

SAFETY CODE FOR PROVIDERS

Preface

This Safety Code defines the safety requirements applicable to all service providers and their subcontractors operating on Eramet sites (excluding intellectual activities). It complemented the general terms of the service contract and is integrated as **a contractual annex**.

Objective: Zero harm. We work with our service providers as partners sharing the same values and standards. Safety is not an option — it is a prerequisite for any intervention.

1. BEFORE ANY INTERVENTION — PRELIMINARY OBLIGATIONS

1.1 Documents to be provided to Eramet

Document	Deadline
Safety policy signed by management	10 business days before the start
List of participants with certifications and medical fitness	10 business days before the start
List of subcontractors (if applicable)	2 days before the joint inspection
Prevention/Safety Plan co-drafted with Eramet*	Before any start edged by all parties
Work instructions and corresponding risk analysis as communicated to the teams	Before any work

** The Prevention/Safety Plan is jointly developed by Eramet, the Service Provider, and all external participants following the joint inspection. It covers intervention areas, co-activity risks, preventive measures, access and circulation routes, alert and rescue mean, emergency contacts. **No activity can start without validation by Eramet. In the case of a multi-year service contract covering several work orders, the initial safety plan shall be supplemented by a risk assessment specific to each work order.***

1.2 Mandatory training for each participant

No person can access the site without having:

- Completed the **site safety induction** (presents actual risks and emergency instructions)
- Passed the **safety competency test**
- Completed specific training for risks in their intervention area (electrical work, confined spaces, molten metal, etc.)
- Provided proof of **medical fitness** valid and appropriate for the tasks to be performed

⚠ The safety induction is not a formality. Any person unable to provide proof will be denied access.

2. LIFE-SAVING BEHAVIOURS — ZERO TOLERANCE

These rules are **absolute**. Non-compliance results in immediate work stoppage and exclusion of the participant. The details of these requirements are contained in the Eramet reference document, an excerpt of which is provided below:

Critical risk	Expected behaviours
Any activity	• I work only on activities for which I am trained and qualified. • I am fit to work and never work under the influence of alcohol or drugs. 🚫 Alcohol Zero tolerance required — Possible checks at entry or during work 🚫 Drugs Zero tolerance — Possible checks 🚫 Prohibited everywhere except identified smoking areas — prohibited in all premises, vehicles, work zones, and workshops Medications that may affect alertness (operating machinery, working at heights, dangerous equipment) must be declared. • I use all required PPE for my task. • I ensure that a risk analysis has been conducted before performing a critical activity. • I never start an activity without completing my Take 5. • I enter risk zones only if authorized. • I stop work or intervene if I observe a situation or act that could endanger a life.

Critical risk	Expected behaviours
	• In case of injury, I seek help immediately and I report it to my supervisor as quickly as possible. • I never modify safety devices (protections, emergency stops, etc.). • I do not use a mobile phone while driving or performing any other risky activity. • I never work on critical activities under adverse weather conditions (strong winds, heavy rain, etc.).
LOTOTO (Lock-out / Tag-out / Try-out)	Mandatory for any work performed on equipment that may release energy. • I do not carry out the job if the equipment is not locked out by a competent person. • Before starting work, I add my own named padlock on the isolating points (visible break switch, locked box, etc.). • I do not allow anyone to add or remove a padlock for me, and I never add/remove a padlock for a colleague
Confined Spaces	• I enter the confined space only when appropriate rescue resources and communication means are available. • I ensure emergency response facilities (evacuation, care of victim) are available. • I do not enter a confined space without the entry permit given by a competent person that guarantees all conditions are met for a safe entry
Electrical Hazard	• Before starting work on electrical equipment, I ensure that the equipment is disconnected from all power sources. • Before starting work on electrical equipment, I ensure it is voltage free and tested for dead. • I always lock electrical cabinet and never open it without authorization. • I always maintain safe clearance from high-voltage power lines, and I check for underground cables before excavation.
Working at height	• I never work at height without fall-arrest equipment or collective protections. • I connect my fall-arrest or restraint lanyard to approved anchor points. • I secure tools/equipment against falls. • I demarcate a safety zone below.

