Appendix No 1 to the ORDER of HSE Director dd. 11.01.2024

No. P-OD-722-00-24-000002

Corporate requirements on occupational safety for contractor companies and organizations rendering services

Table of contents

1	General provisions	3
2	Terms and Definitions	3
3	Abbreviations	3-4
4	Requirements to the employees at the premises of the Company's enterprises	4-7
5	Requirements to the organization of works/services	7-11
6	Requirements to the performance of works/rendering of services	11-12
7	Requirements to placing of contractors' shacks at the Company's premises	13-14
8	Requirements to connection and operation of electrical equipment (power consumers) by the contractor organizations	14-15
9	Requirements on operation of vehicles, rendering services (performing works) with the use of special-purpose machinery by the company's own personnel or involving third parties	15-16
10	Occupational safety requirements for work at heights	16
11	Requirements to the performance of high risk works	16-17
12	Works with the participation of specialists (representatives) of equipment manufacturers (including foreign citizens), who carry out designer's (technical) supervision, erection supervision and commissioning supervision of the equipment shall be carried out taking into account the following requirements	17-18
13	Requirements in the field of environmental safety	18-19
14 15	Actions in case of incidents and deviations in operation Additional special requirements	19-20 20
16	Appendix A. The Company's Health and Safety Policy	21
17	Appendix B. The Company's Environmental Protection Policy	22
18	Appendix C. Amounts of penalties for violation of safety requirements	23
19	Appendix D. Matrix of responsibilities allocation	24-30
	Appendix D.1. Matrix of responsibilities allocation in Enterprise B	31-33
20	Appendix E Risk assessment methodology for high risk works and risk assessment form	34-38
21	Appendix F Unified requirements for checking of the presence of necessary qualifications, certifications of the contractors' employees admitted to work under work permits	39-40

1. General provisions.

- 1.1. Severstal is committed to protecting the life and health of its own employees and the employees of contractors.
- 1.2. These Corporate requirements on occupational safety for contractor companies and organizations rendering services (hereinafter referred to as the Corporate Requirements) contain mandatory rules, conditions, restrictions, prohibitions, and obligations in the areas of occupational health and safety, industrial safety, fire safety, environmental protection, and road safety.
- 1.3. The provisions of the Corporate Requirements apply to all contracting organizations operating at the Company's premises.
- 1.4. The current Corporate Requirements are posted on the Company's website at: https://suppliers.severstal.com/support-center/occupational-safety-and-security/ The contractor organizations assume the responsibility to monitor any changes made to these Corporate Requirements on its own. The Company has the right to unilaterally amend the text of the Corporate Requirements. The amendments shall come into force and become applicable to Contractor Organizations 30 (thirty) calendar days after they are posted on the said website, unless otherwise provided for in such amendments. If a violation of the Corporate Requirements is detected, the version of the Corporate Requirements in effect at the time the violation was detected shall apply.
- 1.5. The penalties for violation of the Corporate Requirements are set forth in Appendix B to these Corporate Requirements.

2. Terms and definitions.

- 2.1. Company the Severstal group of companies (enterprises) consisting of the companies which are the customer (buyer) under a work/service contract.
- 2.2. Company Enterprise a company within the Severstal group of companies which is a customer (buyer) under a work/service contract and which is named in the work/service contract as enterprise A, enterprise B, enterprise C, enterprise D, enterprise E.
- 2.3. The territory of the Company the territory of the Company's enterprises and/or the territory of stand-alone facilities owned by the Company's enterprises.
- 2.4. Contracting organization (contractor) an organization performing works or rendering services on the basis of contractual relationship on the Company's territory including the territory handed over under the work permission certificate.
- 2.5. General contractor an organization that engages other organizations (subcontractors) to perform works/render services on the Company's territory and which is liable to the Company for non-performance or improper performance of obligations by subcontractors.
- 2.6. Subcontracting organization (subcontractor) an organization performing works/rendering services at the Company's territory based on contractual relationship with contracting organization (general contractor).
- 2.7. Occupational safety the requirements of the regulatory and local normative acts of the Company imposed to ensure labor protection, industrial safety, fire safety, environmental protection and road safety, including the Corporate Requirements.
- 2.8. Audit assessment of compliance of a contractor organization's occupational health and safety management system with the requirements.
- 2.9. Mining excavation an artificial hollow space created in the subsurface or on the surface of the ground (underground or surface mining excavation).
- 2.10. Top manager of the contracting organization a person entitled to act on behalf of the contracting organization without a power of attorney in accordance with the constituent documents.

3. Abbreviations

- 3.1. **HSE** health, safety and environmental protection.
- 3.2. BLSR basic life-saving rules.
- 3.3. **CSB** critical safety barriers.
- 3.4. **HOF** harmful occupational factor.
- 3.5. **LSM** labor safety manual.
- 3.6. **CP** checkpoint.
- 3.7. **LNA** local normative act.
- 3.8. **PTL** power transmission line.
- 3.9. **WP** work permit.
- 3.10. **PI** process instruction.
- 3.11. **EP** environment protection.
- 3.12. **HPF** hazardous production facility.
- 3.13. **HIF** hazardous industrial factor.
- 3.14. **LS** labor safety.
- 3.15. **OS** occupational safety.
- 3.16. **BSA** behavioral safety audit

- 3.17. IS industrial safety.
- 3.18. PLR potentially lethal risk.
- 3.19. WEP work execution plan.
- 3.20. **PPE** personal protective equipment.
- 3.21. **LD** lifting devices.
- 3.22. **PC** process chart.
- 3.23. **LC RF** Labour Code of the Russian Federation
- 3.24. **Department manager** head of HSE department of the Company

4. Requirements for employees on the territory of the Company's enterprises.

- 4.1 Entering and leaving the territory is allowed only through checkpoints (CP), upon presentation of the appropriate gate pass and successful passing of test for the presence of ethanol in exhaled breath with the use of breath alcohol testing devices (if available).
- 4.2 When moving around the shop, production areas, mining excavations, only the established passage ways shall be used. Crossing bridges shall be used for walking across conveyors, roller tables, ditches and trenches.
- 4.3 Moving around the production site is allowed on foot or by automobiles. The use of other movement methods, other transportation means and devices is forbidden except for enterprise D, where it is allowed to ride bicycles.
 - 4.4 The following is forbidden:
- to walk/drive through the checkpoint and stay on the Company's territory without personal gate pass, without vehicle gate pass; to use invalid or other people's gate passes; to hand over the gate passes for use by other persons;
 - to walk/drive to the territory of the enterprise outside the checkpoints;
 - to violate the established rules of walking/driving through the checkpoint;
- to bring/carry to the territory of the plant and hold bladed weapons, traumatic, gas, pneumatic weapons, guns and their components, electroshock devices, explosive items, explosives, blasting agents, explosive-filled items, ammunition, pyrotechnic products and special non-lethal agents;
- to commit actions that disturb/change the established modes of operation of turnstiles, barriers, readers, video cameras, sensors, etc.;
 - to hinder the performance of official duties by the security guards;
- to use players, mobile (cellular) phones, smartphones, tablets, netbooks and other electronic devices (including those equipped with hands-free devices):
 - a) in the areas of possible exposure to hazardous occupational factors;
 - b) when crossing the railways:
 - c) when walking on the driveway, the side of the road and when crossing the driveways.
- to damage/soil the top surface of roads, remove, block, damage, install without authorization barriers, signs and other technical means to organize traffic and free access to the Company's premises; leave items/cargoes on the roadway that interfere with the movement of other vehicles;
- to stay on the territory of the Company in a state of alcoholic, narcotic, toxic intoxication, to sneak, consume, distribute, purchase, manufacture, store alcoholic products (including alcoholic beverages), narcotic drugs, toxic, psychotropic and psychoactive substances;
 - to step on broken electrical wires, touch or approach them closer than 10 meters;
 - to remain standing on the bridges over the rolling line during rolling operations;
 - to pour water or throw wet or frozen items into liquid metal or slag;
- to stay in reduced clearance areas during movement of automobile and railway transport, to stay under loads being lifted, lowered, transferred or to stay under scaffolds' floors and trestles.
 - to approach the areas of magnet or clamshell crane operation closer than 10 meters;
 - to blow the dust off the clothes using compressed air;
 - to obstruct the aisles, passages, and clearance limits of railroad tracks;
- to stand, sit, lean on railings, fences, barriers, window openings, step on their elements, bend over them:
 - stand on the covers of manholes and wells:
 - to use heating appliances with an open coil;
- to use electric heating devices (heating appliances, electric stoves, electric kettles, etc.) without thermal protection devices or with defective (missing) heat controllers provided by the design;
- to stay in places not related to the performance of labor duties, without the assignment from an immediate or superior manager;
 - to engage in activities not related to the work, distract others from their work;
 - to climb over fences;
- unauthorized keeping of dogs on the Company's territory by employees, and unauthorized use of dogs for protection of sites and facilities;
- to use office furniture for purposes other than intended, e.g., standing with your feet on a desk or chair, rocking on a chair; stacking of items and other stuff on top of cabinets;

- to leave garbage in undesignated places.
- 4.5. Attention must be paid to the signals of the operating mechanisms and transportation vehicles; the instructions of warning signs and posters must be followed; respect the guidance of safety signs and signal markings.
 - 4.6. Safety requirements when crossing railroad tracks.
- 4.6.1. Pedestrians should cross the roads at specified crossings after making sure that there are no moving vehicles transport nearby.

Railroad tracks should be crossed at a right angle. Walking or running across railway tracks in front of a moving train is not allowed.

- 4.6.2. The following is forbidden:
- to walk or run across the railway tracks in front of a moving train;
- when the railway crossing is equipped with a barrier to cross the railway crossing at the red traffic light regardless of the position of the barrier;
- pass between uncoupled railway cars if the distance between them is less than 6 meters (at enterprise E if the distance between them is less than 10 meters);
 - to approach railway tracks closer than 2.5 meters when a train is moving.
- cross railway tracks in the presence of an approaching rake closer than 100 meters, including those approaching on adjacent railway tracks (at sections consisting of several railway tracks (2 or more));
- to stay between the railway tracks if there is no special passway there and such stay is not related to the performance of the job;
- to cross railroad tracks at the locations of switches, tongue rails and crosspieces, step between the frame rail and the tongue rail or into the switch flangeways, step on rails and the ends of reinforced concrete sleepers, crawl under the rail cars, walk on the couplers and frames of railway cars;
 - to walk in the track gage between the rails;
- to walk through the break platform of railway cars, automatic couplers, buffers and crawl under the rail cars.
- 4.6.3. Cross the tracks at least 3 meters from the nearest railway car (locomotive) if inspection of railway cars, gondola cars, platforms, etc. (hereafter railway cars) or locomotives on the railway tracks is required. Employees operating railway transport on non-public railway tracks and in outdoor areas shall cross railway tracks at least 5 m away from the outermost car (locomotive).
- 4.6.4. When a train with hot metal, slag or oversize cargo or rail platforms with hot ingots/slabs are approaching it is required to move to a safe place at least 10 m away.
 - 4.7. Safety requirements for pedestrians.
- 4.7.1. Pedestrians should walk along the sidewalks or footpaths, and in case of their absence along the side of the road. In case no sidewalks, footpaths or sides of the roads are available, the pedestrians may walk in single file along the driveway edges. When walking along the driveway edges the pedestrians shall face the approaching vehicles.
- 4.7.2. Where the traffic is controlled, the pedestrians shall be guided by the traffic lights or manual signals of the traffic-controller.
- 4.7.3. Pedestrians should cross the driveways at pedestrian crossings, including overhead bridges and subways, and in the absence of them at the crossroads following the sidewalk or road side lines.

In case there are no pedestrian crossings or crossroads in the visibility range pedestrians should cross the road at a right angle in the areas without dividing strip and fencing and where the road is clearly visible in both directions.

4.7.4. At non-controlled pedestrian crossings pedestrians may start crossing the road after they evaluate the distance to approaching vehicles, their speed and make sure crossing the road is safe.

However, when crossing the road outside the pedestrian crossing the pedestrian shall not interfere with the movement of vehicles. It is forbidden to walk out on the road from behind of a stopped vehicle or other obstacle that limits visibility, without making sure that there are no approaching vehicles on the road.

4.7.5. The pedestrian shall not linger when crossing the road or stop walking unless it is required for safety concerns.

A pedestrian who was unable to complete crossing of the road shall stop at the line dividing traffic flows moving in opposite directions. Crossing of the road may be resumed only after making sure that it is safe to continue walking and when green traffic light comes on (permissive manual signal is given by the traffic controller).

4.7.6. When vehicles with blue flashing beacons on or blue and red flashing beacons and special audible signal are approaching, pedestrians shall not cross the road and if already on their way to cross the road - yield right of way to such vehicles and immediately clear the driveway.

When the vehicles with orange flashing beacons which perform cleaning and de-icing of the sidewalks and pedestrian routes, the pedestrian must also yield right of way to such vehicles.

- 4.7.7. Running is forbidden when moving on the territory of the Company and inside the buildings. It is recommended not to wear shoes with high unsteady heels on the territory of the Company.
 - 4.8. Safety requirements for drivers.

