

## Labor safety requirements for Business Partners

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## **1. General provisions**

### **1.1. Subject matter**

VOLKSWAGEN Group Rus OOO (hereinafter - VGR) pays increased attention to labor safety issues (hereinafter - LS) and requires Business partners (hereinafter – BP) and third parties engaged (hereinafter – third parties) to follow the provisions of this document and comply with the requirements of the legislation of the Russian Federation in the field of LS.

### **1.2. Scope**

This document applies to all BP and third parties performing works at the VGR sites or on the sites leased by VGR.

### **1.3. General requirements**

Before starting works, VGR must appoint a person responsible for the safe organization of this work in accordance with the requirements of LS standards and rules (a representative of the division in which the respective work will be performed).

#### **BP responsibilities**

Before starting works, it is to appoint persons responsible for the safe organization of works in accordance with the requirements of LS standards and rules.

Each BP's employee is obliged to:

- comply with LS requirements;
- correctly apply personal and collective protective equipment;
- undergo training on safe methods and techniques for performing work and providing first aid to victims, LS training, on-the-job training, assessment of knowledge of LS requirements;
- have certificates of the relevant assessment of knowledge on hand;
- immediately inform his/her line manager, representative of VGR and a LS specialist (p. 4) about any situation that threatens the life and health of people, about every accident that occurs on the territory of VGR;
- undergo preliminary and periodic medical check-ups, psychiatric examinations, as well as pre-trip and post-trip medical examinations in the prescribed manner and in cases stipulated by the legislation of the Russian Federation.

#### **It is prohibited to:**

- perform work not specified in the contract;
- bring along unauthorized persons and admit them to workplaces;
- smoke on the territory of VGR, except for the places designated and specially equipped for smoking;
- hide information about an occupational injury or another incident from the immediate supervisor of work and representatives of VGR;
- bring, consume and store alcohol, narcotic drugs, psychotropic, potent and toxic substances on the territory of VGR, as well as stay on the territory of VGR under influence of such substances.

BP is responsible for the safety of life, health and property of its personnel and personnel of third parties located on the territory of VGR.

If during the verification VGR reveals the facts of non-compliance by BP or third parties with LS requirements, VGR and BP agree upon a plan and timeline for eliminating such violations.

Failure by BP to take appropriate measures to eliminate the identified violations and achieve the required security level on the territory of VGR within the agreed time frame may be the basis for unilateral out-of-court termination of the contract on the basis of which BP / third parties perform works, as well as other contracts concluded with such BP.

Three working days before the start of works under the contract on the territory of VGR, BP is obliged to provide Labor Safety with the completed Business partner card in accordance with Annex 1 and the necessary documents according to the list. In addition, Labor Safety can require documents depending on the nature of the work performed. After check of documents, the employees of BP / third parties can be admitted to work / provision of service.

Vehicle traffic rules on the territory of VGR.

Drivers of vehicles are obliged to comply with the requirements of road signs, markings established on the territory of VGR, as well as comply with the current traffic rules. Compliance with the speed limit on the territory of VGR can be controlled by means of electronic control.

Maximum vehicle speed:

- on external roads in the territory of VGR - 40 km/h;
- in production areas - 10 km/h.

In case of moving around the territory of production sites for production needs without special footwear, movement is allowed only along pedestrian paths (indicated by green markings). When moving along designated pedestrian paths and crossings inside workshops, it is to take into account the advantage of intra-shop transport, when moving around the outer territory, it is to take into account "Traffic Code of the Russian Federation" (approved by the RF Government Regulation No. 1090 dated 10/23/1993).

## **2. Labor safety management system**

### **2.1. Exchange of information on LS**

BP must ensure that security standards, norms and rules established on the territory of VGR are brought to the attention of all personnel performing works on the territory of VGR, including third parties, and must also control strict compliance with these rules during the performance of works. BP shall ensure that information on safe work practices is provided and exchanged in written between all parties. BP is obliged to inform VGR about all emergencies appeared.

### **2.2. Safe work training**

All employees of BP and third parties are required to undergo LS training and assessment of knowledge of LS requirements in the manner prescribed by the legislation of the Russian Federation. BP shall provide all types of necessary LS trainings.

