

ENVIRONMENTAL, HEALTH AND SAFETY (EHS) REQUIREMENTS FOR VISITORS AND CONTRACTORS

INTRODUCTION

Welcome to our site!

Safety at work is a core value at Smurfit Westrock, and our vision is that everyone goes home safely every day. This document presents key Environmental, Health, and Safety (EHS) requirements for all site visitors and contractors. We request that during your time on site you exercise heightened awareness and extra caution in the six high-risk areas identified within our Safety for Life program as illustrated here.

If you have questions about these EHS requirements, or if you observe any EHS concerns during your time on site, please promptly reach out to your designated Company escort/contact or the site EHS team for assistance.

We encourage all visitors to share their feedback and suggestions to support the ongoing improvement of our EHS practices and ensure the well-being of everyone on site.



EMERGENCY CONTACTS

IN THE EVENT OF AN EMERGENCY, FOLLOW THE INSTRUCTIONS PROVIDED BY THE FACILITY AND/OR YOUR COMPANY CONTACT.

OVERVIEW

- **Applicability.** These requirements apply to all Visitors. “Visitor” means any individual who is present at a Company site and is not an employee of the Company or any of its subsidiaries or affiliates. Visitors include, without limitation, contractors, temporary workers, subcontractors, suppliers, vendors, customers, service providers, and members of the public.
- **Age Requirement.** No one under 18 is allowed on the Company’s manufacturing sites, except with prior authorization from the site’s General Manager or site Safety Manager.
- **Company Expectations.** Visitors to any Company site are responsible for ensuring that their activities are conducted in a safe manner and in full compliance with the requirements outlined in this document, all Permits to Work (if applicable), all relevant laws and regulations, as well as applicable transaction documents.
- **Visitor Responsibilities.** Each Visitor is responsible for carefully reviewing the requirements outlined in this document. This includes consulting with their designated Company escort/contact or the site EHS team if there is any uncertainty about these requirements. Visitors also are required to keep personal belongings to a minimum as the Company is not responsible for lost or stolen items.
- **Enforcement.** The Company reserves the right to immediately remove any Visitor who is, or who the Company has reasonable cause to believe is, engaged in unsafe behavior or fails to comply with the obligations outlined in this document, applicable laws and regulations or other relevant EHS requirements. Visitors found in violation may also be subject to further review, and their future access to Company sites may be restricted or denied at the Company’s discretion.
- **On-site Work/Contractors:** Visitors of the counterparty, as defined by the Agreement, who will be performing work at a Company facility or site (“Contractors”) must follow both the general EHS requirements in this document and the additional applicable procedures in its addenda (“EHS Work Requirements”). Contractors are responsible for ensuring that their employees, subcontractors, and affiliates understand and comply with all EHS requirements before beginning any work on site.

GENERAL EHS REQUIREMENTS

All Visitors must follow the site's essential safety requirements. This document provides baseline safety practices, but additional measures may apply based on specific activities. It is the responsibility of each Visitor to stay

informed about all applicable safety measures and to proactively seek guidance from site personnel when uncertain.

- **Site Access.** All Visitors must check in and out daily at the guard station, reception desk or similar area, sign in/out, and show valid credentials when requested. Exceptions to this daily access requirement must be approved in writing by the site Safety or EHS Manager or another authorized Company representative.
- **Safety Briefing.** All Visitors are required to complete a comprehensive safety briefing before accessing any production areas. This briefing may be conducted online prior to the scheduled visit or in person upon arrival at the site. Visitors may be required to confirm their understanding of the safety requirements by signing an acknowledgment form or electronically verifying completion. Failure to complete the safety briefing may result in removal from the premises or restricted access to production areas.
- **Personal Protective Equipment (PPE).** Visitors are required to wear the following minimum PPE. Additional or different PPE may be required depending on the scope and nature of a site visit. All PPE must be worn at all times in operating areas. [The site will provide PPE if Visitors do not have their own.]
 - High visibility vest or clothing
 - Hearing protection
 - Safety eyewear with side shields
 - Safety shoes: If the scope of a Visitor's activities on a Company site is limited to participating in a tour along a designated tour path, safety shoes are not required. All other on-site activities require Visitors to wear foot protection.
 - Additional clothing and equipment: If the Company requests, Visitors must wear long sleeved pants or shirts, hair nets, gloves, shoe covers or other protective clothing/equipment and/or to wash their hands before entering manufacturing areas, particularly if such measures are necessary to meet the site's quality or food safety protocols.
- **Unauthorized Activities.** The following section outlines activities that are **strictly prohibited** for all Visitors while on Company property.
 - **Hands Off.** Do not touch any equipment, machinery, or materials unless specifically permitted and supervised.
 - **Illicit Substances.** The use of alcohol, illegal drugs or other illicit substances is strictly prohibited on Company sites, including buildings, parking lots, and surrounding areas. If you witness any alcohol or drug use/possession, please report it immediately to your Company escort/contact, site security or another Company representative.
 - **Workplace Violence.** Smurfit Westrock does not tolerate acts or threats of violence, including, but not limited to, abusive, obscene, or threatening language, comments of others advocating violent acts or threats, and stalking behavior.
 - **No Weapons.** Weapons are not permitted on Company property, including company-owned or leased vehicles, except as allowed by local law, for law enforcement officers acting in the course of duty, and for certain site security personnel. Prohibited weapons include, but are not limited to:
 - × Any rifle, handgun, or other portable firearm, whether they are loaded or unloaded, assembled or disassembled
 - × Bow or crossbow
 - × Any form of explosive
 - × Any type of stun device
 - × Any other instruments intended for use as a weapon, such as knives, brass knuckles, and blunt or sharp objects (e.g., a club or sword)
- **Conduct on Site.** Visitors are expected to comply with the following guidelines to ensure their safety and the safety of others while on site.
 - **Stay with Escort:** Visitors must be always accompanied by an authorized site representative unless they receive an exemption from this requirement from the site Safety or EHS Manager.
 - **Restricted Areas:** Entry to unauthorized or restricted areas of a Company site is strictly prohibited.