- 4.8.1. The driver who drives the vehicle on the territory of the Company shall respect the existing Traffic Rules of the Russian Federation. When driving a vehicle equipped with seat belts, the driver may only start driving after he has fastened himself and made sure that all passengers are fastened with seat belts.
- 4.8.2. The driver who drives a vehicle (except for personal car) on the Company's territory is obliged to undergo a pre-trip or post-trip (depending on the work conditions) medical examination in accordance with the established procedure.
- 4.8.3. Transportation of people is allowed only by motor vehicles designed for passenger transportation.
 - 4.8.4. When driving a vehicle on the Company's territory the following is prohibited:
 - transportation of people in truckbeds;
- transportation of more people in the cabin or passenger compartment than it is specified in the vehicle manufacturer's certificate:
 - driving the vehicle with people on the footrests, wings, bumpers, in the truckbed;
 - use of mobile (cellular) phones, smartphones;
- to drive over green lawns and pedestrian sidewalks, to stop and park thereon (with the exception of special maintenance and cleaning vehicles);
- to wash, repair and refuel vehicles on green lawns, pedestrian sidewalks and other places not designated for that purpose;
- take a rest or sleep in the cabin, passenger compartment or truckbed when the vehicle is parked with the engine running.

Driving and parking a private car is prohibited inside production premises.

4.8.5. Parking of vehicles on the Company's territory is allowed in parking lots, as well as in other places in accordance with the Traffic Rules.

During the winter period from November 01 to April 01, parking of vehicles on the Company's territory is prohibited outside the equipped parking lots, except for parking during roads maintenance, works related to process operations, parking of trucks at loading and unloading sites and in places where vehicles are waiting to be loaded (unloaded).

- 4.9. Safety requirements for passengers.
- 4.9.1. The passengers are allowed to wait for route busses only on the boarding platforms elevated above the driveway level, and in case of absence of such platforms on the sidewalk or the side of the road. At the stopping points not equipped with elevated boarding platforms it is allowed to come out to the driveway for boarding into the vehicle only after the vehicle stops. After dropping-off the passengers shall clear the driveway without delay.
 - 4.3.2. Requirements to passengers:
 - when traveling in a vehicle equipped with seat belts, the seat belts shall be fastened;
- boarding and dropping-off shall be done from the sidewalk or curb side only after the vehicle has come to a complete stop (if boarding and dropping-off from the sidewalk or curb is impossible, it may be done from the driveway, provided that it is safe and does not interfere with other road users).
- wait for the vehicle on the boarding platform and in its absence on the sidewalk, at least 1 m away from the curb;
 - hold on to the handrails while boarding and dropping-off from the bus;
 - hold on to the handrails while the bus is moving;
 - avoid actions that may cause harm to the health and life of passengers and driver;
- inform the driver about any unattended items and documents found in the bus cabin, and about any malfunctions:
 - upon arrival at your stopping point, leave the bus and take away personal belongings.
 - 4.9.3. The following is prohibited for passengers:
- while the vehicle is moving: distract the driver from driving the vehicle, open the doors, jump out of the vehicle; grab hold of the vehicle from the outside and jump into it; walk inside the vehicle cabin;
 - wait for the vehicle on the driveway and approach it before it comes to a complete stop;
 - open the doors of the bus by yourself or interfere with their opening or closing;
 - interfere with the driving of the vehicle;
 - throw away items out of the windows and hatches of the vehicle, hang out of the vehicle;
 - use mobile devices when boarding/dropping-off.
- 4.10. When moving on the stairs it is necessary to hold on to the handrails, stand on the steps steadily; running up and down the stairs, jumping from the steps, using a mobile (cellular) phone, portable radio, smartphone, tablet, netbook, other electronic devices is forbidden.
 - 4.11. When using the elevator it is necessary to follow the rules of its safe operation.
- 8.12. The cargoes stored along railway tracks shall be placed at least 2 m away from the head of the nearest rail if the height of the cargo (stack) is up to 1.2 m, and for higher cargoes or stacks that distance shall be at least 2.5 m.
- 4.13. When any materials, tools, equipment, office supplies, etc. have to be taken down from underceiling storage shelves or upper shelves of racks, access to which is difficult, special devices (stepladders, portable ladders) shall be used.

- 4.14. Requirements to the use of personal protective equipment at the Company's premises.
- 4.14.1. It is necessary to have and properly apply the required personal protective equipment on the territory of production sites, in the areas of possible exposure to harmful or hazardous occupational factors and when performing labor duties.
 - 4.14.2. Safety goggles are mandatory in the following cases:
- at production premises (except indoor pulpits and control rooms, enclosed cabins for control of mechanisms, offices, shift meeting rooms, welfare facilities);
- during the performance of works for which the use of safety goggles is required according to occupational safety regulations for specific jobs or type of work;
 - when performing work in areas where safety signs require wearing safety goggles.
 - 4.14.3. The requirement on mandatory use of safety goggles is not applied in the following cases:
- for works requiring other personal protective equipment for protection of eyes and face (masks, face shields) to be worn by an employee in accordance with the established safety requirements;
- production premises and/or types of works where there is no risk of eye injury. The list of premises and/or types of work (if any) is defined by the head of the shop (production area);
 - workers in a vehicle with a glazed cabin.
- 4.14.4. Employees shall wear safety goggles with side shields when impact tools are used and full face masks when they work with aggressive media (acids, alkalis, hot steam, etc.).
- 4.14.5. Machining of products, blanks, parts using cutting and grinding tools shall be carried out with the use of personal eye and face protection equipment (safety goggles with side shields or full face masks). The use of full face shields is mandatory in the following cases:
- when work is performed using cutting and grinding tools with formation of sparks or metal splashes, or if there is a risk of grinding wheel (disk) destruction;
 - when work is performed with cutting wheels.
- 4.14.6. For the performance of one-time works, works of increased danger associated with the risk of eye and face injuries by flying particles, aggressive media, the need of mandatory use of protective equipment is defined by the direct supervisor of workers (foreman) and the employees shall be informed thereof during targeted safety briefing.
- 4.14.7. When performing gas-cutting operations, a risk-oriented approach shall be applied for the use of heat-resistant helmet liners.

Heat-resistant helmet liners must be used in operations with confirmed risk of sparks and metal splashes (scale) hitting the ears and when other effective measures to manage such risk have not been implemented: screens, removal of the employee from the hazardous area, automation, use of PPE protecting from other HIF and HOF which physically prevent splashes and sparks from entering the ear, etc.

The necessary and sufficient safety measures shall be defined by the head of the contracting organization.

Information on safety measures is specified in the LSM for the particular job/type of work.

- 4.14.8. The following rules of wearing special protective clothing and special footwear must be complied with:
- a). Protective clothing must be buttoned up (it is allowed to leave the top button of the protective jacket unbuttoned), the boots must be laced; hair must be tucked under a protective helmet or (if wearing a helmet is not regulated) under another headgear required to be worn by the employee in accordance with the organization's norms for issuance of PPE.

In the conditions of possible exposure to open fire, glowing particles, aggressive substances, electric arc the protective pants shall be worn over the boots.

- b). For outdoor work and when moving around the territory at air temperatures below 0 °C outside indoor premises special warm footwear issued according to the norms shall be used.
- c). Wearing a safety helmet is mandatory at workplaces and in the areas where head protection is required. When wearing a safety helmet, a chin strap must be used, which must be fastened and appropriately adjusted to prevent spontaneous falling or displacement of the helmet from the head.

5. Requirements for organization of works/services.

- 5.1. All contracting organizations engaged for the performance of works and rendering of services on the Company's territory, including the subcontracting organizations, shall undergo pre-qualification procedure for verification of compliance with the established Company's requirements on occupational health and safety. The requirements to the organization within the framework of pre-qualification depend on the risk group of the work performed.
- 5.2 The Company maintains rating of contracting organizations performing works/rendering services on the Company's territory. The rating is calculated on a monthly basis and is formed by accrual or deduction of points according to the criteria established in the Company. Based on the results of the rating calculation, motivation methods may be applied to the organization either negative or positive; material or non-material, in accordance with the procedure determined by local regulations of the Company's enterprise.

- 5.3. The contracting organization must sign in and get access to the personal account in the electronic system of the Company's enterprise, where the information of any identified violations of production safety requirements by the contracting/subcontracting organization on the territory of the Company's enterprise during the performance of works/rendering of services will be stored in the form of an electronic report (hereinafter referred to as the report). The User Manual for software package Labor safety control for contractors' employees is included in the list of LNAs (Section 15 of the Corporate Requirements).
- 5.4 Each enterprise of the Company has a Contractor Management Commission, the decisions of which are mandatory for contractors performing works/rendering services in the territory of that enterprise of the Company.
 - 5.5. Audits (inspections) of contractor organizations' activities. Penalties for the violations found.
- 5.5.1. Audits (inspections) of the contractor organization's activities in the field of OS are conducted to assess compliance of the LS management system of the contractor organization with the requirements.

The top manager of the contracting organization shall grant access, provide the requested documents and arrange the conditions for employees of the HSE function of the Company's enterprises and other authorized persons of the Company for audits (inspections) of the contracting organization's activities in the field of occupational safety.

- 5.5.2. Information on the audit (inspection) findings shall be recorded in the Company's electronic system and will be communicated to the head of the contracting organization by sending a notification from the electronic system to the personal account of the contracting organization.
- 5.5.3. If violations of production safety requirements committed by the personnel of contractor/subcontractor organizations are identified during audits (inspections), a report shall be made in the Company's enterprise electronic system. Each violation in the report shall have its own registration number and date.

In case the contractor/subcontractor organization did not sign in for the personal account in the electronic system of the Company's enterprise, then in the event of violations identification during audits (inspections) of production safety requirements committed by the personnel of contractor/subcontractor organizations, an act of violations will be made on paper (hereinafter - the act).

5.5.4. The contracting organization shall be considered notified of the identified violation(s) of occupational safety requirements on the date of entry of the information on the violation(s) into the Company's enterprise electronic system or on the of delivery against receipt or e-mailing of the act (if any).

The act may be handed over to the direct or superior manager of the violator, or to the violator himself. If it is impossible to deliver the act against receipt, it shall be scanned and sent to the contractor's e-mail. In this case, the contracting organization is considered to be notified of the identified violation on the date when the scanned act was e-mailed.

The top manager of the contracting organization shall ensure that the contracting organization independently tracks, receives and familiarizes itself with the report on the identified violation(s) stored in the Company's enterprise electronic system.

In case of failure to send a substantiated dissenting opinion on the report within three working days from the date of entry of the information about the violation(s) into the electronic system, or if such substantiated dissenting opinion is received beyond three working days, the violation(s) specified in the report shall be considered admitted by the contracting organization without objection.

The contracting organization shall bear the risk of failure to read or untimely reading of the information on violation of occupational safety requirements in the electronic system. The contracting organization shall take measures to obtain up-to-date information in the electronic system in a timely manner.

In case of detection of inoperability of the electronic system of the Company's enterprise or absence of the information confirming violations in the system, the top manager of the contracting organization shall notify the HSE function of the Company's enterprise immediately, but, in any case, not later than on the next working day from the moment of detection. The top manager of the contracting organization who failed to notify on time of the inoperability of the electronic system of the Company's enterprise or the absence of necessary information on the identified violation in the system shall have no right to refer to such circumstances as a basis for non-receipt of information and/or exemption from liability for the identified violation.

- 5.5.5. Under the contracts concluded with enterprise A, the top manager of the contracting organization shall ensure the following:
- 5.5.5.1. Consideration of the results of audits (inspections) and taking measures to eliminate identified violations of occupational safety requirements.
- 5.5.5.2. Development of corrective and compensating measures within three working days from the date of receipt of the report in electronic form on all identified violations.
- 5.5.5.3. Entering information on actions taken into the Company's electronic system on violations of BLSR and checklist evaluations of work producers with an "unsatisfactory" result within ten calendar days from the date of the identified violation.
- 5.5.6. In case of disagreement with the identified violation, the contracting organization has the right to submit a substantiated dissenting opinion to the auditor/inspector who identified the violation within three working days from the date of familiarization with the violation.

The dissenting opinion on the violation submitted by the contractor shall be considered by the auditor/inspector within three working days. Concerning the substantiated dissenting opinion, the auditor/inspector shall make a decision whether to leave the identified violation unchanged, or to correct or to cancel the record in the electronic system.

5.5.7. Violations of occupational safety requirements, formalized by reports in the Company's electronic system or by the acts, entail penalties for contractors.

The amount of penalties for violations of occupational safety requirements committed by the personnel of contracting (subcontracting) organizations on the Company's territory is set forth in the appendix to these Corporate Requirements (Appendix C).

5.5.8. Managers of the contracting organization who have committed gross and systematic violations in the field of occupational safety shall undergo an unscheduled assessment of knowledge by the commission assigned by the order of the Head of HSE Department. The decision on unscheduled knowledge assessment of the contractors' managers shall be made by: the Head of HSE Department of the Company's enterprise, the Contractors Management Commission, the Accident Investigation Commission, and the Head of the contracting organization.

The top manager of the contracting organization shall ensure the implementation of decisions made by the Contractors Management Commission at each enterprise of the Company.

5.5.9. The decision on imposing of penalties and the amount of penalties to be charged shall be made by the Contractors Management Commission.

The decision to switch to automatic claiming of penalties shall be defined in the order/ruling document of the Head of HSE Department of the Company's enterprise.

