

Vattenfall Health & Safety and Environmental minimum requirements for Contractors

In addition to the obligations outlined in the Vattenfall Code of Conduct for Suppliers and Partners, Contractors* are required to comply with the following Health & Safety (HS) and Environmental (E) requirements when conducting work for Vattenfall. Depending on type, scope, and complexity, of work or contract, additional Employer specific and/or legal HSE requirements will also apply.

*Contractor is a company contracted by Vattenfall to perform work (construction and/or maintenance) for Vattenfall.

1 HSE management

1.1 Subcontractors and Consortia

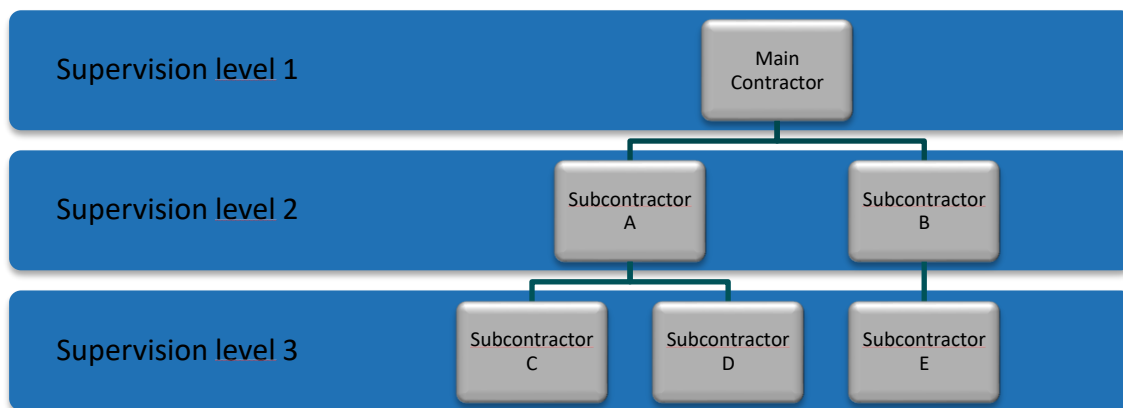
- a) All requirements are applicable for all Contractors, Subcontractors and Consortium partners.
- b) The Contractor shall notify Vattenfall which Subcontractors and Consortium partners are to be used, before Subcontractor or Consortium partner work starts. Based on risk or HSE performance below specified levels in Pre-Qualification Questionnaire (PQQ), open Non-Conformance Record (NCR)s or failure to meet requirements; Vattenfall has the right to refuse the use of specific Subcontractors and Consortium partners.
- c) The Contractor shall instruct its Subcontractors and Consortium partners about relevant requirements and to follow up compliance with these.
- d) The Contractor shall coordinate its Subcontractors and Consortium partners.

1.2 Supervision

- a) All work contracted by Vattenfall and being performed by a Contractor shall be managed by Supervisors from the Contractor. The Contractor shall give the Supervisors authority to instruct personnel.
- b) The Contractor's Supervisors shall be personally appointed and named. The Supervisors shall have sufficient knowledge of the complexity of the task, and the risk involved.
- c) The Supervisor shall always be present during the performance of work, unless it is agreed (based on risk) that the Supervisor is accessible by phone, etc.

1.2.1 Levels of supervision

- a) Maximum three levels/tiers of supervision are allowed. Required competence and resources (as Subcontractors or hired staff) may be added/contracted under the condition that work is performed within these three levels of supervision.
- b) The levels and degree of supervision provided shall be determined on a risk-based approach.



1.3 Certificates and management systems

Contractors shall have documented HEALTH & SAFETY Management System and Environmental Management System(c) unless the Contractor is set under another party's supervision (d). Mainly based on risk, each unit or tender may decide on requirements for certificates (a) or management systems (b). See table.

