

Safety, Security and Environmental Guidelines for Contractor Employees

EXHIBIT "S-1"

SECURITY & SAFETY GUIDELINES FOR CONTRACTOR EMPLOYEES ON KAISER TRENTWOOD/ALUTEK PREMISES

PURPOSE

This document is intended to communicate the general safety and security requirements to be adhered to by contract companies and their employees while working at the Trentwood and Alutek facilities.

The comments are not intended to cover all situations that may arise; nor are they intended to waive any provisions or conditions specified in KAISER general terms and conditions, safety provisions, or insurance requirements governing outside Contractors. You are required to read and adhere to all procedures set forth herein.

DEFINITION OF TERMS

The term "KAISER facility, property, or premises" shall mean the KAISER Trentwood Flat Rolled Products facility and the KAISER Alutek facility.

The term "Contractor" shall mean:

1. A General Contractor, a firm or individual who has been engaged directly or indirectly by KAISER.
2. A "Sub-Contractor", a firm or individual who has been engaged by the Contractor to do certain specific portions of the work for which the Contractor is responsible.

The "Owner's Representative" will be KAISER's direct contact with the Contractor.

SECURITY

ENTRY

Contractor personnel shall enter the plant through the East gate or as designated by the Owner's Representative. Personal vehicles belonging to Contractor employees will NOT be admitted inside the plant gates, and shall be parked in the plant parking lot designated by the Owner's Representative.

All vehicles allowed through the gate must be clearly marked with the name of the Contractor and left in designated areas when unattended. Vehicle passes must be authorized through the KAISER Owner's Representative and then obtained from Security at the East Gate. Contractors shall minimize traffic through the east gate to the greatest extent possible.

KAISER reserves the right to conduct unannounced vehicle and package searches by Security Officers. Persons discovered trying to remove material without authorization will be barred from the premises and will be subject to prosecution.

The acceptance and cooperation with these security searches is a condition of working on KAISER premises.

CAMERAS

The use of cameras and/or video recording devices, for any purpose, on Kaiser property is prohibited without approval from site management.

SHEET NO: HSP.810.38

DATE: 1/22/2021

SUPERSEDED: 7/23/2019

TITLE: Safety, Security and Environmental Guidelines

DOCUMENT OWNER: Safety Department

Kaiser Aluminum Washington, LLC
Occupational Health and Safety Management System

VISITORS

Outside visitors such as vendors, Contractor representatives, etc., must receive permission to enter the facility.

Personal visitors are not permitted beyond the entry gate. In the event of an emergency, contact the KAISER Owner's Representative or Plant Security to notify the concerned party.

THEFT

Report all incidents immediately, regardless of ownership, to your Owner's Representative. In the event of an investigation, absolute cooperation is expected by everyone.

WASHROOM / SANITARY FACILITIES

Contractor employees for small or moderate jobs may use KAISER washrooms and sanitary facilities. Large projects require separate Contractor furnished washrooms and sanitary facilities provided for Contractor employees. Contractor shall confirm requirements for washrooms and sanitary facilities with Owner's Representative before mobilization to Owner's facility.

DRUGS / ALCOHOL / FIREARMS

The use, possession, sale, or exchange on KAISER premises (including parking areas) at any time, of intoxicants, such as alcoholic beverages, marijuana or other illegal drugs of any kind, will not be tolerated. Contractors or their employees shall not be on the plant site while under the influence of drugs or alcohol.

Violators will be banned from working on KAISER premises and will be subject to prosecution.

The possession of firearms is strictly prohibited on both the job site and in the parking area. Violators will be banned from working on KAISER premises and will be subject to prosecution.

SAFETY

TRAINING

The Contractor Safety Orientation will be conducted by a trained Kaiser Owner's Representative or their designee prior to work commencing.

- Contractors who have not worked at the Alutek or Trentwood sites in the previous 12-months are required to be re-trained.
- Contractors are required to conduct an annual review of the Safety, Security and Environmental Guidelines for Contractor Employees (S-1) and document the review annually or whenever an updated document is released with all employees and Sub-Contractors currently working at the Trentwood or Alutek sites.

All contractors working on site will receive Contractor Safety Orientation. Each contractor and sub-contractor will fill out a Contractor Safety Orientation Checklist and will receive a "Safety, Security and Environmental Guidelines for Contractor Employees, S-1 document".

