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## **1 Foreword and Declaration of Commitment**

The company profile of Umicore, as described in "The Umicore Way," and the applicable policies for Quality, Health, Safety, and Environment provide the strategic direction for the business units. In connection with this manual, the following aspects are of particular importance: customer orientation, values and their implementation, principles for employees, environmental and social responsibility, as well as the building blocks of Total Quality Management. The processes of the business units are aligned with these guidelines and encompass, in this sense, quality, environmental protection, occupational and plant safety, health protection, and emergency management. An integral part of the corporate culture is that all Umicore regulations for the protection of people and the environment apply equally to external companies and their employees as they do to Umicore's own staff. Umicore's management system is structured as an integrated system and meets all requirements of ISO 9001 and ISO 14001 standards, as well as, where required by the respective business unit, additional regulations such as ISO/TS 16949. A key component of the management system is ensuring compliance with all relevant legal requirements and site-specific regulations. Particularly noteworthy is the principle of continuous improvement, which forms the foundation of Umicore's management system and is an essential element of all Umicore processes. This principle must be considered in all activities and processes. The regulations of this contractor management manual apply to all Umicore organizational units within the defined scope, as well as to external companies employed in these units and their employees. Every Umicore employee and every employee of external companies is obliged to implement the provisions according to their responsibilities and tasks and to ensure the effectiveness and continuous improvement of the management system.

### **1.1 Purpose and Scope**

The present contractor management manual, together with the associated applicable documents in the form of process descriptions, procedures, work and operating instructions, forms, etc., contains all fundamental regulations of Umicore at the Hanau-Wolfgang site as well as at the Rheinfelden and Bad Säckingen plants. These regulations apply equally to Umicore's organizational units and its subsidiaries as well as to external companies employed by them and their employees. Some provisions, such as access regulations for the industrial park, are specific to the Hanau site, which is evident from the respective context. Specific regulations also apply to the Rheinfelden and Bad Säckingen plants. For simplification, this manual generally uses the term "Umicore" uniformly for Umicore and its subsidiaries. The same applies to employees, for whom the term "employee" is used in a general sense. This contractor management manual communicates all regulations and requirements to Umicore employees as well as to external companies working for Umicore and their employees. The focus is on corporate organization, standard and project organization in order processing, and emergency organization. According to the defined requirements, it must be ensured that the respective organizational structures and workflows are clearly documented with delegated tasks, competencies, and responsibilities, as well as proof of all instruction, selection, and monitoring obligations. The manual is intended to be incorporated as part of the contracts between Umicore and the respective external companies. Umicore AG & Co. KG and its business units focus on their core business. To ensure smooth operations, external companies are required for various tasks, such as maintenance, conversion, and repair work on industrial plants, buildings, infrastructure, as

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well as various services. When external companies are engaged, two or often several companies with their respective organizations come together. Coordination is necessary to ensure safe processes for all employees. When external companies perform work on the premises of Umicore AG & Co. KG as the client, new hazards may arise.

## 2 Abbreviations and terms

### 2.1 Abbreviations

**BGB:** German Civil Code

**DGUV:** Statutory Accident Insurance System

**GSU:** Health, Safety and Environment

**IPW:** Industrial Park Wolfgang

**SiGeKo:** Safety and Health Coordinator (also referred to as Site Coordinator)

### 2.2 Glossary

#### Working conditions

They are legally regulated by the Works Constitution Act and are documented in writing in employment contracts, works agreements, or collective bargaining agreements. Working conditions include, among other things, notice periods, wages or salaries, work-life balance, working hours, and statutory regulations.

#### Audit

It is a systematic and independent examination to determine whether processes, requirements, and policies meet the required standards, whether the related results comply with the planned specifications, and whether these specifications are effectively implemented and suitable for achieving the objectives.

#### Client

The client is the commissioning company for all contractor assignments, e.g., Umicore AG & Co. KG. It is the contractual partner of the commissioned contractor as a legal entity.

#### Project Owner

Is the contact person for the building authority.

#### Plant

Within the meaning of this manual, an organizational unit is a place where external company employees perform their work. These can include, for example, production areas, laboratories, technical centers, workshops, or areas such as buildings and premises that fall under the responsibility of Facility Management.

#### Construction Site Coordinator

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This is the term used in this manual for the coordinator as defined by the Construction Site Ordinance, also referred to as the Safety and Health Coordinator.

### **Purchasing**

This is the specialized department at Umicore that is responsible, among other things, for procuring services from external companies.

### **Instruction**

Instruction provided to familiarize a person (usually once) with, for example, the operation of equipment or a specific environment (see also 'training').

### **External company**

This refers to the contractor who independently provides services. At the same time, it is the contractual partner of the client as a legal entity.

### **External Contractor Management**

Includes the organizational measures and processes required to meet corporate and legal requirements when awarding and executing contracts with external companies.

### **External Contractor Management Coordinator**

Appointed by the company's or organizational unit's management to support the responsible persons in the introduction, implementation, and further development of contractor management. At Umicore in Hanau, the Contractor Management Officer is part of the site organization and is supported by the Contractor Management Officers of the business units. In Rheinfelden and Bad Säckingen, this function is performed by the EHS department.

### **Risk assessment**

A method for carrying out, identifying, and assessing the hazards associated with employees' tasks and for deriving the necessary protective measures.

### **ISO 9001**

EN ISO 9001:2015 Quality management systems

### **ISO 14001**

EN ISO 14001:2015 Environment management system

### **ISO/TS 16949**

Quality Management Systems – Specific Requirements for the Application of ISO 9001:2015 for Series and Spare Parts Production in the Automotive Industry (2016)

### **Coordinator**

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This is an umbrella term for designated coordinators as defined in Section 8 of the Occupational Safety and Health Act, Section 6(1) of BGV A1, and Section 15 of the Hazardous Substances Ordinance (Safety Coordinator), as well as under the Construction Site Ordinance (Construction Site Coordinator).

### **Complaint about defects**

Written notifications to the external company that impact the supplier evaluation due to non-contractual performance, intended to secure claims.

### **Project Manager**

This is the person responsible for the entire project from planning to handover. Their extensive duties, particularly regarding health, safety, and environment, are defined in the procedural instruction 'HSE Responsibilities in Project Organization'.

### **Quality or quality performance**

In this manual, it describes the fulfillment of all contractual and legal requirements, including those related to health, safety, and the environment.

### **Safety Coordinator**

This is the term used in this manual for the coordinator as defined in Section 8 of the Occupational Safety and Health Act, Section 6(1) of DGUV Regulation 1, and Section 15 of the Hazardous Substances Ordinance.

### **Subcontractor**

These are companies engaged by external contractors to fulfill their (partial) services. Technical contact person assumes the tasks of the requester in terms of procurement.

### **Access procedure**

Regulate, based on legal and company requirements, the access of external company employees to the industrial park or their designated work site.

### **8D-Report**

Represents the execution and documentation of the 8D method ('8 Disciplines Process'), a problem-solving process carried out in eight steps.

## **3 External companies**

The essential processes for handling orders awarded to external companies are briefly described below. In particular, the aspects that are relevant for order processing with contractors and directly for the contractors and their employees are summarized. A detailed description of these processes is provided in separate process descriptions. The three processes—procurement, complaints management, and supplier management—fall under the responsibility of the purchasing department. They apply to both materials and services.

### **3.1 Criteria for selecting contractors**

When selecting a contractor, not only economic factors (e.g., cost and duration of the assignment) are decisive, but issues such as safety and health protection must also be considered. Furthermore, Umicore places great importance on ensuring that all legal requirements regarding working conditions are met by all contractors and partner companies. To establish a binding basis for this, all contractors and partner companies are sent a self-disclosure questionnaire, and only after its return and verification may an external company be commissioned. The "Self-Disclosure Questionnaire for Contractors" must be obtained from contractors prior to contract award and at least once a year. These questionnaires are archived by Umicore accordingly (location and retention period to be specified here).