- 5.6. The contracting organization shall enter the data on all conducted internal inspections of compliance with HSE requirements during the performance of works/rendering of services on the Company's territory and non-compliances identified by all levels of internal production control of the organization into the Company's electronic system not later than on the next working day from the date of inspection.
 - 5.7. Obligations of the general contractor organization when engaging subcontractor organizations.
- 1.7.5. The top manager of the general contracting organization, who engages a subcontractor organization for the performance of works/rendering of services shall ensure compliance with the occupational safety requirements by its employees.
- 5.2.7 In case of engaging a subcontractor to perform the works, the top manager of contracting organization shall assume the following obligations:
- a) to obtain approval for engagement of subcontracting organizations to be involved in the performance of works in accordance with the procedure stipulated by the contract for performance of works/rendering of services.
- b) ensure that the head of the customer subdivision is provided with the following information and documents at least three days prior to the commencement of works/services:
- information on the forthcoming work of the subcontractor organization (the kind of work and at which facility it is engaged, the planned start and end dates of works/services);
- copy of the general contractor's order on appointment of the person responsible for organization of safe work execution by the personnel of subcontractor organizations out of the number of competent managers, specialists who have passed the knowledge test (qualification) in the field of HSE;
- the documents held by the subcontractor authorizing the performance of the planned type of works/services.
- 5.8. All managers and specialists of the contractor organizations shall be mandatorily trained in the occupational safety in accordance with the Company's training program after submitting an application to the person responsible for organization of training appointed by the order of the Head of HSE Department. This is applicable to the following managers and specialists of the contractor organizations:
 - those who perform works on the Company's territory;
 - those with whom a work/service contract has been concluded for the first time;
 - those who were appointed to a position.

At the end of training the acquired knowledge shall be checked. Employees who fail to demonstrate satisfactory knowledge shall take repeated training.

The decision on further interaction with employees who repeatedly fail to demonstrate satisfactory knowledge shall be made by the Contractors Management Commission.

- 5.9. The contractor's personnel shall know and comply with the Basic Life Saving Rules existing in the Company. The BLSR standard is included in the list of LNAs (Section 15 of the Corporate Requirements). If additional BLSR are implemented that are not specified in the BLSR Standard, they shall be communicated to the top manager of the contracting organization by the Company's enterprise and shall be mandatory.
- 5.10. Top managers of the contracting organizations are responsible for the learning and implementation of the Company's Health and Safety Policy (Appendix A), Environmental Protection Policy of the Company and related legal entities (Appendix B) by their employees.

5.11. If an employee of the contracting organization is found at the workplace (or on the Company's territory) with signs of intoxication, the top manager of the contracting organization shall to organize immediate removal of such employee from the territory (exclude entry to the territory) with written notification to the Company thereof.

Employees of the contracting organization shall pass testing for presence of ethanol in their breath (if breathalyzers are available at the Company's checkpoints). If the results of testing are disputed, the top manager of the contracting organization has the right to promptly (within 3 hours after detection of signs of intoxication) arrange medical examination for intoxication for the identified offender at a medical institution licensed to perform medical activities including medical examination for intoxication; the results of the examination shall be reported to the Company.

- 5.12. The top manager of the contracting organization shall ensure the following:
- 5.12.1. Compliance of the organization's personnel with the occupational safety requirements.
- 5.2.12 Introductory briefing on occupational safety at the Company's enterprise for all employees of the contracting organization (as well subcontractors' employees).
- 5.12.3. Mandatory pre-employment medical examination (upon employment) and periodic medical examinations (checkups) of employees engaged in heavy works and works under harmful and (or) hazardous working conditions.
- 5.12.4. Provision of qualification certificates and medical examination conclusions to establish the qualification and absence of medical contraindications for specific work in specific production conditions when admitting employees to work at the HPF.
- 5.12.5. Implementation and compliance with the Matrix of responsibilities allocation in occupational safety (Appendix D, for enterprise B Appendix D.1).
- 5.12.6. Implementation of BLSR and compliance with BLSR. The BLSR standard is included in the list of LNAs (Section 15 of the Corporate Requirements).
- 5.12.7. Engaging of a foreign citizen to perform work/render services is subject to the following conditions:
- compliance with the current procedure for labor activity of foreign citizens on the territory of the Russian Federation (registration of the citizen with the Department of the Ministry of Internal Affairs of Russia in the constituent entity of the Russian Federation where the foreign citizen temporarily stays, permanently or temporarily resides and works; availability of patent/work permit/temporary residence permit/permanent residence permit);
- the citizen's command of the Russian language or providing of an interpreter, unless otherwise specified in the contract for the performance of work/rendering of services.
- 5.12.8 The personnel of the organization shall be provided with protective clothing, footwear and personal protective equipment taking into account working conditions and the nature of the work performed/services rendered. Proper use of protective clothing, footwear and personal protective equipment by the personnel of the organization shall be ensured on the territory of the Company, at places where their use is mandatory. The personnel shall be provided with the necessary tools and accessories required for the performance of works/rendering of services.
- 5.12.9. Employees of the organization shall follow the instructions of warning notices, posters and observe the requirements of safety signs and signal markings. Signal colors, signal markings and safety signs in accordance with the requirements established in the Company shall be used on a mandatory basis on the territory handed over to the contracting organization.
- 5.12.10. Presence of a labor protection specialist with appropriate training or experience in this area shall be ensured during the performance of works/rendering of services on the Company's territory when the number of employees engaged for the performance of works/rendering of services on the Company's territory ranges from 50 to 100 people (including the subcontractors' employees).

Permanent presence of the occupational safety service shall be ensured on the Company's territory consisting of specialists with relevant training or experience in this area (at the rate of 1 specialist per 100 employees), if the number of employees engaged to perform works/render services on the Company's territory exceeds 100 people (including the subcontractors' employees).

5.12.11. Development and correct application of the quality design documentation containing all necessary stages of work in accordance with the employed technology, as well as safety measures for each stage of work.

The development of design documentation shall be entrusted to a specialist with appropriate qualifications.

- 5.12.12. Presence of a superintendent of work (supervisor) or a competent worker (foreman) at the place of work.
- 5.12.13. Installation of mobile video monitoring equipment at the place of works at the Customer's request with the possibility of remote viewing (video surveillance).
 - 5.12.14. Timely blocking of gate passes of the employees whose employment has been terminated.
- 5.12.15. Performance of any works/rendering of services not included in the labor duties of the employee, without the assignment from the supervisor and targeted briefing on safe performance of work shall be excluded.

- 5.12.16. Appointment of responsible persons appropriately trained in the field of environmental protection and environmental safety for the performance of activities that have or may have a negative impact on the environment. Compliance with local regulations of the Company's enterprises in the field of waste management.
 - 5.13. The following is forbidden for the contracting organization:
- 5.13.1. To engage personnel for works/services on the Company's territory under civil law contracts actually regulating labor relations between the employee and the employer (including the personnel of the subcontracting organizations).
- 5.13.2. To engage personnel for works/services on the Company's territory without establishing of legal relations (including the personnel of the subcontracting organizations).
- 5.13.3. To submit requests to the Company to issue permanent gate passes for access to the Company's territory to employees with whom legal relations have not been established.
- 5.13.4. Use outstaffed labor (performance of work by an employee at the employer's instruction in the interests, under the management and control of an individual or legal entity which is not the employer of such employee), engage employees under outstaffing agreements.
- 5.13.5. Engage the following personnel (including the subcontractors' personnel) for the performance of works/rendering of services:
- those who have not been trained with knowledge testing (attestation) on labor protection and industrial safety, who did not pass medical examination and psychiatric examination (if necessary) in accordance with the established procedure.
- those who have contraindications according to the results of medical examination or psychiatric examination.
- 5.13.6. Use of defective, beyond design, uncertified auxiliary equipment, tools, accessories and personal protective equipment for the performance of works/rendering of services.
- 5.13.7. Engage the personnel who have not passed the introductory briefing on labor protection at the Company's enterprise (including the subcontractors' personnel) for the performance of works/rendering of services on the Company's territory.
- 5.13.8. Engage line managers (superintendents of works) who do not have vocational/higher professional technical education or work experience in a managerial position (more than 2 years) in the field of work performed (mechanical engineering, construction, electrical engineering, power and utilities engineering, etc.) for the performance of works/rendering of services.
- 5.13.9. Engage supervisors, foremen and workers authorized to work with electrical installations (electrical personnel) with less than 1 year of independent work experience with electrical installations for the performance of work on the Company's territory.
- 5.13.10. Assign more than 12 team members (front-line workers) to one supervisor when high hazard works are performed.
- 5.13.11. Use faulty vehicles, machinery and equipment for the performance of works/rendering of services.
- 5.13.12. To use techniques which do not ensure personal safety and safety of wider public when performing works (to perform dangerous actions / unsafe operations specified in the relevant labor safety regulations for the jobs and types of works).
- 5.14. Persons with the appropriate vocational or higher specialized education shall be admissible to technical supervision at mining and minerals processing facilities.

Mining engineering education is required for the following personnel of mines, quarries, pits, dredges, open-pit mines and non-mining subsoil development facilities:

- managers, technical managers of organizations (facilities), managers of production areas (shops), specialists of engineering departments and their deputies;
 - shift (site) supervisors, technical supervisors and shift dispatchers.

6. Requirements to the performance of works/rendering of services.

- 6.1. In order to exclude negative influence of radio-electronic devices (radios) of the engaged organization on the Company's production radio communication facilities, the contracting organization shall provide information on their radio communication facilities (type, number of radios, capacity and frequency, availability of permission/license) used for day-to-day communications to the e-mail address: radio@severstal.com prior to commencement of works with the use of radio-electronic devices. It is allowed to start using such devices only after obtaining of written approval.
- 6.2. The top manager of the contracting organization shall ensure that the requirements to vehicle traffic organization are met.
- 6.3. Contractor organizations performing transportation of passengers and cargoes shall be guided by the schemes of transport movement on the territory of the subdivisions of the Company's enterprises, loading and unloading sites developed by structural subdivisions or contractor organizations on the territories assigned (handed over) to them.

- 6.4. Movement inside the production facilities is allowed only through the established passages and driveways.
- 6.5. The contracting organization shall ensure compliance with the requirements for maintenance of the territory, roads and pedestrian routes in technically sound and safe condition.
- 6.6. The top manager of the contracting organization shall ensure maintenance of the assigned (handed over) sites in technically sound and safe condition, including:
- a) appointing by the instruction (order) the persons responsible for timely cleaning, and in winter time
 snow removal at the assigned (handed over) parts of the territory, spraying of slippery areas with de-icing materials:
- b) arranging of regular (at least twice a year in spring and autumn) inspections of the assigned (handed over) parts of the territory and ensuring elimination of the deficiencies found;
- c) organizing of work to address any remarks revealed during checking of the contracting organizations' compliance with the terms and conditions of contracts in terms of maintaining of the handed over parts of the territory in technically sound and safe condition;
- d) ensuring maintenance of fire hydrants located on the handed over territories in technically sound and operable condition; appointing persons (among managers and specialists) responsible for maintenance of fire hydrants.
- 6.7. In case of engagement of special equipment for the performance of works/rendering of services, the obligations of the top manager of the contracting organization shall include the following:
- if the special equipment is on the balance sheet of the contracting organization to coordinate the use of special equipment with the owner of the territory and to ensure that the special equipment is checked according to the check-list. The checklist is a mandatory annex to the Standard "Organization of safe operation of lifting facilities", which is included in the list of LNAs (Section 15 of the Corporate Requirements);
- if the contractor organization does not have special equipment inform the owner of the territory about the need to use special equipment, order the special equipment, ensure checking of special equipment according to the check-list. The checklist is a mandatory annex to the Standard "Organization of safe operation of lifting facilities", which is included in the list of LNAs (Section 15 of the Corporate Requirements).
- 6.8. Works that are not high-hazard works (according to the list of high-hazard works of the Company's enterprise) performed by the personnel of contracting organizations are carried out without issuance of a work permit according to Process Instructions, regulations, etc. (developed jointly by the customer and the contractor, agreed by the customer, approved by the contractor), which define the following:
 - hazards present at the work site (customer's hazards) and measures to manage them;
 - hazards arising from the work and measures to manage them.

In the absence of developed Process Instructions (regulations, etc.), or in the absence of necessary requirements in Process Instructions (regulations, etc.), such work should be carried out as follows:

- outside production areas of the Company's subdivisions under the direct supervision of the line manager of the organization performing the works
 - at the production sites of the Company's subdivisions:

option 1: under the direct supervision of the line manager of the organization performing the works (area of responsibility - hazardous factors of the work performed) in the presence of a representative of the customer subdivision from among managers and specialists who were qualified in the field of industrial safety (if necessary) and passed the tests for knowledge of labor safety requirements (area of responsibility - hazardous factors at the place of work), or in the presence of an observing person appointed by him (in this case the representative of the customer subdivision from among managers and specialists shall give a targeted briefing to the observing person (on hazardous factors at the place of work and measures of protection against them, the procedure of actions when observing the work in progress) with registration of such briefing in accordance with the established procedure;).

option 2: based on work permit.

6.9. When mining operations or processing of solid minerals is performed, all works performed by the contracting organization on the territory of the mining or processing facilities shall be specified in the work permit or certificate of admission to work.

