. Even though Metsä Group's representatives issue technical instructions to service providers' employees for carrying out the work, the responsibility for supervising the work is not transferred in the process.

If separately agreed, a service provider's employees may work under Metsä Group's supervisors, in which case Metsä Group's representatives are responsible for ensuring safety at work.

Service providers must ensure that the work they perform does not endanger the environment or other people working in a given area. Metsä's representatives are responsible for coordinating various work in the areas.

4. Requirements concerning personnel's know-how

Access to mill areas requires an access pass applied for and approved in advance. Vehicle passes must also be applied for in advance. Business areas and locations must see to the management and maintenance of a service provider's employee data, which must include verifiable personal data as well as details on completed inductions and the necessary professional qualifications.

Every person carrying out hot work, as well as those issuing permits for it and the persons supervising such work, must have sufficient qualifications for the performance of the work, as referred to in the relevant national requirements.

Employees must have sufficient professional skills and any qualifications for the safe execution of the work required by the law or other standards.

5. Safety reporting

Service providers must inform Metsä Group's contact person immediately of any safety observations, hazardous situations, injuries, other accidents or damage.

Service providers must also draw up written reports delivered to Metsä Group's contact person on any hazardous situations, injuries, other accidents or damage no later than on the day following their occurrence.

All hazardous situations, injuries, other accidents or damage that occur in a mill area are investigated by Metsä Group; the service provider involved is obligated to participate in such investigations.

Service providers must have a procedure of alternative or modified work in place that can be applied in the event of accidents.

6. Personal protective equipment

In terms of personal protective equipment, service providers and their employees must comply with Metsä Group's PPE standard. The equipment must be CE-marked and suitable for the purpose.

Service providers are obligated to provide their employees with the necessary protective equipment (such as safety helmets with chin straps, protective eyewear, hearing protectors, safety shoes, harnesses, protective clothing, respirators, lamps, gas alarms, radiation detectors, etc.).

Service providers are responsible for the procurement of the protective equipment and/or clothing, and for organising their inspections and maintenance. Each employee's work clothing must clearly indicate the name of their employer.

7. Vehicle safety and requirements

Bringing vehicles to a mill area and a project site is always subject to a permit, and the use of a vehicle always requires a valid vehicle-specific driving permit. The driver must abide by general traffic rules and any special rules of the mill area, such as speed limits. Parking is permitted only in indicated areas.

Qualification requirements for drivers and service providers' obligations:

- The driver must be at least 18 years old and hold a driving licence for the vehicle in compliance with national legislation.
- The driver must not have an illness or disability or be on any medication that substantially impairs their ability to drive the vehicle.
- Service providers must ensure that employees operating their work machines have been trained and granted a written permit to operate the machine by their own employer.
- If a service provider needs to use one of Metsä Group's machines, a Metsä Group representative can grant permission for this. The service provider's employee will be trained in the use of the said machine by Metsä. The service provider's employee must also have a written permit issued by their employer to use Metsä's machine.

Requirements for work machines and vehicles:

The following safety devices are required when operating in Metsä's mill areas:

- A signal device based on sound or light to indicate that the machine is reversing.
- A yellow flashing light is obligatory in all work machines that are used outdoors on-site. A yellow flashing light is obligatory in all vehicles used to move around the mills' outdoor process areas.
- All work machines brought on site must be equipped with functioning seat belts.
- All fuel-powered work machines brought on site must be equipped with automatic extinguishers.
- A damaged machine or vehicle must be taken out of use and sent to servicing. A damaged machine or vehicle must not be used.

National legislation may require other safety devices in different countries.

8. Permit to work

Any work subject to a permit is also subject to Metsä Group's standard regarding such work and the location-specific instructions. The key points of the permit standard are as follows:

- permits to work are issued by a representative of Metsä or a party authorised by Metsä;
- the party issuing a permit to work is responsible for the safety of the working environment and the coordination of the work;
- the party issuing the permit to work organises an induction on the requirements for the permit to work for its recipient;
- the person responsible for the work (a representative of the service provider) provides training on the content of the permit to work for their own team, and ensures that the work is performed safely and in accordance with the permit to work;
- employees confirm the permits to work with their signatures and carry out the work safely.

A written permit to work is required for:

- Hot work
- Work in confined or Atex spaces
- Any work concerning process equipment
- Working at heights
- Lifting work
- Excavation work

Each service provider and subcontractor is familiarised with the permit-to-work practice during Metsä Group's general induction.