An induction training on LS must be received by all employees of BP before starting the works. The induction training is carried out in accordance with the program developed and approved by VGR and does not exclude BP carrying out its own induction briefing. BP should have programs of on-the-job trainings and LS instructions applicable to the worker's occupation or the type of work performed.

### **2.3. Features of working with a separate category of BP**

Certain categories of BP providing courier, educational, consulting, auditing services, etc., are the subject of undergoing the introductory LS training only.

#### **2.4. LS audits and checks conducted by VGR**

VGR, with or without a BP's representative at all stages of the contract, reserves the right to carry out monitoring (independent checks, audits) of compliance with LS requirements of BP.

#### **2.5. Suspension/termination of work**

If BP and/or third parties do not comply with the labor safety legislation when performing work, then the representative of VGR has the right to suspend work until the identified violations are eliminated.

VGR has the right to suspend the performance of work under the contract without reimbursing BP for any losses and paying BP's fines in the following cases:

- working conditions are dangerous for people;
- the current situation creates a direct threat to the life and health of people or loss of asset;
- failure to comply with the requirements of the legislation of the Russian Federation in the field of labor safety listed in this Annex.

The VGR representative can ask BP to deny access to the territory for persons who violate LS requirements. The requirement to prohibit access to the territory must be written, indicating the specific reasons that caused this requirement.

In case of non-compliance with the established security standards for certain equipment or construction equipment, the VGR representative is authorized to prohibit BP in written from using this equipment.

In case of detecting situations that may pose a danger to people, equipment or VGR reputation, BP is obliged to take measures to eliminate this situation in agreement with the representative of VGR.

BP is obliged to suspend the employee from work on the territory of VGR if the latter:

- is in a state of alcoholic, drug or other toxic intoxication;
- did not receive LS training and knowledge assessment in the prescribed manner;
- is not provided with special clothing, special footwear and other personal protective equipment (hereinafter - PPE);
- did not pass the preliminary (periodic) medical examination in the prescribed manner and in the cases stipulated by the legislation of the Russian Federation;
- has medical contraindications for performing work in accordance with a medical certificate;
- commits repeated violations of LS requirements;
- in other cases provided for by the legislation of the Russian Federation.

VGR can ask BP to remove the employee from the workplace if the latter:

- is in a state of alcoholic or other intoxication at the workplace;
- repeatedly violates LS requirements.

BP is obliged to immediately fulfill this order received from the representative of VGR, and in the future to present a copy of the corresponding order.

#### **2.6. Personal protective equipment**

BP is obliged to:

- purchase and issue, at its own expense, PPE, washing and neutralizing agents that have passed mandatory certification or declaration of conformity;
- control the correct use of personal and collective protective equipment by employees;
- not to allow employees to work without approved PPE, as well as in defective, dirty workwear and special shoes or with defective PPE;

- ensure the use of additional PPE required by internal procedures and policies of VGR:
  - ✓ in the area of Logistics warehouses outside of the pedestrian paths it is to use a safety vest and special footwear;
  - ✓ in the Body shop it is to use eye protectors.

VGR has the right to:

- disallow BP's employees without PPE into the territory and production facilities of VGR;
- demand from BP to comply with the established rules and standards for issuing PPE when performing work under the contract.

## **2.7. Incidents reporting and investigation**

All incidents in the area of LS, including potential incidents, must be investigated in accordance with the requirements of the legislation of the Russian Federation.

BP is responsible for the timely informing of LS specialist about industrial accidents, emergencies and other incidents.

BP is obliged, at the request of VGR, to provide copies of the investigation materials of accidents and incidents, as well as information on corrective actions of BP to prevent the recurrence of such cases.

VGR has the right, with the involvement of a representative of BP, to conduct its own internal investigation (in accordance with the current corporate standards, which do not contradict Russian legislation) of any incident that occurred on the territory of VGR. BP is obliged to provide full cooperation in the conduct of this investigation and in the implementation of measures to prevent similar incidents in the future.

## **2.8. Arrangement of medical aid posts**

BP is obliged to organize medical aid posts and equip them with medical kits at its own expense. The medical aid post must be easily accessible.