### **3.2 Procurement**

This process covers all procurement activities from the initial request to goods receipt, which are handled in a standardized manner. The process is designed to ensure that all requirements specified in the order are fulfilled accurately and within the agreed timeframe.

#### **Steps for procurement**

1. Definition of Required External Services
2. Tendering
3. Evaluation of Self-Disclosure Questionnaires for Contractors
4. Selection of Offer and Service Description
5. Order Placement and Contract Conclusion (Purchase Order)

### **3.3 Complaints Management**

This process describes the procedure for receiving, handling, and evaluating complaints. Except for minor issues, complaints related to the activities of contractors should also be reported to the purchasing department. In addition, warranty periods must be checked. Warranty periods according to the German Civil Code (BGB) or the Construction Contract Procedures (VOB) may differ and must be agreed upon in advance.

### **3.4 Supplier Management**

In supplier management, the processes for updating the supplier structure and evaluating suppliers are described. One criterion for supplier evaluation is the quality of products and services, which, in the case of external companies, also includes compliance with safety and environmental protection standards.

### **3.5 Access to the Wolfgang Industrial Park and the Rheinfelden and Bad Säckingen sites**

Access to the Wolfgang Industrial Park is controlled by Evonik's plant security on behalf of Umicore. Every external company employee must complete the safety briefing, including a safety test, before entering the site. This can be done in advance – for example, at the company or on the way to IPW – or on-site at Evonik's plant security. The link to the online briefing is provided to external companies with the order via the Umicore external company contact

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person.

At the Rheinfelden site, access is also controlled by Evonik. Here, the briefing including the safety test is completed in advance on-site at the terminal. At all three locations, the external company must be registered in advance by the Umicore external company contact person.

### 3.6 Order Processing

The standard procedure for order processing is defined in Section 6 of this manual, describing the corresponding tasks and responsibilities. It particularly applies to the requester in both standard and project organizations, the management of the contracted external companies, and the other commissioned Umicore organizational units.

Key steps in the process include identifying potential hazards and necessary safety precautions, planning, coordinating, and monitoring the work, checking compliance with health, safety, and environmental regulations as well as order and cleanliness, and reviewing and approving the services provided.

Especially important for accident prevention are the careful assessment of possible hazards and the measures to be taken, such as the possible appointment of coordinators, documentation of safety requirements, issuance of work permits, and execution of workplace-specific risk assessments. Only official work permits are valid. Further details on handling work permits may be defined by the organizational units.

### 3.7 HSE Responsibility in the Project Organization

Responsibility for health, safety, and environmental protection within the project organization is defined in an associated procedural instruction ("EHS Responsibility in the Project Organization"). According to this, the project manager is, among other things, responsible for the careful selection of external companies and compliance with the requirements of the External Company Management Handbook.

## 4 Requirements

### 4.1 Requirements for the Contractor

#### Occupational Safety

The general requirements for the contractor's conduct regarding hazards associated with the work for people and property are included in this guideline. Job-specific requirements for occupational safety are generally defined in writing by the client (e.g., in individual orders or work requests). The relevant occupational safety regulations, workplace directives, and occupational health rules, including the safety provisions applicable to the order, must be observed.

The contractor bears full responsibility and liability for the safety of its employees. The contractor must ensure that its activities do not create hazards for the client's employees or other contractors. When using equipment, tools, and operating resources, all legal and trade association regulations as well as company-specific special rules must be observed. The contractor bears full responsibility for the safe operation of all work equipment it uses.

To continuously improve occupational safety and health protection, data on workplace accidents involving external company employees at the site are also recorded and evaluated.

### **Environment Protection and Energy Management**

The contractor must comply with all relevant laws, regulations, decrees, and directives as well as internal plant rules. Job-specific requirements regarding the contractor's conduct in relation to hazards associated with the work for people, property, and the environment are defined in writing by the client. Contractors are encouraged to use energy and resources sparingly and to apply energy-efficient techniques and methods.

### **Fire Prevention**

The contractor is responsible for complying with all fire protection-related laws and regulations as well as the fire protection rules applicable at the site. The responsible fire department must be involved in all matters concerning preventive fire protection or preventive hazard control.

### **Subcontractors**

The use of subcontractors must be requested in writing from the client using the designated forms and requires the client's explicit approval. The client reserves the right to reject subcontractors proposed by the contractor. The selection and evaluation of subcontractors by the contractor must comply with the criteria set out in the contract concluded with the client. The services provided by the subcontractor, including the necessary instruction of its personnel, are treated in the same way as those provided directly by the contractor. Any complaints in all matters will be addressed to the contractor. The client reserves the right to carry out inspections related to the use of subcontractors and, in justified cases (e.g., violation of safety regulations), to reject them.

### **Personnel Service Providers of the Contractor**

The contractor who employs personnel under the German Employee Leasing Act (AÜG) is fully responsible for the occupational safety of the employees during their assignment. Individuals deployed under employee leasing must be treated by the contractor as if they were its own employees.

### **Language Requirements**

Employees of external companies must be able to sufficiently understand instructions and directions in the local language of the site, especially in case of alarms and hazardous situations. If the external company cannot deploy employees who adequately understand the local language (for instructions and directions in alarm and hazard situations), the company must provide competent contact persons permanently at all locations where external company employees perform work. Supervisors of any nationality must have a good command of the German language, both spoken and written, and be sufficiently familiar with the applicable German occupational safety laws and accident prevention regulations.

## 4.2 Maintaining Operational Order

It is generally prohibited on the site premises to:

- Post posters, write on walls, or place advertising on vehicles
- Distribute flyers, leaflets, or printed materials
- Collect signatures
- Sell goods, advertise them, or hold assemblies

Exceptions to this prohibition include approved activities of existing institutions and the distribution of union publications. Permitted activities of employee representatives and trade unions remain unaffected. Any political activity on the site that could disturb or endanger order or workplace harmony is prohibited. Employees may also not engage in activities for non-political external associations on the site if such activities could disturb or endanger order or workplace harmony.

## Correction of Deficiencies

Identified deficiencies must be corrected immediately. Unsafe or non-compliant behavior must be avoided. The client must be informed immediately of any safety deficiencies noticed by the contractor. If necessary, work must be interrupted.

## Liability and Insurance

The contractor is required to take out adequate liability insurance and provide proof of this without being asked. If insurance coverage is insufficient, the client may terminate the order or contract without notice. The contractor must indicate in its offer whether and to what extent the proposed service is covered by an installation insurance policy. The client reserves the right to specify the insurance amount when awarding the contract or to take out the installation insurance itself at its own expense, including co-insurance of the contractor's interests. The site equipment provided by the contractor, including installation devices and tools, is generally not insured. This does not affect the contractor's liability. The contractor works independently within the framework of applicable laws, regulations, and other legal provisions; that is, the contractor and its employees must bear the full legal consequences (fines, monetary penalties, imprisonment) resulting from their misconduct. The client reserves the right to take further steps, such as claims for damages or site bans.

## Confidentiality

The contractor and its employees may not provide third parties with any information about plant facilities, business processes, or work procedures. This obligation of confidentiality remains in effect even after the completion of the contract. All documents made available to the contractor (e.g., plans, written materials, construction drawings, programs, data, and models) and all work results achieved in the course of performing the contract are the property of the client. They must be protected against

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unauthorized access by third parties and returned after completion of the work. The contractor is not authorized to obtain knowledge of plant facilities, business processes, or work procedures without the involvement of the client.

#### 4.3 Access procedure

**The access procedure consists of three briefing levels:**

**1st Level (Access to the Site):**

At the site gate, the contractor's employees receive the general safety regulations and, if necessary, their understanding of the German language is checked. At the Hanau, Rheinfelden, and Bad Säckingen sites, a briefing including a safety test must be completed.