Critical risk	Expected behaviours
	• I only access scaffolding with a compliance tag.
Molten metal	• I never start drilling or pouring liquid metal if there is a risk of water/metal contact. • I use PPE to be fully protected against potential liquid metal splashes and radiant heat. • I never allow unauthorized people to enter the restricted area during drilling and pouring.
Mechanical handling	• I never position myself under a suspended load or within the exclusion zone. • I always use lifting accessories and equipment suitable for the purpose and function. • I never touch the suspended load. I use a stabilizing cable or extension if I need to control the load. • I always use a lifting permit and a lifting plan for performing critical lifts.
Train Shunting Operations	• Unless I am a shunting or driving operator, I always maintain a safety distance of at least 3m from the shunting area until the train has come to a complete stop. • As a driver, I stop the shunting operations if I am unable to establish communication (hand signal, radio, or any other visual signal) with the shunting operator. • As a driver or shunting operator, I always check the condition of the • equipment and tracks before any shunting operation.
Maritime safety	• I ensure that weather conditions are suitable for my activities. • I never work and I never walk near the water's edge without wearing my life jacket. • I move away from the snap-back zone of mooring lines and tensioned cables. • I know the man-overboard procedure (what to do if someone falls into the water).
Aviation Safety	• I only fly on aircraft and with air operators approved by Eramet • If travelling in a helicopter or an aeroplane, I have been appropriately briefed and equipped • When travelling by air, I respect instructions from the ground staff and aircraft crew

Critical risk	Expected behaviours
Machine protection	• After intervention and before returning the equipment to service, I always reinstall guards. • I do not work on a live machine with moving parts, with loose clothing, jewellery, long hair or beard. • I do not put my hands close to moving parts of a machine unless specifically authorized by the safety operating procedure or risk analysis
Traffic Management & Vehicles	• I do not operate a vehicle without valid authorization and permits. • I always respect traffic management plans. • I always use my seatbelt and do not use phone while driving. • As a pedestrian, I ensure driver acknowledgment before approaching any vehicle.
Hazardous Materials	• I segregate incompatible materials when stored. • I always know where the emergency equipment (E.g.: SDS, safety shower, etc.) is. • In case of high-level alert, I stop working and evacuate the area.

Stop authority and behavioural vigilance

Every worker has the authority and duty to immediately stop any situation deemed dangerous.

- This decision must be made without delay as soon as there is any doubt about safety conditions.
- No penalty will be applied for a stop made in good faith.

Everyone must demonstrate behavioural vigilance:

- Identify risky situations and behaviours
- Take action immediately in the event of any observed deviation.
- Always protect yourself and others.

Failing to act in the face of a dangerous situation is contrary to Eramet's safety requirements.

3. WORK PERMIT SYSTEM

Principle: No permit = No work. Any risky or non-routine task must be subject to a Work Permit

Type of permit	Applicable for
General work permit	Any critical risk intervention outside routine
Fire permit	Any work involving hot spots (sparks, flames, heat)
Confined space permit	Any entry into a confined space
ATEX Area Entry Permit	Any entry into an ATEX area
Electrical permit / Isolation certificate	Any intervention on HT/BT electrical installations
Lifting permit	Risky lifting (exceptional loads, proximity to networks)
Work at height permit	Any activity at a height > 2m without collective protection
Grating removal permit	Before any temporary removal of gratings
Excavation Permit	Before any digging or excavation work
Others (blasting, etc.)	According to site-specific permit procedure

Procedure:

1. The contractor requests the permit before starting work
2. The Eramet supervisor validates the conditions and issues the permit
3. The worker checks the conditions on-site before starting
4. The permit is closed at the end of each shift or operation

4. CONTRACTOR'S EQUIPMENT

4.1 Equipment Compliance

The Contractor shall ensure that all equipment used for the performance of the Services fully complies with all applicable regulations and with the Client's requirements.

The Contractor shall ensure that the equipment, machinery, and vehicles used are those that have been declared in advance and for which the Client has verified the supporting compliance documentation. The Contractor shall ensure that any equipment used in the performance of the Services that does not comply with applicable requirements and regulations is not allowed onto the Site(s). Any Contractor equipment used in the performance of the Services may be subject to inspection by the Client.

4.2 Loan on equipment Between Companies

The Contractor shall provide all equipment necessary for its own activities.

However, for a specific operation and only where the purpose is exclusively to improve safety conditions for the performance of the Services, the loan of equipment (such as overhead cranes, powered industrial trucks/forklifts, mobile elevated work platforms (MEWPs), etc.) may be accepted upon written request from the Contractor to the Client.

