Abstract

This document sets out the minimum environmental, health, and safety standards that are required to be adopted by all contractors who carry out construction works for Iron Mountain.

1 Table of Contents

2 Document Revision Log

Date	Version No	Changes by	Summary of changes
10/5/2021	00	John Steggall	Initial production of document
20/5/2021	01	IMDC TEAM	Review draft document
08/08/2021	V.1	IMDC TEAM	Approval of document
6/20/2021	V.2	Sari Lynch	Including expectations for all Global requirements

CHANGE CONTROL TABLE

DISTRIBUTION

Date	Version No	Name
10/05/2021	01	Alex Sharp
10/05/2021	01	Paul Hazel
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3 Definitions of Terms Used in this Document

This document makes use of a number of terms. For clarity, definitions of terms used are provided as follows:

- "business" means a trade, business or other undertaking (whether for profit or not);
- "construction site" or "site" includes any place where construction activities are being carried out or to which the workers have access, but does not include a workplace within the site which is set aside for purposes other than construction work;
- "construction work/activities" means the carrying out of any building, civil engineering or engineering construction work and includes—
  a) the construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance (including cleaning which involves the use of water or an abrasive at high pressure, or the use of corrosive or toxic substances), de-commissioning, demolition or dismantling of a structure;
  b) the preparation for an intended structure, including site clearance, exploration, investigation (but not site survey) and excavation (but not pre-construction archaeological investigations), and the clearance or preparation of the site or structure for use or occupation at its conclusion;
  c) the assembly on site of prefabricated elements to form a structure or the disassembly on site of the prefabricated elements which, immediately before such disassembly, formed a structure;
  d) the removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure, or from disassembly of prefabricated elements which immediately before such disassembly formed such a structure;
  e) the installation, commissioning, maintenance, repair, or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure,

  but does not include the exploration for, or extraction of, mineral resources, or preparatory activities carried out at a place where such exploration or extraction is carried out;

- "contractor" means any business or organization (or person who, in the course or furtherance of a business), who is directly appointed by Iron Mountain Data Centers to carry out, manage or control construction work;
- "design" includes drawings, design details, specifications and bills of quantities (including specification of articles or substances) relating to a structure, and calculations prepared for the purpose of a design;
- "designer" means any person (including a contractor or other person referred to in this document) who in the course or furtherance of a business—
  a) prepares or modifies a design; or
  b) arranges for, or instructs, any person under their control to do so,

relating to a structure, or to a product or mechanical or electrical system intended for a particular structure, and a person is deemed to prepare a design where a design is prepared by a person under their control;

"EHS" means Environmental, Health & Safety;

"excavation" includes any earthwork, trench, well, shaft, tunnel or underground working;

"Regulatory Authority" means any governing body that sets forth the regulations for that specific location.

"mobile equipment" means any type of vehicle used on site to assist with carrying out construction work (e.g., Forklifts, excavators, telehandlers, mobile elevated work platforms, etc).

"place of work" means any place which is used by any person at work for the purposes of construction work or for the purposes of any activity arising out of or in connection with construction work;

"project" means a project which includes or is intended to include construction work and includes all planning, design, management or other work involved in a project until the end of the construction phase;

"structure" means—

a) any building, timber, masonry, metal or reinforced concrete structure, railway line or siding, tramway line, dock, harbour, inland navigation, tunnel, shaft, bridge, viaduct, waterworks, reservoir, pipe or pipeline, cable, aqueduct, sewer, sewage works, gasholder, road, airfield, sea defence works, river works, drainage works, earthworks, lagoon, dam, wall, caisson, mast, tower, pylon, underground tank, earth retaining structure or structure designed to preserve or alter any natural feature and fixed plant;
b) any structure similar to anything specified in paragraph (a);
c) any formwork, falsework, scaffold or other structure designed or used to provide support or means of access during construction work,

and any reference to a structure includes part of a structure;

"temporary works" means any works that are required for the construction of the permanent works which will normally be removed from the site on completion (e.g. falsework, scaffolding, hoardings, propping, crane bases, and pile mats). Temporary works also includes permanent works in an incomplete state and permanent works which are used to provide temporary support (e.g. secant piled walls, part-erected steel-frames, and integrated raft and crane bases).

"vehicle" includes any mobile work equipment;

"work equipment" means any machinery, appliance, apparatus, tool or installation for use at work (whether exclusively or not);

"working day" means any day on which construction work takes place or is planned to take place.

"PSE" Potentially severe event is when there is an incident that could have resulted in a severe injury or fatality, with alos the potential for severe environmental impact.

4 INTRODUCTION

At Iron Mountain Data Centers (IMDC), we are committed to providing a healthy and safe environment for all of our workers and visitors at our properties, as well as to third-parties who may be affected by the operations of ourselves and our contractors, such as members of the public or neighbours who may be in the vicinity of our properties. To help us realize this aim, IMDC expects all of their contractors and their employees, workers, agents and subcontractors carrying out any construction works to adhere to the minimum standards set out in this Global Construction Environmental, Health & Safety Policy and that all necessary resources are provided to enable the safe and efficient completion of the project and each individual task.

Unless otherwise agreed in writing with the IMDC project management team, IMDC expects all works of the project (construction or otherwise) to be carried out in accordance with the environmental, health and safety (EHS) regulations/legislation that apply to the location and type of activities being performed within the project.