**2nd Level (Access to the Plant/Construction Site):**

The supervisor or foreman is instructed on the plant-specific and safety-related requirements of the plant or construction site. The contractor's employees must be instructed by their supervisor.

**3rd Level (Execution of Work/Access to the Workplace including Risk Assessment):**

Briefing on specific workplace-related safety measures for external company employees is carried out by the plant at the workplace, usually based on work orders or work permits.

#### 4.4 Breach of Contractual Provisions

##### Breach of the Contractor Guidelines

In the event of violations of this policy, the employees of the contractor who breach the site regulations or whose behavior otherwise compromises occupational safety must be replaced by suitable personnel upon request of the client's construction or assembly management. Furthermore, the following measures will be taken:

- Issuance of complaints and, if necessary, termination of the contract
- Meeting with the contractor's management
- Cost reimbursement based on the effort required for handling investigation processes

##### Violation of EHS Agreements

In the event of violations, the client will implement the following graduated measures:

- Written documentation of violations (complaint)
- Instruction to suspend work until the identified deficiencies have been corrected
- Removal of the affected individuals from the premises or construction site
- Removal of the affected individuals from the plant

The resulting expenses shall be borne by the contractor. Furthermore, any violation of safety regulations may lead to immediate termination of the contract and a site ban for the contractor.

If the contractor is unable to remedy safety or environmental deficiencies within a reasonable period, the client may arrange for corrective action by third parties, with all associated costs charged to the contractor.

### **Breach of quality standards**

In the event of violations of quality requirements, depending on the degree of quality deviations, the client shall decide whether the defective, non-contractual performance is to be:

- used with a reduction,
- rectified, or
- rejected.

The contractor shall be granted the opportunity to remedy the defects at their own expense within a specified period, in accordance with contractual and statutory provisions. The assertion of claims for damages remains reserved.

### **Violation of order and cleanliness**

In the event of violations of order and cleanliness, the client may take the following graduated measures:

- Verbal or telephone notice of the violation with instructions to remedy the deficiencies
- Written documentation of violations with a specified deadline (objection)
- Organization of a cleaning team consisting of personnel from the contractors working on site, at the contractors' expense
- Deployment of a cleaning team at the contractors' expense in case of non-compliance with the deadline

### **4.5 Assessment of quality performance**

The assessment of the contractor's quality performance by the client is decisive for future contract awards. The determination of the subcontractor's quality performance is based on evaluations of complaints regarding services from all company departments of the client directly or indirectly involved in order processing. Furthermore, the client reserves the right to carry out regular supplementary technical quality assessments based on inspections, tests, and similar measures.

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## 4.6 Cost allocation

Costs incurred by the contractor, such as for plant security, medical services, and occupational safety, may be charged to the contractor. This provision also applies to subcontractors engaged by the contractor and to additional expenses caused by incorrect invoicing. The charging rates are defined on a site-specific basis.

## 5 Tasks and responsibilities

### 5.1 Responsibility of the client

External Company Coordinator / client's local site supervisor

The client's external company coordinator is the authorized representative towards the contractor. Their points of contact are the employees designated by the contractor. The external company coordinator/on-site supervision is assigned induction, coordination, and monitoring duties as well as the corresponding authority to issue instructions for the deployment of contractors.

#### EHS specialists

EHS specialists include:

- Occupational Safety Specialist
- Responsible Fire Protection Specialist
- Company Medical Service
- Environmental Protection Officer of the Client

They advise and support the contractor's site management in preparing and implementing appropriate safety and environmental protection measures. These EHS specialists do not replace the contractor's obligation to appoint safety specialists and company physicians and – where required – safety and fire protection specialists. The contractor's EHS specialists are obliged to cooperate with the client's EHS specialists.

#### Construction and assembly manager of the client

The site manager is responsible on-site for the execution of a project throughout the entire construction/installation period. Their tasks arise both from statutory regulations and from the internal delegation of responsibilities by the client. For the deployment of contractors within the project, the site manager is assigned specific duties for induction, coordination, and supervision, as well as the corresponding authority to issue instructions.

The site manager's tasks include:

- Preparing the project-specific safety instructions or the Health and Safety Plan (SiGe Plan)
- Defining the site organization

- Appointing order and safety coordinators for the respective subprojects (trades)
- Coordinating between specialist departments, plants, and contractors
- Ensuring compliance with all safety regulations
- Performing final acceptance and issuing an acceptance protocol
- Handing over the plant to operations management
- Investigating damage incidents

If the appointed site manager does not have the required technical qualifications (e.g., for construction work, heavy assembly, pipeline installation, EMR installation, handling radioactive isotopes) for the respective trades of a project, the site manager shall appoint so-called specialist site managers for these trades to supplement their own expertise and experience. The client's site management does not affect the contractor's tasks and responsibilities. The client's site management is authorized to issue instructions to the contractor's representative, meaning that the site manager and the specialist site managers are authorized representatives of the client for awarding orders.

## **Safety briefing**

Safety briefings for the contractor's site management regarding general, operational, and project-specific measures and rules of conduct are carried out by the client. The briefing must be documented in an appropriate form and confirmed with a signature.

## **Order-related or project-specific safety instructions**

The client shall define contract-related safety instructions specifying the necessary measures based on the requirements for safety, health protection, and environmental protection (EHS). For major projects in accordance with the Construction Site Ordinance (e.g., large-scale projects), the client must prepare a Health and Safety Plan (SiGe Plan). The SiGe Plan must be available before the start of construction or installation work to ensure that safety-related aspects are considered during contract award.

In addition to the measures determined during the hazard assessment, the following must be specified:

- Site facilities (e.g., in the site layout plan indicating container locations, site power distributors, traffic routes, storage and assembly areas)
- Procedure for briefing all personnel working on site
- Procedure for daily reporting of workforce numbers
- Behavior in case of alarm and designation of the assembly point
- Organization of first aid

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- Permit-to-work system
- Appointment of safety coordinators
- General references to existing regulations, guidelines, order, and cleanliness

## 5.2 Responsibility of the contractor

### Site manager (contractor)

The contractor shall ensure compliance with the contractual execution by providing a written nomination of a responsible on-site manager (= Site Manager). The Site Manager or their deputy must guarantee a safe, smooth, and timely workflow. The Site Manager is responsible for personnel management, has the authority to issue instructions, and organizes and supervises workforce deployment. The contractor must provide sufficient and qualified supervisory personnel. The contractor's Site Manager or their deputy must be available at all times during execution as a point of contact.

If specific tasks require specialized personnel, the contractor shall provide and nominate them in writing. The contractor's appointed and locally responsible specialists or supervisors may only be removed during a work order with the client's consent. The Site Manager and their safety officers are obliged to attend the occupational safety meetings and site inspections scheduled by the client.

### Safety specialist

The contractor shall ensure the proportional deployment of a safety specialist on the construction site as required by the Occupational Safety Act. Before commencing specific activities (e.g., work requiring respiratory protection), the contractor is obliged to arrange the necessary medical examinations and provide proof of the fitness of its employees.

### Safety representative

The contractor shall appoint safety officers on the construction site in accordance with the Occupational Safety Act (AsiG). The contractor's safety officers must be reported to the local safety specialist.

### Contractor's visitors

For visitors of the contractor, the general safety regulations apply, supplemented by the specific provisions on the construction site. Visitors must be registered in writing with the client's representative, who will obtain the necessary authorization. The responsibility for briefing visitors on safety regulations lies with the contractor. Visitors of the contractor may only enter the respective site for work-related reasons. Representative visits, e.g., for tools and

machinery, must be handled at the contractor's company headquarters unless there is a specific technical need at a client's site.

### **5.3 Qualification of employees**

#### **Qualification of employees**

The contractor must ensure the professional and personal suitability of the employees for carrying out the assigned tasks. Current qualification certificates (e.g., welder's certificates, fire watch credentials) must be submitted by the contractor in copy without being requested.