Preferred order	Requirement/clarification
a) Certificates according to ISO 45001 and ISO14001 or equivalent	If there are certificates considered equivalent to ISO 45001 and ISO 14001 certificates, those shall be specified by the client for the contract.
b) Management system, equivalent to ISO 45001 and ISO 14001	If there are standards considered equivalent to ISO 45001 and ISO 14001, those shall be specified by the client for the contract.
c) Documented system, showing how HSE is managed	This means a documented system at an appropriate level, including procedures and records. Even when legislation does not require documentation, Vattenfall requires documentation for specifically the topics on: • HSE Risk management • Reporting, investigation, and handling of Incidents and impacts • Monitoring of legal requirements • Yearly follow up of the HSE work
d) No documented system	If the Contractor (small, medium, and large enterprises) does not have a documented system, the work shall be done under another party's supervision (Vattenfall or another Contractor) and management system. For micro enterprises* (<10 employees) the business must at least respond in writing and inform about the following parts; • How the company identifies which laws and regulations are relevant to the assignment in question. • How the company ensures compliance is based on local work environment requirements and adaptations at Vattenfall facilities and workplaces.

	• How the company identifies and manages the risks that the assignment entails. • How the company ensures that employees have the right skills and use the right personal protective equipment in all work steps included in the assignment in question. * <u>EU Enterprise definitions</u>
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1.4 Health & Safety, and Environmental plans

- a) The Contractor shall present a contract-specific Health & Safety plan and an Environmental plan to Vattenfall, which will be reviewed with feedback provided where required. Vattenfall may require an improved plan addressing the major and minor issues before the work starts.
The HSE plan can be presented as one common HSE plan or two separate plans (Health & Safety plan and Environmental plan).
- b) The HSE plan shall include at least the following but can differ in detail depending on the size, complexity, and risks of the project/work:
 - The HSE project/contract organisation including subcontractors, roles, and responsibilities, ensuring required HSE competence.
 - Describe the system for HSE risk management.
 - Address any known risks associated with the intended work, and if any high-risk activities are identified, safeguards/critical controls shall be in place prior to commencing work (1.6.1).
 - Describe how to ensure that all employees and/or subcontractors have the competence and capability to comply with all requirements; from Vattenfall, the Contractor and any regulatory requirements appropriate to the intended work.
 - A plan for monitoring HSE performance.
- c) For framework agreements, the HSE plan shall be at an appropriate level to cover what is necessary for managing relevant risks. Examples:
 - For emergency work, the HSE plan needs to be specific enough for the cases where there is no time to develop separate HSE plans for each call off.
 - For planned service, the HSE plan may be generic if there are specific HEALTH & SAFETY plans developed for each call off.

1.5 Health, Safety, and Environmental documentation

- a) The Contractor's documentation (governing documents and records) related to HSE shall be made available to Vattenfall upon request without delay.
- b) The Contractor's documentation shall be made available in the language(s) specified in the contract.

1.6 Health, Safety, and Environmental risk management

- a) The Contractor shall manage the risks related to its work. Necessary risk assessment and risk reduction measures shall be taken by a competent person and documentation required due to legal requirements, local regulations, permits or contract requirements shall be developed before the work starts.
- b) The Contractor shall inform Vattenfall if input for the risk management is missing.
- c) The Contractor shall, upon request, be able to present all risk management documentation to Vattenfall, which has the right to require an improved risk management before the work starts or continues.

1.6.1 High-risk activity controls

- a) High-risk activities shall be systematically identified and managed to ensure safety and compliance. Such activities include, but are not limited to working at height, performing switching operations,

working in proximity to live electrical equipment, conducting lifting operations, operating near heavy machinery, entering confined spaces, working in flowing water, diving, etc.

- b) For activities assessed as high-risk for HEALTH & SAFETY, Contractors shall identify, document, and implement the most effective safeguards and critical control measures to prevent or mitigate serious incidents.
- c) These safeguards shall be:
 - Clearly defined and documented prior to commencement of work.
 - Verified for functionality and effectiveness before and during execution.
 - Subject to regular review and performance confirmation.
- d) Contractors shall maintain records of these safeguards, including verification outcomes, and share this information with Vattenfall. The approach must demonstrate a proactive commitment to fatality prevention and continuous improvement in operational safety.