The contractor must promptly inform its IMDC contact person(s) when any situation develops that causes the contractor to operate in violation of this policy. While the contractor is expected to self-monitor and demonstrate its compliance with this policy, IMDC may audit the contractor and/or inspect the site and off-site locations where the construction work is performed to confirm compliance. If IMDC notifies the Contractor of any non-compliance with EHS requirements, the Contractor shall make all reasonable efforts to correct the unsafe conditions or acts. Satisfactory corrective action shall be taken within a reasonable time as specified by IMDC. If the Contractor, or its subcontractor(s), refuse(s) to correct notified unsafe or unhealthy conditions or acts, IMDC may, in addition to all other remedies that IMDC may have under Contract Documents or otherwise, take one or more of the following steps:

- Cease the operation or a portion thereof until the condition is brought into compliance with the Contractor's site specific EHS plan and Employer's EHS requirements;
- Require Contractor to replace or supplement its Site Safety Representative and/or the supervisory personnel;
- Stop payment for the Work being performed;
- Correct the situation using other contractors and back-charge the Contractor for expenses incurred. All costs, including, but not limited to those above, associated with ensuring a safe and health-conscious work environment shall be borne by Contractor and costs will be back-charged to Contractor. The Contractor shall be responsible for payment of all fines and/or claims for costs or damages levied against Employer or by regulatory agencies for deficiencies relating to conduct of Contractor's work.

IMDC may update this policy on one or more occasions and in its sole discretion. All changes will be effective upon notice to the Contractor, unless otherwise agreed in writing. The contractor shall promptly notify its IMDC contact person(s) if the contractor determines that changes to a policy or procedure will cause a material change to the schedule/programme, the price or other costs for the construction work and/or other work. Upon IMDC receipt of the contractor's notice, the parties will discuss how to mitigate the impact of the change to enable the contractor to comply.

Upon completion of the project, the Contractor is to hand over a completed health & safety file and O&M Manuals to IMDC.

5 Environmental, Health & Safety Plan

For any project involving construction work, each contractor directly appointed by Iron Mountain who is also given temporary control of specific area(s) of Iron Mountain property to carry out their construction works, is required to develop a project-specific Environmental, Health & Safety Plan (EHS Plan) that meets or exceeds the standards set out in this policy and should also comply with any applicable laws and regulations where the construction work is taking place.

The contractor's EHS Plan should account for the entirety of the Work, whether performed at the site or elsewhere, including third-party locations where prefabrication, skidding, and/or commissioning services may be performed. Notwithstanding any rights and authority granted to Iron Mountain under the contract or other written agreement, the contractor will solely be responsible for, and have control over, the means, methods, techniques, sequences and procedures and for coordinating all portions of the construction work they are awarded under instruction, order or contract from Iron Mountain. The contractor is solely responsible for initiating, maintaining and supervising all environmental, health and safety precautions and programs in connection with the performance of the construction work. If IMDC or this policy is deemed to have given specific instructions concerning construction means, methods, techniques, sequences or procedures, the contractor shall evaluate the jobsite safety of the same and will be fully and solely responsible for the jobsite safety of such means, methods, techniques, sequences or procedures. Where construction means, methods, techniques, sequences and procedures are specified, either directly or indirectly, by reference to industry standards, or otherwise, the contractor shall review the specified procedures and, if they will not produce intended results, cannot be warranted or otherwise are objectionable to the contractor, the contractor will propose alternative procedures.

Prior to the start of any construction work, the Contractor will submit their EHS Plan to IMDC. The Contractor will then meet with the project leaders from IMDC to assure how the contents of their EHS Plan meets or exceeds the standards set out in this Global Construction Environmental, Health & Safety Policy. Where the construction works are carried out within an existing occupied property/place of work (e.g., existing data centers, offices, etc) or if the construction works may have an effect on an existing occupied property/place of work, there may be additional rules and requirements to be implemented that can have an effect on the Contractor's EHS Plan and EHS on the project generally. In this situation, the Contractor is required to contact their designated contact at IMDC to request any additional rules and requirements, prior to submitting their EHS Plan to IMDC.

The EHS Plan is classified as a 'live' document, which is expected to be reviewed and updated regularly by the Contractor to ensure the content remains appropriate and relevant.

5.1 High-Risk Activity (HRA) Management

The contractor's EHS Plan should include a dedicated section to outline specific strategies as to how the risks from certain high-risk activities (HRAs) that increase the likelihood for serious injuries/incidents and fatalities (PSE's) will be minimized. These HRAs should include the following topics (wherever they are present in carrying out the construction works): working from heights, electrical, energy isolation, mobile equipment, material handling, confined spaces, lifting operations, ground disturbance, hazardous materials, traffic management on site, driving on-site (and driving off-site if it is in connection with the works), noise and extreme temperatures. This list is not

exhaustive and the Contractor or IMDC may specify additional activities that are considered as have a high PSE potential following completion of a risk assessment.

5.1.1 Working from Heights

Any work at height shall meet or exceed the requirements of the regulations/legislation set forth by the governing regulative authority. Work at height means work in **any place** where, if there were no precautions in place, a person could fall any distance liable to cause personal injury.

5.1.1.1 Mobile Elevating Work Platforms (MEWPs)

MEWPs are purpose-built machines that are used to provide temporary access to high and hard-to-reach areas, with common examples including scissor lifts, telescopic booms (including cherry pickers) and articulating booms. All operators are required to have 100% tie-off while operating a MWEP unless otherwise approved due to additional inherent risk. Contractors should ensure that they have a program to address the following; Inspections, operator training/certification, emergency situations, and operator safety. All MEWP programs and use should comply with the regulations set forth in the area where the MEWP is in use.

5.1.1.2 Fall Prevention

Fall protections systems must be used for areas or activities that require the use. Contractors should have a fall protection program that outlines the following: 1. Types of fall protection systems being used on site, 2. Inspection requirements for each type of system, 3. Training for inspectors and operators, 4. Rescue procedures in the event of a fall, 5. Fall protection site plan that outline the location and activities requiring fall protection. IMDC requires 100% tie-off when using personal fall arrest systems, with at least one lanyard connected to an anchorage point at all times,when a person could fall any distance liable to cause personal injury.

a) Before starting any work with a fall exposure, the Contractor will have a written fall protection plan. The written fall protection plan will be written by a competent person. See above for requirements of the written plan.
b) Contractor will ensure that fall protection equipment is inspected prior to each use and not used for any other purpose other than worker fall protection. The use of controlled decking zones is prohibited. 100% tie off is required at all times when a person could fall any distance liable to cause personal injury. Warning lines may be used to warn personnel of fall hazards.
c) Safety netting is not permitted as the sole means of fall protection.