7. Requirements to placing of contractors' shacks at the Company's premises

7.7.1. For the period of work performance/services rendering the contractor organization is allowed to place shack(s) on the Company's territory. In order to place a shack on the territory of the Company written permission shall be obtained from the head of the structural subdivision (enterprise), on the territory of which the shack will be placed (or the head of the workshop / department to whom that function was delegated), as well as from the head of the contracting organization, which accepted the territory under the certificate of admission to work. In order to obtain the permission for placing of a shack the following documents shall be submitted: a filled-out form of permission for placing of a shack; a filled-out check-list "Compliance with the established requirements for mobile buildings, structures (shacks)", technical specifications for the shack. The form of permission for placing of a shack and the checklist "Compliance with the established requirements for mobile buildings, structures (shacks)" are mandatory annexes to the Standard "Ensuring of safe maintenance of the industrial site territory", which is included in the list of LNAs (Section 15 of the Corporate Requirements).

The permission and technical specifications with appendices to it shall be kept by the following persons:

- the head of the shop (department, site) of the structural subdivision (enterprise), on the territory of which the shack is placed,
- the head of department of the organization, which accepted the territory under the certificate of admission to work if the shack carriage is located on that territory.
 - 7.7.2. The shack shall meet the following requirements:
- the shack shall be manufactured in accordance with the design document specifying the shack application, power supply diagram including lighting, installed heaters, machines, electric welding machines and other electric appliances, ground fault interrupters, electric power meters and connections to power supply network.
- a dry chemical powder fire extinguishing module must be installed in each shack which is connected to the electric power supply network;
- a sign (plate) with the following information must be placed on the shack entrance door: abbreviated name of the organization, its legal address, inventory stock number of the shack, number of the permission for installation of the shack and its validity period, name, initials, phone number of the person responsible for the technical condition and safe operation of the shack.

The shacks without such information plates shall not be admitted to the Company's territory through the checkpoint.

- 7.7.3. The shack slinging diagram and grounding sign at the external grounding circuit connection point shall be shown on the shack. The shack on wheels shall have an operable towing attachment.
- 7.7.4. The shack shall be placed on a prepared site. The location of the wagon shall be as specified in the permit, and safe walking routes to the shacks and access roads for fire-fighting machinery shall be provided.
- 7.7.5. Before the electric power is supplied to the installed shack, it shall be grounded in accordance with electrical safety requirements.
- 7.7.6. Connection of the shack on the territory of the Company to power supply shall be done upon written request addressed to the person responsible for electrical facilities of the corresponding subdivision.
- 7.7.7. Connection of the shack to the heating network shall be done by the specialized subdivision of the Company's enterprise upon written request from the owner of the shack.
 - 7.7.8. It is forbidden to place the shacks in the following locations:
 - directly under pipelines, trestles;
 - on wells, heating and power supply routes, in gas hazardous places, in fire separation clearances;
 - in clearances for movement of transportation vehicles;
 - closer than 1.5 m from parking lots;
- closer than 3.5 m from the centerline of railway tracks:
- in the protection zone of overhead power lines (up to 1 kV 2 m; 1-20 kV 10 m; 35 kV 15 m; 110 kV 20 m; 220 kV 25 m). closer than 5 m from transmission line towers (regardless of voltage);
 - closer than 15 m to pipelines, pipeline trestles, administrative and welfare buildings and structures. 7.7.9. The following is forbidden:
- storage of any cylinders with gases inside the administrative and welfare shacks and annexes to them, as well as inside the shacks made of combustible materials, without natural ventilation and natural lighting
- storage of gas cylinders and empty cylinders, materials, equipment, tools in places where flammable gas cylinders are stored;
 - storage of gas-filled cylinders together with empty cylinders;
 - tracing of pipelines with flammable gas, air separation products, steam into the shack;
- unauthorized connection of the shack to the power supply, connection to the power supply of the shack with the electrical equipment which does not comply with the electrical safety requirements;
 - use of the shack for purposes other than intended;
 - placing of the shack without permission;

- use of the shack by organizations not specified in the permit;
- handing over of the shack for use to an organization not specified in the permit;
- use of the shack after the expiration or revocation of the permit;
- storage of materials and equipment on the roof of the shack;
- leaving electric heaters unattended if such operating mode is not stipulated in the manufacturer's documentation; drying of clothes and footwear on electric heaters.

8. Requirements to connection and operation of electrical equipment (power consumers) by the contractor organizations.

- 8.8.1. Connection of the contractors' power consumers to power supply networks of the Company's enterprize subdivisions shall be done upon on written request addressed to the person responsible for electrical facilities of that subdivision. The request shall contain the following information:
- name of the power consumer (connection point, compressor, pump, welding machine, power tools, etc.);
 - power consumer class by the type of electric shock protection;
 - power rating, voltage;
 - VRD function for welding machines or separate unit (open-circuit voltage reduction unit);
 - employees responsible for safe operation of power consumers and their sound technical condition.

The request shall be signed by the contractor's superintendent of work. The person responsible for electrical facilities of the subdivision which is the owner of the electrical installation to which the consumer shall be connected shall sign the request to permit connection of such power consumer with specification of the power supply take-over point (disconnector, circuit breaker, switch, etc. and its dispatch name).

8.8.2. When stationary electrical equipment (transformer substations, connection points, site shacks, etc.) is connected to the Company's electrical grids a certificate of delineation of the balance sheet attribution and operational responsibilities of the Parties on electrical grids shall be made. The person responsible for electrical facilities of the Company's subdivision is responsible for making of such certificate.

When such electrical equipment is located on the territory of industrial site (including the territory handed over under the work permission certificate), the person responsible for electrical facilities of the subdivision which is the owner of the territory shall check whether electrical safety rules are complied with by the contractors' personnel operating the electrical equipment before connecting the equipment.

- 8.8.3. The power consumers shall be connected to (disconnected from) electrical mains, except for plug and socket connections, by electrical personnel of the Company's enterprise subdivision operating such electric mains.
- 8.8.4. Portable and mobile power consumers, its auxiliary equipment shall meet the requirements of state standards or technical specifications. Portable and mobile power consumers may be used only for the intended purpose specified in their manufacturers' certificates.

All electrical loads and its auxiliary equipment shall have inventory stock numbers (written on the their bodies or on the attached tags).

- 8.8.5. The top manager of the contracting organization shall define the following in the appropriate instructing document:
- the employees from among managers or specialists responsible for safe operation of electric power consumers;
- the employees from among electrical personnel of electrical safety category 3 or higher, responsible for the safe operation of electric power consumers;
- number and storage locations of the logbooks of inventory records and periodic inspection and repair of portable and mobile electric power consumers and auxiliary equipment to them.
- 8.8.6 Record keeping, issuance, repair and inspection of portable and mobile electrical power consumers (power tools, lamps, electric machines, pumps, compressors, electric welding units, etc.) and their auxiliary equipment (extension cables, step-down and isolating transformers, protective disconnecting devices, etc.) used in production activities shall be reflected in the logbook of inventory records, periodic inspection and repair of portable and mobile electric power consumers and auxiliary equipment to them.

The logbook shall be kept for one year after the date of the last entry.

- 8.8.7. The obligations of employees responsible for the safe operation of electric power consumers include:
 - maintaining and safe-keeping of the logbook;
- registration of newly received power consumers in the logbook and putting of inventory numbers on them;
- prior to the initial issue of the power consumer into use, together with the employee responsible for its sound condition, organize checking of its technical condition, determine the class of protection against electric shock and the categories of premises (with regard to the risk of electric shock to people) in which it may be used based on the information in its manufacturer's certificate;
- within the established time limits make the power consumers available to the employees responsible for their technical condition for periodic inspection, as well as for extraordinary inspection after repairs;
 - organizing of issuance and return of power consumers with appropriate entries in the logbook;

- withdraw from circulation the defective power consumers (with a record and signature in the logbook) which were not registered or operated in violation of electrical safety requirements;
 - organizing of repair of power consumers by trained qualified personnel.
- 8.8.8. The obligations of employees responsible for technically sound condition of electric power consumers include:
- at least once in six months (at the request of the employee responsible for safe operation) checking of technical condition of the power consumers, including the quality of previous repairs, with a record of checking results in the logbook: "good" or "defective";
- recording of the results of inspection after repair with signature in the logbook and determining of the possibility of further operation of the power consumer.

9. Requirements on operation of vehicles, rendering services (performing works) with the use of special-purpose machinery by the company's own personnel or involving third parties.

- 9.9.1. The top manager of the contracting organization shall ensure availability and proper use of the required PPE by the personnel performing passenger/cargo transportation, operating special equipment, organizing cargo transportation.
- 9.9.2. The technical condition of the vehicle shall meet the requirements of the Company's regulatory and local normative acts. Its operation must be in accordance with the manufacturer's instructions.
- 9.9.3. Entry/exit/movement of the vehicle on the Company's territory is allowed with clean, clearly legible state registration plates.
- 9.9.4. The vehicles shall enter/exit the territory through the checkpoint in their lane, at maximum speed 5 km/h and keeping at least 5 m distance from the vehicle ahead.

For checking of the documents, inspection of the vehicle by the Company's security guard, the vehicle shall stop at the place marked by road signs, markings or as instructed by the security guard and take measures to prevent spontaneous movement of the vehicle.

Movement of the vehicle may be resumed (including when the barrier is open) only at the guard's command and when the barrier is fully open.

9.9.5. The vehicle shall be equipped with a video surveillance and video recording device in the direction of the vehicle movement (for contractors performing works/rendering services at Enterprise E and Enterprise B - the vehicle may be equipped with a technical means of video surveillance and video recording with the direction along the vehicle movement); in case of passenger transportation such device shall be additionally installed in the vehicle cabin.

Video recording shall be continuous from the moment the vehicle enters the Company's territory until it leaves the territory. The top manager of the contracting organization shall ensure the safety of the video recording for 24 hours and make it available to the Company upon request.

- 9.9.6. Movement of the vehicle to the place of loading and unloading shall be in accordance with the traffic scheme on the territory of the Company's enterprise.
- 9.9.7. The driver shall to put the vehicle to the place of waiting for loading according to the scheme of traffic (parking) of vehicles on the territory of the shop (production site) or loading and unloading area.
- 9.9.8. When stopping and parking the driver shall make sure that the vehicle does not interfere with other vehicles, pedestrians and work. Leaving the cab of the vehicle, the driver shall take measures to prevent spontaneous movement of the vehicle.
- 9.9.9. Loading and unloading operations shall be performed in compliance with the rules established by regulatory legal acts and local regulations of the Company's enterprises.
- 9.9.10. Schemes of arrangement and fastening of cargo in the body of the vehicle shall be available with the driver; the cargo shall be placed and fastened according to such schemes.
 - 9.9.11. The driver is required to blow horn in the following cases:
 - when driving in or out through the workshop or warehouse gates,
 - when backing,
 - in places of limited visibility,
 - in all cases of possible danger of running over or collision.
- 9.9.12. When driving a vehicle through the danger zone of special equipment operation, the driver must:
 - stop before entering the danger zone.
 - attract the attention of the driver of special equipment by blowing the horn,
 - establish eye-to-eye contact with the driver of the special equipment,
 - make sure that the driver of the special equipment sees the vehicle and gives way to it.

Driving is allowed only if the load-grabbing attachment of the special equipment is lowered to the ground.

9.9.13. Systematic transportation of passengers shall be organized only according to the scheme of bus routes developed by the Company enterprise; or the route developed by the contracting organization and agreed with the representative of the Company enterprise.

The top manager of the contracting organization shall provide the driver performing systematic transportation of passengers with the scheme of the route.