#### **Occupational health check-ups**

Only individuals who have been examined and deemed fit according to the "Principles of Occupational Health Examinations" issued by the employers' liability insurance association may be assigned to perform certain tasks and handle various hazardous substances. The contractor is responsible for arranging these examinations at their own expense prior to commencement of work and for maintaining a health record of the employees, which must be presented upon request. In addition, the contractor must monitor the physical condition and health status of employees deployed at the site. In cases of health impairments, the employee's suitability must be assessed and documented based on a workplace analysis (e.g., employees with known conditions such as circulatory weakness or dizziness must not be assigned to chemical plants/facilities, as this complicates root cause analysis in the event of an accident). As part of a health risk assessment, each contractor must verify for the contracted activities that the employees deployed have completed the legally required occupational health examinations and meet the health requirements for the planned tasks.

#### **Provision of personal protective equipment**

The contractor must provide the required personal protective equipment (PPE) to its employees. The contractor shall ensure that the PPE is always in proper and certified condition and that it is used correctly by the employees. The required PPE for the contractor is determined based on site-specific conditions and the work permits for activities within the facility. Task-related PPE (e.g., welding shield) is specified by the contractor. In special cases agreed upon contractually, site-specific PPE such as respiratory masks or protective suits will be provided by the client.

#### **Knowledge of safety regulations**

Employees of the contractor must be familiar with and comply with the safety regulations and occupational health-related contractual conditions relevant to their work assignments. The contractor's site management is responsible for communicating the contractually stipulated safety regulations to its employees and, where applicable, subcontractors. Employees must be trained regularly—at least once a year for long-term assignments at the site. Newly assigned employees must receive instruction before commencing work. It must be ensured that the content of the training is understood by the personnel. Records of the training content and the participants must be maintained and presented to the client upon request. All relevant accident prevention regulations issued by the employers' liability insurance association, this

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guideline, and other safety regulations provided by the client, as well as assembly instructions, must be kept accessible in the contractor's office. For preliminary training of the contractor's employees using the provided training materials, e.g., during major repairs and overhauls, the completed training sessions must be confirmed in writing.

## **Safety of installations**

The contractor's site manager is responsible for the safe setup and use of work equipment, the safe utilization of traffic routes within the plant, as well as scaffolding and protective devices. Evidence of inspections must be kept available at the construction site and/or permanently displayed on the work equipment.

## **Handling of supplied materials**

By accepting and using the materials, the contractor acknowledges their condition as being free from defects. Materials supplied by the client do not release the contractor from warranty obligations. If the contractor has any concerns regarding the materials and components provided by the client or the work performed by other contractors, these must be communicated to the client immediately in writing.

## **Conducting a hazard assessment**

Before commencing work, the contractor must carry out and document a job-, project-, and/or task-specific risk assessment in accordance with the Occupational Safety and Health Act, the Ordinance on Industrial Safety and Health, the Hazardous Substances Ordinance, and other applicable laws and regulations. This assessment must include the identification of necessary measures for the safe provision and use of work equipment. Particular attention must be given to hazards associated with the use of the equipment itself and those arising at the workplace due to interactions between equipment, substances, or the work environment. The risk assessment must be submitted to the client prior to the start of work. In the event of changes in the execution process that may affect the identified hazards, the contractor must promptly update the risk assessment.

### **5.4 Organization of cooperation**

#### **Stay at the site**

Employees of the contractor may only remain in those parts of the site where their work or an explicit assignment requires them to be. Exceptions apply to general facilities that are freely accessible (e.g., the canteen). Extended stays on site are permitted only for business-related purposes (work, breaks, washing, and changing). Overnight stays on site (including parking areas) are not allowed. Work commencement within the plant, on the construction site, or on the premises of the respective facility may not take place without the approval of the plant/construction management or the external company coordinator.

#### **Arrangements regarding work execution**

Arrangements regarding the execution of work shall be agreed upon between the contractor's site management and the client prior to the start of work. The material, scheduling, and location requirements necessary for performing the work will be communicated to the contractor. The

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contractor shall carry out the work independently and responsibly, in accordance with the agreed specifications and deadlines. The contractor may not modify, remove, activate, or deactivate any plant facilities without the client's permission. The contractor must ensure that the assigned work is performed only by qualified personnel. Instruction, guidance, and supervision of the deployed employees are the responsibility of the contractor.

### **Entering and driving on the construction site**

Entering and driving on the construction site is permitted only for the fulfillment of contractual obligations. Staying on the site outside working hours is prohibited. Plant facilities outside the designated work area may not be entered.

### **Working hours**

Working and break times must be coordinated with the client. The contractor is responsible for compliance with the Working Hours Act. As a rule, the contractor shall perform work on the construction site during the client's day shift. Overtime, night work, Saturday, Sunday, and public holiday work must be agreed upon with the client and require approval. For work on Sundays and public holidays that requires official authorization, the contractor must obtain the necessary permits from the competent authority and inform the client's site management accordingly.

### **Information on personnel deployment**

Information on personnel deployment must be documented in writing by name by the contractor's site management for construction sites with independent site organization prior to the start of work. This list must be updated regularly and submitted to the client at agreed intervals without being requested. Separate lists must be maintained for employees of subcontractors.

### **Compliance with safety regulations**

The safety regulations of the site, the plant, and/or the construction area must be observed, and compliance must be ensured by the contractor's site management.

### **Issuance of work permit**

The workplace-related safety measures are implemented by the client's plant/construction management before the start of work and communicated to the contractor's employees. Acknowledgment must be documented on the work permits. The handover of the permit by the plant/construction management and the signature of the contractor's authorized representative confirm the release of the work.

### **Obtaining permits**

Obtaining work permits before starting any activity in the plant or on the construction site is the responsibility of the client's site management. The specifications stated in the permits or work orders must be strictly observed.

### **Mandatory check-in and check-out at the workplace**

There is a general obligation to register and deregister. Every day before starting work, whenever leaving the premises – including during work interruptions – and at the end of the workday, the contractor's employees must report in person to the site's registration point (e.g., control room, operations center) and, if available, enter and sign out in the attendance list for external personnel. Any deviations from this procedure must be defined in the project-specific or site-specific safety instructions. This applies particularly to facilities or buildings with a low risk potential regarding occupational safety and environmental protection, such as offices, laboratories, and technical centers.

### **Inspections at the contractor's site**

The client's authorized representatives are entitled to carry out inspections of the contractor's internal areas in order to verify compliance with this guideline, among other things. Participation of the contractor's site manager in these inspections is mandatory.

### **5.5 Safety coordinators**

The fundamental obligation to coordinate work involving employees from multiple employers or work with specific hazards is laid down in the following legal provisions:

- Coordinator in accordance with the Occupational Safety and Health Act and DGUV Regulation 1, as well as § 3 of the Construction Site Ordinance
- Specialist coordinator in accordance with the Hazardous Substances Ordinance
- Coordinator in accordance with DGUV Rule 101-004 (Work in Contaminated Areas)

The coordinators are appointed by the client; for work during ongoing operations, by the respective operator. Coordinators must be qualified to perform their duties through technical and operational knowledge as well as experience. The appointment of coordinators must be documented in writing for each contract, including construction site and telephone number (e.g., on the work permit or in the project-specific safety instructions). The coordinators must be communicated to the contractor.

### **Obligation to coordinate**

Before starting work, there is an obligation to coordinate with the client and other external companies working on the site or construction area to avoid mutual hazards in the following cases:

- Different company groups
- Employees working on existing facilities of the client
- Joint ventures

Agreements between two or more external companies that may affect the workflow must be discussed with the client. This obligation applies regardless of whether coordinators have been appointed.