5.1.1.3 Hole Covers

Any opening in a surface (e.g., the ground, a floor, a roof, etc) with a minimum dimension of 5cm in any direction, and not otherwise protected by handrail or other guarding system must be suitably and sufficiently be covered over to prevent a person and/or any foreseeable object from physically breaking through the cover.

5.1.1.4 Ladders and Stepladders

Ladders and stepladders must only be used where a documented risk assessment shows they can be used safely in accordance with the the regulations/legislations set forth. Where step ladders are used, they will be of the platform design or equivalent. The contractor is to ensure a permit-to-work system is in place, which will include suitable checks being carried out by the Contractor's Site Management to ensure they are suitable for the task to be carried out.

a) All straight and extension ladders will be equipped with non-slip feet. All such ladders will be either tied off at the top and bottom (where possible) or held when in use. No more than

one person will work from a single ladder at any given time. All ladders will be inspected by the user before each use. Any ladder found to be defective during any inspection will be removed from the site or disposed of. Any evidence of oil, grease, or other slippery substance on any ladder must be immediately remedied. No conductive ladders or job-made ladders will be used.

b) When a worker working from or using a ladder is exposed to a fall of more than 6 feet (1.8m), a safety harness must be worn with at least one lanyard attached to a suitable anchorage point. If there is no anchorage point available, a different means of access to the work is required, such as a scaffold or aerial lift. Personal fall arrest is not required when using straight or fixed ladders for access to a different level (such as when descending into a trench or climbing a scaffold) unless there are other conditions that increase the fall exposures (such as muddy terrain or awkward transitions). Stepladders must be fully extended and locked when in use.

c) Workers will not carry tools, materials or other items in their hands while climbing a ladder. Any material or tools needed that cannot be carried on a belt must be hoisted by rope or passed to the person by an assistant.

5.1.1.5 Scaffolding

The contractor must comply with regulations/ legislation of the location for the: erection, use, inspection and maintenance of all scaffolds. Scaffolds will be erected, moved, dismantled, or altered only by trained personnel under the supervision of a competent person. The competent person will inspect all scaffolds for structural integrity and deficiencies. The inspection will be documented in writing on a tag hung from the scaffold. The tag will indicate whether the scaffold is approved for use. Scaffolding that is incomplete or otherwise not suitable for use will have a red tag displayed on the scaffold indicating that it is out of service.

5.1.1.6 Steel Erection

Steel erection will be by all means possible accomplished from aerial lifts. Climbing of columns is prohibited. Steel erection personnel will maintain 100% tie-off at all times when a person could fall any distance liable to cause personal injury. Traversing horizontal beams is permitted so long as proper tie-off is maintained using such devices as rolling beam clamps. Safety netting is not permitted as the sole means of fall protection.

5.1.2 Electrical

a) Ground Fault / Residual Leakage Current Protection. Contractor will provide ground fault circuit interrupter (GFCI/RCD) protection for all cord sets, receptacles and electrical tools and equipment connected by cord and plug which are used or available for use by employees. All GFCI/RCD receptacles will be placed at the source end of the electrical service and tested prior to each use. The contractor must maintain a documented inspection program that is completed by a competent person.

b) Energization or Re-energization. When initially energizing electrical equipment or systems, or re-energizing systems that have been modified, Contractor must have a written plan in place that addresses the integrity of the equipment/system being energized and the protection of personnel involved. When carrying initial energizing and re-energizing all personal should be clear of area and barriers in place. Suitably rated Arc Flash clothing should worn by those carrying out switching operations.

c) Temporary Power and Lighting. Contractor will provide all temporary power necessary for office trailers, welding machines, mall tools, etc. Except for welding machines, temporary

power distribution will be limited to 120 volts. Transformers supplying 110 volts shall be CTE Type (55v-0v-55v). Contractor will ensure sufficient levels of illumination exist inside buildings and outside with emphasis placed on hazardous tasks and walking paths. Temporary lighting stringers will be hard usage cord construction with lamp covers. Outdoor temporary lighting will be protected by ground fault current interrupters (GFCI's/RCDs). Temporary power must be protected by hard barricades to prevent damage from vehicle traffic.

5.1.3 Energy Isolation

Contractor will prepare a written Isolation / Switching Schedule and notify IMDC whenever Contractor deems it necessary to work on equipment or systems that are energized or pressurized or may become energized or pressurized during such work. The plan must state that every worker is protected by his/her own lock. In the case of complex lockouts with multiple lockout points, Multi Locks with a lockout box should be used and managed by the supervisor, where a single key may be placed in a lockbox. The workers then place their individual locks on the lockbox. Appropriate signage will be posted at points of lock out isolation (Do Not Operate, Safety Lock Do not Remove) Contractor will periodically audit lockouts in progress to assure the integrity of the lock and tag process. Contractor will forward to IMDC the findings of such audits. Workers are not permitted to work on any electrically energized component. Energy forms include : Electrical, Water, Chemical, Steam, Pneumatic, Gas, Hydraulic and Mechanical. Suitable means of isolation and de-energizing will be provided by the contractor in RAMS (Risk Assessments and Method Statements). Proving dead on LV Systems should be carried out prior to any works commencing. Proving dead on LV System should be using test equipment which has certified calibration and complies with governing regulatory requirements. Work on HV systems with require appropriate test equipment and carried out by the appropriate HV Authorized personnel.

5.1.4 Lifting Operations

All lifting operations are to be undertaken in full accordance with the regulatory requirements for the location. All lifting equipment is to be used and inspected by competent people also in accordance with regulatory requirements.

5.1.4.1 Cranes

All crane lifts are to be carried out in accordance with the relevant regulatory requirements that are subject to the area of the lift and activities within the operation.