8.1. Hot work

Hot work is work that causes a fire hazard, either by generating sparks or due to the use of a flame or other heat source. The sparks and ignition sources caused by hot work must be confined to the hot work site so that they cannot spread into the surroundings. Priority should be given to minimising hot work in production facilities by making use of prefabricated elements or components, alternative working methods, and permanent hot work sites. Any hot work carried out in areas controlled by Metsä is subject to Metsä Group's hot work standard. Service providers:

- must ensure that their operations do not cause a risk of fire or another accident;
- must ensure the procurement of adequate fire suppression equipment and hot work supervision in accordance with national requirements;
- are obligated to comply with the hot work plan of the site in question, unless otherwise agreed;
- be aware that hot work is subject to a permit, and that the work must account for all conditions determined in the risk assessment and permit to work;
- ensure that all individuals participating in hot work have valid safety training for hot work (hot work card) or a certificate required by the country's legislation.

In the supervision of hot work, service providers must ensure their employees have an adequate level of training and are ready to use fire suppression equipment. When procuring hot work supervision, service providers must ensure that:

- the individuals in question are fluent in the language of the destination country in the event of emergencies and for calling help;
- the individuals responsible for supervising hot work are not carrying out hot work at the same time;
- the individuals responsible for supervising hot work wear visible vests which meet the requirements of standard EN 11612 (protective workwear).

8.2. Confined spaces and Atex spaces

Work carried out in confined or Atex spaces is subject to Metsä Group's standard for work in confined spaces and the location's instructions.

A work permit for confined spaces is required if:

- the confined space has a manhole or another access hole
- access and rescue is difficult
- the space concerned is located on an electrically conductive platform in a confined space
- the space lacks adequate ventilation or may contain toxic gases
- the work is carried out in a canal, well or excavation involving the aforementioned factors
- hazardous gases may be present or form in the space (measurement prior to the start of the work and as specified in the permit).

The required personal protective equipment and tools must be defined before the permit to work is issued, as must the course of any rescue operations that may have to be carried out.

The tools must meet the requirements of the space classification.

The hatch guard must be familiarised with the requirements of the permit to work and the duties of a hatch guard, defined in MG's standard.

A copy of the permit to work must be placed in a visible location at the site and it must indicate the results of the gas measurements.

The site is isolated and locked out/tagged out according to MG's Lockout/Tagout standard. These safety precautions must be followed until all workers have exited the confined space, the hatches have been closed and the work has been completed in all respects.

8.3. Permit to work with process equipment

A written permit to work is required when the planned work involves:

- the maintenance or servicing of chemical piping or equipment or pressure equipment;
- equipment and piping work related to steam distribution;
- a pressurised conveyor system (for example, pipes used to transport dust);
- maintenance work on the odorous gas treatment system;
- bypassing fixed safety guards, such as fences, safety rails or obstacles;
- bypassing electronic safety measures related to the control systems of machines (i.e. locking).

8.4. Working at heights

Working at heights is subject to Metsä Group's standard on working at heights. On site, the risk of falling is prevented primarily by structural means and secondarily with personal fall protection (such as a harness preventing falls).

- There is no safe height from which to fall. The planning of the work must include an assessment of the risk of falling.
- The use of fall-arrest harnesses is mandatory on all aerial access platforms. The use of fall protection such as fall-arrest harnesses may be mandatory case-specifically in work carried out on platforms or scaffolding.
- Single ladders may not be used as working platforms.
- If the risk of falling cannot be prevented by structural means, a service provider must draw up task-specific fall protection plans. A service provider's own fall protection plan must furthermore include a separate rescue plan for rescuing a person whose fall has been arrested by their harness.
- Service providers must ensure that the necessary CE-marked protective equipment and systems have been acquired and installed. Plans are always reviewed separately before installation by a representative of Metsä.
- The falling of objects on passageways must be prevented by, for instance, covering passageways. If this cannot be done in a reliable manner, passage to the hazardous area must be prevented.

8.5. Lifting work

Each lifting operation must be planned in advance to ensure its safe implementation and that all foreseeable risks are taken into account.

The key points of the standard for lifting work are as follows:

- The party responsible for the lifting work is the party which has ordered it and acts as the supervisor of the work in question, unless otherwise agreed.
- A written plan must always be prepared for demanding lifting operations; cf. MG's standard for lifting work.
- Everyone participating in the lifting work must familiarise themselves with the lifting work plan before starting the work.
- The site must be fenced off before the lifting work begins to prevent unauthorised access to the area.
- The bearing capacity of the base must be established before the planning of the lifting work.
- The lifting accessories must be CE-marked, inspected and suitable for the purpose in question.

- The work machines used for the lifting must undergo and pass periodic inspections. Service providers are obligated to inform Metsä of any cranes, aerial lifting platforms and forklifts they bring to areas controlled by Metsä. In Finland, the records concerning the periodic inspections of the aforementioned equipment must be saved in the Zeroni system prior to a particular piece of equipment being deployed.
- The load slinger and the signaller must have appropriate qualifications for the work and a written certificate of completed training (ISO 23853) provided by their own employer.
- The use of fixed lifting equipment and forklifts controlled by Metsä requires induction and a permit provided by a representative of Metsä.