- **Cell Phone Usage.** Visitors may only use cell phones in designated safe areas, not while walking on site. Always remain alert and attentive to your surroundings.
 - **No Smoking or Open Flames:** Smoking and open flames are not permitted anywhere on the site except in designated areas.
 - **Photography and Recording:** Photography, video, or audio recording is prohibited unless explicitly authorized in advance by an authorized Company representative.
 - **Samples and Tests:** Do not sample or test indoor areas, environmental media, or materials without prior written authorization from the site's Environmental or EHS Manager.
 - **Driving:** Do not operate vehicles or machinery unless authorized by the site's Safety or EHS Manager, and only in accordance with site policies.
 - **Air Emissions:** Avoid actions that could release dust, fumes, or vapors into the environment.
 - **Wildlife and Vegetation:** Do not disturb local wildlife or plants on site.
- **Emergency Procedures/Evacuations.** Visitors must follow all instructions from site personnel in the event of an emergency. Should a fire, gas, or other incident occur that warrants an evacuation, a warning will be issued. When the evacuation signal is given, Visitors must immediately make their way to the identified muster location and identify themselves to an emergency point coordinator for headcount purposes.
 - **Safety and Environmental Incidents.** Report **ALL** accidents, injuries, illnesses, near misses, property damage, spills, releases, or unsafe conditions **IMMEDIATELY** to your site escort/contact, the site Safety, Environmental or EHS Manager, or another company employee.
 - **People and Vehicles.** Visitors must pay careful attention to the unique risks presented by the interaction of people and moving vehicles at Company sites. Visitors must take the following precautions while on-site.
 - Follow all safety signs and instructions
 - Walk only where pedestrians are allowed; stay out of PIT zones unless authorized and escorted
 - Do not use ear buds, headphones, or cell phones while walking
 - Keep away from PITs; do not touch or operate equipment
 - Cross vehicle paths only after operators signal it is safe
 - Watch for blind spots and corners
 - Never ride on PITs or equipment
 - **Waste Management.**
 - Visitors may not dispose of any waste on Company property, including in facility sewers, unless pre-approved by the site's Environmental or EHS Manager in writing.
 - Do not dispose of hazardous waste on Company property or store it for more than 180 days.

Thank you for helping us maintain a safe and environmentally sustainable workplace.

ADDENDUM A

EHS REQUIREMENTS FOR ON-SITE WORK

These **EHS Requirements for On-Site Work** ("EHS Work Requirements") are in addition to the EHS requirements for Visitors, applicable Laws, any Permits to Work and relevant transaction documents. Supplemental requirements apply to contractors performing specialized, on-site environmental work involving **Asbestos** (Addendum B), **Lead-Based Paint** (Addendum C), **Mold Abatement** (Addendum D), **HVAC Services** (Addendum E) and/or **Pesticide/Herbicide Application** (Addendum F). To the extent that a conflict arises between any of the addenda for specialized environmental work and any transaction documents, the more specific requirements of the applicable addendum shall govern.

CONTRACTORS ARE RESPONSIBLE FOR ENSURING THE SAFETY OF ALL EMPLOYEES AND CREW MEMBERS, INCLUDING SUBCONTRACTORS AT ALL TIERS.

A. GENERAL

Stop Work Authority

Contractors are encouraged to stop work and notify the site's Safety or EHS Manager or another member of Company management if they reasonably believe that such action is necessary to prevent significant injury, illness, harm, or damage to employees, contractors, visitors, vendors, the public, property, and/or the environment.

Language

If Contractor employs workers whose primary language is not English, Contractor must provide a qualified translator. This translator must always be present when non-English speaking workers are on site, including but not limited to general and job-specific orientations, permit to work preparations, job safety analyses, and the like. The translator must be capable of accurately conveying both EHS and operational instructions, ensuring that all critical information is fully understood by the workers. It is Contractor's responsibility to confirm that language barriers do not impede compliance with EHS requirements or the effective communication of hazards, procedures, emergency protocols, and the like.

Training

Contractor shall ensure that only trained and experienced personnel who are familiar with the applicable EHS requirements perform work on site. All personnel must have the necessary skills, knowledge, training and certifications, as applicable, to carry out their assigned tasks safely and in compliance with these EHS Work Requirements, all relevant laws, and any additional site safety requirements.