Operators of cranes are to be competently trained and experienced in the crane they are using and are to hold a valid license and provided documentation that must be kept onsite for the duration of the project. All crane documents for inspections annual, quarterly (as applicable), and daily shall be submitted and kept onsite for the duration of the project.

A lift plan and HRA planning meeting is required for all lifts. The lift plan and associated planning meeting can cover multiple lifts within the same operation. The lift plan must clearly outline the scope of work to be completed. Contractor will review changes to the plan to ensure no adverse risks emerge and go unmitigated. The Lift Plan must be produced by a person trained and experienced in planning lifts of a similar type and nature – this person will be named on the Lift Plan as the Appointed Person and is the person ultimately responsible for the safety of a lifting operation. Any submittals that are provided for the equipment specifications that is being lifted need to be attached to the pick plan. All lift plans will be maintained onsite for the duration of the project.

Contractor will not lift a suspended load over personnel, buildings, processes, or electrical conductors.

5.1.4.2 Rigging and Hoisting

Contractor will ensure that only competent employees are used for rigging tasks.

Rigging from the bucket or booms of mobile equipment (including backhoes, front-end loaders, etc.) to pick and/or carry loads is prohibited unless a properly installed and tested lifting eye or lug has been attached to the bucket or boom by the manufacturer. Lifting capacities and configurations will be in accordance with the manufacturer's operating manual. All operators must be trained by the manufacturer or vendor regarding the specific use of equipment. All lifting equipment such as chains, slings and strops must display a valid testing tag and be within the inspection date period. Rigging from the forks of fork trucks is prohibited.

All hoisting shall use a qualified signal person to coordinate actions with the operator of hoisting equipment. The signal person must be in constant communication with the operator; able to track the load at all times, and, if using hand signals only, must be in full view of the operator. Contractor's lift plan must address communication protocols and positive acknowledgement by operators of signals from the signal person when radio communications are used. All loads shall have a tag line(s) attached for control. Controlling loads by hand is not permitted. Workers must always stay clear of the potential impact area should a load fall. Cranes, hoists and heavy equipment will be kept a safe distance away (and within regulatory requirements) from overhead power lines and equipment, with the required minimum distance to be confirmed following discussion with the IMDC of the power lines/equipment.

Contractor will establish an exclusion zone to protect personnel in the swing radius and the full length of the boom. No workers are allowed under a suspended load.

5.1.5 Mobile Equipment

No worker will operate mobile equipment unless he/she has been trained and demonstrated his/her competency. Documentation of this training and compotency must be retained at the project site whenever the operator is operating the mobile equipment on site. Contractor shall ensure all mobile equipment is in safe working order. A daily inspection, at the beginning of the shift, will be made by the operator of such equipment, and findings will be documented in an appropriate inspection log. Tractors, backhoes, and end-loaders will be equipped with rollover protection and seat belts. Seat belts will be used whenever the equipment is in operation. Equipment attachments must be engineered and approved by the manufacturer of the equipment prior to use.

Contractor will not allow the use of any personal electronic devices (e.g. mobile/cell phones, tablets, etc) by operators or workers in proximity to mobile equipment in use.

Contractor will enforce a policy against leaving mobile equipment engines running while the cab is unoccupied. Mobile equipment left unattended shall be left in a state to prohibit any unintended movement by ensuring that all attachments are lowered and all locks, levels, or brakes are set to prevent any unintentional movement.

5.1.6 Material Handling

5.1.6.1 Site Logistics Safety Plan

Part of or in addition to the Contractor's EHS Plan must address logistical risks associated with material handling, mobile equipment movement, lifting operations, personnel and vehicle

movement, designated parking areas, location of overhead power lines, major delivery routes, emergency vehicle access, and emergency assembly locations. Contractor will establish personnel walkways and provide a hard barricade separating mobile equipment and vehicles from common pedestrian pathways.

5.1.6.2 Manual Handling

The contractor is to promote the avoidance of manual handling (i.e., the physical moving of items by a person) by ensuring a manual handling risk assessment is carried out in accordance with applicable regulatory requirements. Manual handling should be documented on the RAMS. Safe lifting practices should be followed and the environment should be acceptable to allow for safe handling to occur.

5.1.7 Confined Spaces

A confined space is a place which is substantially enclosed (though not always entirely), and where serious injury can occur from hazardous substances or conditions within the space or nearby (e.g. lack of oxygen). The contractor is expected to have a daily 'Permit to Enter' system in place for all confined spaces with stringent control measures contained in the permit to ensure safe access, egress and working within. All confined spaces are to be clearly marked with signage and secured with sufficient physical barriers or fencing to prevent unauthorised access. All permits must be submitted to IMDC for retention.

5.1.8 Ground Disturbance

If the surface of ground is to be disturbed (e.g. excavations, digging, installing poles, fencing rakes, etc), the Contractor is expected to follow the applicable regulatory requirements for the are of activity. The contractor is expected to have a daily 'Permit-to-dig' system in place, whereby the Contractor will ensure the relevant informational and physical checks for underground utility services and any other health & safety checks have taken place prior to commencement of any work. All proper benching, or sloping activities need to meet standards. If the ground has not been classified by a competent person that is qualified to determine soil classification; where sloping and benching are not being used as mitigation measures, then a trench box is required.

5.1.9 Hazardous Substances

Contractor will submit for IMDC's review and acceptance Safety Data Sheets (SDS) for all hazardous substances which will be used as part of the project. The contractor is responsible for complying with the Hazardous Communication standards in the applicable region where the work activity is being performed.

The contractor will take effective and responsible steps to contain, control, and clean up all spills of hazardous chemicals. The contractor will immediately notify IMDC of any chemical spill, including fuels and lubricants, and will notify appropriate regulatory agencies of any spill where required. All drums, containers, chemicals, and wastes generated by the contractor are the property and responsibility of Contractor. Chemical wastes will be secured by the Contractor at all times and removed from the property at the reasonably earliest opportunity and before completion of the construction works. The contractor is responsible for disposing of waste in accordance with the applicable regulatory requirements and guidance. Contractor will not discharge any construction materials or chemicals, including service water, into any waterways or drains.

