

Safety, Security, and Environmental Guidelines for Contractor Employees

EXHIBIT S-1

Purpose

This document communicates the general safety, security, and environmental requirements applicable to all contract companies and their employees while performing work at the Kaiser Trentwood and Alutek facilities.

These guidelines do **not** cover every possible situation, nor do they modify or waive any requirements stated in Kaiser's general terms and conditions, safety provisions, environmental standards, or insurance requirements governing contractors.

All contractors and subcontractors are required to read, understand, and adhere to the procedures contained within this document.

Definitions

Kaiser Facility, Property, or Premises

Refers to the Kaiser Trentwood Flat Rolled Products facility and the Kaiser Alutek facility.

Contractor

A general contractor, firm, or individual engaged directly or indirectly by Kaiser.

Subcontractor

A firm or individual engaged by a contractor to perform specific portions of the contracted work.

Owner's Representative

Kaiser's designated point of contact with the contractor.

Security Requirements

Entry

- Contractor personnel must enter through the East Gate or as directed by the Owner's Representative.
- Personal vehicles belonging to contractor employees are **not permitted** inside the plant and must be parked in the designated contractor parking area.

- Contractor vehicles allowed through the gate must be clearly marked with the contractor's name and parked only in designated areas when unattended.
- Vehicle passes must be issued by Kaiser Security after authorization from the Owner's Representative.
- Traffic through the East Gate must be minimized to the greatest extent possible.
- Kaiser reserves the right to conduct **unannounced vehicle and package searches**.
- Unauthorized removal of materials from the premises will result in removal from site and possible prosecution.

Acceptance of security searches is a condition of working on Kaiser property.

Cameras

Use of cameras, video devices, or any recording equipment is strictly prohibited without prior approval from site management.

Visitors

- Vendor or contractor business visitors must obtain authorization before entering the facility.
- Personal visitors are not permitted beyond the entry gate.
- In emergencies, contact the Owner's Representative or Plant Security.

Theft

All incidents of theft or suspected theft must be reported immediately to the Owner's Representative. Full cooperation during investigations is required.

Washrooms / Sanitary Facilities

- Contractors performing small or moderate jobs may use Kaiser facilities.
- Large projects require contractor-provided washrooms and sanitary facilities.
- Confirm facility requirements with the Owner's Representative prior to mobilization.

Drugs, Alcohol, and Firearms

- Use, possession, sale, or distribution of alcohol, marijuana, illegal drugs, or intoxicants is strictly prohibited on Kaiser property, including parking areas.
- Individuals under the influence are prohibited from entering the site.
- Firearms are not permitted anywhere on the premises.
- Violations will result in removal from the site and potential prosecution.

Safety Requirements

Training

- A Contractor Safety Orientation must be completed by all contractor employees before starting work.
- Contractors who have not worked at Trentwood or Alutek within the past 12 months must be trained.
- Contractors must review the S-1 Guidelines annually with all personnel and document the review.
- Each contractor and subcontractor employee must complete the Contractor Safety Orientation Checklist and receive a copy of the S-1 Guidelines.
- Refer to **HSP.810.39 – Contractor Safety and Loss Policy** for additional requirements.

Accident Reporting and Investigation

- All near-miss events, property damage, and injuries must be reported immediately to the Owner's Representative.
- **High Potential Incidents (HPIs)** must be fully investigated by the contractor within 10 days.
- Written HPI reports must identify causal factors and corrective actions.
- Kaiser reserves the right to conduct its own investigation.

Mobile Equipment

1. All mobile equipment must be inspected and certified safe prior to initial use, per **WAC 296-155-610**.
2. Daily inspections are required prior to each shift.
3. Inspection records must be maintained for 30 days and provided upon request.
4. Unsafe equipment must be immediately removed from service and tagged out.
5. Seatbelts must be used in all equipped vehicles.
6. All golf carts must have an operating visual beacon.
7. Contractor vehicles must obey all posted speed limits and traffic signs.
8. Vehicles may not block traffic routes without prior approval.
9. Idling is allowed only when necessary and in well-ventilated areas; extended idling is prohibited.
10. Operators must sound their horn at STOP signs with limited visibility and when moving through overhead doors.
11. LPG containers are not allowed inside casting pits.
12. Gasoline-powered PITs are prohibited on the remelt furnace lines and induction furnace areas.
13. Internal combustion equipment may not be used within 50 feet of confined spaces without proper controls.
14. No refueling indoors.
15. A safety watch is required when operating cranes or aerial lifts with restricted visibility.
16. Cell phones may not be used while operating mobile equipment.

