



APPENDIX No. 1

**to Order No. _____ of
_____ 2015**

Safe Working at Heights Policy of Ilim Group

St. Petersburg
2015

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1. Purpose

The Safe Working at Heights Policy (hereinafter , the Policy) of Ilim Group (hereinafter, **the Company**) defines minimum safety requirements to be complied with by Company and contractor employees when working at heights. This Policy aims to prevent fall-related incidents with employees working at heights.

2. Scope

2.1. The Policy is binding on all Company and contractor employees.

2.2. The Policy is recommended for adoption by Ilim Group's subsidiaries and affiliates. This Policy will be adopted by the subsidiaries and affiliates through approval and implementation of corresponding internal regulations by their duly authorized management bodies.

3. Policy

- Work at heights must be arranged in accordance with the Safety Rules for Working at Height approved by the Ministry of Labor and Social Protection of the Russian Federation No. 155n of March 28, 2014 On approval of safety rules for working at heights”
- Work at heights using industrial climbing techniques must meet the Temporary Industrial Climbing Safety Rules approved by the Cross-Departmental Commission for Certification of Emergency Rescue Teams, Rescuers and Rescuer Training Institutions of June 09, 2001.
- Work at heights includes any work performed by a worker who is at a distance of less than 2 meters from unfenced uneven surfaces with a height difference of 1.3 meters and above. If it is impossible to install rails or guards, the use of safety harness is mandatory.
- Repair of vehicles at an elevation higher than 1.3m must be performed in accordance with the process flow charts developed for each specific type of equipment.

4. Definitions

- Factory-made knock-down scaffolds and scaffolding platforms with inventory numbers are scaffolds manufactured by OEM manufacturers and registered by the mill/forest in its inventory records.
- Scaffolds and scaffolding platforms without inventory numbers are wooden or steel scaffolds and scaffolding platforms designed and made by the mill/forest in-house.

5. Guidelines

When working at heights, people are exposed to a risk of fall and injury. Therefore, each location must develop and implement a program to minimize such risks in line with the requirements of this Policy and Safety Rules for working at heights.

5.1. Guidelines for the use of scaffolds and scaffolding platforms

Guidelines for the use of factory-made knock-down scaffolds (with inventory numbers):

- Scaffolds, scaffolding platforms and other devices purposed for working at height must be factory-made and registered by the location in its inventory records.
- Knock-down scaffolds and scaffolding platforms with inventory numbers must have an OEM certificate.
- Scaffolds and scaffolding platforms must have a guard of at least 5 cm to prevent falling of any objects or railings.
- Scaffolds can be used once they have been accepted by a person assigned to be responsible in the respective department for safe performance of work at height, which must be documented in writing in the scaffold and scaffolding platforms acceptance and inspection book.
- Prior to the start of each shift, a foreman must visually examine the scaffolds and make a note in the scaffold and scaffolding platforms acceptance and inspection book.
- A person assigned to be responsible for safe performance of work at height in their department must visually inspect the scaffolds at least once every ten shifts and make a note to that effect in the scaffold and scaffolding platforms acceptance and inspection book.
- Scaffolding erection and dismantling must be performed on the basis of a properly issued site access and work permit.
- If the scaffolding is erected by a contractor, the contractor must provide the person responsible for safe performance of work at height with a scaffolding certificate before erecting the scaffolds
- All scaffolds must have a safety certificate displayed visibly for everyone. (Appendix 2)

Guidelines for scaffolds without inventory numbers (wooden scaffolds made by the mill/forest/contractors in-house)

- Use of mill-made/contractor-made scaffolding must be minimized.
- Each location must develop a program to convert to knock-down scaffolds with inventory numbers.
- Mill-made/contractor-made scaffolding will be allowed in exceptional cases only. Mill-made/contractor-made scaffolds must be erected based on an individual design with a load and height capacity calculation of their main elements and calculation of stability for the entire scaffolding structure. The design must be endorsed by a person assigned to be responsible for safe performance of work at height in the respective department and approved by the maintenance manager.
- Prior to being accepted for operation, mill-made/contractor-made scaffolds must be impregnated with a flame retardant agent.
- Scaffolds up to 4 m high can be operated once they are accepted by the foreman with a note to that effect in the scaffold and scaffolding platforms acceptance and inspection book (Appendix 1).
- Scaffolds higher than 4 m can be operated once they are accepted by an acceptance team which must execute an acceptance report and make a note to that effect in the scaffold and scaffolding platforms acceptance and inspection book (Appendix 1).
- Prior to the start of each shift, a foreman must visually examine the scaffolds and make a note in the scaffold and scaffolding platforms acceptance and inspection book.
- A person assigned to be responsible for safe performance of work at height in

	<p>their department must visually inspect the scaffolds at least once every ten shifts and make a note to that effect in the scaffold and scaffolding platforms acceptance and inspection book.</p> <ul style="list-style-type: none"> • Scaffolding erection and dismantling must be performed on the basis of a properly issued site access and work permit. • If the scaffolding is erected by a contractor, the contractor must provide the person responsible for safe performance of work at height in the respective department with a scaffolding certificate, including the information on the manufacturer, materials, load capacity calculation etc. before putting the scaffolds in place. • All scaffolds must have a safety certificate displayed visibly for everyone. (Appendix 2)
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5.2. Guidelines for the use of ladders