- 9.9.14. Passenger transportation, except for systematic transportation, shall be in accordance with the scheme of traffic on the roads of the industrial site.
 - 9.9.15. The following is prohibited for drivers and forwarders:
- carry away/take away in a vehicle any valuables, cargo, and goods from the Company's territory without appropriate valid forwarding documents,
 - transport any persons in violation of the established procedure,
 - move inside the premises/on the territory of sites without escort by the Company representative

10. Occupational safety requirements for work at heights

- 10.1. Top manager of the Contractor organization shall ensure that its employees are sent for training in safe working practices at heights to the training centers recommended by the Company.
- 10.2. It is forbidden to engage employees with less than 1 year of experience in working at heights to perform work at heights.
- 10.3. The type and location of the anchoring device of safety systems for work at heights shall be specified in the WEP for work at heights, in the PC or in the permit to work.
- 10.4. The anchoring device of restraint and positioning systems is considered suitable if it can withstand a load of at least 13.3 kN without breaking.
- 10.5. The anchoring device of safety systems for one worker is considered suitable if it can withstand a load of at least 22 kN without breaking.
- 10.6. The anchor points for connecting the safety systems of two workers must be able to withstand a load of at least 24 kN without breaking, and 2 kN shall be added for each additional worker (e.g. for horizontal flexible anchor lines 26 kN for three workers, 28 kN for four workers).
- 10.7. It is allowed to use several anchor points as an anchoring device that are connected to each other, according to the calculation of the load value in the anchoring device.
- 10.8. The service life of means of protection against falling from height is determined taking into account the requirements of the quality certificate for the product the service life specified in the quality certificate shall be calculated from the date of manufacture (the date of issuance for use is not taken into account).
- 10.9. If lethal risk "Work at height" is identified in the course of risk assessment, the superintendent of work must assess the readiness of employees for safe performance of work at height, with the mandatory filling out of the appropriate checklist on the reverse side of the risk assessment form. (Appendix E)

11. Requirements to the performance of high risk works.

- 11.1. When works are performed at one site (facility, building, equipment) simultaneously by several organizations, the general contractor shall develop and coordinate with all organizations involved in the works a schedule of joint and combined works. The schedule of joint and combined works provides for safe work practices and required time for all organizations whose working areas are adjacent or overlapping. When any adjustments of the work schedule are made in the course of work execution, the schedule of joint and combined works shall be coordinated with all organizations involved for the works.
- 11.2. When high-risk works are performed, the superintendent of work shall carry out risk assessment in accordance with the requirements of the "Risk assessment methodology for high risk works". (Appendix E)
- 11.3. Employees involved in high risk works must know their obligations in organizing and performing of such works and fulfill their functions:
 - a) The person who issues work permits shall:
- make risk assessment at the site of the upcoming work; identify hazards originating from the production shop equipment, power and utilities networks, technological process, etc., as well as combined works:
- develop and include into the work permit the measures to exclude or reduce the risk level for the identified hazards. The developing of such measures shall take into account the technology of the upcoming works and presence of combined works;
 - bear responsibility for completeness of the safety measures specified in the work permit;
 - appoint persons responsible for the implementation of measures specified in the work permit;
 - inform the person who admits employees to work aware of the developed safety measures.
 - b) The person who admits employees to work shall:
 - organize and check the implementation of preliminary measures specified in the work permit;
 - instruct the superintendent of work (supervisor) on specific features of the works to be done;
- show the pedestrian route to the superintendent of works by accompanying him/her to the work site.
 - observe the place where hot (fire) works were done during 2 hours after their completion.
 - c) the superintendent of work (supervisor) shall:
 - personally check the implementation of the measures specified in the work permit;
- perform all actions in the work permit which were attributed to the superintendent of work (supervisor);

- assess the risks of all hazards that may arise during the work in accordance with the requirements of the "Risk assessment methodology for high risk works", the source of hazards the process technology of the upcoming work, and develop all necessary measures to reduce the risks;
- record the assessment results for identified potentially lethal hazards in the risk assessment form, and in case of identification of lethal risk "Work at height" fill out the check-list on the reverse side of the risk assessment form (Appendix E);
 - have the work performers acknowledged against receipt with the risk assessment form;
- have the work performers acknowledged against receipt with the procedure (technology) of the work;
 - give targeted briefing on safety measures to the work performers;
- carry out the works in a safe manner in accordance with the organizational and technological documentation:
 - control compliance of the work stages with the technology applied and design documentation;
- control the correct use of protective clothing and personal protective equipment by the crew members and operable condition of technical means of labor safety;
 - observe of the place of hot (fire) works during the work performance (until completion of the work):
- -show the pedestrian route to employees who will perform works by accompanying them to the work site:

Any identified hazards that cannot be eliminated by the superintendent of work independently shall be reported to the person who admits employees to work or the person who issues work permits if the hazards are in the area of responsibility of the customer (production shop); and to his immediate superior if the hazards are in the area of responsibility of the organization performing the work.

- d) The work performer (crew member) shall:
- know potentially lethal hazards existing in the course of work performance,
- know and follow safety requirements for the performance of works;
- know and follow the procedure (technology) of the work performance;
- correctly use the necessary PPE, tools and equipment;
- make sure that the work place is safe;
- make sure that there is no threat of injury or harm from the actions of colleagues working in the same area,
 - in case of any doubts regarding personal safety, contact the immediate superior.

In the presence of risk to life or health of the employees or other persons, accidents, or any obstacles to fulfill the above requirements, the employees shall inform their immediate superior about it and shall not start working.

- 11.4. Risk assessment form (Appendix E):
- issued for 1 shift, for works under a single work permit;
- attached to the work permit;
- does not substitute the WEP or PC;
- does not cancel obligatory compliance with the WEP, PC, labor safety manuals. It is not allowed to substitute the wordings of safety measures in the risk assessment form by referring to the WEP, PC, labor safety manuals;
 - kept by the site supervisor (foreman) until the shift works are finished;
- upon completion of work in the shift shall be handed over together with the work permit to the person admitting employees to work.
- 11.5. When work is performed under work permit for high-risk work, combination of functions (of the person who issues work permits, the person who admits to work, work superintendent or crew member (work performer)) by one employee is prohibited.

This requirement does not apply to the work not related to high-risk work performed by expert organizations (inspections, surveys, expert examinations, etc.) and design organizations (surveys of buildings and structures, dimensional measurements, inspections, etc.).

Combination of the functions of the person who issues work permits and the person who admits to work as well as the person who admits to work and work superintendent is allowed.

- 11.6. The contractors' employees admitted to work under work permits shall have appropriate qualifications/certifications. Control of the presence of the necessary qualifications/certifications of the employees shall be done in accordance with the "Unified requirements for checking of the presence of necessary qualifications, certifications of the contractors' employees admitted to work under work permits (Appendix F).
- 12. Works with the participation of specialists (representatives) of equipment manufacturers (including foreign citizens), who carry out designer's (technical) supervision, erection supervision and commissioning supervision of the equipment shall be carried out taking into account the following requirements
- 12.1. If direct involvement of such specialists in the performance of work does is not required (their duties include control and advisory functions) their presence at the production site is allowed without work permit in the following cases:

- option 1: when escorted by a Company representative from among managers and specialists qualified in the field of industrial safety and tested for knowledge of labor safety requirements;
- option 2: independently after targeted briefing on safety measures at the production site and familiarization with the schemes of pedestrian routes in accordance with the established procedure (where permissible) in accordance with the established procedure.
- 12.2. Independent (unattended) work of such specialists outside the hazardous industrial factors area (hereinafter HIF) (office work with a computer, work in control room, etc.) is possible without work permit after targeted briefing on safety measures at the production site and familiarization with the schemes of pedestrian routes in accordance with the established procedure.
- 12.3. If direct participation in erection and commissioning is required in the HIF area of the Company's enterprise, the work permit shall be issued in accordance with the established procedure for the performance of the functions of work superintendent (supervisor) by the specialist performing designer's (technical) supervision, erection supervision and commissioning supervision of the equipment. Such person shall be trained/qualified in LS and IS issues (if necessary), electrical safety (if necessary), working at heights (if necessary) in accordance with the laws of the Russian Federation.

13. Requirements in the field of environmental safety.

13.1. Waste management requirements.

During performance of works/rendering of services on the Company's territory, the contracting organization shall comply with local normative acts of the Company's enterprises on management of reinforced concrete wastes and waste disposal at the industrial wastes landfill.

- a) When the contracting organization uses its own raw materials, materials, semi-finished products, its obligations include the following:
- defining of hazard categories of generated wastes in accordance with the procedure specified by the federal authorities in the area of wastes management;
- obtaining of the necessary permits in the field of wastes management from the authorized state bodies;
- clearing of the sites of work performance/services rendering from wastes with subsequent transportation, disposal and/or use of wastes in accordance with the obtained permits in the field of waste management;
- arranging for separate collection of plastic and paper wastes in accordance with the requirements of environmental laws.
- b) The contractor shall arrange wastes accumulation places for the wastes generated as a result of its activities in compliance with the requirements of regulatory legal acts and local regulations of the Company.
- c) Wastes accumulation conditions are defined by their hazard category and the operations on further wastes management. Waste accumulation places shall be identified and marked with the name of the accumulated waste or a group of similar wastes.
- d) The contracting organization shall remove the wastes in a timely manner, prevent overfilling of containers and ensure their further management in accordance with the requirements of the laws of the Russian Federation.
 - e) During transportation of wastes the contracting organization shall ensure the following:
 - exclusion of losses and contamination of environment along the transportation route;
 - application of dust suppression devices (covering with tarpaulin or similar material).
 - f) The following is prohibited on the Company's territory:
 - littering with production and consumption wastes;
 - storage, burial, neutralization, incineration of production and consumption wastes.

When complying with the requirements of production safety, it should be taken into account that the ownership of wastes generated as a result of the contractor's activities and the burden of its management arises with the contractor from the moment of generation of such wastes (except for ferrous and non-ferrous metal wastes, the ownership of which remains with the original owner of such materials).

13.2. The top manager of the contracting organization is obliged to exclude leakage of solutions containing petroleum products, acids, alkalis, and other process solutions, on the terrain, as well as their discharge into sewage systems not designed for them and without coordination with HSE function.

In case of leakage, spillage or smudges of solutions containing petroleum products, acids, alkalis, and other technological solutions, the top manager of the contracting organization shall immediately take measures to eliminate them. In the place of oil/solutions/liquids spillage on the soil the contaminated layer of soil shall be removed into specially equipped container and the resulting excavation shall be filled with fresh soil or sand.

Construction, excavation works and discharge of waste water from the construction sites into the sewerage system may be done only upon coordination with HSE department.

- 13.3. Contractor organizations shall investigate the causes of environmental violations independently in accordance with local regulations of the Company's enterprise. After receiving information about environmental violation, the contracting organization shall establish the cause of environmental violation, develop corrective actions and specify time frames for their implementation, appoint the responsible persons and draw up a report of investigation of the causes of environmental violation.
- 13.4. For transportation of hazardous cargoes on the territory of the industrial site contractor organizations shall develop schemes of routes for transportation of hazardous cargoes in accordance with local regulations of the Company's enterprise.

14. Actions in case of incidents and deviations in operation.

14.1. Employees shall immediately notify their immediate or superior manager or call the Company Hotline at 8-800-700-72-77 about abnormalities in operation of the equipment, disturbances in the process and any other situation (incident) that threatens the life and health of people or poses a danger to equipment, facilities, transportation vehicles or the environment.

Upon receiving of information about an emergency situation, employees of the contracting organization shall follow the instructions of the shop (site) employees.

- 14.2. The first manager of the contracting organization shall ensure that the Company is immediately informed of all cases of injuries that occurred to the personnel of the contracting organization and involved subcontractor organizations in accordance with the procedure defined in the Company's enterprise where this contracting organization performs work/renders services. Such procedure shall be communicated to the contracting organization by the HSE function of the enterprise; if it was not communicated, the top manager of the contracting organization shall request it and bring it to the notice of the subordinate personnel, as well as the personnel of the involved subcontractors.
- 14.3. In case of deterioration of health condition, including injury or signs of acute occupational disease (poisoning), the employee shall immediately notify his/her immediate or superior manager (if the state of health and the circumstances allow for it).
 - 14.4. Actions in case of an accident:
- (a) Anyone who found an employee injured in an accident or who became an eyewitness of the accident shall proceed as follows:
- assess the situation for the presence of danger to oneself and dangerous factors affecting the injured person, eliminate if necessary (with observance of personal safety measures) dangerous factors threatening oneself and factors threatening the life and health of the injured person (release from the action of electric current, extinguish burning clothes, pull out of water, extract the injured person from a hard-to-reach place, etc.);
- assess the condition of the injured person, determine the need for further action taking into account his condition (escort or deliver the injured person to the nearest first-aid station, call a paramedic of the subdivision's first-aid station to the scene of the accident, call an ambulance to the scene of the accident);
 - administer first aid to the victim until the arrival of medical personnel at the scene;
- report the incident in accordance with the procedure defined in the Company's enterprise, where this contracting organization performs work/renders services, as well as to his/her immediate or superior manager;
 - upon arrival of medical personnel at the scene, follow their instructions;
- until the arrival of persons from among the managerial staff, take all possible measures to preserve the situation as it was at the time of the accident, if it does not threaten the life and health of other persons and does not lead to an accident.
- b) The immediate or superior manager of the contracting organization, who received information about injury, signs of acute occupational disease (poisoning), other deterioration of the employee's health condition, shall determine the necessity of further actions taking into account the information received:
 - escort or deliver the injured person to the nearest first-aid station;
 - call a paramedic of the subdivision's first-aid station to the scene of the accident;
 - call an ambulance crew to the scene of the accident;
- upon receiving of information from an eyewitness about an ambulance call, contact the Company's dispatcher, verify the information and, if necessary, coordinate further actions;
 - make arrangements to meet the ambulance crew.

All cases of injury or acute occupational disease (poisoning) shall be reported by the manager who received the information to the Company in accordance with the procedure defined in the Company's enterprise, where that contracting organization performs work/renders services.

14.5. All accidents and micro-injuries shall be investigated in accordance with the requirements of regulatory legal acts in force in the Russian Federation and in accordance with the procedure established in the Company (internal investigation). The top manager of the contracting organization shall ensure the participation of the organization's representatives in the internal investigation.

- 14.6. The contracting organization shall investigate all accidents and micro-injuries occurring in the organization in accordance with the state requirements. In doing so it shall ensure inclusion of the Company's representatives (upon request) in the commission for investigation of non-fatal accidents, including when investigating accidents and micro-injuries that occurred with the personnel of subcontractor organizations.
- 14.7. By signing of the contract for performance of works/rendering of services the contracting organizations give their consent to use the information, except for personal data, received within the framework of investigation of accidents and micro-injuries with their personnel, including its distribution by any means (including electronic communication, placing on information stands, etc.) and to any persons.

The top manager of a contracting organization may engage a subcontracting organization to work on the Company's premises only after obtaining approval to extend provisions of this clause to the subcontracting organization engaged.