See **HSP.810.39 – Contractor Safety and Loss Policy** for additional information and the **Contractor Safety Orientation Checklist (Appendix A)**.

ACCIDENT REPORTING AND INVESTIGATION

1. All near-miss, property damage or injury incidents shall be reported to the KAISER Owners Representative immediately.

2. All High Potential Incidents which have a reasonable potential to cause serious injury or death or which could have caused serious injury or death shall be fully investigated. The Contractor shall have 10 days to investigate the High Potential incident and provide the KAISER Owners Representative with a written investigation report that includes causal factors and what corrective actions will be taken to prevent recurrence of a similar event.
3. KAISER Aluminum reserves the right to participate in or conduct a separate investigation into any incident that occurs on KAISER Property.

MOBILE EQUIPMENT

1. All mobile equipment shall be inspected and certified as safe to operate by the contractor prior to the equipment being placed into initial service. The equipment shall comply with the minimum requirements set forth in WAC 296-155-610. The KAISER Owners Representative or their designee will verify that this inspection has occurred and they will conduct periodic audits of the inspection records and equipment to ensure it is being maintained. Mobile Equipment applies to all equipment used on KAISER Property. Light Duty Vehicles used to travel to and from the TWD facility are exempt from this requirement.
2. Use of seatbelts is required in all mobile equipment that is so equipped.
3. Equipment shall be inspected daily for mechanical defect prior to being placed into service on the shift. The Contractor is required to maintain records of these inspections for a period of 30 days and submit them to the KAISER Owners Rep at their request for review.
4. Equipment which is unsafe to operate shall be shut-down and tagged out immediately. The equipment shall remain out of service until repairs have been made.
5. All golf carts shall be equipped with a visual warning beacon such as a strobe light.
6. Contractor vehicles shall obey all speed limit and traffic signs.
7. Contractor shall minimize the number of vehicles in each project area.
8. Contractor shall not block traffic routes without prior approval from Owner's Representative.
9. If idling mobile equipment is necessary, the Contractor is responsible for positioning the idling mobile equipment in a well-ventilated area. Idling mobile equipment for extended periods of time is prohibited.
10. All persons operating mobile equipment are required to sound horn prior to movement at all STOP signs where there is limited visibility and when entering or exiting through overhead doors.
11. LPG containers are not allowed within the Casting Pits.
12. Gasoline powered PITs are not authorized for use on the north and south Remelt furnace lines or the induction furnace area.
13. Internal Combustion Equipment shall not be used within 50 feet of any Confined Space or low-lying work area without appropriate control measures. (Ventilation, Exhaust Containment, etc.)
14. Refueling of equipment is NOT allowed inside the Plant buildings.
15. When operating any mobile cranes, aerial lifts or other equipment where visibility is limited inside of the Plant, a Safety Watch (person), provided by the contractor, shall direct Plant traffic.
16. Cell phone usage is prohibited when operating mobile equipment.

PLANT SAFETY RULES

1. All Contractor employees are expected to comply with federal, state, local or other regulatory safety standards as a minimum. Where required, contractors shall comply with Kaiser Trentwood Policies, Procedures and Programs.
2. All company safety signs, warnings, or notices must be followed.
3. All persons working on the plant site must wear appropriate clothing. This means full length pants and shirts with minimum quarter length sleeves. Shorts and skirts are not acceptable. Persons working in the Casting Department must wear FR-9 clothing or a FR-9 jacket and ANSI/ISEA Z89.1-2009 Type I, Class G hard hat.
4. The Contractor is responsible for supplying all safety equipment to their employees. The following safety equipment is mandatory for workers in the Trentwood facility:
 - Steel toed or Composite-toe Work Boots
 - Safety Glasses with Side Shields
 - Hearing Protection
 - Hard Hat (ANSI Approved)
 - Personal lock, meeting the requirements of OSHA for Lockout, if necessary
 - Elevated work / fall protection equipment if necessary