Only approved containers and portable tanks will be used for storage and handling of flammable and combustible liquids. Approved safety cans shall be used for the handling of flammable liquids. All

containers must be properly capped when not in use. Flammable or combustible liquids shall not be stored in areas used for exits, stairways, or normally used for the safe passage of people.

5.1.10 Driving

5.1.10.1 Vehicles

Where vehicles travel on the Site (including parking areas, office/storage compounds, etc), the Contractor will post speed limit signs at regular and appropriate locations. Speed limits must be approved in advance by IMDC. Riding on equipment or in the back of pickup trucks is not permitted. Use of seat belts is required. Vehicles must not be left unattended unless the engine is turned off, transmission is in park or low gear, and the parking brake is set to prevent unintentional movement. Contractor will maintain a reverse parking policy in all designated parking areas. Contractor will maintain a vehicle policy that controls unnecessary vehicle traffic inside the construction area and precludes the use of mobile/cellular phones while driving on the Site.

5.1.10.2 Off-Road Vehicles

Off-road vehicles (ORVs) must be made readily visible and equipped with seatbelts, headlights, a horn, and a reversing alarm. Contractor will assure that workers using ORVs receive adequate training for operation on the project construction site. ORVs include ATVs, utility vehicles, mini-trucks, etc.

5.1.10.3 Public Protection Plan.

Contractor will develop a written plan outlining the means and methods that will be taken to protect the general public while on or in the immediate vicinity of the Site. The EHS Plan will address appropriate roadway signage and be coordinated with local transportation authorities. Vehicles exiting the Site will utilize a truck wheel wash (or equivalent) to prevent mud and construction debris from being exported to the public streets adjacent to the project. All dump trucks exiting the Site will cover loads of loose dirt or gravel.

5.1.10.4 Onsite Traffic Management Plan.

The Contractor will develop a written plan outlining the means and methods that will be taken to protect employees, contractors, sub- contractors and visitors from the risks of vehicle movements across the site. This will consider an appropriate means of vehicle / pedestrian segregation which, for example, could include temporary barriers or the use of proximity alert technology.

5.2 Management Standards

5.2.1 Access

The contractor will suitably fence and control access to the site. Only those persons and vehicles with proper authorization will be allowed to enter the site, with access gates suitably locked and appropriate warning signage posted. Appropriate PPE is required for all people entering construction zones, and signage will be prominently displayed at all access points stating PPE requirements. Signage will also indicate that no weapons, alcohol, or illegal drugs will be permitted on the site. Cameras may be allowed with written permission from IMDC. The Contractor shall address how the hazards associated with the classification and scope of these people will be proactively managed to ensure risks are mitigated.

5.2.2 Barricades

The Contractor will furnish, erect, maintain, and dismantle suitable and sufficient safety barricades surrounding the construction site to prevent unauthorised access by third parties. In addition,

suitable and sufficient barricades should be installed to separate pedestrians and vehicles, as well as segregating site operations (e.g. areas where mobile equipment is operating) and creating exclusion zones to keep site personnel and visitors away from any health and safety dangers.

5.2.3 Lasers

Only competently trained and experienced workers will install, adjust and/or operate any equipment that emits lasers. The Contractor shall ensure that all personnel exposed to direct or reflected laser light greater than permissible exposure limits shall be provided anti-laser eye protection devices. Area in which lasers are used shall be posted with standard laser warning placards. Beam shutter caps shall be utilized, or the laser turned off, when laser transmission is not actually required. When the laser is left unattended for a substantial period of time such as during lunch hour, overnight, or at change of shifts, the laser should be turned off. The laser beam must not be directed at employees. When it is raining or snowing, or when there is dust or fog in the air, the operation of laser systems will be prohibited; in any event, employees should be kept out of range of the area of source and target during such weather conditions.

5.2.4 Demolition & Dismantling

Before permitting workers to start any demolition or dismantling of existing structures, the Contractor must develop a demolition plan and assure that a competent person has conducted a survey of the exact scope of work and the method to safely execute it. The findings of the survey must be incorporated as part of a site-specific 'demolition plan' or 'demolition method statement' with risk assessment and provided to IMDC at least 10 working days prior to the initiation of demolition activities. This 'demolition plan/method statement' must include the following as a minimum:

- details on methods and sequence of the demolition/dismantling works;
- the integrity of the structure (including surrounding structures that may be affected);
- arrangements for the isolation/protection/disconnection of live services (e.g. electricity, gas, water/drainage, telecommunications, data, etc);
- the presence of any hazardous materials and how they will be dealt with;
- environmental considerations;
- sustainability considerations; and
- provisions to safeguard all personnel and third parties from the hazards associated with the demolition/dismantling activities.

An intrusive type of asbestos survey (such as a 'Refurbishment/Demolition' type asbestos survey) will be required to be carried out prior to commencement of any demolition or refurbishment work, the findings and action required of which is to be incorporated as part of the demolition plan/method statement.

All workers involved in the management, supervision and carrying out of demolition are to be competently trained and experienced in demolition.

5.2.5 Documented Safe System of Work (RAMS etc)

The contractor is to ensure that a safe system of work is in place for every work task that is carried out for the project, whether it is carried out on-site or off-site. The expectation is that Risk Assessments and Method Statements (RAMS) will be completed for each task prior to starting the task, and prepared with involved workers. The Method Statements will describe the step-by-step approach to performing the work safely and will include – but not be limited to – proper PPE

required, proper use of correct tools and mobile equipment, access/egress, identification of key hazards, any necessary barricading, coordination with other crafts in the area, emergencies, environmental considerations, and any high-risk activities and permits required for the work. Workers will sign the RAMS indicating they have received and understood the information. RAMS shall be re-written any time the task changes. The Contractor shall maintain completed RAMS in a file on site whilst the work is taking place and make them available to IMDC on request.