Plant Safety Rules

1. Federal, state, local, and Kaiser safety regulations must be followed at all times.
2. Company signage and warnings must be obeyed.
3. Required clothing: long pants and shirts with at least quarter-length sleeves. No shorts or skirts.
4. Only reusable, sealable beverage containers are allowed.
5. Lighters are prohibited in casting red zones and within 35 feet of cutting/welding operations.
6. Use designated walkways; overhead doors are not pedestrian walkways.
7. Horseplay is prohibited.
8. Do not sit or lean on aluminum products, which may be hot.
9. Never walk or drive under suspended loads.
10. Flammable liquids must be stored in UL/FM-approved containers.
11. Only fiberglass ladders are allowed; extension ladders must be tied off.
12. Contractor use of Kaiser equipment requires explicit approval.

Contractor Safety Rules

- Contractors must ensure all employee training (confined space, crane, mobile equipment, etc.) meets current regulatory requirements.
- A designated Contractor Safety Representative must manage compliance, inspections, and corrective actions.
- Repeated or serious violations may result in removal from site or termination of contract.
- Contractors must provide the Owner's Representative with required incident reports submitted to regulatory agencies or insurers.
- Contractors must provide adequate fire extinguishers for their work areas and equipment.

Personal Protection Equipment

The following table outlines all PPE requirements for contractor personnel:

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**
 - When working near molten metal, boots must be rated to offer wearer protection from high temps and potential molten metal contact.
- **Safety Glasses with Side Shields**
- **Hearing Protection**
 - High Noise Areas require custom molded ear plugs or dual levels of hearing protection, i.e. ear plug and ear muff
 - See Hearing Protection Area Map for details
- **Respiratory Protection (N95 Masks must be available).**
 - Individuals who are required to wear respirators must have a current fit-test
- **Hard Hat (ANSI Approved)**
 - Hard hats must meet the ANSI Z89.1 Class C or G requirements and be Bright Orange in color.

- Hard hats must meet the ANSI Z89.1 Class E requirements and be Bright Orange in color if Electrical work is to be done.
- Contractors on site 30 days or less can provide high visibility striping on their current hard hats. If the term of the contract is greater than 30 days then the Contractor must provide Bright Orange hard hats for their employees.
 - High Visibility Striping must cover at least 10 square inches (minimum height of 1 inch) and be visible from all approaches. Striping must be bright Yellow or Orange and must be reflective.
- **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

People working in the Casting Department must wear FR-9 or HRC/2 clothing or an FR-9 Lab Coat, and ANSI/ISEA Z89.1-2009 Type I, Class G hard hat.

- Clothing must offer a minimum of 8.0-8.5 cal/cm² of protection.
- Clothing must include a hi-vis pattern in reflective and fluorescent material, which encircles the torso and is placed to provide 360 degrees of visibility around the employee.
 - i. If clothing does not have required striping, then individuals can use a vest over the top of the approved clothing. The vest used must also have a minimum HRC/2 rating.
 - ii. Any striping added to the clothing must be done by the manufacturer and must not interfere with the ARC/FR rating.
- People working within 50 feet of a furnace hearth where molten aluminum is being engaged must wear heat resistant clothing that includes an FR-9 or ASTM-F955 designation.
 - i. Special HRC/2 clothing that does not contain an FR-9 designation must meet the testing requirements of ASTM-F955 in order to be considered FR-9 rated. Heat resistant clothing with these designations are intended to shed molten aluminum when struck, limiting the opportunity for thermal burns.
- People utilizing standard HRC/2 clothing that does not contain an FR-9 or ASTM-F955 designation are not permitted within 50 feet of any activity wherein molten aluminum is being engaged. Clothing without these designations is not designed to shed molten aluminum and can cause thermal burns if splashed upon. This situation typically applies to work being performed on a furnace complex involved in an outage next to an active furnace complex.
- Engaging molten aluminum is described as any interaction with the metal such as casting, transferring, charging, stirring, skimming, or making additions to furnace hearths.