The Client shall then draw up a free-of-charge equipment loan agreement setting out the terms governing the arrangements (delivery and return conditions, maintenance requirements, duration, etc.), as well as the obligations and principles applicable to the allocation of responsibilities between the Parties.

5. PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE	Requirement
Safety helmet with chin strap	Always outside office areas
Safety shoes	Always outside office areas
Protective glasses	Always outside office areas
High-visibility clothing / vest	Always outside office areas
Hearing protection	Noise zones > 85 dB
Appropriate work gloves	Depending on activity

PPE	Requirement
Fall protection PPE	Work at height
Respiratory equipment / gas detector	Gas risk zones
Other PPE	Depending on activity and risk analysis

Wearing PPE is mandatory on all sites. Any violation may result in site exclusion

6. SAFETY ORGANIZATION

6.1 Contractor organization

The contractor must demonstrate an organization and resources enabling strict application of Eramet's requirements. Roles, responsibilities, and organizational charts must be documented and communicated, from management to field supervision.

6.2 Managerial commitment to safety

The contractor's management plays a key role in risk prevention and effective implementation of the requirements of this Safety Code.

In this regard, it commits to:

- Ensuring regular and visible field presence
- Conducting safety visits and observations to identify gaps and reinforce good practices
- Promoting daily safety (briefings, experience feedback, reminders of critical rules)
- Providing dedicated safety resources (supervision, safety coordinator if applicable)
- Setting an example by strictly applying rules and promoting a proactive safety culture

Management is responsible for ensuring compliance with safety requirements by all teams and subcontractors.

6.3 SAFETY coordination meetings

Meeting	Frequency	Participants
Joint inspection	Before startup	Eramet representatives + Contractor(s) + Subcontractors
Safety kick-off meeting	Before startup	Eramet managers + Contractor
Safety follow-up meeting	Monthly minimum	SAFETY representatives from both parties
Daily/shift startup meeting (AVP)	Daily	All teams on-site
Amendment meeting for Prevention Plan	Before any major change	Relevant managers
Closure meeting	End of service	Eramet managers + Contractor

6.4 Daily safety rituals

Startup meeting (5 to 15 min every morning):

- CLAUSE 1. Share site SAFETY information (alerts, recent incidents, changes)
- CLAUSE 2. Allocate planned tasks for the day
- CLAUSE 3. Remind of daily risks and control measures based on risk analysis
- CLAUSE 4. Assign checks of critical controls on-site during the shift
- CLAUSE 5. Verify availability and condition of PPE and equipment

TAKE 5 — Before each task: Before any intervention, each worker (individually or as a group) takes **5 minutes** to:

1. **Identify** the present hazards (energy, height, substances, co-activity, etc.)
2. **Assess** the risks
3. **Implement** the necessary protections
4. **Check** their PPE and equipment
5. **STOP** if safety conditions are not met

Take 5 is not optional. It is documented and verifiable. A template will be provided by Eramet.

6.5 Emergency system

The contractor must familiarize themselves with the site's Emergency Plan and ensure their personnel and subcontractors:

- Know the emergency procedures (evacuation, fire, assembly points, alarms)
- Provides its emergency response plan for its own critical activities
- Participate in drills organized by Eramet
- In case of emergency: **immediate cessation of all work in the affected area**

7. ENVIRONMENTAL MANAGEMENT

- **Waste:** Sorting and disposal in compliance with site requirements. No unauthorized dumping tolerated
- **Hazardous products:** Safety Data Sheets (SDS) provided to Eramet prior to use. Storage in suitable retention containers
- **Accidental spill:** Immediate alert to the Eramet representative. Anti-pollution kits available in high-risk areas
- **Cleanliness:** Work areas, walkways, and emergency exits must always remain clear.

8. CONTRACTORS

The contractor is **fully responsible** for their subcontractors on-site. Obligations:

- Include this Safety Code in all contracting agreements
- Provide the list of contractors to Eramet 2 days before the joint inspection
- Verify their skills, certifications, and medical fitness before any intervention
- Ensure that all resources (human and material) identified in the mitigation measures of the plan and risk assessments are in place before the start of the activity
- Always monitor and ensure their compliance with safety requirements

9. COMPETENCIES AND TRAINING

The contractor must ensure that their personnel and subcontractors:

- Possess the knowledge and qualifications appropriate to their activities
- Hold the required certifications and authorizations (presented to Eramet before starting)
- Receive regular and appropriate training

The contractor keeps training and certification records for all their personnel up-to-date and provides them to Eramet upon request.