Lighting

The Company shall establish and communicate the designated working hours for all Contractors. Contractors must adhere strictly to these prescribed hours unless prior written authorization is obtained from the Company for any deviation. In instances where the Company grants permission for nighttime or low-light operations, the Contractor is responsible for ensuring adequate illumination of all active work areas. This includes providing and maintaining sufficient lighting equipment to enable safe, effective, and compliant execution of duties. All lighting must meet or exceed applicable regulatory standards, and the Contractor must ensure that lighting arrangements do not create additional hazards, such as glare or obstruction. The Contractor is also required to regularly inspect and promptly address any deficiencies in lighting to maintain safe working conditions throughout the duration of authorized nighttime work.

Housekeeping

Contractor must keep its work area(s) in a neat and orderly condition and shall not cause or contribute to any unclean, unsafe or nuisance conditions on Company property. Contractor's housekeeping obligations include, but are not limited to, the following.

- **Fugitive Dust.** Contractor must take reasonable steps to control fugitive dust related to its activities or operations, including the use of dust suppression measures such as watering and minimizing the stockpiling of materials that could result in dust.

- **Noise.** Contractor must comply with all applicable noise ordinances and Laws and take reasonable steps to minimize noise from its work, especially during the hours of 7 p.m. to 7 a.m.
- **Waste Piles.** Contractor must not create any waste piles or open dump areas on Company property.
- **Open Burning.** No open burning of any materials (including wood and paper) may be conducted without the prior written permission of the site's Environmental or EHS Manager and in accordance with all applicable environmental permit requirements.
- **Materials, Tools & Equipment Storage.** Materials, tools, and equipment will be kept out of aisles, walking areas, and must not block or impede any means of egress. Exit doors, exit routes, passageways, emergency equipment and electrical cabinets and panels must be kept unobstructed. Materials, equipment, and tools that remain on site must be neatly stacked, safely stored, and identified with Contractor name.
- **Cleanup/Restoration.** At the end of a project or upon completion of its work, Contractor must take the following actions at a minimum: (1) promptly remove all tools, equipment, chemicals and other materials, and (2) work with a designated representative(s) of the Company and Contractor to conduct an exit inspection of Contractor's work areas to make sure that no waste remains and the area is clean to the Company's reasonable satisfaction.

Chemical and Material Management

- **Prohibited Materials.** Contractors are prohibited from bringing onto Company property any of the following materials in any form (including as equipment components), unless Contractor obtains prior written approval from the site's Environmental, Safety or EHS Manager:
 - + Chlorinated solvents
 - + Lead-based paint
 - + Asbestos
 - + PCBs
 - + Chlorofluorocarbons (CFCs) or Hydrochlorofluorocarbons (HCFCs)
 - + Restricted-use pesticides, herbicides, fungicides, and rodenticides
 - + Any PFAS-containing products or materials
 - + Gasoline or diesel fuel
- **Safety Data Sheets.** Contractor must provide the Company with copies of Safety Data Sheets (SDSs) for all chemicals and materials that will be used on-site during Contractor's work, as well as information about the quantity of each material that is brought onto Company's property. All chemicals Contractor proposes to use on-site require Company approval before use, but approval does not waive Contractor's legal, contractual, or other obligations. SDSs and chemical inventories must be updated as requested by the Company.
- **Labeling.** All chemicals and materials brought onto Company property by the Contractor must be properly labeled in accordance with applicable Laws. Each container must clearly display the chemical name, hazard warnings, the manufacturer's name and address, and the appropriate handling and storage instructions to ensure safe identification and use by all personnel.
- **Storage.** All chemicals, mixtures, oils, fuels, gases, and other materials brought onto Company property by the Contractor must be stored in a safe, neat, and orderly manner that complies with all applicable laws and regulations. Contractors are responsible for providing their own containers and appropriate flammable material storage cabinets that meet applicable OSHA requirements. Additionally, Contractor must:
 - Store chemicals securely in clearly marked areas designated by the Company
 - Use only containers that are in good condition and compatible with the materials they store
 - Keep chemicals away from incompatible substances, heat, and sunlight
 - Use appropriate containment devices to prevent drips and releases into the environment, including any facility process sewers and storm drains
 - Prevent chemical tanks, drums or containers from coming in direct contact with the ground
 - Regularly inspect for leaks or damage and address issues promptly

- **Compressed Gas Cylinders.** Contractors must store compressed gas cylinders in accordance with the following minimum safety requirements and in compliance with all applicable laws and regulations.
 - Store cylinders in an upright position and securely fasten them to prevent tipping or falling. Only use securing devices that are compatible with the cylinder material and size.
 - Store cylinders in a designated area that is free from combustible materials, excessive heat, direct sunlight, and sources of ignition with full cylinders separated from empty ones.
 - Group cylinders by gas type, keeping incompatible gases apart.
 - Use appropriate racks or pallets to prevent cylinders from contacting the ground
 - Regularly inspect cylinders and storage areas for leaks, damage, or signs of corrosion, and address any issues promptly.
 - Ensure all cylinders are properly labeled with the gas type, hazard warnings, and manufacturer information.