For examples of safeguards and critical control measures see Appendix.

1.7 Time out/Stop work

A procedure shall be in place to ensure all Contractors understand that they have the right, the responsibility, and the obligation to call a Time Out/Stop Work without fear of reprisal whenever an unsafe or unhealthy condition or act, or risk to the environment is perceived.

NOTE: Facts or evidence is not needed; it is the perception of risk which determines Time Out/Stop Work.

1.8 Coordination responsibility

- a) In case a coordination Responsible Person has been appointed by Vattenfall, it does not relieve the Contractor from its own employer's liability, especially planning, supervision and monitoring of the work towards its own personnel and Subcontractors' and Consortia partners' personnel.
- b) Coordination requires mutual dialogue between all parties. The dialogue shall be performed as specified.
- c) All Contractors shall be represented in the coordination meetings they are called to participate in.

1.9 Language barriers

The Supervisor shall be sufficiently skilled in the languages required (written and spoken), to be able to:

- a) Understand and implement all relevant HSE directions and instructions.
- b) Communicate with the client and the workforce being supervised, including all relevant written HSE instructions and warnings translated in writing or verbally.

1.10 Assessments, inspections, and audits

The Contractor shall cooperate when Vattenfall performs assessments, inspections, and audits, and give access to the Contractor's relevant documentation, working places and personnel.

1.11 Reporting and handling of incidents and risks

"Incident" in the following text includes also risk observations.

- a) The Contractor shall report incidents according to specifications in the contract.
- b) For fatality, serious injury or illness and serious near misses:
 - The Contractor shall immediately inform Vattenfall.
 - The Contractor shall present
 - an initial cause analysis within a week, and
 - a final report with identified root causes within the period agreed with investigation lead.
 - Vattenfall shall always be invited to participate in Contractor's incident investigations.
- c) Vattenfall may always decide to perform an own investigation, and the Contractor shall cooperate.
- d) The Contractor shall without delay inform Vattenfall;

- if a notification is done to any authority regarding incidents,
 - if an authority initiates an investigation, and
 - about all related authority decrees, such as injunctions, fines or legal proceedings related to work contracted by Vattenfall.
- e) The Contractor shall approve that analysis and evaluation of incident data may be done by Vattenfall.
- f) The Contractor is responsible for environmental remediation and eventual rectification after incidents.
- g) The Contractor shall inform all employees about Vattenfall's whistle blowing function.

1.12 Emergency planning and response

- a) Unless otherwise agreed, the Contractor shall perform emergency response planning for HEALTH & SAFETY before work starts, considering existing plans. The plan shall contain at least: Emergency phone numbers, evacuation, worst-case high-risk scenarios, assembly place, first aid, rescue, and drills.
- b) The Contractor shall instruct any personnel on the location about measures in case of emergency, unless done by Vattenfall.

1.13 Consequences in case of violation

- a) In case the Contractor does not fulfill the HEALTH & SAFETY requirements, Subcontractors or Consortium partners, Vattenfall has the right to issue consequences via dialogue, warning, rejection, or cancellation of contract.
- b) Contractors shall have a formal system for issuing consequences to their personnel and Subcontractors.

2 HSE Operations

2.1 HSE competence and individual certification

- a) Personnel working on the location shall have the necessary competence for their respective tasks. This includes individual certificates not required by law, when Vattenfall has specified such certificates as a requirement.
- b) The Contractor shall document permits, proof of necessary knowledge, competence and certificates/licenses required during the performance of work (e.g., mobile work platforms, riggers, four-wheelers, and personnel responsible for electrical installations).