## **2.9. Keeping the workplace clean**

BP shall ensure that all workplaces on the territory of VGR are kept clean and tidy in order to reduce the risk of injury to employees, damage to property and environment, and delays in schedule.

## **3. General provisions and organizational measures when performing construction and installation works**

### **3.1. Key terms and abbreviations**

**WP:** works program

**TC:** technological chart

**LD:** lifting devices

**FNR:** federal normative rules

**RCD:** residual current device

**Energy source** is any source of electrical, mechanical, potential, hydraulic, pneumatic, chemical, gravitational or other energy, the use of which could cause injury.

**Limited and enclosed space** is a space limited on all sides, the entrances and exits from which are difficult or limited and prevent the rapid passage of employees, and the air exchange parameters are not sufficient to maintain their breathing and which is not intended for permanent stay of employees.

### **3.2. General requirements**

Before starting building and installation works by BP, the responsible representatives of the customer and BP must issue an admission certificate for the performance of work on the VGR territory in the prescribed form (Annex 2) for the entire period of work, develop and implement organizational and technical measures aimed at ensuring the safety of listed works, as well as safe operation of working technological equipment.

When organizing a construction site, it is necessary to provide separate or fenced-off entrances for people and an entrance for transport and construction equipment.

WP for certain types of work, including foundation pits, installation of LD, lifts, scaffolding, etc. must be provided to LS specialist 3 business days (based on a five-day working week) before the start of these works.

All work must be performed in accordance with the developed WP and only after the workers familiarize themselves with the WP against signature.

### **3.3. Work permit for high-risk work**

Work associated with increased danger, performed in places where harmful and hazardous production factors are active, must be performed in accordance with the work permit for the execution of work (hereinafter, work permit), which determines the content, place, time and conditions of work, the necessary safety measures, the composition of the team and persons responsible for work safety.

It is allowed to start performing the following works of increased danger only with a valid work permit:

- works with electrical power systems;
- works in enclosed spaces;
- welding, gas-cutting and other hot works;
- works at a height of more than 1.8 m;
- simultaneous operations;
- works associated with the use of open fire, the release of a large amount of heat, sparks;
- and other types of work.

### **3.4. Electrical power system works: power source disconnection and lockout and electrical safety**

Work on any equipment should not begin until the following requirements are met:

- all energy sources are disconnected from the equipment (in the presence of the VGR employee responsible for the equipment);
- an appropriate blocking was installed to prevent the inclusion of energy sources before the end of the work (in the presence of the VGR employee responsible for the equipment);
- accumulated energy has been discharged. Disconnection and discharge of the accumulated energy must be coordinated by the appropriate specialists (the VGR employee responsible for the equipment) and must be performed by trained employees;
- a check was made to disconnect power sources;
- a poster "Do not turn on! People working" is installed;
- lock release and connection of equipment to power sources is not allowed until the equipment is returned to a safe state. The lock shall be removed only by the employee who set this lock (in the presence of the VGR employee responsible for the equipment).

In exceptional cases, it is allowed to work on electrical equipment without turning off the electricity with prior agreement with Energy Management. Such work is carried out by employees who have been trained and have an electrical safety group assigned. All electrical circuits must be protected (RCD and overcurrent safety devices). All power tools and electrical equipment must be labeled with inventory number and date of the next inspection. Metal containers, accommodation

units, switchboards, items to be welded must be grounded with separate grounding conductors. Subsequent grounding is prohibited.

### **3.5. Works in enclosed space**

Before starting works in enclosed space, BP shall ensure organizational and technical and technological activities:

Appoint persons responsible for

- organization and safe execution of works in enclosed space;
- safe operation of technological equipment, ready for service;
- permit issue;
- persons who maintain and periodically check personal and collective protective equipment;
- development of a work execution plan in enclosed space or development and approval of a process sheet for work performance;
- provision of activity plan in case of an accident and emergency rescue operations, evacuation and rescue from enclosed space.

Entering any enclosed space is prohibited if:

- a risk assessment has not been carried out and all other possible options have not been used;
- a work program wasn't developed in an enclosed space;
- the person(s) in charge has not issued a permit;
- employees are not trained to work in an enclosed space;
- not all sources of energy in this space are isolated;
- environmental parameters have not been analyzed before works in an enclosed space nor permanent or repeated control of environmental parameters during works inside an enclosed space;
- there is no lighting in an enclosed space;
- workers are not provided with PPE that meet the conditions of the work performed;
- there are no means of evacuating people working in enclosed spaces;
- at the entrance there is no safety officer with communication equipment, and if necessary, with an insulating gas mask.