15. Additional special requirements.

- 15.1. In addition to the provisions set forth in these Corporate Requirements the top manager of the contracting organization shall ensure the fulfillment of special requirements determined additionally and specific to the particular conditions of production facilities (shop, subdivision, enterprise).
- 15.2. Additional special requirements shall be defined, if necessary, by a local normative act of the Company's enterprise and brought to the attention of the top manager of the contracting organization.
- 15.3. Local normative acts of the Company's enterprise which are obligatory for execution by contracting organizations, are available on the web-site https://suppliers.severstal.com/support-center/information-for-partners/poleznye-materialy-dlya-podryadchikov/ in separate folders for each enterprise. Contractors working on the territory of the respective enterprise shall:
 - ensure that these requirements are complied with to the extent applicable to them,
 - independently monitor any changes made to these requirements.

Appendix A

(mandatory)

The Company's Health and Safety Policy

Severstal's high priority is taking care of safety and well-being of its employees and contractors. Industrial safety is the core value of our Company. We believe that a safe working environment can facilitate us to achieve our business goals.

Our main goal is to become a safety leader. We are striving for reducing the injury rate to the maximum extent possible and preventing all fatalities and accidents.

The Company undertakes the following commitments to achieve this goal:

- Provide and maintain safe labor conditions corresponding to or exceeding applicable occupational health and safety requirements accounting for individual characteristics of employees.
- Comply with applicable legal health and safety requirements, demand contractors working at the Company's facilities and site to follow such requirements, take into account health and safety requirements of parties concerned.
- Apply the best available techniques and take measures to prevent injuries, accidents and other incidents, identify and eliminate dangers, analyze and mitigate health and safety risks.
- Consult employees and partners on health and safety issues, involve them in health and safety activities and stimulate their interest in participating in such activities.
- Ensure that all employees in the Company can develop their occupational safety skills and facilitate contractors to develop such skills.
- Analyze the Occupational Health and Safety Management System performance on a regular basis and improve it all the time.
- Form a corporate culture focusing on the employees' safety and well-being based on a safe behavior and high personal responsibility.

Employees are obliged to:

- Commit to safety principles and be responsible for both their own and their colleagues' lives and health.
 - Be safety leaders and use a proactive approach to safety culture development.
- Identify hazards and inform the management on occupational risks and incidents as well as their initiatives to improve safety at workplaces.
- Talk openly about their concerns regarding potentially hazardous works, stop works if they pose a threat to employees' and contractors' lives and health.

The Company management undertakes to implement this Policy and ensure safe working conditions, including provision of required resources, and encourages all employees to be leaders in implementing this Policy.

Occupational safety at Severstal is always and at all times our unconditional obligation.

Appendix B

(mandatory)

Appendix B. The Company's Environmental Protection Policy

General

PAO Severstal and its associated legal entities which statements are used to prepare PAO Severstal's consolidated statements as per IFRS (hereinafter collectively referred to as the "Company") consider environmental protection matters very important.

Our position:

Environmental protection is one of our top priorities at all stages of production activities: from coal and ore mining, coke production, iron and steel smelting to high-tech product manufacturing.

Priority areas of our activities in the field of EP:

- prevent and minimize environmental impact:
- participate in solving the problem of greenhouse gas emissions;
- use the energy and natural resources prudently and rationally;
- effectively manage the waste that is generated.

Our EP commitments:

- comply with applicable legal requirements, and require this of contractors hired for our facilities;
- plan the development of production with this policy in mind;
- openly engage with parties of interest on environmental issues;
- direct the efforts of managers at all levels to identify and assess environmental risks and reduce their possible consequences;
 - conduct environmental performance analysis;
 - minimize the impact of emissions on the environment;
 - improve the quality of wastewater in order to achieve the established standards;
 - control the disposal of waste;
 - ensure rational land use and reclamation of disturbed lands:
 - ensure the rational use of water resources;
 - voluntarily carry out biodiversity monitoring and conservation activities.

To ensure continuous improvement in the EP field, we will:

- continually improve our management practices, increase our environmental knowledge, and reward our employees for their environmental contributions;
- set challenging environmental goals and objectives, monitor its implementation, and publicly report on the progress being made;
 - introduce modern technologies and equipment to reduce environmental impacts.

We expect all of our managers and employees to:

- have responsible attitude towards environmental protection, strict compliance with the requirements in this field:
- immediately inform management of all accidents and dangerous events in the workplace that pose a threat to the environment;
 - be personally involved in the company's environmental actions and initiatives.
- By improving environmental performance, we contribute to improving the quality of people's lives and the Company's competitiveness!

Appendix C

(mandatory) Penalties for Safety Requirement Violations

No.	Violation	Penalty (K rubles)
ı	Accident:	
1	Fatality	500
2	Serious injury	300
3	Accidents happened on technical facilities, buildings and structures, vehicle accidents, other Class 1 accidents	500
4	Class 2 accidents	150
5	Potential fatality (except for clause 2)	150
6	Environmental disruption	150
II.	Violations (for each case):	
7	Concealing injuries of any severity and circumstances which caused such injuries	200
8	Using or providing false documents (e.g. on personnel qualifications, certificates of conformity for products, licenses, evidence, etc.)	100
9	Engaging employees under civil contracts which actually govern labor relations between the employee and employer, without any legal arrangements, engaging sub-contractors, personnel leasing and engaging employees under outstaffing contracts	100
10	Engaging employees without required qualification, training, certification; who have not undergone induction training	100
11	Violating the corporate requirements caused by the general contractor's failure to fulfill its obligations and assure safe operations conducted by the subcontractor	100
12	Performing equipment maintenance and repair without de-energizing	150
13	Working at heights without using personal protective equipment preventing from falling from the height. Improper organization of works at height (no safe fastening points)	150
14	Violating the Basic Life Saving Rules (except for clauses 12,13)	100
15	Working without work permits	100
16	Violation implying a potentially fatal risk (except for clauses 12, 13, 14, 15)	80
17	Being on the Company site under the influence of alcohol, drugs or other intoxicants	50
18	Other violations of health, safety, environmental protection, fire safety and traffic safety rules, regulations and recommendations, including the corporate requirements (except for clauses 1-17)	50

Appendix D

(mandatory)

Responsibility Matrix

I. OHS Responsibility Matrix for Contractors' Jobs (outsourcing companies*)

*Outsourcing companies are companies that perform similar works at certain intervals in the workshop (at the area), except for overhauls, periodic and running repairs.

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Shop/area manager of the Company plant
1	2	3	4	5	6	7	8
1	Supervision	Every shift: - condition of passways, crossings, platforms, stairs, handrails; - integrity of fixed equipment and tools; - availability and integrity of barriers, safety guards, interlocks, alarms, personal and collective protective equipment; - knowledge and execution of responsibilities related to critical safety barrier control	Every shift: - knowledge and execution of supervision-related responsibilities by workers; - knowledge and compliance with regulatory OHS requirements while performing works by workers; - knowledge and execution of responsibilities related to critical safety barrier control by subordinate workers	Every week: - knowledge and execution of OHS responsibilities by foremen; - checks whether foremen know critical safety barrier methods to control fatal risks Reviews violations identified and takes measures to those who made such violations.	Supervision over: - implementation of OHS activities and assessment of their performance; - implementation and performance of the best OHS practices Check whether occupational health and safety requirements are complied with due to gemba visits (within the area of responsibility) - at least 3/week. Analyze violations identified every month (including potentially fatal ones, reoccurred violations) and develop measures to avoid them.	Personally check how the OHS requirements are complied with (at least twice a month) Personally review all identified potentially fatal violations and take measures to those how made such violations	workers engaging subordinate personnel (at least twice a month). Personally investigate potentially fatal
2	Provision		Provide workers with functioning PPE, equipment, tools and accessories.	-	-	Provide: - subordinate supervisors with all required resources for them to fulfill their OHS obligations; - there shall be an OHS function at the site assuming 1 OHS expert per 100 employees.	-
3	Organization	-	Ensure that subordinate workers undergo mandatory medical check-ups in due time.	•	Ensure that corporate tools and best OHS practices are implemented.	 corporate tools and best OHS practices are implemented; implement accident preventing 	Ensure that the OHS Responsibility Matrix for Contractors' Jobs and the Basic Life Saving Rules are implemented in outsourced companies. Determine corporate tools and best OHS practices that must be implemented.
4	Direct execution	requirements set forth in	subordinate workers. Arrange works accounting for	Adhere to decisions developed together with the customer shop.		Be personally involved in investigating all incidents (within the area of responsibility) according to the Company's standard requirements. Develop and take measures to eliminate incident causes. Review manager assessments, OHS proposals and take respective managerial decisions. Assess the OHS function performance.	incidents (within the area of responsibility) according to the Company's standard requirements.

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Shop/area manager of the Company plant
1	2	3	4	5	6	7	8
5	Informing on problems	violations (non-conformances) identified as part of inspections and inform the line manager if eliminating		foreman (involving representatives from the Company's enterprise as well).		Review and solve problems outlined by supervisors in charge (involving representatives from the Company's enterprise as well). Inform the shop (area) manager of the Company plant about problems that cannot be solved by themselves.	
6	Actions in abnormal situations		In case of violations (non- conformances), do not permit subordinate employees to work/stop works, eliminate the violations (non- conformances) (involving representatives from the Company's enterprise as well).		-	-	-

II. OHS Responsibility Matrix for Contractors' Jobs (maintenance)

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen's line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Maintenance supervisor (or shop manager in the absence thereof) which contractor is involved in such maintenance
1	2	3	4	5	6	7	8
1	Supervision	Every shift: - integrity of applicable PPE, equipment, tools and accessories knowledge of safety requirements set forth in process control documentation (WEP, process chart, structural concept, work management plan) to the extent relating to them, and also in labor safety manuals for their professional occupation, pedestrian traffic diagram knowledge of fatal risks, Basic Life Saving Rules attributable to their job and respective control measures.	fit for such work; - knowledge and compliance with regulatory OHS requirements while performing works by subordinate workers; - knowledge of fatal risks attributable to workers' job and respective control	On the first maintenance day and then every week: - knowledge and execution of OHS responsibilities by subordinate site supervisors. Reviews violations identified and takes measures to those who made such violations.	- implementation of OHS activities and assessment of their performance; - implementation and performance of the best OHS practices. Check whether occupational health and safety requirements are complied with due to gemba visits (within the area of responsibility) - at least 3/week.	Approve WEPs personally or delegate a right to approve them to their deputies by order (Technical Director, Chief Engineer, Operations Director, Deputy Director) provided such functions are prescribed in deputies' job descriptions. Persons who approve WEP shall have a university degree in technical fields. Visit the area where works will be performed (before WEP approving) and personally assess (or have the person responsible for WEP approval do it) the following: - whether the technology is relevant and can be used at the specific facility; -adequacy of activities protecting from hazardous/harmful production factors caused by the work practice. Personally check how the OHS requirements are complied with (at least twice a month). Personally review all identified potentially fatal violations and take measures to those how made such violations.	Personally check how the OHS requirements are complied with (at least once/maintenance) Randomly check how the OHS requirements are complied with by contractor workers involving subordinate personnel (at least twice/maintenance). Assess site supervisors as appropriate. Personally investigate potentially fatal violations.
2	Provision		Provide subordinate workers with functioning PPE, equipment, tools and accessories.	Provide subordinate foremen with required resources (qualified personnel, tools, etc.) and proper technical documentation (WEP, process charts, etc.); Ensure that subordinate foremen have required qualifications;	-	Ensure that: - subordinate supervisors have all required resources for them to fulfill their OHS obligations; - there shall be an OHS function at the site assuming 1 OHS expert per 100 employees;	-
3	Organization	-	_		Ensure that corporate tools and best OHS practices are implemented.	Ensure that the OHS Responsibility Matrix for Contractors' Jobs and the Basic Life Saving Rules are implemented in the company under their control. Ensure that: - corporate tools and best OHS practices are implemented; - implement accident preventing activities recommended by Severstal.	-

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen's line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Maintenance supervisor (or shop manager in the absence thereof) which contractor is involved in such maintenance
1	2	3	4	5	6	7	8
4	Direct execution		kind of works shall be done during their shift, on the relevant work procedure, hazards identified as part of the risk assessment and safety requirements. Do not permit workers to start working if they have not grasped this information.	mandatory gemba visits. The WEP adequacy is assessed in a month after putting the WEP in effect and then every month until the works are complete; before each repeated application. The PC adequacy is assessed for works performed on a regular basis (which are	OHS responsibilities (foreman and supervisor in charge of the contractor) based on the Red-Yellow-Green principle every month. Assess whether each foreman is ready or not before permitting them to work	responsibility) according to the Company's standard requirements. Develop and take measures to eliminate incident causes. Review manager assessments, OHS	contractors on days-off, holidays and at night. Be personally involved in
5	Informing on problems	Do not start working in case of violations (non-conformances) identified as part of inspections and inform the line manager if eliminating thereof is not their responsibility. Inform the line manager immediately in case the prescribed requirements cannot be fulfilled. Inform the line manager about all incidents, including injuries and ill health.	Take appropriate measures in due time when workers inform about any problem (involving representatives from the Company's enterprise as well), stop any work in case of injury risks until such risks are eliminated. Delegate safety problems which they cannot solve by themselves to the responsible manager.	foremen (involving representatives from the Company's enterprise as well). Inform the contractor director about problems that cannot be solved by	-		contractors are solved.
6	Actions in abnormal situations	In case of no response to the requests from managers, call the Hot Line and inform about the violations (non-conformances).	conformances), do not permit	-	-	-	-

III OHS Responsibility Matrix for Contractors' Jobs (investments)