10. INCIDENT AND ACCIDENT MANAGEMENT

10.1 Immediate procedure in case of incident/accident

1. **SECURE** — Remove people from danger
2. **RESCUE** — Call site emergency services (number displayed at the entrance)
3. **ALERT** — Immediately notify the Eramet representative
4. **PRESERVE** — Do not touch anything — Preserve the scene for investigation
5. **REPORT** — Complete the incident report in the **48h**

➊ No changes to the scene before authorization from the Eramet investigator.

10.2 Events that must be reported

- Accident with or without lost time
- High Potential Incident (HPI) — near-serious accident
- Dangerous situation or behaviour with High Potential (HPO)
- Anomaly on equipment or installation
- Any environmental event

10.3 Analysis and corrective actions

The contractor actively participates in accident investigations conducted by Eramet. They implement a corrective action plan and ensure follow-up until complete closure.

10.4 Transparency and reporting obligation

The contractor commits to complete transparency in reporting safety.

In this regard:

- All accidents, incidents, high-potential events (HPI/HPO), dangerous situations, or anomalies must be reported immediately to the Eramet representative upon detection
- A formal report must be completed within the defined timeframe ($\leq 48h$)
- All transmitted information must be complete, accurate, and sincere

The reporting of events is part of an approach based on transparency, individual responsibility, and recognition of safe behaviours, aiming to promote learning and prevention:

- No sanctions will be applied for reports made in good faith
- Teams are encouraged to systematically report dangerous situations, including near miss

However:

- Any withholding, concealment, or late reporting constitutes a serious breach of the requirements of this Safety Code
- Undeclared events later identified by Eramet may result in contractual sanctions, linked to defined KPIs

11. AUDITS AND INSPECTIONS

- **Internal audits:** The contractor conducts regular compliance audits (at least once for any service lasting ≥ 1 month) and communicates the reports to Eramet.
- **Eramet audits:** Eramet may audit and inspect the contractor's activities at any time, with prior notice or unexpectedly.
- **Right to stop:** The Eramet representative may immediately stop any work if a safety or health imperative justifies it.
- **Improvement plan:** The contractor establishes a continuous improvement plan covering training, procedures, equipment, subcontractors, waste management.

12. KPI — SAFETY PERFORMANCE INDICATORS

These indicators are integrated into the contract. Some are subject to **contractual penalties**.

Indicators subject to contractual penalties

Indicator	Measurement	Objective	Frequency
Undeclared High Potential Events	Any safety event not reported by the contractor but identified by Eramet	0	Report within 48h / Monthly review
Closure rate of HPI/HPO actions	HPI or HPO actions closed within deadlines / total open actions	$\geq 90\%$	Monthly

Tracking indicators — Long-term services (> 3 months)

Indicator	Measurement	Frequency
Number of reported accidents	Accidents with and without work stoppage	Report within 24h / Monthly review

Indicator	Measurement	Frequency
Reported dangerous acts and conditions	Any safety event reported by the contractor	Monthly
Safety interactions	Safety interactions communicated to the Eramet contact	Monthly
Hours worked	Hours worked by the provider's teams	Monthly
Training hours	Training hours for the provider's teams	Monthly
Turnover rate	(Departures / Average annual workforce assigned to the contract) × 100	Monthly

These indicators feed into Eramet's SRM (Supplier Relationship Management) process and contribute to the initiation of continuous improvement plans or the contractual escalation process.

13. CONSEQUENCES IN CASE OF NON-COMPLIANCE

Observed situation	Immediate consequence
Absence or inappropriate use of PPE	Intervention halted — resumption after correction
Work conducted without risk analysis or valid permit	Immediate cessation of work
Non-compliance with life-saving behaviours	Immediate exclusion of the individual
Alcohol or drugs on site	Permanent exclusion of the individual from the site
Failure to report an incident/accident	Contractual impact (see KPI)
Serious or repeated violations	Termination of the contract without compensation

REFERENCE DOCUMENTS

- [Essential Safety Requirements Standard](#)



FOLLOW UP

VERSION	DATE	PARTAGE	AUTEUR	VALIDATION BPO
V1	June 2026	Creation	Safety Operational Excellence Manager	Safety & Prevention Group Director