### **Coordinator in accordance with the Occupational Health and Safety Act (ArbSchutzG) and DGUV Regulation 1**

The appointment of a coordinator in accordance with DGUV Regulation 1 is required when

- Employees of the client (e.g., plant personnel, workshop staff) and employees of a contractor, or
- Employees of several contractors could endanger each other during the execution of their work, for example, by working simultaneously next to or above one another.

The coordinator's task is to schedule and organize work processes in terms of time and space to prevent mutual hazards, ensuring that all necessary measures to avoid such risks are in place at all times.

### **Coordinator in accordance with § 3 of the Construction Site Ordinance**

For all measures, the appointment of a coordinator in accordance with § 3 of the Construction Site Ordinance is required when employees of different companies could endanger each other during the execution of their work. In addition to the tasks of the coordinator under DGUV Regulation 1 (see section 2.4.2), duties during the planning phase of the construction project must also be fulfilled (e.g., preparation of the Safety and Health Protection Plan).

### **Specialist coordinator in accordance with the hazardous substances ordinance**

The appointment of a coordinator for activities involving hazardous substances is required whenever, in the context of work by external companies, there is a possibility of mutual risk to employees. The coordinator for hazardous substance activities must be appointed in writing and communicated to all parties involved. The coordinator's task is to plan and coordinate work processes in terms of time and space to prevent hazards from hazardous substances, ensuring that all necessary measures to avoid such risks are in place at all times.

### **Coordinator for work in contaminated areas in accordance with DGUV rule 101-004**

The appointment of a coordinator for work in contaminated areas in accordance with DGUV Rule 101-004 is required when work in contaminated areas is carried out by multiple contractors – possibly including their subcontractors. The coordinator's task is to plan and coordinate work processes in terms of time and space to prevent hazards from hazardous substances in contaminated areas, ensuring that all necessary measures to avoid such risks are in place at all times.

### **Instruction authority of the coordinators**

All personnel working on the construction or work site, including the contractor's employees and supervisors, are subject to the coordinators' authority to issue safety-related instructions. The coordinators are authorized to order the shutdown of a work area in case of safety violations.

### **Instructions from the client**

Instructions from the client concerning dangers to life and limb, the environment, and property or assets must be followed immediately by the contractor's employees. In addition, the contractor's employees must also comply with the directives of plant security (e.g., during vehicle and personnel checks).

### **Responsibility of the contractor**

The responsibility of the contractor and its site management remains fully intact with regard to contractual performance, leadership duties, and safety, regardless of the activities of a coordinator.

## **6 Behavior on site, in the plant and on the construction site**

### **6.1 General conduct**

All actions that could endanger people or property at the site must be avoided.

### **Housekeeping and cleanliness**

Work areas, workplaces, storage and assembly areas must be kept clean, orderly, and in a safe condition. Waste generated by the contractor must be collected separately in the containers provided for this purpose. The provision of waste collection containers shall be regulated in individual contracts. Building materials must be stored in the designated storage areas in compliance with applicable storage and environmental protection regulations. The storage area must be marked with information about the responsible contact person of the contractor.

### **Access roads and internal plant roads**

Access roads and internal plant roads must be protected from damage. Any contamination must be removed immediately. Environmentally relevant contamination must be reported to the client. Traffic on plant roads must not be obstructed or endangered by temporarily stored materials, construction aids, or similar items. Measures that affect traffic (e.g., construction work in road areas such as sewer work, installation of aerial work platforms, cranes, scaffolding) must be coordinated in advance with the client to ensure compliance with traffic safety obligations.

### **Entering facilities**

Starting work in the plant, on the construction site, or on the premises of the location is not permitted without the client's approval. Entering operating facilities and rooms that do not belong to the contractor's scope of work is prohibited. Contractor employees may only use

designated entrances and gates, the shortest access routes to the workplace, and the assigned work area. Driving onto construction zones and building sites is only allowed with the client's authorization.

### **Conduct at the workplace**

The employees' workplace and the tasks to be performed are defined by the order-specific assignments. Staying outside the assigned work area is not permitted. The client's facilities may only be used properly and professionally with prior approval.

### **Operation of plant equipment**

Operating electrical switches, machines, valves, or other control devices on existing systems is prohibited. Exceptions require written approval from the client's operations, assembly, or construction management.

### **Repair work on vehicles, machines and equipment**

Repair work on vehicles, machines, and equipment (e.g., oil changes) where the leakage of fuel or other mineral oils cannot be ruled out is only permitted within approved and suitable workshops.

### **Completion of work**

After completion of the work, the construction or work site must be cleared immediately. Material residues as well as all objects and installations must be removed and, if necessary, transported away. Storage areas, workplaces, and access routes must be restored to their original condition. After completion of the assignment, the construction or work site must be left in a tidy, proper, and clean condition.

## **6.2 Prohibitions**

### **Food and drinks**

Eating, washing, and changing clothes are only permitted in the designated rooms. The regulations for using these rooms must be observed.

### **Compressed air for cleaning purposes**

Compressed air must not be used for cleaning clothing, the body, or the work area. Exceptions are only permitted when using the prescribed safety devices of the professional associations.

### **Open fires**

Open fires may not be set up or operated on company premises. Open flames are prohibited. Exceptions for official purposes require written approval (fire permit).

### **Smoking**

Smoking on the plant premises and in company facilities is prohibited. This also applies to vehicle interiors. Violations will result in a site ban. Smoking is permitted only in specially

designated areas. A smoking permit for staff accommodations can be requested through the client. The smoking permit is valid only for the specified location. The smoking permit sign must be clearly displayed in the respective room.

### **Intoxicating substances**

The following is prohibited:

- Bringing or consuming alcoholic beverages or intoxicating substances on the premises, including associated parking lots/garages.
- Entering or remaining on the premises under the influence of drugs or alcohol.
- Working under the influence of alcohol or drugs.

The contractor's site management has a duty of care toward employees and must immediately stop work and remove the employee from the premises if there is suspicion of a violation of this prohibition. Plant security must always be informed. Since this involves a suspicion concerning an external company employee, there is the option to undergo a voluntary test through the company medical service.

### **Radio devices, mobile phones and battery-powered equipment**

External companies must report any radio devices to plant security in writing—if applicable, including the frequencies used. Devices may only be brought in after approval by plant security. The operation of radio devices, mobile phones, and battery-powered equipment is subject to site-specific regulations.

### **Photography and filming**

Photography and filming, as well as carrying cameras or video equipment, is prohibited on the plant premises. Exceptions require written approval from the client.

### **Access to roofs**

Access to roofs is prohibited without inspection and approval confirming their load-bearing capacity and condition. For repair work, appropriate measures to ensure safety must be taken and documented.

### **Driving motor vehicles in hazardous areas**

Driving motor vehicles in explosive (Ex) areas is strictly prohibited. Exceptions require explicit authorization.

## **6.3 Traffic regulations**

### **Road traffic regulations**

At the site and on external parking areas, all traffic participants must comply with the provisions of the German Road Traffic Act (StVO) and the Road Traffic Licensing Regulations (StVZO), as well as the company-specific regulations. In particular, all vehicles and machines must always be in an operational and roadworthy condition

### **Maximum speed**

The applicable maximum speed limit is defined based on site-specific regulations.

### **Driving and parking of vehicles**

Access to the construction site or the plant is only permitted via the designated traffic routes. Vehicles may only be parked in areas where they do not obstruct moving traffic, rail tracks, fire departments, fire-fighting equipment (e.g., hydrants), emergency facilities (e.g., safety showers), escape routes, or entry and exit points.

### **6.4 Energy management at the Hanau site**

In the area of energy management, Umicore Hanau, as a future-oriented company, is aware of the growing importance of energy-conscious actions with regard to resource and climate protection. As a globally operating circular materials technology company with strong expertise in chemistry, materials science, metallurgy, and recycling, Umicore recognizes its special responsibility to raise awareness among internal and external employees about energy efficiency and energy savings. Furthermore, the company strives to continuously improve its own energy performance. To systematically implement these aspects, an energy management system in accordance with DIN EN ISO 50001 has been introduced.