The risk assessments are to clearly show how the risks to health, safety and environment are identified, who will be affected and the control measures that are required to be implemented to reduce the risk to as low as reasonably practicable. When carrying out a risk assessment, the expectation is that the Contractor will implement any preventive and protective measures on the basis of the following principles of prevention:

- avoiding risks;
- evaluating the risks which cannot be avoided;
- combating the risks at source;
- adapting to technical progress;
- replacing the dangerous by the non-dangerous or less dangerous;
- developing a coherent overall prevention policy which covers technology, organization of work and the influence of factors relating to the working environment;
- giving collective protective measures priority over individual protective measures; and
- giving appropriate instructions to employees.

5.2.6 Environmental & Sustainability Planning

The EHS Plan is to dedicate a section outlining how the project will avoid, minimize or mitigate effects on the environment and surrounding area to maximize sustainability and recycling opportunities. The expectation is for this section to detail the implementation of measures in accordance with environmental commitments outlined in an environmental policy statement. It must also take into account the requirements of any planning conditions or other legislative requirements.

Some projects will be subject to an environmental assessment at the design and/or construction stages, such as for example the BREEAM International New Construction 2016 with Annex 1 and Annex 2. Where a Project is subject to such an assessment, the Contractor is expected to comply with the necessary requirements in order to obtain the certification required by IMDC.

5.2.7 Fire Safety & Prevention

5.2.7.1 General Site Fire Safety

To be included as part of or in addition to the EHS Plan, the Contractor must document and give effect to fire safety arrangements generally on site, for the effective planning, organization, control, monitoring and review of the preventive and protective measures within regulatory requirements for the region where work activity is occurring. This is also to include a suitable and sufficient assessment by a competent person of the risks to fire safety on site generally, as well as giving consideration to the construction works being carried out.

5.2.7.2 Hot Works (e.g. Burning, Welding, Cutting, Grinding, and Heat Treating)

Any work that produces any spark or flame that could potentially be capable of initiating a fire or explosion will be considered “Hot Work”. The contractor is expected to have a ‘Hot Works’ permit system in place, whereby the Contractor will ensure the relevant informational and physical checks have taken place for each activity involving hot works on a daily basis, prior to commencement of any

hot work. A suitable number and type of fire extinguishers should be available at the working area and a designated 'fire watch' person must be present during the hot work activity. Prior to commencing with the activity, the fire watch will ensure that all combustibles have either been cleared from the area or have been protection from sparks. For two hours after the hot work activity is complete, the fire watch will monitor the area to ensure no smouldering, smoke, or other indications of fire are present.

Where compressed gas cylinders may be used on site, the EHS Plan is expected to document how these are to be safely stored and handled. Compressed gas cylinders shall be properly secured at all times and brought into buildings only as needed and removed as soon as work is completed daily or as tanks are emptied. Unless individual cylinders are equipped with regulating devices, they will have the safety cap secured in place. Cylinders should have a three-part identification tag attached to all cylinders. Oxygen and fuel gas cylinders, when not in use, must be stored at least the minimum regulatory distance apart or separated by a structure of 30 minutes fire-resisting construction. All oxy-fuel burning or welding units will be equipped with one combination check valve flashback arrester installed between the regulator and the hoses, and a second arrestor between the hoses and torch. All cylinders fitted with regulators must be visibly inspected for damage before use, should have valid certification and be less than 5 years of age.

The Contractor must develop an independent method statement with corresponding risk assessment for all roofing operations, including the use of tar kettles, bitumen boilers, etc. Tar kettles and bitumen boilers must remain on the ground level and always attended. Tar kettles will not be lifted or transported while a fire potential exists.

5.2.7.3 Fire Extinguishers

Contractor shall furnish a sufficient number of non-expired fire extinguishers to protect its work area. Extinguishers will be the correct size and type and located, maintained, and inspected. Contractor must provide separate extinguishers for hot work tasks and not rely only on those provided for the facility. Workers will be trained on the use of fire extinguishers.

5.2.7.4 Smoking

Smoking and the use of smokeless tobacco, including the use of e-cigarettes, is not permitted inside any buildings, temporary trailers, or near flammable liquid storage areas and is allowed only in designated areas. The designated areas are to be clearly identified on the Site Logistics Plan and clearly marked and with signage on site.

5.2.8 Housekeeping

During the course of construction, all debris must be kept cleared from the work area, passageways, stairs, and in/around buildings or other structures. Contractor shall provide adequate waste receptacles, continuous clean-up of its work areas to prevent waste accumulating. All cables, cords, leads, and hoses in a building shall be strung by nonconductive means and above ground level in locations and in a manner that prevents the creation of trip hazards. The contractor will be responsible for removing snow and ice from its work, office, storage areas, and other construction facilities in its use, and walkways between these areas. When weather conditions are favourable for the presence of snow or ice, walkway traction shall be enhanced with salt or sand. Impalement protection should be provided for both horizontal and vertical exposures. Protection should be provided on rebar where there are hazards associated with laceration and related injuries in addition to impalement.

5.2.9 Off-Site Pre-Fabrication, Skidding, and Commissioning Services

The Contractor's EHS Plan should also address any work that will be performed at off-site locations for the purposes of pre-fabrication, skidding, and commissioning services, etc. The EHS Plan should clearly set expectations that align with IMDC's culture and vision for EHS and include focus around HRAs. The Contractor will provide oversight and perform periodic safety inspections at all off-site locations.

5.2.10 Portable Tools & Other Work Equipment

All portable electrical items (tools, equipment, leads, etc.) on site will have a portable appliance test (PAT) arranged by the Contractor and carried out by a competent person prior to use and on a quarterly basis. Portable tools to be preferably Class II double insulated. 110 volt tools powered from CTE transformer (55-0-55). Any and all tools and equipment remaining on site after shift end shall be secured/locked up.