Driving / Vehicle Operation

Contractors must obtain the Company's permission to operate vehicles or mobile equipment (including, without limitation, golf carts, buggies) on Company property, and only trained, authorized, and licensed, if applicable, personnel shall operate vehicles or equipment. Where permission to operate a vehicle is granted, Contractors must adhere to the following minimum driving safety requirements:

- Obey all posted speed limits, traffic signs, and directional markings
- Use only authorized access routes and designated parking areas
- Remain alert for pedestrians, equipment, and other vehicles
- Wear seat belts and other safety devices at all times
- Turn off all vehicles when fueling
- Avoid distracted driving - including the use of mobile phones or other electronic devices

Vehicles must be maintained in good working condition at all times. If any leaks, defects, or malfunctions are discovered, the vehicle must be removed from service immediately, and the leak, defect or malfunction must be addressed promptly.

Weather Hazards

Contractors must assess and address weather-related safety risks prior to commencing any work on Company property. This includes reviewing current and forecasted weather conditions and identifying hazards such as extreme heat, cold, rain, wind, lightning, or other adverse weather events that could impact work activities. Contractors are required to implement appropriate mitigation measures, such as adjusting work schedules, providing suitable PPE, and establishing emergency response procedures, to ensure the safety of all personnel. All weather safety precautions must be incorporated into the Job Safety Analysis and communicated to the work crew during pre-job briefings or tailboards. Work must be suspended or modified if weather conditions present unacceptable risks to health, safety, or the environment.

Overhead Utilities

Contractors must exercise extreme caution when working near or under overhead utilities, including but not limited to electrical powerlines, to avoid safety hazards. Prior to beginning work, Contractors must verify the integrity and placement of systems for avoiding safety risks associated with overhead utilities and communicate all overhead utility risks and safety measures during pre-job briefings. If overhead utility hazards cannot be adequately controlled, Contractors must suspend or modify work until safe conditions can be assured.

To manage risks associated with overhead utilities, Contractors are required to implement at least the following measures:

- **Minimum Clearances.** Always maintain the minimum required clearance distances from powerlines as specified by applicable Laws, codes, and/or NFPA 70E, and never operate equipment or vehicles in a way that could bring them into contact with overhead lines.
- **Marking System.** Use designated systems such as flags or goal posts to clearly mark the location of overhead utilities and install signage to alert all personnel to the presence of overhead hazards.
- **Access Restrictions.** Erect physical barriers to restrict access to hazardous areas and ensure that any marking or barrier systems implemented do not introduce new risks.

Start Briefing

- **Requirement.** Prior to starting any on-site work, Contractor must participate in a pre-mobilization meeting (“Start Briefing”). The objective of the Start Briefing is to communicate and review general site EHS requirements, as well as the specific EHS aspects and potential hazards related to the Contractor’s planned work activities.
- **Attendance.** Attendance at the Start Briefing is mandatory for all Contractor personnel assigned to the project or work. It is the Contractor’s obligation to ensure all their personnel and other Representatives are present and attentive during the Start Briefing. Failure to participate in the Start Briefing may result in delayed work authorization or removal from the site. Contractor Representatives may be required sign an attendance record or acknowledgment confirming participation in the Start Briefing.
- **Change Notification.** Contractor must promptly notify the Company of any changes in personnel assignments or modifications to the scope of work that differ from those addressed during the initial Start Briefing. Failure to inform the Company about these changes may result in delays, suspension of work authorization, or removal from the site until all required safety briefings have been completed.

Audits

The Company shall have the right at any time to inspect and audit Contractor's work areas and documents to determine compliance with these EHS Work Requirements. Contractor shall cooperate with the Company's inspection and audit requirements, including providing the Company and its employees and representatives with reasonable access to Contractor's employees and relevant information and records.

B. SAFETY

Safety Pre-Qualification

- **Registration.** When requested by the Company, Contractors are required to have ISNetworld (ISN) accounts. Contractors must submit insurance information and OSHA statistics regardless of the size of their company. If a Contractor’s ISN grade falls to an unacceptable level (C or F grade) at any time, the Company reserves the right to pause or cancel the work until Contractor has restored their grade and status. Contractors are responsible for ensuring that their ISN contact information is accurately listed and regularly updated. For more information on ISN see <https://www.isnetworld.com>.
- **Variances.** Contractors who do not meet the Company’s ISN grade requirements are generally ineligible to perform work on Company property. However, in exceptional circumstances, such as when no other pre-qualified Contractors are available for the specific scope of work, or when the Contractor offers a specialized service critical to operations, a variance may be considered. To be eligible for this exception, the Contractor must obtain prior written approval from both the site Safety Manager and EHS Manager, as well as the site General Manager. In addition, the Contractor is required to submit a detailed and comprehensive safety mitigation plan that clearly outlines the measures they will implement to address any identified risks and ensure full compliance with all applicable health, safety, and environmental requirements. This mitigation plan must be accepted by relevant site management before any work may proceed under the variance.