<p>General guidelines:</p> <ul style="list-style-type: none"> • The structural units using portable ladders¹ shall appoint persons responsible for accounting, storage, and provision of ladders • The structural units shall determine room/space for storage of portable ladders (if any in the structural units).² Access to such rooms shall be limited. Ladders located outside such rooms/space shall be disposed of • Before/during acceptance, all ladders shall be inspected to ensure their good condition • Provision of rope ladders to employees shall be carried out against the written permit • All ladders shall be tested: metal ladders - once in 12 months, wooden, rope and fiberglass ladders - once in 6 months 	<p>It is forbidden to work on access ladders or stepladders:</p> <ul style="list-style-type: none"> • standing on two upper steps of a stepladder which does not have railings or supports; • There can be no more than one person on the steps of an access ladder or stepladder. • It is not allowed to move loads up and down access ladders or leave tools on them . • with the use of electric or pneumatic tools, cartridge-operated guns; • during gas welding, gas flame and electric welding operations; • when drawing wires or supporting heavy parts, etc. at height <p>No self-made ladders</p>
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¹Wooden, metal, fiberglass, rope ladders and stepladders

² In case it is impossible to determine a place (for example, a logging plot), free access to ladders shall be limited by an interlock/lock

<ul style="list-style-type: none"> • All ladders shall indicate which SU they belong to, Inv. No., and date of the next testing <p>When working on an access ladder at a height of above 1.8 m, one should use safety harness fastened to the structure or the ladder if it is fastened to the building or another structure.</p> <ul style="list-style-type: none"> • Ladders and stepladders shall be inspected before use by the responsible person 	
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5.3. Requirements to safety harnesses (safety belt with criss-cross straps)

<p>General guidelines:</p> <ul style="list-style-type: none"> • All safety harnesses must be equipped with hip and shoulder straps. • All safety harnesses must have at least two attachment elements. • Employees having permits for working at heights shall inspect PPE provided to them before and after each use. • The structural units using safety harnesses shall appoint persons responsible for their accounting, storage, and provision • Provision of safety harnesses to employees shall be made only on the basis of a written permit (except for cases when they work at their permanent workplaces) • Each safety harness shall have an indication as follows: trademark of a manufacturer, size and type of the belt, date of manufacture, stamp of Quality Control Department, designation of the standard or technical specifications, compliance sign • When moving at heights, safeguarding shall be made with two straps • When working at heights and moving horizontally at the same time (for example, at railway rack), safety 	<p>Use of strapless safety belts (body belts) is prohibited.</p> <p>It is not allowed to use safety harness after:</p> <ul style="list-style-type: none"> • Effect of chemicals on the harness. • Fall of a person
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5.4. Working at heights is not allowed in the following cases:

- in open spaces when wind speed is 15 m/sec and over
- during thunderstorm or fog preventing vision within the workplace, as well as in case of ice-covered surfaces and ice accumulation on wires, equipment, engineering structures (including electrical transmission towers) and trees
- during installation (dismantling) of big windage structures when the wind speed exceeds 10 m/sec.
- in the dark while performing work in the street without additional artificial illumination

6. Responsibility

6.1. Mill/Forest Managers shall be responsible for:

- Compliance with the Policy requirements at the Mills/Forests
- Procurement of resources required for the Policy implementation;

6.2. Heads of the Company's organizational units shall be responsible for:

- communication of the Policy to the employees
- compliance with the Policy requirements in controlled structural units;

6.3. All Company employees shall comply with the requirements of this Policy.

7. Revision Procedure

7.1. The Policy shall be approved by the Company's Chief Executive Officer.

7.2. This Policy may be amended or supplemented by resolution of the Company's Chief Executive Officer.

Appendix 1
to the Safe Working at Heights Policy

Scaffold and scaffolding platforms acceptance and inspection book

(location, department)

Installation sites for scaffold and scaffolding platforms and their height; name of the installation company	Type of scaffold and scaffolding platforms; body approving the certificate	Date of acceptance/inspection of scaffold and scaffolding platforms and No. of acceptance certificate	Opinion on suitability of scaffold and scaffolding platforms for operations	Full name, position of an employee who performed acceptance/inspection of scaffold and scaffolding platforms	Signature of an employee who performed acceptance/inspection of scaffold and scaffolding platforms
1	2	3	4	5	6

Appendix 2
to the Safe Working at Heights Policy

Safety Certificate

Safety Certificate for scaffold and scaffolding platforms installed for	
Contractor which performed installation	
Elev., area/plant	
Scaffold acceptance date	
Position/department/full name of a person responsible for safe working at heights, tel.	
Contractor performing work at heights	
Information on performed work and work schedule	
Position/department/full name of work supervisor	
List of persons permitted to perform work (full name/position)	
H&S Expert of the contractor performing work, tel.	
Mill/Forest Occupational Health, tel.	
Mill/Forest Safety, tel.	
Mill/Forest central control room, tel.	
SPASS operations control center, tel.	
Medical station, tel.	