- Any additional task specific PPE, such as gloves or weld shields
- 5. Enclosed beverage containers of any type other than reusable containers with a closing lid, are **NOT PERMITTED** on the plant properties. This includes plastic, aluminum cans, and glass bottles. This is due to the possibility of an explosion that could result in the event these containers were accidentally exposed to molten metal.
- 6. Lighters of any kind are **NOT PERMITTED** at Trentwood or Alutek facilities.
- 7. Contractor shall utilize outdoor pathways as primary travel route when operating mobile equipment on-site.
- 8. All pedestrians are required to use designate walkways when possible. Overhead doors are not to be used as doors for pedestrians.
- 9. Horseplay will **NOT BE TOLERATED** on plant property or in the parking lot. Violators are subject to expulsion from the plant.
- 10. Use of the proper tools in the performance of a task is required.
- 11. **DO NOT** sit on or lean against aluminum products stored throughout the plant. **DO NOT** sit or rest in between rows of stored materials. Aluminum products are the same color whether hot or cold and could cause severe burns.
- 12. Be aware of mobile equipment / crane traffic and do not walk or drive under suspended loads.
- 13. Flammable liquids must be stored in UL/FM approved safety cans/containers only.
- 14. Ladders made of conductive materials are prohibited. Wooden or fiberglass ladders are acceptable. Extension ladders must be tied off prior to use.
- 15. Contractors may control cranes if needed; provided all necessary training and documentation is complete, meets or exceeds regulatory requirements, and is readily available.
- 16. Contractor may not use company equipment and / or materials without specific approval from the KAISER Owner's Representative.

CONTRACTOR SAFETY RULES

It is the contractor's responsibility to ensure that all training (including but not limited to Confined Space, Crane, Mobile Equipment, etc.) is up-to-date and meets the requirements of current standards.

The Contractor's Safety Representative shall be responsible for initiating the safety program, ensuring that job site safety requirements and procedures are being accomplished.

The Contractor's Safety Representative shall also be responsible for on-going operations surveys, to ensure that probable incident cause(s) are controlled and that operating equipment, tools and facilities are used, inspected and maintained pursuant to applicable safety and health regulations.

No Contractor or Contractor Employee shall willfully/deliberately or continually violate or disregard safety rules or common safety practice. This includes, but is not limited to failure to wear required personal protective equipment (PPE), and non-compliance with agreed or known safety practices. If any individual violates these rules in such a way as to indicate serious, flagrant or continuing infractions, they will immediately be expelled from the plant site.

The failure or refusal of a Contractor to correct an observed violation may result in the termination of the Contract, and/or the dismissal from the job site of those responsible for such failure or refusal.

The Contractor shall provide the Owner's Representative a copy of all reports made to government agencies or insurance companies relating to any job site accident or injury during Contractor's performance of the work.

Appropriate portable fire extinguishers shall be provided by each Contractor for the worksite, equipment, office and work activities.

LOCKOUT

The Trentwood and Alutek Lockout Policy & Procedure shall be followed at all times while contractors are performing work. Failure to comply with the Lockout Policy will not be tolerated, and shall result in contract termination and the removal of the appropriate contractor from Plant premises.

The KAISER Owner's Representative shall provide an overview of Trentwood/Alutek lockout requirements prior to initiation of work. Contractors, or their employees, are **NOT** allowed to lockout, shut down or start up plant equipment. All Contractor Employees are responsible for supplying personal locks, meeting the requirements of **OSHA** for Lockout.

KAISER's Owner's Representative will coordinate and arrange for all equipment Lockouts and their respective removal with the Contractor's representative. KAISER Owner's Representative will supervise all lockouts and isolation verification to ensure it is performed by qualified Kaiser Personnel. An exception may be granted by the KAISER Owners Representative for specific tasks which require lockout at the point of work.

ELECTRICAL SAFETY

1. Comply with the requirements in WAC-296-800-280 and 296-155-426 through 296-155-462
2. Work on any live electrical sources must be approved by the KAISER Owner's Representative and the KAISER Maintenance Department prior to work commencing. Prior to work commencing an Electrical Energized Work Permit (EEWP) must be completed. All live electrical work must be done in accordance with all applicable regulations and the KAISER Electrical Safety Arc Flash Policy.
3. Only persons qualified as per NFPA 70E are allowed to work on electrical equipment.
4. All corded tools and extension cords shall be plugged into GFCI protected circuits.
5. No Daisy Chaining (connecting) of electrical cords is allowed. Ensure cords are of sufficient length and in good repair.

FALL PROTECTION

All contractors are required to comply with the Washington Industrial Safety and Health (WISHA) comprehensive safety standard WAC 296-155-246

This standard requires a written fall protection plan to be developed and maintained on the job site. The plan must describe how the employer will protect employees on a given work site when they are working 4 feet or more above the ground, other work surfaces, or water.