The commitments within the framework of the energy policy are described in document PO-SF-10001, which can be requested if needed.

## **7 Safety in traffic areas**

### **7.1 General regulations**

#### **Driving license**

Persons operating cranes, aerial work platforms, and forklifts must be properly trained, competent, and in possession of a valid driving permit. The issuance of the driving permit requires a valid occupational health examination in accordance with G 25 'Driving, Control, and Monitoring Activities.' These certificates must be submitted to the client without being requested.

#### **Driving authorization**

In addition to each driving permit for industrial trucks (DGUV Regulation 68), cranes (DGUV Regulation 52), and aerial work platforms/articulated boom lifts (DGUV Rule 100-500 or DGUV Guideline 308-008), a driving authorization must be issued for each driver by the client upon request of the contractor.

### **Carrying passengers in trucks**

Passenger transport in trucks is limited to the number of fixed seats. Riding on the loading platform is prohibited.

### **Personnel transport with lifting devices**

For necessary personnel transport using lifting equipment, the legal regulations, such as DGUV Regulation 52, must be observed.

### **Special transports**

For special transports of bulky or heavy goods, the contractor must inform the client in advance about the road conditions and take all necessary safety precautions. Particular attention must be paid to narrow passages, clearance heights, overhead structures (e.g., pipe bridges), and route-installed control and electrical cables. To guide and secure special transports, escort personnel (e.g., plant security) must be requested from the client in good time.

## **7.2 Driving vehicles**

### **Professional driver**

Drivers must hold the required driving licenses and comply with the site-specific and project-related safety regulations at loading and unloading points.

### **Cranes**

Cranes may only be used on the construction site in compliance with DGUV Regulation 52 'Cranes' and must be positioned at locations assigned by the client. Information on the permissible load capacity of equipment must be clearly displayed. Work areas within crane zones must be secured against unauthorized access by barriers; if necessary, safety personnel must be deployed. Hazard zones must be cordoned off and clearly marked. For crane operations in the vicinity of pipe bridges, a separate permit is required.

### **Use of forklifts**

The use of forklifts is subject to the provisions of DGUV Regulation 68 'Industrial Trucks.'

### **Use of aerial work platforms**

The use of aerial work platforms (e.g., scissor lifts, vehicle-mounted platforms) must be coordinated with the client. The use of aerial work platforms is subject to the provisions of VBG 14 / DGUV Rule 100-500 / DIN EN 280. Site-specific requirements regarding the

equipment of aerial work platforms (e.g., additional safety systems in the work basket area, guardrail edge protection) must be observed.

## **8 Workplace safety**

### **8.1 General provisions for workplace safety**

#### **Setup of the work area**

Before setting up a work area, the organization and workflow of the tasks as well as the necessary safety measures must be coordinated between the client, the involved workshops, the site/construction management, and the contractor's site management.

#### **Work permit**

The client's site management is responsible for obtaining permits before starting any activity within the plant or on the construction site. The requirements stated on the permits or work orders must be strictly observed.

Examples of permits include:

- Work order permit
- Work permit (authorization for work on equipment and pipelines)
- Confined space entry permit (authorization to enter vessels, tanks, or narrow spaces)
- Certificate of protective measures for electrical equipment ("lightning permit")
- Permit for deactivation of safety-related systems
- Hot work permit (welding, cutting, and related processes)
- Scaffold release certificate
- Roof access permit (authorization to access or work on non-walkable roofs)
- Excavation permit (authorization for trenching or digging work)
- Permit for underground work

Workplace-specific safety measures will be communicated to the contractor's employees by the plant management or designated persons. Acknowledgment must be documented on the permits. The handover of the permit by plant management or designated persons constitutes the release for work. Permits must remain available at the workplace or construction site during the work. After completion of the work or upon expiry of the permit's validity, the original must be returned to the client's plant/construction site management. Any site-specific deviations from this procedure must be defined separately by the client.

#### **Personal protective equipment**

Wearing personal protective equipment (PPE) in the plant or on the construction site is mandatory. PPE must consist at least of body-covering clothing and safety shoes. Additional protective equipment is site-specific and defined through the permit-to-work system. The contractor is responsible for ensuring that the PPE is always in proper condition. Employees must be instructed on the correct use of PPE.

#### **Working with respiratory protective equipment**

The contractor must ensure that, when respiratory protective equipment is used, the required occupational health examination and necessary training have been completed. Work assignments involving respiratory protective equipment may only be carried out by employees with a valid medical certificate (G 26 "Respiratory Protective Equipment" examination). The required training and qualification must comply with the "Rules for the Use of Respiratory Protective Equipment." Proof of participation in training and refresher courses must be maintained. Persons with beards or sideburns in the sealing area are not suitable for wearing respiratory protection.

### **Escape routes and traffic routes**

Escape routes and traffic routes must be kept clear at all times. Contractor employees must familiarize themselves with the escape routes before starting work.

### **Use of third-party facilities**

Cranes, hoists, assembly masts, elevators, and similar equipment belonging to third parties must never be used without prior agreement with the owner. Information on the permissible load capacity of equipment must be clearly visible.

### **Deconstruction**

The contractor must ensure that all pipelines, equipment, supply systems, and installations have been cleaned and prepared for safe dismantling by the plant operator. The individual phases of the dismantling process, as well as the loads to be handled, must be discussed in detail with the client's representative before starting work.

### **Extreme weather conditions**

It is the contractor's responsibility to check weather forecasts in good time and, if necessary, suspend work. Storm warnings must also be observed. In extreme weather conditions such as storms, tanks, vessels, and materials under construction—such as timber, loose scaffold planks, sheets, and plastic panels—must be anchored or secured. Special care must be taken to ensure that every workplace is left in a wind-safe condition before work is interrupted. Before resuming work, scaffolding and similar structures must be inspected for proper condition. Work interruptions at the contractor's site caused by extreme weather conditions (e.g., snowfall, storms, hail, cold) will not be compensated by the client.

## **8.2 Securing the work area**

### **Closure of traffic routes**

Closures of traffic routes, as well as any obstruction of traffic and interference with the work of other contractors or the client, must be agreed upon with the client in advance and initiated by them. The client's designated representative is responsible for timely notification to plant security and for making the necessary arrangements with the local fire department as well as with other plants and construction sites.

### **Working at height**

For all work at height, employees must be protected against falls (e.g., scaffolds, safety harnesses). It must be checked whether an occupational health examination according to G 41 "Work with Risk of Falling" is required.

### **Work with risk of falling**

For work involving fall hazards, fall protection must be installed in accordance with DGUV Regulation 38 "Construction Work," Section 12. Safety belts or harnesses with energy absorbers and rope adjusters must be used when scaffolding cannot be erected, safety nets cannot be installed, or protection by parapets/guardrails is not possible due to the nature of the workplace or the work to be performed. Safety nets must be installed for larger openings. These nets must be designed, secured, and maintained in accordance with DGUV Rule 101-011 "Use of Safety Nets." Warning tapes are not permitted as barriers.

### **Covers and barriers**

At locations with a risk of falling, adequate coverings and barriers (e.g., railings, handrails, safety lines, nets) must be installed and maintained. Such locations include floor openings, assembly openings in grating panels, open trenches, pits, shafts, manholes, and transfer points for lifting equipment. Gratings, covers, etc., may only be removed—while observing personal safety—once a firm and secure barrier has been provided. Gratings and other coverings must be reinstalled and secured after work is completed. The provisions of DGUV Regulation 1, Section 33 "Barriers" must be observed.

### **Access using a work basket and truck-mounted crane**

As a general rule, the transportation of persons using cranes with load-handling attachments is prohibited.