The Contractor is expected to enforce a policy of ensuring that, prior to its first use each day. all tools and equipment are visually checked for any damage that may give rise to a health & safety risk.

5.2.11 Powder Actuated Devices

Powder actuated devices are not permitted at the Site without written permission from IMDC.

- Only properly trained and qualified operators may use powder-activated tools.
- The operator must have his/her operator's card in their possession at all times while using the tool.
- Use only approved tools with all built-in safety features including shields or guards that cannot be removed without making the tool inoperative.
- Tools must be tested to ensure the safety devices are working properly. Defective tools must be removed from service immediately.
- Additional eye and face protection is required when using any powder-activated tool.
- Wear safety goggles or face shields when using the tool.
- Always leave tools unloaded until it is being prepared for immediate use. Keep cartridges in the carrying case provided with the tool, and do not allow them to be carried loose in the operator's pockets.
- Post warning signs in areas where the tool is to be used. The sign shall read: "POWDER-ACTIVATED TOOL IN USE IN THIS AREA"
- Operators must use the tool in accordance with the manufacturer's instructions.

5.2.12 Temporary Works

The Contractor is expected to include, either a dedicated section of their EHS Plan or in addition to, Temporary Works procedures to an appropriate detail. Temporary works procedures should be written to ensure that all temporary works are designed, constructed, maintained, used and dismantled safely.

5.2.13 Welfare Facilities

The Contractor is required to provide suitable and sufficient welfare facilities for the duration of the works as a minimum and in addition to any specified project requirements of IMDC and/or statutory requirements of the country where the work is taking place.

5.2.14 Workforce Fitness Programme

The contractor shall implement an ergonomic program including (but not limited to) morning stretching, aimed at avoiding soft tissue injuries on the job.

5.3 Administration

5.3.1 Accountability

Contractor shall assure direct line supervision is held accountable for EHS performance of their personnel. The role of Contractor's EHS professional is to support and provide technical guidance to the project team.

5.3.2 Incident/Injury Reporting and Investigation

Contractor shall immediately notify the designated Project contact for IMDC by phone (and then immediately followed up with an email) of any injury to personnel or any potentially serious on-site incidents, which includes, but is not limited to, accidents, unsafe conditions, near misses, property damage, or environmental incidents. The Contractor shall submit a preliminary written report to IMDC within 12 hours of the incident. The Contractor will follow the requirements as described in the region that work is being performed in regards to prescribed incident investigation activities. The Contractor shall notify IMDC within the reporting timeline outlined in the contractual agreement, of any accident, injury, incident, near-miss, dangerous occurrence or the like that is required to be notified to the regulating authorities. The Contractor shall submit a formal written report, including root cause(s) and corrective action, within 7 working days of the incident. Any corrective action not completed within the 7 working days period shall require a follow-up report within 30 days of the incident indicating all corrections have been implemented.

5.3.3 EHS Inspections and Audits

The Contractor will conduct regular EHS inspections and program audits of the construction works. All work areas must be inspected at least weekly by a Contractor team consisting of one safety resource, one manager, and at least one supervisor or worker. The purpose of the inspection is to reinforce good EHS behaviour, provide coaching for any at risk behaviour, and identify any negative trends needing management attention. IMDC shall be made aware of inspection and audit schedules so a representative may participate if available.

Audit findings, both positive and negative, should be documented and corrective action noted where necessary. Findings shall be ranked according to risk with corresponding timelines for correction. Interim abatement should be established for those items not immediately corrected. High risk deficiencies shall be corrected immediately. The Contractor shall provide to IMDC on a weekly basis copies of all completed inspection and audit reports and record results in a designated project database.

The Contractor will develop and conduct High Risk Activity (HRA) program audits. The audit will, at a minimum, review the existence and execution of regulatory required written programs, training and competency, forecasting and planning of HRAs, risk assessments, administration of permits, and the field execution. Contractor will record results in a designated project database.

IMDC may in its sole discretion conduct one or more audits to assess Contractor's compliance with this policy.

5.3.4 EHS Meetings

Prior to beginning each shift, all Contractor personnel and subcontractors shall participate in a safety meeting to discuss safety requirements of the job(s) to be performed that day. Daily meeting material and attendance shall be documented and furnished to IMDC on request. The Contractor shall hold a weekly safety meeting for all workers assigned to the site. This meeting should be used to provide safety feedback and to expand the workers' safety awareness, using prepared safety topics. Meeting attendance shall be documented and furnished to IMDC upon request.

Following any recordable injury or serious incident, the Contractor shall hold a site-wide stand down – preferably the same day – to communicate what happened and reinforce the need for constant EHS vigilance.

The Contractor shall hold a weekly supervisory safety meeting to show leadership for the safety program, and to discuss safety incidents, rule changes, educational material, and continuous improvement. Meeting attendees will include Contractor's Site Management and any subcontractor Supervisors and safety personnel on site.

Contractor shall initiate and participate in a Project-specific safety committee. The committee shall be comprised of representatives and agents of IMDC, Contractor and project labour representatives selected by the workers, as applicable.

5.3.5 EHS Induction

The Contractor is responsible to ensure each worker and visitor to site is aware that EHS is a top priority for the Project. The Contractor will prepare a formal site-specific EHS induction to be delivered to each worker before he/she starts his/her first day of work. At a minimum, the EHS induction will cover Contractor's EHS Plan and the IMDC EHS induction. All site visitors should also receive a suitable EHS induction that at least covers all pertinent EHS items. EHS Inductions must be communicated in a manner which is understood by all workers, regardless of the nationality. A written outline of the EHS Induction will be made available to IMDC before commencement of the Work. Contractor will keep records of all workers and visitors who receive the EHS Induction.