The fall protection work plan shall include:

1. The identity of your company and the work site to which the plan applies.
2. Identification of all fall hazards in the work area.
3. Description of the method of fall arrest or fall restraint to be provided.
4. Description of the correct procedures for the assembly, maintenance, inspection and disassembly of the fall protections system to be used.
5. Description of the correct procedures for handling, storing and maintaining security of tools and materials.
6. Description of the method for providing overhead protection for workers who may be in, or pass through, the area below the work site.
7. Description of the method for prompt, safe removal of injured workers.
8. Inclusion of where on the job site a copy of this plan will be posted.

Prior to permitting employees into areas where fall hazards exist, the employer shall ensure that employees are trained. This training shall include the inspection of fall protection devices and systems as required by the WAC. A record of employee training shall be maintained and available for review.

BARRICADING REQUIREMENTS

All barricades and barriers erected shall comply with HSP.810.16 Protective Barricades and Barriers Policy.

Purpose of this policy is to protect personnel by preventing or controlling access to hazards in work areas by the installation and maintenance of protective barricades, barriers, demarcation, and restricting access. This work practice will provide guidance for the erection of permanent and temporary barricading and demarcation to prevent personnel from being unnecessarily exposed to a hazard by raising awareness of the presence of a hazard, or restricting access to an area of the workplace.

HAZARDOUS MATERIALS

Prior to transporting materials onto KAISER property, the Contractor must supply a complete SDS inventory of all products to be used on-site and receive approval from the Owner's Representative, Environmental and Safety Departments. This includes, but is not limited to: all lubricants, paints, solvents, etc. All SDS must be provided to the KAISER Contractors Representative, Environmental and Safety Departments upon request

Safety Data Sheets (SDS) for chemicals which contractors and their employees may be exposed to during routine or non-routine tasks associated with their project site will be available upon request.

Any questions concerning hazardous materials on the project site should be directed to the Owner's Representative by the Contractor before work begins.

The Contractor shall be responsible for reviewing the hazards associated with any chemicals or products in use with their employees and taking any necessary precautions to protect their health and safety. In addition, Contractors shall review potential environmental impacts of their activities with their employees and ensure necessary precautions and controls are in place to prevent or mitigate potential spills or exposures to hazardous materials. Contractors must retain SDS on-site for all chemicals used by Contractor employees.

The contractor is responsible for the proper removal of any unused products brought onto KAISER property. Contractors shall be responsible for the proper shipment and disposal of wastes generated as a result of work specified in the contract. Contractors shall obtain an approval from the Owner's Representative and Environmental Department for the selection of the disposal site.

Contractors shall make arrangements with the Owner's Representative to arrange management of any hazardous wastes that may be generated as a result of work.

ASBESTOS

If you encounter materials that are suspected of containing asbestos, stop work immediately and contact your supervisor and Kaiser's Owner Representative. Do not touch or remove any Presumed Asbestos Containing Material (PACM).

Contractors should assume any thermal insulation is asbestos containing and any painted surface contains Lead Based Paint unless notified otherwise by the Owner's Representative.

BLASTING/EXCAVATION

The KAISER Owner's Representative must review and approve any blasting or excavation activities before they begin. Underground wiring and utilities are abundant on the plant site.

Contractors shall provide for dust control during any excavation or cutting project where dust can be generated.

In addition, all excavations shall comply with WAC 296-155 Subpart N.

WELDING & BURNING

A Hot Work permit must be obtained from and signed by the KAISER Owner's Representative before any Hot Work is conducted, indoor or outdoor.

Where directed by the Owner's Representative, the Contractor must supply a fire watch, who has no other duties, while performing specific welding/burning. At all such operations where a fire watch is required, the Contractor shall provide fire extinguisher, tarpaulins, curtains and similar materials. **ALL** welding operations shall be shielded from view or personnel exposure.

If a KAISER portable fire extinguisher is used, it must be immediately reported to the Owner's Representative.

All welding bottles (empty or full) must be properly secured at all times. The bottles must be disconnected, and secured when left unattended for extended periods of time (when no longer in use on during the shift or overnight, etc.). Bottles shall not be stored in the vicinity of any furnaces. **NO** loads shall be left unattended while suspended in the air such as welding equipment, compressors, etc.