Health & Safety Plans

Contractors are required to have relevant Job Safety Analysis and pre-job safety briefings or tailboards. Additionally, at the Company’s request and prior to the commencement of work, Contractor may be required to prepare and submit a comprehensive Health and Safety Plan specific to the scope of activities to be performed. This plan must outline Contractor’s approach to identifying, assessing, and controlling potential hazards, and

include details on training, emergency procedures, job hazard analyses, use of personal protective equipment (PPE), and other methods for ensuring job safety and compliance with all relevant EHS requirements. Any required Health and Safety Plan must be reviewed and approved by the site Safety Manager and Environmental Manager (or EHS Manager where applicable) before any on-site work may begin; however, this review will not limit Contractor's obligations under a contract, at law or in any other respect.

Permits to Work

Before starting any work on-site, Contractors are required to work with site safety personnel to determine whether a safety Permit to Work is required. Permits to Work required for a Contractor's on-site activities may include the following:

- Hot work
- Roof access
- Working at heights
- Line and equipment opening
- Confined space entry
- Demolition work
- Critical, non-standard, or multiple lifts
- Trenching and/or excavation
- Work within a lagoons, pond or other waterbody
- Electrical work (greater than 50 volts)
- High-risk tasks (e.g., any task that has the potential to result in a fatality, serious injury or other substantial harm or damage)

Contractors must obtain all required Permits to Work before any work commences. Failure to obtain the necessary permits may result in delays, suspension of work authorization, or removal from the site. Contractors are responsible for ensuring that all Contractor Representatives are aware of and comply with permit requirements. The validity of a Permit to Work is specifically limited to the time period specified in the Permit.

PPE

Contractors are responsible for providing all necessary PPE to their employees and Representatives, ensuring that each individual is properly equipped for the tasks they are assigned. PPE must be selected based on a documented hazard assessment, meet safety standards (e.g., OSHA, ANSI, CSA, EN, ISO, and/or ASTM), and be available in multiple sizes and styles for proper fit.

- **PPE Supplies.** Before starting any work on-site, contractors must assess the job requirements and confirm that all required PPE - including, but not limited to, hard hats, safety glasses, gloves, hearing protection, high-visibility clothing, and steel-toe boots - is available and in good condition for use.
- **High Visibility (Hi-Vis) Workwear.** **All Contractors are required to wear Hi-Vis vests at a minimum while on Company property, regardless of the location of their work on a site.** Other requirements for hi-vis workwear may apply to Contractors based on the location and type of work to be performed.
- **Specialized PPE.** In addition to standard PPE, Contractors must supply any additional PPE required for work in designated areas as specified by site safety personnel. This may include, for example, respiratory protection, chemical-resistant clothing, fire-resistant clothing, or specialty harnesses for fall protection.
- **PPE Adherence.** Contractors must ensure their personnel are trained in the correct use, maintenance, and limitations of the PPE provided. PPE must be worn at all times as required by site rules and any specific Permit to Work. Contractor is responsible for enforcing the use of PPE for its employees and Representatives. Failure to comply with PPE requirements may lead to removal from the site or suspension of work authorization. Contractors are responsible for regularly inspecting, maintaining, and replacing PPE as necessary to guarantee ongoing protection for their personnel throughout the duration of their project or work.

First Aid

Contractors must ensure that adequate first aid resources are always available and easily accessible on-site while work is being performed. This includes maintaining a fully stocked first aid kit appropriate for the scope of work and number of personnel, as well as ensuring that at least one trained first aid responder is present during all

work shifts. The location of first aid supplies and emergency contact information must be clearly marked and communicated to all Contractor personnel. Contractors are responsible for regularly inspecting and replenishing first aid supplies as needed, and for ensuring rapid access to emergency medical care if required.

Safety Incidents

- **Reporting.** All work-related injuries, illnesses, emergencies, fires, spills, or damage on-site must be reported to the site Safety or EHS Manager immediately. Incidents include, but are not limited to, fatalities, OSHA recordables, lost workdays, first aids, near misses, motor vehicle accidents, fires, and property damage. **Contractors are responsible for reporting incidents involving their subcontractors or other Representatives.**
- **Incident Investigation.** Except for “SIFs” as defined below, Contractors must investigate all safety incidents that occur during their work on-site and provide a written investigation report to the site Safety or EHS Manager as soon as possible but no more than 48 hours from the time of the incident for all significant injury and/or illness events. Contractors must cooperate fully with any additional investigations or follow-up requests from site safety personnel and ensure all information provided is accurate and complete. Also, Contractors are responsible for maintaining records of all incidents and reports as required by site policy and applicable laws and regulations.
- **Serious Incidents and Fatalities (SIF).** **SIFs must be reported to the Company’s Site Safety or EHS Manager immediately and not more than eight (8) hours from the occurrence of the incident.** Contractors must promptly, thoroughly, and transparently investigate all SIF events and develop and implement corrective actions based on these investigations.