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen's line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Project Manager on site where the contractor works
1	2	3	4	5	6	7	8
1	Supervision	Every shift: - integrity of applicable PPE, equipment, tools and accessories; - knowledge of fatal risks, Basic Life Saving Rules attributable to their job and relevant control measures.	Every shift: - knowledge and execution of follow-up responsibilities by subordinate workers; - check whether each worker has the required qualification and is medically fit for such work; - knowledge and compliance with regulatory OHS requirements while performing works by subordinate workers; - knowledge of fatal risks attributable to workers' job and respective control measures.	Every week: - knowledge and execution of OHS responsibilities by subordinate foremen. Reviews violations identified and takes measures to those who made such violations.	and assessment of their performance; - performance of the best OHS practices in place. Check whether occupational health and safety requirements are complied with due to gemba visits (within the area of responsibility) at least 3 per week.	deputies by order (Technical Director, Chief Engineer, Operations Director, Deputy Director) provided such functions are prescribed in deputies' job descriptions. Herewith, persons who approve WEP shall have a university degree in civil engineering. Visit the area where works will be performed (before WEP approving) and personally assess (or have the person responsible for WEP approval do it) the following: - whether the technology is relevant and can be used at the specific facility;	Approve personally (or ensure that the project team members approve) the work practice (WEP) for works to be done under the project. Together with the shop (area) manager - site owner, assess the contractor supervisor in charge (foremen line manager) before permitting him to work on site for the first time and check whether the WEP can be executed (all required utilities, tooling, machines, accessories, instruments prescribed by the WEP are available and such equipment, accessories, tools can be used on the site). The fact that the WEP can be executed by the contractor shall be confirmed by relevant signatures of the project manager and shop manager on the WEP cover page stating that it is READY FOR EXECUTION and indicating the assessed contractor, supervisor in charge (full name, position, assessment date). Personally check whether the OHS requirements are adhered to at each site during civil works (at least once every 2 weeks for the project manager responsible for more than 5 sites at the same time, and at least once a week for other cases). Check whether the OHS requirements are adhered to by subordinate personnel (at least twice a week) covering all sites (during civil works) within a month. Assess foremen as appropriate. The supervision procedure for investment project managers is determined in the structural division.
2	Provision	-	Provide subordinate workers with functioning PPE, equipment, tools and accessories.	Provide subordinate foremen with required resources (qualified personnel, tools, etc.) and proper technical documentation (WEP, process charts, etc.). Ensure that subordinate foremen have required qualifications.		Ensure that: - subordinate supervisors have all required resources for them to fulfill their OHS obligations; - there shall be an OHS function at the site assuming 1 OHS expert per 100 employees.	
3	Organization	-	-	Keep the designated area safe.	Ensure that corporate tools and best OHS practices are implemented.	Ensure that: - corporate tools and best OHS practices are implemented; - assign the area obtained under the work permit to responsible people (zoning). Ensure that the OHS Responsibility Matrix for Contractors' Jobs and Basic Life Saving Rules are in place and adhered to.	Ensure that the OHS Responsibility Matrix for Contractors' Jobs and the Basic Life Saving Rules are in

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen's line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Project Manager on site where the contractor works
1	2	3	4	5	6	7	8
4	Direct execution	requirements set forth in guidelines, regulations and other documents where they	Train and give instructions to subordinate workers. Arrange works accounting for subordinate worker qualifications. Inform subordinate workers on what kind of works shall be done during their shift, on available hazards and safety requirements. Do not permit workers to start working if they have not grasped this information. Ensure that the safety measures given in the regulatory documents are adhered to (within their area of responsibility).	together with the customer shop. Assess whether the WEP is ready for execution before getting a permit to work on site for the first time as initiated by the project manager and shop manager (or their deputies). Assess the WEP and PC adequacy with mandatory gemba visits. The WEP adequacy is assessed in a month after putting the WEP in effect and then every month until the works are complete; before each repeated	Assess how supervisors execute their OHS responsibilities (foremen and supervisors in charge of the contractor based on the Red-Yellow-Green principle every month. Assess whether each foreman is ready or not before permitting them to work on the site on their own (OK/not OK).	all incidents (within the area of responsibility) according to Severstal's standard requirements. Develop and take measures to eliminate incident causes. Implement accident preventing activities recommended by Severstal. Review manager assessments, OHS proposals and take respective managerial decisions.	Approve works carried out by contractors on days-off, holidays and at night. Develop correcting and remedial measures following the inspections on the site within 3 working days after preparing an inspection report and enter them to the electronic system. Personally investigate potentially fatal violations committed by contractor employees. Personally analyze all identified violations, develop comprehensive measures on the site and enter them to the electronic system (once a month, based on inspection results in the previous month). Be personally involved in investigating all incidents (within the area of responsibility) according to Severstal's standard requirements. Prepare proposals on contractor management for the committee.
4	Direct execution			The PC adequacy is assessed for works performed on a regular basis (which are determined by the shop/area manager of the Customer) — once every 5 years after putting the PC in effect; for works performed not on a regular basis (which are not listed by managers) — in a month after putting the PC in effect each time before using the PC.			
5	Informing on problems	Do not start working in case of violations (non-conformances) identified as part of inspections and inform the line manager if eliminating thereof is not their responsibility. Inform the line manager immediately in case the prescribed requirements cannot be fulfilled. Inform the line manager about all incidents, including injuries and ill health, while working.	, ,	Review and solve problems outlined by foremen (involving representatives from the Company's enterprise as well). Inform the contractor director about problems that cannot be solved by themselves.	-	Review and solve problems outlined by supervisors in charge (involving representatives from the Company's enterprise as well). Inform the shop (area) manager of the Company plant about problems that cannot be solved by themselves.	Ensure that problems outlined by contractors are solved.
6	Actions in abnormal situations	In case of no response to the requests from managers, call the Hot Line and inform about the violations (nonconformances).	In case of violations (non- conformances), do not permit subordinate employees to work, eliminate the violations (non- conformances) (involving Severstal's representatives as well).	-	-	-	-

Matrix Application Procedure

- 1. The matrix requirements do not apply to companies performing the following works:
- inspections, surveys, expert studies;
- supervision of erection, supervision of commissioning, and other supervisory works;
- works carried out outside the division under contractor agreements.
- 2. The general contractor involving the sub-contractor to perform works shall ensure that the above matrices are applied by such sub-contractor.
- 3. A decision on applying the matrices in part is taken by the shop (area) manager, project manager (or persons assigned by him/her) together with the contractor's top manager.
- 4. Compliance with the matrix requirements is followed up as part of OHS inspections (audits).
- 5. Follow-up results obtained by contractors' line managers shall be reported by contractors on the electronic platform.

Appendix D.1 (mandatory) Company B Responsibility Matrix

Typical OHS Responsibility Matrix for Contractors' Jobs

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Head of structural division of Company B
1	2	3	4	5	6	7	8
1	Organization	-		Provide subordinate superintendents of work and foremen with required resources (qualified personnel, tools, etc.), proper technical documentation (WEP, process charts, etc.) and OHS documentation. Ensure that subordinate foremen have required qualifications.	OHS practices are implemented.	Ensure that: - subordinate supervisors have all required resources for them to fulfill their OHS obligations; - there shall be an OHS function at the site assuming 1 OHS expert per 100 employees - ensure that the corporate tools (including the OHS responsibility matrices and basic life saving rules) and best OHS practices are in place; - assign the area obtained under the work permit to responsible people; - implement accident preventing activities recommended by Severstal	
2	Direct execution	Personally comply with the OHS requirements set forth in prescriptions, regulations and other documents where they were given dedicated instructions.	subordinate workers. Organize works accounting for subordinate workers' qualifications and medical check-ups. Additional activities (maintenance and investments): - assess risks for works to be done; - inform subordinate workers on what kind of works shall be done during their shift, on the work procedure, available	Adhere to decisions and take measures developed together with the customer shop. Assess the WEP and PC adequacy with mandatory gemba visits. The assessment shall be confirmed by the wording "CHECKED FOR RELEVANCE"; the auditor full name, signature and date shall be indicated. The check mark shall be on the back title page. The WEP adequacy is assessed in a month after putting the WEP in effect and then every month until the works are complete; before each repeated application. The PC adequacy is assessed for works performed on a regular basis (which are determined by the shop/area manager of the Customer) — once every 5 years after putting the PC in effect; for works performed not on a regular basis (which are not listed by managers) — in a month after putting the PC in effect each time before using the PC.	Assess whether each foreman is ready or not before permitting them to work on the site on their own (OK/not OK) Assess how supervisors execute their OHS responsibilities (foremen and supervisors in charge of the contractor) based on the Red-Yellow-Green principle every month.	responsibility) according to the Company's standard requirements. Develop and take measures to address incident causes and prevent incidents (whether they are developed by themselves or recommended by the Company's enterprise).	incidents (within their area of responsibility). Prepare proposals on the production supervision committee. Additional activities (maintenance and investments): Coordinate works carried out by contractors on days-off, holidays, at night according to Severstal's standard

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Head of structural division of Company B
1	2	3	4	5	6	7	8
3	Supervision	(outsourcing): - condition of passways, crossings, platforms, stairs, handrails; - integrity of fixed equipment and tools; - availability and integrity of barriers, safety guards, interlocks, alarms, personal and collective protective equipment; - check whether critical safety barriers are in place and well functioning (outsourcing);	Every shift: - knowledge and execution of follow-up responsibilities by workers; - knowledge and compliance with regulatory OHS requirements while performing works by workers. Check whether each worker has the required qualification and is medically fit for such work. Additional activities (outsourcing): - check knowledge and execution of responsibilities related to critical safety barrier control by subordinate workers every shift. Additional activities (maintenance and investments): - check knowledge of fatal risks attributable to workers' jobs and respective control measures every shift. In case any non-conformances are identified information thereof shall be entered into Yandex Forms (OHS PC) https://forms.yandex.ru/cloud/62cd5d e464e14abcd1e02655/	Every week: - knowledge and execution of OHS responsibilities by foremen (site supervisors working under work permits); Additional activities (outsourcing): - every week checks whether foremen know critical safety barrier methods to control fatal risks.	taken or not and assess their	right to approve them to their deputies by order (Technical Director, Chief Engineer, Operations Director, Deputy Director) provided such functions are prescribed in deputies' job descriptions. Persons who approve WEP shall have a university degree in engineering corresponding to the specific nature of works to be done. Visit the area where works will be performed (before WEP approving) and personally assess (or have the person responsible for WEP approval do it) the following: - whether the technology is relevant and can be used at the specific facility; - adequacy of activities protecting from hazardous/harmful production factors caused by the work practice. Personally investigate all identified potentially fatal violations, develop	employees adhere to the OHS requirements. Personally investigate potentially fatal violations committed by contractor employees. Ensure that the work execution plan (WEP) is approved. Assess foremen as appropriate. Additional activities (investments): - personally make walkarounds (at least once a week) personally analyze all identified violations, develop comprehensive measures on the site and enter them to the BSA software (once a month). Assess the contractor supervisor in charge (foreman's line manager) before permitting him to work on site for the first time and check whether the WEP can be executed (all required utilities, tooling, machines, accessories, instruments prescribed by the WEP are available and such equipment, accessories, tools can be used on the site). The fact that the WEP can be executed by the contractor shall be confirmed by the relevant signature of

No.	Element	Contractor worker	Contractor foreman (workers' line manager)	Contractor supervisor in charge (foremen line manager)	Contractor Occupational Health & Safety Function	Contractor director (top manager)	Head of structural division of Company B
1	2	3	4	5	6	7	8
4	problems	inspections if their elimination is not in their area of responsibility. Do not start working. - the specified requirements cannot be met - all incidents and ill health. In case of no response to the requests from managers, call the Hot Line (8-	(or violations), ensure that such problems are solved (violations are eliminated) in due time (involving representatives from the Company's enterprise as well). In case of an injury risk, suspend works until the threat is eliminated.	Inform the contractor director about problems that cannot be solved by themselves.		supervisors in charge (involving representatives from the Company's	Ensure that problems outlined by contractors are solved. Give feedback on the problem solving to all parties concerned.

The OHS Responsibility Matrix for Contractors' Job is applied as follows.

- 1. The matrix requirements do not apply to companies performing the following works:
- inspections, surveys, expert studies;
- supervision of erection, supervision of commissioning, and other supervisory works;
- outside the company's site.
- 2. The contractor shall adapt the typical OHS Responsibility Matrix to its own organizational structure and approve it by its local regulation.
- 3. The general contractor involving the sub-contractor to perform works\render services shall ensure that the above matrices are applied by such sub-contractor.
- 4. Compliance with the matrix requirements is followed up as part of OHS inspections (audits).
- 5. Follow-up results obtained by contractors' line managers (when they are performing works at the company site) shall be reported by contractors on the electronic platform.

Appendix E

(mandatory)

Hazardous Work Assessment Procedure

1. Scope

- 1.1 This procedure covers methods used to assess risks associated with hazardous work organization and performance.
- 1.2 This procedure in binding on managers and specialists of the company and contractors who are responsible for hazardous work organization and performance.
- 1.3 The risk assessment is intended to identify all hazards and take measures to ensure that works are performed in a safe way.