CONFINED SPACE ENTRY

Contractors are required to follow **ALL** federal, state, and local laws and regulations in regard to confined space entry. The Contractor shall perform continuous atmospheric tests prior to entry including oxygen, combustibles, and appropriate toxic gases, using their own instruments.

Any Contractor employee entering into a confined space shall be properly trained and the contractor must be prepared to make a space safe to enter. (i.e., ventilation equipment, fall protection equipment, rescue equipment, etc.)

ALL CONFINED SPACES AT KAISER TWD ARE CONSIDERED PERMIT REQUIRED CONFINED SPACES.

PLANT FIRE SUPPRESSION SYSTEMS

Under no circumstances shall any person shut down or interfere with the normal operation of the fire suppression system. In cases where the system must be shut down for work being performed on the system, prior written permission must be obtained from the KAISER Owner's Representative. Permission must be obtained prior to using any KAISER fire hydrants and/or hose reels except in the event of an emergency.

The Contractor shall report any damage to the system to the Owner's Representative immediately.

EMERGENCIES

FIRST AID: It is the Contractor's responsibility to provide basic first aid supplies. The KAISER First Aid supplies and equipment (Enhanced First Aid Kits and AED's) are available to Contractors or their employees in emergency events. It is recommended that Contractors have at least one Industrial First Aid Certified employee on the plant site.

MEDICAL EMERGENCIES: First Employee at the Scene

1. Assess the ill/injured employee, call or direct someone to call (9)911
2. Notify or direct someone to notify the on-shift supervisor.
3. Obtain a First Aid trained employee in the Area. (this may be the on-shift supervisor)
4. Provide as much information about the injured employee as is known.
5. Notify East Gate Security Guard by Radio or Telephone (x6444 or x6111).
 - a. Identify the nature of the emergency as "MEDICAL".
 - b. Identify location of injured employee and the emergency door.
 - c. Inform the security guard to expect incoming emergency vehicles.
6. Send two employees to the door to escort the vehicles to the scene (two emergency vehicles may arrive at different times, and the vehicle(s) must be escorted by an employee to the scene).

FIRE: In the event of a fire, call KAISER Security by dialing 6444 from any extension throughout the plant.

PLANT EVACUATION: In the event of fire, explosion or release of hazardous gas, all Contractors and their employees will be given instructions on how and where to exit the facility.

SHEET NO: HSP.810.38

DATE: 1/22/2021

SUPERSEDED: 7/23/2019

TITLE: Safety, Security and Environmental Guidelines

DOCUMENT OWNER: Safety Department

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PLANT TELEPHONE NUMBERS

EMERGENCY	6444
911 (using plant phone)	9-911
SECURITY	6444

ENVIRONMENTAL

ENVIRONMENTAL AWARENESS

All contractors and subcontractors working on the Kaiser Trentwood/Alutek plant site shall have an awareness of the potential impacts their work activities have on the environment. Kaiser Trentwood/Alutek plant site is a certified ISO 14001 site. Compliance with the standard is required.

SPILL REPORTING

The contractor has an obligation to report any spill or release of material outside of engineered containment to the Owner's Representative. In the event that any spill or release of material outside of engineered containment occurs, the Contractor must call the East Gate at 927-6444 as soon as reasonably possible.

The contractor shall at all times while work is being performed on-site, have a designated employee who is responsible for making the appropriate notifications to the Owner's Representative and the Environmental Department in the event of a spill.

HOUSEKEEPING

GENERAL REQUIREMENTS: Daily cleanup to KAISER's satisfaction is required. Unobstructed passageways for movement of Fire/EMS personnel and equipment must be maintained at all times. At no time shall material be placed in designated walkways without prior approval of the Owner's Representative.

DEBRIS AND REFUSE: Materials shall be piled so that safe clearances are maintained. Accumulation of refuse that may create a fire hazard is not permitted.

DISPOSAL OF REFUSE: Unless defined otherwise in contract documents, all refuse and debris, including but not limited to: Paper, Wood, Concrete and Asphalt shall be taken off-site and disposed of in an environmentally approved manner.

Revision History

- 7/23/2019: Updated and re-formatted document. Added Environmental Section and additional Security Requirements.
- 1/22/2021: Added section on Training and section on Barricading Requirements