To illuminate tanks, containers, it is necessary to use rechargeable lights, which can be turned on and off only outside the tank (tank).

The representatives of client and BP should draw up a work permit on the territory of VGR for the whole work performance period (Annex 2).

### **3.6. Welding, gas-cutting and other hot works**

A permit to carry out fire hazardous works (work permit) must be issued for the production of works related to the use of open fire, the release of a large amount of heat, sparks and other potential sources of ignition, including:

- welding, gas cutting works
- soldering using burners with an open flame for heating;
- works using gas burners when installing a waterproofing layer;
- using a blowtorch to shrink clutches;
- grinding and cleaning with abrasive wheels in fire hazardous areas and indoors and cutting works with angle grinders.

Hot works in hazardous areas should be avoided if possible. The use of mobile phones in hazardous areas is not permitted, even with a permit to operate in hazardous areas and premises.

### **3.7. Work at heights, mobile lifts, work platforms, scaffolding and trestleworks**

Works at height includes works in which:

a) there are risks associated with a possible fall of an employee from a height of 1.8 m or more, including:

- ✓ when the employee lifts to a height of more than 5 m, or descends from a height of more than 5 m on a ladder, the angle of inclination of which to the horizontal surface is more than 75°;
- ✓ when working on sites at a distance of closer than 2 m from leading edge of more than 1.8 m, as well as if the height of the protective fencing of these sites is less than 1.1 m;

b) there are risks associated with a possible fall of the employee from a height of less than 1.8 m if work is carried out on machines or mechanisms, the surface of liquid or loose fine materials, protruding objects.

Employees performing work at height must have qualifications appropriate to the nature of the work performed. The qualification level is confirmed by a document on occupational education (training) and (or) on qualification.

Before starting work at height, BP must provide the customer with a work program at height or technological maps for the work at height.

Work at a height of 1.8 meters or more from any surface must be carried out using scaffolding or factory-made trestleworks with a double fencing and a side element, the technical condition of which has been checked by a competent person.

Lifts must have a plate with the designation of the registration number, serial number of the LD, rated capacity and the dates of the next full and partial technical certification. The wheels must be locked when using the scaffold.

Ladders must be made of metal only (exception: work in electrical installations).

When working at a height below, under the place of work, the hazardous areas shall be marked.

When combining work along the same vertical, the downstream places must be equipped with appropriate protective devices (flooring, canopies) installed at a distance of no more than 6 m vertically from the downstream workplace.

It is not allowed to perform works at a height:

- a) in open places at an air flow (wind) speed of 15 m/s or more;
- b) during a thunderstorm or fog, excluding visibility within the work front, as well as in case of ice from icy structures and in cases of an increase in the ice wall on wires, equipment, engineering structures (including power transmission line supports), trees;
- c) when assembling (dismantling) structures with high windage at a wind speed of 10 m/s or more.

### **3.8. Roofing works**

The admission of workers to the performance of roofing works must be carried out in accordance with the work permit after inspection by the responsible performer of work (foreman, site supervisor) of the serviceability and reliability of the supporting structures of the roof and fences and determining their condition and safety measures.

Works performed at a height without protective fences should be performed using restraining, positioning, safety systems and/or rope access systems in accordance with WP at a height or the work permit.

It is allowed to place materials on the roof only in places provided by WP, with measures taken against their fall, including from the effect of wind load. During breaks in work, technological devices, tools and materials must be fixed or removed from the roof.



### **3.9. Requirements for construction equipment**

The technical condition of vehicles, mechanisms and construction equipment used at the construction site must comply with the requirements of the legislation of the Russian Federation and the working conditions. All safety equipment provided by the manufacturer must be available and maintained.

BP shall check the availability and validity of documents that reflect (record) the technical condition, registration of the equipment in the relevant state authorities, the timing of testing the equipment and devices. Construction machinery and equipment shall be accepted for works only after verification by representatives of the customer and after issuing a work permit.