Safety Barriers / Barricades

Contractors must install barriers and warning signs to prevent incidents near their work areas, including but not limited to areas around excavations, holes, tank openings, roof edges, and elevated platforms. Barricades must be made of appropriate material and be visible, durable, and placed to ensure safety. When appropriate, yellow, or yellow/black tape should be used to signal caution and conditional entry. Red or red/white tape should be used to mark areas where entry is prohibited. Tags or signs must be posted around the barricaded area on all sides and access points to indicate conditional or prohibited entry. Proper ballasting and support should be used to keep barricades upright and visible, especially when used in windy conditions. Contractors must remove all barricades when work is completed. Additional barricade requirements for scaffolding, ladder use, working at heights, crane operations, and confined space entry apply – see below.

Tools and Equipment

- **Supply.** Contractor is responsible for supplying all necessary tools and equipment required to safely and effectively complete the project or work. This includes, but is not limited to, aerial lifts, forklifts, scaffolding, and any specialized equipment essential for the tasks at hand. **Homemade or fabricated tools are prohibited.**
- **Company-Owned Tools / Equipment.** Contractor will not be allowed to use, operate, or borrow any Company tool, equipment, or process unless such usage is absolutely necessary and Contractor has signed Company’s **Tool and Equipment Use Agreement**. The Contractor must provide documentation that their personnel or Representatives who will use any loaned Company tools or equipment are trained and fully qualified to use such in accordance with applicable regulatory requirements.
- **Proper Management.** All Contractor tools and equipment, including all safety devices, must be maintained in good working condition at all times. Regular inspection of tools and equipment is mandatory. Contractors must immediately remove defective equipment from service and ensure that any equipment found to be faulty, damaged, or in need of repair is promptly tagged, taken out of operation, and reported to site safety personnel. Repairs or replacements should be carried out before the equipment is returned to service to prevent accidents and maintain a safe working environment. Safety guards must be in good condition, in place and firmly affixed to all power tools before use.
- **Tool Modifications.** Tools must not be forced beyond their capacity, and “cheaters” shall not be used to increase tool capacity.

- **Specialized Tools.** When specialized tools are necessary to mitigate safety risks associated with specific tasks, the Contractor is responsible for providing the appropriate equipment. For example, in environments where vapors or gases are present or may develop during work, the Contractor shall utilize spark-resistant tools to prevent ignition hazards. Likewise, non-conductive tools must be used for tasks involving electrical systems to ensure the safety of personnel and property.
- **Portable Power Tools.** Portable power tools supplied by the Contractor may not be used in areas where flammable or combustible liquids or dusts are stored or handled (classified zones) unless the tools are approved and rated for service in a hazardous location. Portable power tools must be double-insulated or be grounded. Extension cords must be maintained in good working condition and may not contain any splices. Cords must be kept out of walkways and other areas where they could present trip hazards or where they could be damaged. Ground Fault Circuit Interrupters (GFCI, USA, Canada) or Residual Current Circuit Breaker (RCB, Int'l) must be used as warranted by the circumstances and local codes and regulations. All power tools must be inspected regularly by the Contractor and repaired and removed from service if found to be defective

Pneumatic Tools and Compressed Air

Pneumatic tools and hoses supplied by Contractor must be appropriate for the maximum pressure rating of the associated air compressor system, must have banding clamps or ear clamps to prevent accidental disconnections, and must be secured by a positive means (such as whip checks, Chicago clips, or lanyards) to prevent pressurized hoses from thrashing in the event of a coupling failure. All pneumatic tools and hoses must be inspected prior to use by Contractor to verify that all couplings have matching thread types, are compatible with ports to be used, and are secured by a positive means, all connections are tight so that they will not come loose under pressure, and there are no indicators of structural weakness in air hoses such as bulging sections, abrasions, and cuts. If a compressed air hose and/or associated equipment does not pass a pre-use inspection, Contractor shall immediately remove the defective item(s) from service and have them repaired. Compressed air may not be used for cleaning personnel or clothing. Compressed air hoses must be properly stored (off of the floor) when not in use.

Cranes, Hoists, Lifts and Rigging

Contractors must adhere to the following minimum requirements, plus all applicable Laws, when using cranes, hoists, and rigging on the Company's property.

- **Inspection Certificates:** All cranes and hoists brought onto the site must have a current and valid inspection certificate. Proof of inspection must be provided upon request.
- **Qualified Operators:** Only certified crane operators are permitted to operate cranes on site. Rigging and lift operations must be performed by designated, qualified riggers. Proof of crane operator certification must be provided upon request.
- **Lift Planning:** Contractors are responsible for developing appropriate rigging and lift plans. For critical, non-standard, or multiple lifts, a detailed lift plan must be created and discussed during the Start Briefing and a permit-to-work must be issued before any critical, non-standard, or multiple lift operation begins.
- **Minimum Lifting Requirements.** Contractors must perform all lifting safely and, including, without limitation, comply with the following minimum requirements:
 - + All hooks must be equipped with safety latches.
 - + Outriggers must be fully extended on firm ground. The crane driver must maintain a safe working clearance of at least 10 feet/3 meters from energized electrical lines.
 - + A signal person (flagger) must be used in lifting situations where the crane operator does not have full view of the lift.
 - + Suspended loads cannot be left unattended. When moving a suspended load, a tag line must be used. Personnel must not walk under suspended loads and suspended loads must not be moved over personnel.
 - + All accessible areas within the radius of the counterweight swing must be barricaded by the Contractor to prohibit access.