Transport in a work basket: Following written notification by the contractor (not the crane company) at least 14 days prior to the commencement of work, the responsible employers' liability insurance association (Berufsgenossenschaft) of the contractor may, in individual cases, grant approval for the transportation of persons in accordance with DGUV Regulation 1.

The written notification by the company may be waived if the inspection of the operation is carried out by an expert or qualified person authorized by the employers' liability insurance association at the site. The inspection must be registered at least 24 hours before the start of work. Each time the crane is repositioned for personnel transport, a new inspection must be performed. In addition, the "Safety Rules for Suspended Access Equipment" (DGUV Rule 101-005) must be observed.

### **Opening of plant components**

A permit (e.g., an opening permit or work permit) is required when parts of a plant—such as vessels, pipelines, pumps, valves, measuring and control devices—where hazards are to be expected, are opened or removed.

## **Work in confined spaces**

A confined space entry permit must be issued for all work carried out in vessels, silos, bunkers, equipment, pipelines, ducts, pits, and other confined spaces. The provisions of DGUV Regulation 1 §47 and DGUV Rule 113-004 must be observed. Trenches, pits, etc., deeper than 1.2 meters are to be treated as confined spaces. Vessels and ducts may only be closed again after they have been released by the site management of the client.

## **Work in confined conductive spaces**

When working in confined conductive spaces, electrical equipment may only be operated using protective extra-low voltage (less than 50 V) or individually with protective isolation (230 V). Welding power sources must be approved for use in areas with increased electrical hazards. The open-circuit voltage must not exceed 42 V for alternating current and 100 V for direct current.

Confined spaces with increased electrical hazards include, for example:

- Inside vessels
- Other spaces made of conductive material with dimensions smaller than 2 m<sup>3</sup>
- Spaces, steel structures, and other areas where work must be carried out in a forced posture or where additional hazards may arise due to external conditions such as heat and moisture
- Pits and shafts

The provisions of DGUV Rule 113-004 "Guidelines for Work in Vessels and Confined Spaces" must be observed.

## **Entering electrical installations**

Entering electrical operating areas, such as switchgear rooms, is permitted only for qualified electricians and instructed persons with authorization from the responsible electrical specialist of the client.

## **Work in electrical installations**

Work on electrical installations must be carried out in compliance with legal regulations (DGUV Regulation 3, VDE 0100, and taking into account DGUV Rules and DGUV Information). Such work may only be performed in a de-energized state and with approval from the client on the permit form by qualified electricians. This also applies to electrical equipment installed by the client and to the insertion and replacement of fuses.

## **Underground work**

Before starting excavation work, such as digging or driving objects into the ground, the contractor must obtain information from the client about the possible presence and routing of

cables, grounding conductors, pipelines, etc., in the respective work area. Excavation work, including soil testing, must be coordinated and may only be carried out with a written permit for excavation work. If any irregularities occur, such as unusual soil color or odor, work must be stopped immediately and the client notified. At hazardous locations, excavation work may only be performed manually. All cables, pipes, ducts, etc., not identified in the clearance for underground work must be considered live or in operation. Backfilling may only be carried out after approval by the client.

### **Work in sewer systems**

Work in wastewater treatment facilities (sewer systems) requires an operating instruction that points out possible hazards and specifies clear measures to prevent these hazards. The provisions of DGUV Regulation 21 ("Wastewater Treatment Facilities"), ZH 1/177 ("Safety Rules for Work in Confined Spaces of Wastewater Treatment Facilities"), and DGUV Rule 103-003 ("Work in Confined Spaces of Wastewater Treatment Facilities") must be observed.

### **Hot work**

Hot work such as welding, cutting, soldering, drilling, and operating non-explosion-proof equipment may only be carried out with special written authorization—a hot work permit. Due to its particular importance, special attention must be paid to the accident prevention regulations DGUV Information 209-016 "Welding, Cutting and Related Processes" and DGUV Rule 100-500. If required, the contractor must provide a trained fire watch/fire safety guard until all ignition hazards have been eliminated. Additional requirements are specified on the hot work permit.

### **Handling gas cylinders**

For the storage of flammable and explosive substances of any kind, as well as gas cylinders, all relevant regulations and any specific instructions from the client must be strictly observed. Storage locations outside the construction site must be specified by the contractor. At the entrances to workshops or other enclosed spaces, a warning sign reading "Caution: Gas Cylinders" must be posted. In addition, next to the entrances, a sign showing the floor plan of the building or room and the designated locations of the gas cylinders must be displayed. Gas cylinders may only be transported with screwed-on protective caps. Cylinders must be secured during transport and storage.

## **8.3 Safety of work equipment**

### **Condition of work equipment and tools**

The proper use of all work equipment, including personal protective equipment, must be ensured by the contractor. The Ordinance on Industrial Safety and Health (BetrSichV) must be observed. All work equipment, tools, and materials used must be kept in a safe and proper condition by the contractor. The legally and contractually specified inspection intervals must be adhered to and documented. Work equipment may only be used by appropriately qualified employees. In plant areas with explosion hazards, only ignition-free (explosion-proof) electrical devices and equipment are permitted. Deviations from this rule are only allowed after consultation with the client (e.g., via a permit). The client reserves the right to inspect the

assembly equipment and tools used by the contractor and to withdraw any non-compliant equipment from service at any time.

## **Scaffolding**

All scaffolds, including small scaffolds, must be erected in compliance with legal regulations (DGUV Regulation 38 and DIN 4420) as well as any additional requirements of the client.

Each scaffold user confirms:

- that they inspect the scaffold before starting work for suitability for their tasks and for any obvious defects
- that they are responsible for the proper use of the scaffold and have received appropriate instruction
- that they will not make unauthorized modifications to the scaffold

If the scaffold is unsuitable or shows visible defects, it must be locked by removing the clearance tag and the responsible scaffold erector must be notified immediately!

Mobile small scaffolds must be used according to the manufacturer's assembly instructions. The assembly instructions must be visibly attached to the scaffold. Mobile scaffolds may not be used for transporting persons or materials.

The use of makeshift scaffolds ("trestle scaffolds") according to DGUV Information 208-016 must be approved by the client or contractually agreed. The contractor must provide proof of employee training.

All scaffolds and work platforms must be inspected and approved by the contractor and the responsible scaffolding company before use. Approval is given in the form of a clearly visible sign at the access point. The design and content of the sign (e.g., "Scaffold Clearance") must be agreed between the client and the contractor.

A scaffold without clearance or with a removal notice is locked. Assembly, modification, and dismantling work may only be carried out by the responsible scaffolding company. Unauthorized changes that could compromise safety in any way are not permitted.

## **Ladders**

Ladders must be provided in a safe operating condition according to their intended use and in compliance with DGUV Information 208-016 "Ladders and Stepladders". Ladders must be clearly marked with a valid inspection label. A ladder logbook must be maintained to document inspections.

### **Ladders as elevated workstations**

The use of ladders as elevated workplaces (standing height from 1 m) is only permitted if you can always maintain three points of contact (both feet and one hand) while working on the ladder. For work above one meter in height where both hands are required and the three-point

contact rule cannot be observed, leaning or step ladders are not permitted. In such cases, alternatives such as platform ladders, aerial work platforms, or scaffolds must be used.

### **Electrical equipment**

Electrical equipment, plug-in devices, and connection cables must comply with applicable technical regulations and be adapted to the respective place of use. Portable electrical equipment must be inspected at prescribed intervals by a qualified electrician in accordance with DGUV Regulation 3 "Electrical Installations and Equipment" and checked by the user for proper condition before each use. The inspection by the qualified electrician must be documented and visibly marked on the device (e.g., sticker).

### **Lifting equipment**

Winches, lifting and pulling devices must comply with the design and equipment requirements of DGUV Regulation 54 "Winches, Lifting and Pulling Devices." In particular, proof must be provided that inspections have been carried out in accordance with the aforementioned regulations before initial commissioning, after significant modifications, and during recurring inspections. As evidence, the prescribed crane logbooks must be kept available on the construction site for inspection at any time. Lifting accessories may only be used in accordance with DGUV Regulation 52 "Cranes."