2.2 Briefings, control before work, and training

The requirements below are valid also when circumstances change (e.g., weather, location, other work in progress, working environment), during the conduction of work by the Contractor.

- a) Work shall not be started until Vattenfall, or the person appointed has had a briefing with the Supervisor on the Contractor's side about relevant HEALTH & SAFETY requirements, and the information has been passed on to the Contractor's and Subcontractor's personnel.
- b) The Supervisor's briefings with personnel shall be documented. The frequency of briefings shall be described in the HSE plan.
- c) Controls before work starts shall be done when relevant and described in the HSE plan. Documentation for controls shall be developed when not already existing.
- d) In cases where the work requires permit from any stakeholder it shall be stated in the HSE plan, and the work may not be started until the written permit has been received.
- e) It is mandatory to participate in HSE training and meetings that Vattenfall calls for.

2.3 Access regulations

All Contractor personnel shall check in and out according to the rules that are applicable for the specific Vattenfall location where the work is performed.

2.4 Working hours, wages, leave and benefits

- a) The Contractor shall follow the legal regulations and Vattenfall's Code of Conduct for

Suppliers and Partners with respect to working hours, wages, leave and benefits.

- b) The Contractor shall be able to provide documented evidence in relation to all items in a).

2.5 Harassment

- a) The Contractor shall communicate to their employees that any form of harassment is not accepted and shall be reported (1.11).
- b) The Contractor shall have routines for dealing with harassment.

2.6 Alcohol, drugs, and smoking

- a) Bringing, consuming and being under the influence of alcohol and other drugs is prohibited at Vattenfall.
- b) When there is reason to suspect people of being intoxicated by alcohol or drugs, Vattenfall has the right to deny access to Vattenfall's location and/or stop people's work.
- c) Vattenfall has the right to randomly, and/or if someone is suspected to be under the influence, request alcohol, or drug testing to be conducted.
- d) Personnel required to be alcohol or drug tested are obliged to follow Vattenfall's instructions for this. To not cooperate in testing is seen as a positive test result, which may lead to sanctions. Negative test results are required to continue work.
- e) Smoking, including e-cigarettes, is only allowed in areas designated for smoking.

2.7 Occupational health checks

The Contractor shall ensure that all personnel, when required by legislation or risk assessment for the actual work, during the performance of work always have valid certificates confirming that relevant health checks have been passed.

2.8 Personal protective equipment

Personal protective equipment (PPE) shall be used based on Vattenfall's local requirements, contract requirements, and/or as a result of the Contractor's risk assessment.

2.9 Tools, equipment, and utilities

- a) The Contractor is responsible for providing relevant training, condition, safeguards, regular inspections and to ensure correct and safe use according to safety rules for all tools, equipment, and utilities.
- b) All detected defects on tools, equipment and utilities provided by Vattenfall shall be reported by the Contractor to Vattenfall without delay.
- c) Use of tools, equipment and utilities owned by Vattenfall requires permit in advance by Vattenfall.

2.10 Logistics and transport

- a) Specific Vattenfall traffic rules apply at Vattenfall locations.
- b) Only the roads and storage areas designated by Vattenfall shall be used for transport and storage of materials at, and in conjunction with, the Vattenfall location.
- c) All roads and other traffic routes, emergencies, and evacuation routes, including those in buildings, shall always be kept clean at the Vattenfall location.
- d) Vattenfall has the right to check different types of permits for driving vehicles.
- e) Transport shall be coordinated to minimise emission and noise, as far as possible

NOTE: For environmental requirements on road transport to Vattenfall sites, plus transport and machinery use within Vattenfall sites, contact Vattenfall for more information.

2.11 Using and handling hazardous chemicals

- a) Based on the substitution principle, the least hazardous products to human health and the environment shall be used. Before using products with hazardous properties, they should be risk assessed and involve a review of whether a less hazardous product is available.