- **Use of Owner's Equipment:** Contractors are not allowed to use, operate, or borrow any of the owner's house cranes except when absolutely necessary, and only after executing a written **Crane, Lift, and Scaffolding Use Agreement**.

Hot Work

"Hot Work" includes work tasks that could produce sufficient heat or spark to cause ignition and work tasks that generate or could generate static electricity. "How Work" tasks include, but are not limited to, welding, cutting, brazing, grinding, abrasive blasting, use of a combustion engine, and/or use of power tools. Contractor is responsible for furnishing all safety equipment needed for such work including welding shields, respirators, fire extinguishers, fire hoses, and fire watch personnel.

Minimum Hot Work requirements, which are in addition to any measures specified in a Hot Work Permit, include:

- **Hot Work Permit to Work.** Before starting any hot work activities, a Hot Work Permit to Work must be obtained. The Hot Work Permit must be conspicuously posted in the area where the work is being performed.
- **Hot Work Location.** Welding activities must only be performed in areas that have been specifically approved for this type of work. Before beginning any welding operation, contractors are responsible for confirming that the designated location has been evaluated and authorized for welding, ensuring it does not pose a fire risk and that adequate ventilation is available. Contractors must verify that the work area is free from combustible materials or properly shielded, and that all necessary fire prevention measures are in place. Under no circumstances should welding be conducted in spaces that have not been inspected and cleared for safe hot work.
- **Welding Stainless Steel and Chromium-Containing Alloys**

Contractors must use at least the following precautions when welding on stainless steel, and ongoing compliance must be monitored throughout the duration of the welding operation.

- + Prior to commencing any welding activities on stainless steel, Contractors must implement comprehensive controls to prevent exposure to hexavalent chromium (CrVI). A hazard assessment must be performed to identify potential sources and levels of CrVI generated during welding. Contractors are required to provide and enforce the use of appropriate personal protective equipment (PPE), including respirators rated for CrVI and protective clothing to prevent skin contact.
- + Work areas must be equipped with adequate local exhaust ventilation systems designed to capture and filter fumes at the source. Where ventilation alone is not sufficient, supplemental air monitoring must be conducted to ensure airborne concentrations remain below permissible exposure limits. All Contractor Representatives involved in welding operations must receive training on the risks of CrVI, proper use of PPE, and safe work practices. Decontamination facilities, such as hand-washing stations, must be readily available to personnel upon completion of work.
- + Contractors must post warning signs and erect appropriate safety barriers or access controls in welding areas indicating the presence of CrVI hazards.
- + Any waste materials or debris contaminated with CrVI must be handled and disposed of in accordance with applicable regulations and any instructions provided by the site's Environmental department.
- **Fire Watch.** Contractor must assign a fire watch to monitor hot work area for any signs of fire hazards. This person must be trained to recognize and respond to fire hazards and must have access to appropriate fire extinguishing equipment. The fire watch must be fully dedicated to monitoring the hot work throughout the job and must stay at least 60 minutes (or such other period as is appropriate under the circumstances) after hot work is completed to continue monitoring for signs of fire. The hot work area must be checked again by the fire watch up to 3 hours after completion of the job to ensure there are no flare-ups.

- **Safety Inspections.** Before starting any hot work, a comprehensive safety inspection must be conducted to ensure that flammable or combustible materials have been removed or adequately shielded. Proper ventilation of the work area also must be established to prevent fumes from accumulating.
- **Equipment.** Contractors must provide fully charged fire extinguishers, fire hoses and other fire suppression equipment dedicated specifically to monitoring the hot work.

Scaffolding

- **Scaffolding Use.** Contractors are required to provide their own scaffolding. Scaffolds must not be erected, moved, dismantled, or altered except under the supervision of a designated Contractor representative or other person with appropriate qualifications. Contractor is prohibited from using scaffolding erected by the Company or any service provider hired by the Company except when absolutely necessary and only after Contractor executes a written **Crane, Lift, and Scaffolding Use Agreement**.
- **Scaffolding Condition.** Scaffolds must be equipped with all necessary safety features, including but not limited to, guardrails, mid-rails, toe boards, and appropriate means of access. Scaffold platforms must be tightly planked with appropriate grade material. Scaffolds must be always a safe distance from electric power lines. Scaffolds must be erected on solid surfaces. Scaffold accessories such as braces, brackets, trusses, screw legs, or ladders that are damaged or weakened from any cause must be immediately repaired or replaced.
- **Access Controls.** Appropriate barricades or other appropriate access controls are required around all scaffolding in use to prohibit people from entering areas underneath.