2. High Visibility Garments

- High Visibility Garments shall be worn by Contractors as required by WAC 296-155-200.
 - Construction Work: All or any part of excavation, construction, erection, alteration, repair, demolition, and dismantling, of buildings and other structures and all operations in connection therewith; the excavation, construction, alteration and repair of sewers, trenches, caissons, conduits, pipe lines, roads and all operations pertaining thereto; the moving of buildings and other structures, and to the construction, alteration, repair, or removal of wharfs, docks, bridges, culverts, trestles, piers, abutments or any other construction, alteration, repair or removal work related thereto.
- During daylight hours, when employees' duties are performed in close proximity to moving vehicles, employees must wear a high-visibility safety vest, shirt, or jacket that is fluorescent yellow-green, fluorescent orange-red or fluorescent red in color. This garment must always be worn as an outer garment.
- When working at night or in areas with low-light conditions, when employees' duties are performed in close proximity to moving vehicles, employees must wear, at a minimum, a high visibility safety vest, shirt, or jacket:
 - Designed according to ANSI/ISEA 107-1999 Class 2 specifications.

- Worn as an outer garment; and
- Worn to provide 360 degrees of visibility around the employee. Note: A high-visibility garment meets Class 2 specifications if the garment:
 - Has an ANSI "Class 2" label; or
 - Has at least 775 square inches of background material and 201 square inches of retroreflective material that encircles the torso and is placed to provide 360 degrees of visibility around the employee.

Molten Metal Requirements

Contractors must remain outside a 50-foot radius of any furnace where molten aluminum is being engaged unless properly protected and coordinated with operations. A safety watch is required.

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. Egregious or repeat violations shall result in a contract review which could result in 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

- All work must comply with WAC 296-800-280 and WAC 296-155-426 through 462.
- Energized electrical work requires prior approval and an Electrical Energized Work Permit.
- Only NFPA 70E-qualified persons may work on electrical equipment.
- GFCI protection is required.

Fall Protection

All contractors are required to comply with the Washington Industrial Safety and Health (WISHA) WAC 296-880 Unified Fall Protection Standard

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.

Category	Requirements	Key Notes / Conditions
Duration of Barricading	Barricades must remain in place as long as the hazard exists.	Temporary barricades in place ≥ 90 days must be replaced with solid/fixed barricades.
Barricaded Area Requirements	Barricades must be placed far enough from hazards to prevent personnel or equipment contact.	Must cover the entire potentially affected hazard zone (e.g., sparks, falling objects). Open holes with serious injury potential require a 6 ft setback or additional controls.
Fall-Related Requirements	Within 6 ft of an open hole, 100% tie-off or fall restraint is required.	Holes must be protected with solid/fixed barricades.
Barricade Condition	Barricades must be maintained in good, effective condition.	Area owner responsible for inspections and monitoring.
Barricade Tags	Tags must be attached and visible from all approaches.	Tags must state the hazard and required protective actions. See Appendix A.
Overhead Work	Barricades must be erected around overhead work zones.	Safety Watch/Spotter may substitute if they can monitor all approaches.
Entrapment/Engulfment	Must be barricaded with warning	Applies to chutes, drop zones, dumping areas, etc.

Areas	signs.	
Excavation Warning System	Excavations require warning systems (barricades, signals, lights at night).	Protects pedestrians and mobile equipment.
Permanent Barricades	Must be built by a qualified person and meet OSHA requirements.	Guardrails required for open-sided floors >4 ft above ground. Removal requires approval.
Danger Zone Barricading	Used when hazard has reasonable potential for injury, disability, or death.	"No-Go" areas. Entry requires authorization, awareness of hazards, and required PPE. Danger tape = red.
Soft vs. Solid Barricading for Danger Zones	Soft barricades are allowed only in limited temporary conditions.	Solid/fixed barricades required for floor openings, removed guardrails, deep holes, manholes, or when >6 ft high.
Handrail Requirements	Rope or chain cannot replace handrails.	Temporary railings must meet regulatory requirements. Ladderway openings require self-closing gates or bars.
Caution Zone Barricading	Used when hazards are present but can be safely approached with precautions.	Personnel may enter with authorization, awareness, and PPE. Caution tape = yellow.
Temporary Barricading Examples	Used for restricted travel areas, leaks, slick floors, hot work, uneven floors.	Minimizes personnel access to hazardous areas.
Construction Zone Barricades	Fluorescent orange signage required when detours alter normal traffic routes.	Signs must identify detour paths, restrictions, and communication procedures (e.g., radio channel).
Arc Flash Barricades	Must follow Electrical Safety Arc Flash Policy.	See HSP.810.43 Electrical Safety and Arc Flash
Asbestos Areas	Must follow the Asbestos Program requirements.	See HSP.810.29 Asbestos Program
Removing Barricades	Barricades cannot be removed unless the reason is identified.	If unclear, a Job Hazard Analysis (JHA) must be conducted before removal.