- b) The Contractor shall provide Vattenfall with the details of all chemical products with a hazard classification according to the CLP ¹ regulation regardless of whether it will be utilised for the works or if it will remain on site e.g., left in the permanent works. Vattenfall shall be notified of these before work commences.

2.12 Pollution prevention

- a) Storage arrangements for hazardous chemicals shall be suitable and sufficient for the location and properties of products present. They should prevent loss of containment into water and soil. Temporary measures to contain the spill shall be taken in such a way as to prevent physical damage and damage (e.g., collision) and damage caused by weather conditions, including wind and rain (e.g., flooding of spill containment).
- b) Fluids shall be transferred with care, meaning supervision of, for example, valves and pumps until transfer is complete. Drip trays shall be used below entry and sampling points for the fluid or other chemicals. Re-filling shall be conducted at least fifty meters from any water course or other surface body water.
- c) Equipment including mobile generators, compressors etc. shall be kept according to requirement a) in this paragraph.
- d) If a spill or incidental release of hazardous chemicals occurs (including e.g., fuels and oils), the spill or release shall be stopped immediately (as soon as it is safe to do so) and contained until proper clean-up has been completed.
- e) Provisions shall be made to mitigate any loss of containment risks, for example absorbing material, spill kits etc. Items that are required should be readily available and in close proximity to any threat, and any spill shall be disposed of.

2.13 Waste management

- a) For waste generated at the location and within the contract scope, the Contractor shall ensure the following is arranged according to legal requirements, unless otherwise agreed:
- Setting up waste handling equipment.
 - Collection and disposal of waste.
- b) If the Contractor uses Vattenfall's waste handling equipment, the directions from Vattenfall shall be followed to avoid double counting of waste amounts.
- c) When specified, a waste management plan (can be a part of the HEALTH & SAFETY/E plan) shall be presented for Vattenfall before the work starts, describing procedures to ensure that legal requirements are met as a minimum:
- How the waste hierarchy principles are used to promote circular waste management (prevention and minimisation > reuse > recycling > energy recovery > disposal).
 - Correct identification of each individual waste type.
 - Separation of individual waste types.
 - Correct classification, labeling, storage, and shipping of each waste type.
 - How records of permits, transport documents, and reception acknowledgement are handled and archived.
- d) The Contractor shall after finalised work, yearly or as specified, report the amount of waste. Each waste type shall be reported in kg and categorised according to the European Waste Catalogue and respective kinds of treatment.
- Waste to be reported includes demolition of waste from Vattenfall devices, exchanged chemicals in devices (such as lubricants), oil from oil separators, consumables, or replaced spare parts and similar.

Waste because of Contractor activities, e.g., cleaning material (rags, solvents), and packages are normally in the responsibility of the Contractor and is not to be reported.

¹ Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation)

Appendix

Examples to illustrate safeguards and critical control measures for some high-risk activities.

High-risk activity	Safeguards and Critical Control Measures
<i>Working at height</i>	- Railing / barriers / hatch covers / indications around hazardous area. - Properly selected and attached fall-arrest system and harness.
<i>Switching operations</i>	- Application of the Electrical Safety Rules. - Switching is performed only by competent personnel. - Adherence to approved switching schedule / log.
<i>Working near live equipment</i>	- Application of the Electrical Safety Rules. - Marking of live equipment (not to be worked on). - Ensure the work area for equipment is safe.
<i>Lifting operations</i>	- "Do Not Enter" areas beneath suspended load. - Correct selection and use of suitable lifting accessories /equipment. - Use of competent lifting personnel. - Establish and honor exclusion zones.
<i>Working near heavy machinery</i>	- Physical barriers around the work area. - Strategic positioning of machinery, materials, and traffic flow. - Continuous line of communication with operator.
<i>Confined space entry</i>	- Measure for gases in the atmosphere before AND during operation. - Manhole guard with communication line to inside / outside. - Stabilisation and timely extraction from confined space.

NOTE: These are examples of high-risk activities for illustration only. It does not cover all high-risk activities.