5.3.6 EHS Personnel

The Contractor must provide a sufficient number of competent safety professionals to ensure proper administration of Contractor's EHS Plan. The Contractor's most senior safety manager will participate in quarterly progress calls, in person meetings, and job walks or when performance warrants more frequent interaction and visits to the Site.

5.3.7 EHS Management Reports

The Contractor shall submit a monthly written report to IMDC providing feedback on the project's EHS performance. The content that is to be included within this report will be confirmed by IMDC prior to commencement of the construction works and may change during the life of the project.

5.3.8 Emergency Planning

The Contractor's EHS Plan must include a Project-specific emergency action plan for emergencies such as extreme weather, medical, power failures, major fires, civil unrest, pandemics, etc. The EHS Plan shall include, as a minimum, a means of notifying and accounting for all personnel on site, assembly points, and a list of phone numbers for key site leaders and IMDC personnel, and a communication plan. The phone list must be updated any time new vendors or Subcontractors arrive on site. Table top drills will be conducted at least every six months. As part of the emergency

planning, the Contractor must also develop and maintain a Project-specific crisis management plan which outlines details in the event of major catastrophes or fatalities.

5.3.9 First Aid and Medical Care

The Contractor is responsible for ensuring that first-aid and medical treatment is administered for workers in the event of injury. The Contractor should ensure that qualified people are provided in sufficient numbers and at appropriate locations to enable first aid to be administered without delay should the occasion arise qualified in administering first aid treatment and CPR on site during all working hours. The qualified person must also be trained in Blood-borne Pathogens and familiar with Contractor's exposure control plan. The Contractor shall prepare a written emergency plan for handling injuries. The plan will include, at a minimum, the name, telephone number, address, and driving directions for the nearest medical facility designated to handle emergencies for that work location. The Contractor will maintain an injury log for the duration of the work showing all recordables, lost time, and first-aid injuries. The log will be available to IMDC on request and be included as part of Project Progress Reports produced by the Contractor for IMDC.

5.3.10 Job Hazard Analysis (JHA)

None of the Contractor's workers will perform tasks he/she is not fully trained and experienced to perform. The Contractor will analyse every non-routine task prior to initiation of the work, and assess the related hazards to develop protective measures. The analysis must be written and thoroughly discussed with personnel assigned to conduct the work before the task begins. As work on the task continues on subsequent days, appropriate parts of the JHA will be reviewed as part of the daily pre-task analysis. The Contractor may use its own form for the analysis. The following work categories will always be considered for inclusion in a JHA. This list is not all inclusive, but is intended to provide examples of the type of tasks needing hazard analysis:

- Biological hazards
- Chemical exposure
- Confined space working
- Crane and other lifting operations
- Electrical hazards.
- Excavations
- Energy Isolation
- Excessive noise
- Fire or explosion potential
- Ground disturbance
- Hot work
- Maintenance and repair
- Manual lifting of heavy or awkward objects
- Material handling
- Material Storage on site in excessive quantities and inappropriate locations
- Rigging and transportation of equipment and materials
- Oxygen deficiency
- Temperature extremes
- Vehicle / pedestrian segregation
- Working at heights

The contractor shall complete and include as part of or in addition to the EHS Plan a summary of the Health Hazard Evaluation (HHE). The summary of the HHE should identify all major health hazard issues including the following:

- The hazards
- Who is at risk
- Control measures required
- Monitoring requirements
- Equipment required for monitoring
- Analysis of any monitoring results
- Reporting and distribution of results

5.3.11 Permits

Contractor's EHA Plan shall include procedures requiring written safety permits for the following work:

- Hot work
- Confined space
- Ground disturbance
- Critical lifts
- Energized electrical work
- Elevated work
- Ladders
- Energy Isolation
- Working at heights

None of the above work will commence without a properly filled out permit, authorised by the Contractor's Site Management who must review with the appropriate personnel and/or crew the details of every permit to ensure safe completion of the work. A copy of all live permits must be made available to IMDC upon request.

5.3.12 Personal Protective Equipment (PPE)

Workers must wear the following minimum PPE (that meets the regulatory requirements that apply to the region of work activity) while in areas where construction works are taking place:

- Hard hats.
- High visibility jacket or vest - Class 2 minimum. Class 3 when required by a project specific risk assessment.
- Protective gloves – glove type to be appropriate to the work activities being undertaken.
- Safety footwear – incorporating toe and midsole protection with ankle support.
- Protective eyewear - incorporating prescription lenses where necessary Over the glasses can be worn. Side shelds can only be worn on glasses that have the applicable regulatory stamping on the perscription frame or have a document to support safety lenses with perscription glasses.
- Long trousers (not ‘jogging’ or ‘baggy’ style and without holes or frays), and
- Shirts with at least 10cm sleeves

Additional PPE should also be worn as necessary where the task or environment requires it as to be recorded.

5.3.13 Subcontractors

The Contractor is responsible to ensure that all Subcontractors comply with Contractor's EHS Plan and with this Global Construction Environmental, Health & Safety Policy. IMDC may request on one or more occasions that the Contractor provide EHS information about each prospective subcontractor. IMDC may require that the Contractor register with a designated third-party due diligence service to pre-qualify prospective subcontractors.

5.3.14 Substance Abuse

The Contractor's EHS Plan will include a policy of random drug and alcohol testing as a minimum. The Contractor shall ensure that such procedures, as well as maintenance, use, and disclosure of information gathered from test results, comply with all applicable laws and regulations. The Contractor shall remove from the Project any worker who fails a drug and alcohol test.

5.3.15 Training

The Contractor shall ensure that all regulatory training is carried out before workers commence work and that workers are competent in risks associated with their environment and assigned tasks. Contractor is responsible for maintaining written proof of workers qualifications and training and will make records available to IMDC when requested.

5.3.16 Wellness

The Contractor shall consider the wider impact of health and wellness on its workers and sub-contractors and how it will raise awareness and standards and, for example, develop a Project-specific wellness program after completing an assessment to identify risks for the geographical location and demographic worker population.