Hazardous Materials

- SDS sheets must be provided and approved before bringing materials on-site.
- Contractors must understand hazards and communicate them to employees.
- Hazardous waste must be properly managed, approved, and disposed of.
- Unused materials must be removed from site.

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 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. **See HSP.810.28 for full fire watch requirements.**

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 always secured. The bottles must be disconnected, and secured when left unattended for extended periods of time (when no longer in use 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 must have a compliant confined space program meeting WAC 296-809.
- All spaces on Kaiser property are considered Permit-Required Confined Spaces.
- Continuous atmospheric monitoring is required.
- Rescue plans and equipment must be available.
- Completed permits must be submitted at the end of the job.

Fire Suppression Systems

- Systems may not be shut down or modified without written authorization.
- All damage must be reported immediately.

Emergency Response

First Aid

- It is the Contractor's responsibility to provide basic first aid supplies.
- Kaiser First Aid supplies and equipment (Enhanced First Aid Kits and AEDs) are available to contractors **in emergency situations only**.
- It is recommended that contractors have at least **one Industrial First Aid–certified employee** on site

Medical Emergencies – Responsibilities of the First Employee on Scene

1. **Assess the ill or injured person.**
2. **Call (9)911**, or direct someone else to call.
3. **Notify the on-shift supervisor**, or direct someone to do so.
4. **Obtain a First Aid–trained employee** (this may be the on-shift supervisor).
5. Provide as much information about the injured person as possible.
6. **Notify East Gate Security** by radio or by calling **509-927-6444** or **509-927-6111**.
 - a. Identify the nature of the emergency as "MEDICAL."
 - b. Provide the injured person's location and which *emergency door* responders should use.
7. Send **two employees to the designated door** to escort emergency vehicles to the scene.
 - a. Emergency vehicles may arrive at different times and must be escorted.

Fire

- In the event of a fire, call **Kaiser Security at 509-927-6444** from any plant phone.

Plant Evacuation

- In the event of a fire, explosion, or hazardous gas release, contractors and their employees will move to the closest exit door.
- Go to designated Rally Point (Placard on exit door)
- Get a headcount (ensure everyone is out)

Plant Telephone Numbers

Type	Number
Emergency	509-927-6111
911 (from plant phone)	9-911
Security	509-927-6444

Environmental

Environmental Awareness

All contractors and subcontractors working on the Kaiser Trentwood/Alutek plant site must maintain awareness of the potential environmental impacts associated with their work activities. The Kaiser Trentwood/Alutek plant is a certified ISO 14001 site, and compliance with all applicable requirements of the standard is mandatory.

Stormwater Considerations

Unless otherwise specified in the contract documents, equipment and materials—including, but not limited to, mobile equipment, project materials, refuse, and debris—shall **not** be stored in areas upgradient of dry wells or on permeable surfaces.

Hazardous Waste Considerations

Any waste or discarded material that is identified in **40 CFR Part 261** as being subject to hazardous waste regulations must be reported to the **Kaiser Owner's Representative** and the **Environmental Department** immediately upon generation or discovery.

Spill Reporting

Contractors are required to report any spill or release of material occurring outside of engineered containment to the Owner's Representative. In the event of a spill or release outside of containment, the Contractor must call the **East Gate at 927-6444** as soon as reasonably possible.

At all times while work is being performed on-site, the Contractor shall designate an employee responsible for making the required 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. Contractors must maintain unobstructed passageways for the movement of Fire/EMS personnel and equipment at all times. No materials may be placed in designated walkways without prior approval from the Owner's Representative.

Debris and Refuse

Materials must be piled in a manner that maintains safe clearances. Accumulation of refuse that could create a fire hazard is strictly prohibited.

Disposal of Refuse

Unless otherwise defined in contract documents, all refuse and debris—including, but not limited to, paper, wood, concrete, and asphalt—shall be transported off-site and disposed of in an **environmentally approved** manner.

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Occupational Health and Safety Management System

Revision History

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1/22/2021: Added section on Training and section on Barricading Requirements

1/21/2022: Added section on High Visibility Garments for Contractors and reference to the Unified Fall Protection Standard (WAC 296-880). Update contractor requirements for Confined Spaces

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