8.6. Excavation work permit

A written permit to work is required for on-site excavation work. The purpose of the permit is to ensure the safety of excavation work. The issuance of the permit requires the advance examination of underground structures, such as electrical wires, pipes and other structures. The demarcation of the excavation area must also be planned and implemented carefully.

9. Safety locking of process equipment

Safety isolation means making a piece of equipment, process or part of a process safe. Metsä Group's trained personnel plan, issue permits to work and carry out safety isolations for process equipment. Safety locking is subject to Metsä Group's lockout/tagout standard.

Service providers are obligated to comply with Metsä Group's lockout/tagout standard and the requirements of the permit to work in the safety locking of process equipment. This means that all safety isolations are carried out by Metsä Group personnel or in cooperation with the person performing the maintenance or modification work. Safety isolations are installed and reversed only by Metsä Group personnel or with their permission. Service providers' maintenance and servicing employees are subject to the following requirements:

- a valid permit to work and familiarisation with any hazards to be accounted for at a site;
- the use of their own lock and its addition to lockout/tagout objects (such as safety switches) before starting work. The lock must be equipped with the contact information (on a sign, for example) of the person who does the locking.
- When more than one person is working in the same work area, everyone adds their own lock. The lockout/tagout can be team-specific.
 - At sites where safety locking and the use of personal locks is not possible, the equipment's safety isolations must be carried out in another reliable manner (such as by removing fuses). The safety of employees and the working environment is ensured with the help of permit-to-work procedures.
- Once the work is completed, the maintenance employee removes the lockout/tagout they have installed and reports the completion of the job to Metsä Group's personnel.

Service providers are obligated to procure the safety locking devices (the locks, locking cables, contact detail signs, etc.) required by their work for their own personnel.

10. Scaffolding work

Metsä Group allows only two types of scaffolding: prefabricated scaffolding or structurally engineered scaffolding built on-site. Employees must be provided with the necessary work and protective scaffolding for all work that cannot otherwise be safely carried out. Scaffolding must be designed and erected in a manner that ensures sufficient strength, rigidity and stability during all phases of assembly and disassembly, and during use. The scaffolding must be equipped with appropriate and safe work platforms and access routes.

- Scaffolding may be erected solely by scaffolding experts or experts with training/certification for the erection, inspection and dismantling of scaffolding.
- Prefabricated scaffolding must be constructed in accordance with the relevant operating instructions or structural plan.
- The scaffolding must be equipped with a harness card if the scaffolding cannot be built in accordance with the regulations concerning railings, baseboards, gap protection or other fall protection.
- Falls must be prevented in all situations and in all work carried out during the erection, use, and dismantling of scaffolding.
- A commissioning inspection must be carried out before taking scaffolding into use.
- The commissioning inspection is carried out by Metsä's representative or by a person authorised by Metsä, in cooperation with the builder's representative.
- The condition of any scaffolding in use must be checked at least every seven days.

11. Hazardous chemicals and use of radiation sources

Service providers and Metsä Group must agree on any hazardous chemicals to be used on the construction site. Service providers must provide Metsä Group with a list of the chemicals they use and keep the safety data sheets for the chemicals in a visible place. Metsä can provide safety data sheets for all chemicals used by Metsä.

The use of X-ray and other equivalent equipment is subject to any instructions issued by the authorities. In addition, the hazardous area must be closed off with clearly visible signs, and guarding for such areas must be arranged.

12. Tidiness and cleanliness

Each service provider must keep their work environment clean and tidy on a daily basis. The work also includes cleaning the working area immediately after the work has been completed, and sorting waste and surplus supplies and removing them from the work site in accordance with Metsä Group's instructions or transferring them to a location designated by Metsä Group. Service providers are responsible for equipping work sites with the necessary waste collection bins, unless otherwise agreed.

Should a service provider fail to take care of these obligations, Metsä Group may have the work site cleaned at the service provider's expense without a separate agreement.

13. Information security

The management and processing of data are subject to Metsä Group's information security policy and related instructions.

The documents related to the work are the property of the client, unless otherwise agreed. Service providers and other operators with access to the construction site may not disclose information related to the production process, finances or other confidential issues to third parties. Documents containing confidential information must be destroyed in a reliable manner.

Photographing or recording videos on Metsä Group's premises without permission is prohibited.

14. Procedures in the event of violations

Metsä Group and service providers ensure – through induction, training, guidance and monitoring – that no one violates the safety instructions.

All safety violations are always reported to Metsä Group's contact person and the employer of the employee in question.

In the event of such a violation, Metsä Group may remove the employee in question from the shared workplace and prevent them from accessing it for a specified period of time. Any removals from a site can be expanded to cover all of Metsä Group's units.

Zero tolerance is applied to the use of alcohol and narcotics, and the consequence is always removal from the site. Breathalyser tests are carried out in compliance with Metsä's instructions.

If the same service provider repeatedly neglects their duties or the negligence is considered to be particularly serious, the purchase agreement on the work can be terminated and a waiting period employed according to the customer's discretion.