### **Construction hoists and freight elevators**

Construction and goods hoists are subject to the Industrial Safety Regulation (BetrSichV). Passenger transport is prohibited and must be indicated by a warning sign.

## **8.4 Protection of the customer's premises**

### **Ducts, cables, pipes and power lines**

Ducts, cables, as well as pipes and power lines must not be damaged by the contractor. For this purpose, the contractor must obtain information from the client in good time before starting work about their presence and location and take all necessary protective measures.

### **Gas and oxygen pipes**

Welding and cutting work in the vicinity of gas and oxygen lines is strictly prohibited.

### **Insulation and cable trays**

The cladding of insulation and cable trays must not be stepped on or used as a support.

### **Pipe bridges**

Storing materials and other site equipment as well as parking under pipe racks is prohibited. Exceptions to this rule are only permitted with the client's approval and with the consent of the local fire department and the operator of the pipe rack.

### **Work in the vicinity of public utility lines**

For work in the vicinity of public utility lines and third-party traffic installations, the necessary permits are obtained by the client from the competent authorities and companies. The contractor must notify the client and the locally responsible authorities in good time before starting construction work and comply with all conditions issued. In the area of overhead lines, no assembly work may be carried out if the required safety distances according to VDE are not maintained. Protective fences or protective devices must be strictly observed and must not be removed. For crane and excavator work near high-voltage lines, the responsible utility company must be informed in advance. Their instructions must be followed.

## **9 Management of deviations and continuous improvement**

The established and documented procedure for contractor management ensures that processes are documented, measured, and analyzed as required, and that corrective and preventive actions are taken to ensure that identified deviations are properly, thoroughly, and completely investigated and eliminated with regard to their causes, and that appropriate measures are implemented to prevent future errors. Defective performance includes deficiencies in execution and quality of the services provided, as well as other breaches of contract and violations of established safety and environmental protection regulations. This also includes general safety rules, such as site access regulations.

### **9.1 Accidents/Incidents**

All incidents and accidents must be reported to the responsible supervisor and also to Umicore AG & Co. KG as the client! The contractor is requested to also report any downtime or personnel absence caused by accidents or incidents on the premises of Umicore AG & Co. KG to the designated Umicore contacts. To comply with data protection regulations, only the accident details, type of injury, and absence days may be reported by the contractor to Umicore AG & Co. KG.

Data Protection: Umicore AG & Co. KG is committed to compliance with the General Data Protection Regulation (GDPR). Personal data will not be shared with third parties. Only the necessary data required for incident and accident analysis will be collected. These data are gathered for root cause analysis to derive measures for preventing future incidents and accidents. Furthermore, they are used for statistical purposes, including recording downtime caused by occupational accidents or work-related illnesses. The contact person in all cases is the requester or their representative, or, if appointed, the safety coordinator. Umicore's safety specialists will be involved in accident reporting and investigation.

### **9.2 Handling of defective performance**

Compliance with contractual agreements is verified by all Umicore employees involved in order processing according to their responsibilities. In the event of deviations, they report these appropriately, e.g., as an error message or deviation report, to the requester. This also applies to checking the effectiveness of corrective and preventive measures already implemented. The requester or an employee appointed by them records and evaluates the deviations and, if necessary, clarifies them with the respective contractor. Except for minor issues, they forward them as a complaint to the purchasing department. Purchasing

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evaluates the complaint with the involvement of the requester and initiates appropriate measures, such as issuing an 8D report to initiate corrective actions, issuing a notice of defect, or asserting claims. Complaints are included in the supplier evaluation in accordance with supplier management regulations.

### **9.3 Corrective and preventive actions**

Defective performance must be corrected by the contractor either by reworking or by other appropriate means (see below). In addition, the contractor must take all necessary measures to permanently eliminate the defect and ensure that the error or deviation does not recur. The corresponding measures must be initiated immediately and, if required, documented by the contractor in an 8D report. The completed 8D report will be reviewed and archived by the requester. Depending on the type of defect or violation, Umicore may take measures as described below. These measures are determined by the requester or their representative in coordination with the responsible departments within Umicore.

### **9.4 Measures in case of defects regarding the quality or execution of the provided services**

In the case of non-contractual performance by the contractor, Umicore will decide, depending on the degree of deviation, which claims will be asserted in accordance with statutory and other contractual provisions. These claims may include, among others, rework or replacement delivery, substitute performance, withdrawal, reduction, and/or compensation for damages and reimbursement of expenses.

#### **Performance of services**

The time of performance is deemed to be the delivery or the day the work is completed. For work on buildings, a warranty period of five years applies (according to German Civil Code – BGB), which is the standard case. However, you may also agree with the contractor to extend the warranty period or conclude the contract under VOB regulations (Construction Contract Procedures). If, in a bilateral contract, the contractor fails to perform a due service or performs it improperly, the client may withdraw from the contract if they have unsuccessfully set the contractor a reasonable deadline for performance or subsequent fulfillment.

#### **Measures in Case of Violations of EHS Agreements**

In the event of violations of agreements and instructions regarding Health, Safety, and Environmental protection, the following graduated measures may be taken depending on the level of risk and other operational circumstances:

- Written documentation of violations (complaint),
- Instruction to interrupt work,
- Removal from the premises or the Umicore area,
- Supplier evaluation,
- Exclusion (temporary or permanent) from further contracts.

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## Measures in Case of Violations of Order and Cleanliness

In the event of violations of agreements regarding order and cleanliness, the following graduated measures may be taken:

- Written documentation of violations with a deadline for corrective action (complaint),
- Organization of a cleaning team with personnel from the external company working on the site at the expense of the external company, or
- If the deadline is not met, deployment of a cleaning team according to Umicore's specifications at the expense of the external company,
- Supplier evaluation.

The procedure is set out in the accompanying document "Guideline for Reducing Accidents Involving External Companies."

## 9.5 Emergency management

Emergency management at Umicore is ensured through the assessment of potentially hazardous activities and the definition of necessary precautions. The responsibility for conducting risk assessments for specific tasks prior to commencing work lies with the requester. In addition to risk assessments, the implementation and adherence to safety instructions are essential measures for emergency prevention. Safety instructions are divided according to different requirements: general safety instructions, which are specific to the industrial park and to Umicore's facilities, must be completed before entering the site; workplace-specific safety instructions are the responsibility of the requester or their delegate and must be defined individually for each work location. The management of contracted companies is responsible for ensuring that their employees fully comply with these safety instructions. To prevent emergencies, it is also essential that contractors fulfill all responsibilities outlined in Section 6, including assigning only qualified and medically fit employees to designated workplaces and monitoring them during their tasks. In the event of accidents or hazardous situations, contractor employees must follow instructions given by Umicore staff or the plant fire brigade, including during evacuation drills. Emergency medical care at the Hanau-Wolfgang site is provided by the company medical service of Evonik GmbH or its subsidiary IPW (in Rheinfelden and Bad Säckingen: Evonik WD-ALLG.). All injuries, even minor ones, must be treated by this service. Every work accident, illness, and potential hazard must be reported to Umicore. Reporting all incidents and injuries, including minor ones, is essential for evaluation, identifying correlations, and initiating improvement measures. Reports to Umicore are made via the Evonik company medical service.

## 9.6 Evaluation of the contractor management system

The suitability and effectiveness of the contractor management system are reviewed as part of Umicore's integrated management system. This is carried out, for example, through regular compliance audits, the analysis of accident statistics, and supplier evaluations.



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Umicore reserves the right to conduct audits at contractors' premises in special cases or for specific reasons. Contractor employees are obliged to actively support such audits. The results serve as input for the annual management reviews within the business units and at Umicore's corporate level, with the participation of the respective contractor management representatives of the business units.