It is forbidden to use vehicles and construction equipment without an appropriate certificate, which indicates that the driver, operator or machinist is allowed to operate this equipment.

### **3.10. Requirements for LD operation**

The operation of the LD, equipment used in conjunction with the LD must be carried out in accordance with the requirements of the legislation of the Russian Federation. The installation of LD in buildings, in open areas and other areas of work should be carried out in accordance with the manual (instruction) for LD operation and the FNR requirements.

LD are approved for works if the following requirements are met:

- a) information about the current assessment of personnel servicing the LD is provided;
- b) information was provided on the appointment of a specialist responsible for the safe performance of works using the LD;
- c) the passport of the LD and information on the registration of the LD with the bodies of the Federal Environmental, Industrial and Nuclear Supervision Service (for LD subject to registration) were provided;
- d) information on the validity of the period of the technical examination of the LD, the period of the industrial safety examination of the LD (for the expired service life) was provided;
- e) the LD is in good technical condition;
- f) removable load gripping devices and containers are operable and correspond to the mass and type of transported goods;
- g) WP, TC, work permit in accordance with the requirements of the Rules are provided.

### **3.11. Tools and equipment**

All electrical circuits (including circuits in personnel facilities) must be protected by RCDs and overcurrent safety devices.

Gas cylinders must be stored and used in accordance with the requirements of the relevant standards and rules.

Moving the cylinders at the facilities to the places of work should be done in the way that excludes jolts and impacts of the cylinders against each other on specially adapted trolleys or with the help of other devices and mechanisms. Gas cylinders at the place of use must be installed in an upright position and reliably fixed against falling before their use. All cylinders with flammable gases and oxygen shall be equipped with serviceable reducers, pressure gauges and safety valves. Persons at least 18 years of age who have passed a medical check-up, a LS training and have a certificate of admission to independent work, issued in the prescribed manner, are allowed to directly maintain gas cylinders.

Welding and cutting stations shall be equipped with fire extinguishers. All flexible gas hoses shall meet the requirements of the Russian standard and be fixed with clamps.

## **4. Labor Safety responsible specialist at VGR**

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## **5. Related documents**

Labor Code of the Russian Federation No. 197-FZ dated December 30, 2001

Labor Protection Rules in Construction, reconstruction and repair (Order of the Ministry of Labor of Russia No. 883n dated December 11, 2020)

Labor Protection Rules during Placement, Installation, Maintenance and Repair of Technological Equipment (Order of the Ministry of Labor of Russia No. 833n dated November 27, 2020)

Construction Rules and Regulations (SNIIP) 12-03-2001 Labor Safety in Construction. Part 1. General Requirements (Decree of the Gosstroy of the Russian Federation dated July 23, 2001 No. 80)

Labor Protection Rules when working at height (Order of the Ministry of Labor of Russia dated November 16, 2020 No. 782n)

Labor Protection Rules when working in limited and enclosed spaces" (Order of the Ministry of Labor of Russia dated December 15, 2020 No. 902n)

Construction Rules and Regulations (SNIIP) 12-04-2002 Labor Safety in Construction. Part 2. Construction Production (Decree of the Gosstroy of the Russian Federation of September 17, 2002 No. 123)

GOST 12.0.230-2007. Interstate Standard. Labor Safety Standards System. Labor Safety Management System. General Requirements

Regulation on approval of forms of the documents necessary for investigating and registering industrial accidents and the Specifics of Investigating Industrial Accidents in Certain Industries and Organizations (Decree of the Ministry of Labor of Russia dated October 24, 2002 No. 73)

Decree of the Government of the Russian Federation No. 1479 dated September 16, 2020 "On the Fire Prevention Regime in Russian Federation"

The procedure for training in labor safety and assessment of knowledge of labor safety requirements for employees of organizations (Decree of the Ministry of Labor of Russia and the Ministry of Education of Russia No. 1/29 dated January 13, 2003)

Rostekhnadzor Order No. 461 dated November 26, 2020 On Approval of Federal Standards and Rules in the Field of Industrial Safety "Safety Rules for Hazardous Production Facilities on Which Lifting Structures Are Used"

And other relevant Russian regulatory documents.