2. Definitions and abbreviations

- 2.1 Fatal risk conditions that can potentially result in a fatal injury, poisoning.
- 2.2 Hazardous works works as listed in the company standard STP-PB 2.3.01 Safe Work Management.
- 2.3 WEP work execution plan.
- 2.4 PC process chart.
- 2.5 WP work permit.
- 2.6 PPE personal protective equipment.
- 2.7 LD lifting devices.
- 2.8 OTWC one-time work chart.

3. General requirements

3.1 Risk assessment as part of hazardous work management and performance is carried out in 2 stages: Stage 1 – site preparation for safe working;

Stage 2 - handling hazards which can arise while working.

3.2 Site preparation for safe working.

- 3.2.1 A risk assessment responsible at this stage is a person who issues a work permit and:
- assesses hazard risks which source is the site where future works will be done (equipment, utilities, manufacturing process in the workshop, etc.) as well as simultaneous operations;
- as for identified hazards, such person develops measures to ensure safe working and includes them into the work permit.
- 3.2.2 The work permit issuer shall take into account the following things while developing measures to be included into work permits:
 - the future operating procedure (WEP, PC);
 - simultaneous operations.

<u>Example:</u> Future works to be done (WEP, PC) involve a boom truck crane. The work permit issuer shall take it into account while developing relative measures and include the required measures into the work permit. For example, such measures as preventing overhead crane movement, de-energization in the boom crane work area.

- 3.2.3 Outcomes of risk assessments performed by the work permit issuer:
- all hazards at the future work site and those associated with simultaneous operations have been identified:
- work permits have been issued containing preparations to ensure safety at the work site as well as safe simultaneous operations.

Examples of hazards arisen out of the future work site:

- lifting cranes in operation;
- running process equipment;
- running rail cars and trucks;
- utilities in operation (gas, oxygen, steam, electric grids, etc.);
- manufacturing process in the workshop;
- openings, leading edges without any barriers;
- gas hazardous places.
- 3.2.4 A person admitting to work under the work permit (job authorizer):

- coordinates making preparations specified in the work permit and monitors their execution;
- gives instructions to the foreman (supervisor) and explains specific features of works to be done in the workshop:
 - admits foremen (supervisors) to work after making sure that all the preparations have been made.
 - 3.2.5 Before admitting to work, the job authorizer shall be sure that:
 - all preparations listed in the work permit have been made:
 - foremen (supervisors) have been instructed.
- 3.3 Process control documentation (WEP, PC) for hazardous works to be done in the workshop shall be approved by the customer's shop (area) manager (or by other manager designated by an instruction or an order).
- 3.4 Having approved (signed) the WEP/PC, the customer's shop (area) manager is responsible for the following:
- works to be done will not have a negative impact on the floor personnel, manufacturing process in the workshop, equipment, utility lines, buildings and structures;
- the manufacturing process, equipment, utility lines, buildings and structures in the workshop will not have a negative impact on the works to be done under the WEP/PC and on the personnel who performs such works.

3.5 Handling hazards which can arise while working.

3.5.1 A person responsible for risk assessment at this stage is the foreman (supervisor). This person assesses risks depending on hazards which may arise while working; the source of hazard is the future operating procedure.

Examples of hazards caused by the future operating procedure:

- height: a team will work at height or height will appear because a hole covering will be removed or a safety barrier will be dismantled;
 - handling loads using lifting mechanisms: a team will use lifting mechanisms for working;
 - moving transport: a team will use trucks to deliver materials;
 - electric current: electrical equipment or electric tools will be used; therefore an electric shock risk exists;
 - structure collapse: structures may collapse under certain conditions;
 - material collapse, fall: materials may collapse or fall under certain conditions.
 - 3.5.2 Process control documentation (WEP, PC, etc.) shall be reviewed before the risk assessment.
 - 3.5.3 Risk assessment is carried out with obligatory visiting the future work place.
 - 3.5.4 Risk assessment shall be performed for each job planned for the work shift.

Example:

Works planned for the work shift under the work permit – Ladle car No. 7 repair Jobs:

- 1. Inspection of bearing travel wheels
- 2. Driven wheel replacement

3.5.5 The foreman (supervisor) shall:

- list jobs in the risk assessment form in the order in which they will be performed;
- identify hazards for each job which may arise while working;
- assess risks for each hazard (probability and severity);
- record identified hazards, if any, which may result in a fatal injury, poisoning (fatal risks) in the risk assessment form;
- determine required safety measures for each risk. He/she shall also record preventive measures (safety measures) for all identified fatal risks in the risk assessment form.
- 3.5.6 Hazards for which the foreman (supervisor) must conduct a risk assessment in case they may arise while working:
 - 1. Works at height
 - 2. Cargo handling
 - 3. Steel structure collapse
 - 4. Falling from height
 - 5. Electric current
 - 6. Fireworks. Open flame
 - 7. Material collapse, fall
 - 8. Moving transport

In case any other fatal risks are identified which are not listed therein (which may arise while working) they shall be also included into the risk assessment form.

- 3.5.7 Safety measures to eliminate hazards are determined depending on their priority (starting from 1):
- 1 identify a hazard;
- 2 ensure that no people are in the dangerous area;

- 3 mitigate the hazard by replacing it (use a safer product, part or process having a lower influence, lower voltage, etc.);
 - 4 isolate, barrier;
 - 5 visualize, warn, signal about hazards, train employees;
 - 6 use PPE.
- 3.5.8 The foreman (supervisor) shall ensure that corrective and (or) remedial measures are in place to avoid the risks identified.
 - 3.5.9 When the foreman (supervisor) cannot eliminate the risks identified by himself he shall inform:
- a person admitting to work or issuing a work permit if the hazards are the customer's responsibility (workshop, area);
 - the line manager if the hazards are accounted for by the subdivision (company) that performs works.
- 3.5.10 Should it be impossible to avoid the identified risk (ensure safe working) no work shall be performed, and the work permit shall be given back to the person admitting to work or issuing the work permit.
- 3.5.11 If any non-conformances are identified in the WP, WEP or PC the manager who conducted the risk assessment shall amend the above documents as appropriate:
- if any risks are identified which were not listed in the WP but their source is either the work place or works performed by other workers it is necessary to inform the person admitting to work or issuing the WP and not start working until all the risks are eliminated (until safe working is ensured);
- if fatal risks and respective safety measures are identified which were not listed or incorrectly listed in the WEP/PC and required data shall be included into the risk assessment form (operations, fatal risks, safety measures) the risk assessment form shall be an appendix to the WEP/PC.
 - 3.5.12 Risk assessment results are reported in the risk assessment form (see Appendix 1).
 - 3.5.13 Risk assessment form:
 - shall be issued for 1 shift, for works under a single work permit;
 - shall be attached to the work permit;
 - does not substitute the WEP or PC;
- does not cancel obligatory compliance with the WEP, PC, labor safety manuals. It is not allowed to substitute the wordings of safety measures in the risk assessment form by referring to the WEP, PC, labor safety manuals:
 - shall be kept by the foreman (supervisor) until the shift works are finished;
- after finishing the shift works, the foreman (supervisor) shall hand over the work permit together with the risk assessment form (s) to the job authorizer.
- 3.5.14 Shift works and risk assessment results (data in the risk assessment form) shall be communicated by the foreman (supervisor) to the team members who should sign the risk assessment form. Being aware thereof, the foreman (supervisor) shall be sure that all team members have understood the information communicated to them.
- 3.5.15 If some jobs are required while working which were not accounted for in the risk assessment the foreman (supervisor) shall:
 - carry out an additional risk assessment for such jobs;
- make amendments in the risk assessment form by signing them and indicating the time the amendment was made:
 - ensure that the team members have read and understood the amendments.
- In case of signed acknowledgment, the team members shall indicate the time when they read the amendments in the form.

Risk Assessment Form

This form includes fatal risks caused by the operating procedure.

Do not confuse with the activities specified in the work permit! The work permit includes hazards arisen out of the future work site.

וו טע	not confuse with the activities specified in the work permit. The work permit includes hazards ansen out of the future work site.								
Date									
Worl	c time								
Worl	k place (subdivision, plant,								
area									
Worl	c performed								
	to be performed under the permit (WP No., issue date)								
No.	Job	Fatal risk arisen while performing the job (hazard source – operating procedure)	Sa	afety measures					
The	risk assessment has been perf	ormed. I confirm that these measures	are enough. Site supervisor (foreman)): Position	Full name	Signature			
						O.g. lataro			

Note:

- the risk assessment form is issued for 1 shift, for works to be done under a single work permit. It is attached to the work permit.
- references to the WEP, PC, labor safety manuals are not allowed. It does not substitute the WEP or PC. It does not cancel obligatory compliance with the WEP or PC. In case of the fatal risk "WORKING AT HEIGHT", the site supervisor (foreman) shall conduct the risk assessment according to Appendix 1 to the risk assessment form (on its reverse side)

We have read and understood the risk assessment results:

No.	Full name	Signature	Time	No.	Full name	Signature	Time	No.	Full name	Signature	Time
1				5				9			
2				6				10			
3				7				11			
4				8				12			

Appendix 1 to the Risk Assessment Form

"Safe Working at Height Readiness Assessment"

Assessment criteria					
1. All workers have good and free of defects PPE for working at height.					
2. PPE fits to workers properly.					
3. There are necessary fault-free points to attach safety harness which ensure continuous safety while going up and down and moving. They correspond to the WP, WEP, PC.					
4. Workers know where and how to attach safety harness.					
5. Scaffoldings (scaffold towers), stairs and ladders, cradles are properly functioning and correspond to the specified requirements (WP, WEP, PC).					
6. Workers are aware of the BLSR associated with working at height.					

Note:

1. If there is at least one **NO** answer to the above statements, it is prohibited to work at height.

Appendix F

(mandatory)

Unified requirements for control over the presence of necessary qualifications, certifications of the contracting organizations employees admitted to work under work permits

- 1. Option 1 no electronic system is available with information on certifications, qualifications of contactor employees.
- **1.1** Before working, **the contractor manager** shall provide the work permit issuer with a signed list of employees who will be involved in the work with data on their certifications, qualifications and knowledge checks.

1.2 Work permit issuer:

- 1.2.1 Using the Matrix of Requirements for Qualifications and Certifications of Employees Performing Various Hazardous Works available at the web-site https://suppliers.severstal.com/support-center/information-for-partners/poleznye-materialy-dlya-podryadchikov/ shall check that the site supervisors and workers are in line with the specified requirements to certification, qualification and knowledge checks.
- 1.2.2 After issuing the work permit (signing and evidencing it has been issued), the issuer confirms that the site supervisors and workers have the required certifications, qualifications and have undergone the required knowledge checks. Work permits cannot be issued to workers who haven't got the required certifications, qualifications or haven't undergone the required knowledge checks.
- 1.2.3 The issuer provides people admitting to work with lists of site supervisors and workers (in paper or electronic form) submitted by contractors and checked by the issuer when issuing the work permit.

1.3 Job authorizer:

- 1.3.1 Checks whether the site supervisors and workers who have come to perform works correspond to those listed (par. 1.2.3) (whether their full names correspond to those who actually have come).
- 1.3.2 Workers who were not included into the list (par. 1.2.3) are admitted to work only after checking that they have the required certifications, qualifications and have undergone the required knowledge checks (checking whether certificates and reports are available and relevant using the Matrix of Requirements for Qualifications and Certifications of Employees Performing Various Hazardous Works).
- 1.3.3 After admitting to work (signing and evidencing about the job authorization), the job authorizer confirms that:
- workers whose certifications, qualifications, knowledge were checked by the work permit issuer are admitted to work (par. 1.2.1);
- workers who were not included into the list (par.1.2.3) have the required certifications, qualifications, and have undergone the required knowledge checks.

2. Option 2 – electronic system is available with information on certifications, qualifications of contactor employees.

2.1 The contractor manager shall:

- enter information on certifications, qualifications and knowledge checks for site supervisors and workers in the electronic system;
- provide a list of workers who will be involved in the job to the work permit issuer before working.

2.2 Work permit issuer:

- 2.2.1 Using the Matrix of Requirements for Qualifications and Certifications of Employees Performing Various Hazardous Works, checks in the electronic system whether the site supervisors and workers have the required certifications, qualifications and have undergone the required knowledge checks.
- 2.2.2 Before issuing the work permit, the issuer makes a note in the work permit and confirms that the site supervisors and workers are in line with the requirements to certification, qualification, knowledge checks. Work permits cannot be issued to workers who haven't got the required certifications, qualifications or haven't undergone the required knowledge checks.
- 2.2.3 The issuer shall provide lists of site supervisors and workers who will perform future works to the job authorizer.

2.3 Job authorizer:

- 2.3.1 Checks whether the site supervisors and workers who have come to perform works correspond to those listed (par. 2.2.3).
- 2.3.2 Workers who have come to work but were not included into the lists (par. 2.2.3) are admitted to work only after checking that they have the required certifications, qualifications and have undergone the required knowledge checks (checking whether certificates and reports are available and relevant using the Matrix of Requirements for Qualifications and Certifications of Employees Performing Various Hazardous Works).
- 2.3.3 After admitting to work (making a note in the electronic system on the checking as per par. 2.3.1, 2.3.2 and on the job authorization), the job authorizer confirms that:
- workers checked by the work permit issuer are admitted to work (par. 2.2.1);
- workers who were not checked by the work permit issuer (not included into the lists as per par. 2.2.3) have been checked by the job authorizer and their certifications, qualifications and knowledge are in line with the specified requirements.