Ladders

- **Ladder Use.** Contractors are strictly prohibited from using any Company-owned ladder except when absolutely necessary and only if Contractor executes a **Tool and Equipment Use Agreement**. Each contractor must supply their own ladders, ensuring that every ladder is in good working condition and free from any visible defects. Contractors must only use ladders with non-conductive side rails, such as fiberglass, when working near or with electricity or electrical equipment. Prior to each use, ladders must undergo a thorough inspection to identify damage, wear, or any signs of compromised safety. Any ladder found to be defective or unsafe must be promptly removed from service and replaced. It is the contractor's responsibility to guarantee that all personnel and Representatives who utilize ladders have received comprehensive training in safe ladder practices and adhere to these safety protocols at all times.
- **Barricades.** Contractors must install appropriate barricades around all areas where ladders are being used, particularly during elevated work. These barricades are essential for restricting unauthorized access beneath or near ladders, thereby minimizing the risk of injury from falling objects or accidental contact with the ladder. Barricades should be clearly marked and sturdy enough to prevent accidental entry into the hazardous area. Regular monitoring of these barricaded zones is required to ensure ongoing compliance and protection throughout the duration of ladder use.

Fall Protection

The use of an appropriate fall arrest system - full harness, stirrup pack and Self Retracting Lanyard (SRL) - is required when working at unprotected heights of 4 feet (1.2 meters) or greater and may be required to obtain a Permit to Work prior to initiating any work at heights. Contractors are prohibited from working from the forks of a lift truck or standing on any platform positioned on the forks to complete overhead work, and Contractors are required to wear a full body harness or positioning device with a proper anchor point when operating areal lifts. All Contractors must obtain a Roof Access Permit to Work before entering or accessing any roof.

Energy Control - Lockout / Tagout (LOTO)

If Contractor's work involves energized equipment, Contractor must obtain a Permit to Work prior to initiating the job and follow the minimum requirements set forth below.

- **Procedure Review:** Contractors must thoroughly review the site's LOTO procedures applicable to their work before beginning any work involving energy isolation. This review must evaluate whether the site's LOTO procedures sufficiently address all hazards associated with the specific work. If gaps or concerns are identified, consult with the site's Safety or EHS Manager to update or amend procedures as needed.

Any work on energized equipment for testing purposes or the use of alternative energy safe procedures must be agreed and permitted as part of the Permit to Work issued by the Company.

- **Training and Authorization:** Contractors must ensure that only personnel with the required LOTO Authorized Person training are assigned to perform LOTO tasks. They also must confirm that each worker understands the procedures and is competent in their application.
- **LOTO Equipment:** Contractor personnel must use designated lockout locks, hasps, and/or lock boxes in strict accordance with equipment-specific lockout procedures. Personal locks must be clearly tagged with the name, company, and contact number of the person applying the lock.
- **Communication:** Before re-energizing any power source, Contractors must notify the designated Company representative to coordinate safe removal of locks and restore equipment operation. Contractors also must ensure all personnel are accounted for and clear from the work area before reactivation.
- **Continuous Monitoring:** Contractors must monitor compliance with LOTO procedures throughout the job and immediately address any unsafe conditions or procedural deviations.

Electrical Work

For electrical work, Contractors must implement at least the following minimum procedures in addition to meeting the requirements of all applicable Laws, including but not limited to State or local electrical inspection agencies, and all Permit to Work requirements.

- **Qualified Personnel:** Only Contractor Representatives who are qualified electricians and whose qualifications have been verified during the pre-qualification process are permitted to perform electrical tasks at a Company site.
- **Attendant Requirement:** When working under an Energized Electrical Permit to Work, Contractors must ensure that an attendant is present. This attendant must be trained in rescue procedures for victims in contact with live electrical components, possess first aid certification, and be proficient in the use of an Automated External Defibrillator (AED). The Contractor is responsible for providing this attendant, who must remain on-site and attentive throughout the duration of the work.
- **Site Isolation and Barricading:** Contractors must clearly mark work areas involving exposed live electrical parts with highly visible red or red/white barricade tape and appropriate safety signage. These barriers must be positioned to prevent unauthorized or unqualified personnel from entering hazardous zones.
- **PPE:** All Contractor Representatives involved in electrical tasks must wear arc-rated PPE provided by the Contractor. The PPE must be selected in accordance with the arc flash rating specific to the installation and the level of risk identified in the job safety analysis.
- **Specialized Tools and Equipment:** All tools and equipment used in electrical work - including hand tools, ladders, and other devices - must be constructed of nonconductive materials to minimize the risk of accidental electrical contact.
- **Continuous Monitoring:** Contractors are responsible for continuously monitoring adherence to electrical safety procedures throughout the job. Any unsafe conditions or deviations from established protocols must be immediately addressed and reported to the site Safety or EHS Manager.

Confined Space Entry

Contractors whose work involves activities within a confined space are required to follow all regulatory and site's Confined Space Procedures. Before entering a confined space, Contractors must obtain a Confined Space Entry Permit to Work from the Company's Safety or EHS Manager. The rescue plan, either to be performed by the Contractor or the Company, must be reviewed as part of the Permit to Work issuance process before permission for entry is granted.

Only qualified firms and individuals are allowed entry into confined spaces, and all entrants, the entry supervisor and the entry attendant must be appropriately trained in accordance with OSHA's confined space entry requirements. Proof of completed training must be made available to the Company upon request. Entry attendant must be provided by the Contractor.

Trenching / Excavation

A review or survey of underground utilities, sewers and/or lines must be performed before digging any hole or trench on Company property. This review must occur sufficiently in advance (at least 48 hours) before the start of the digging work. Contractor must provide an excavation competent person to be on-site for all excavations. Training records or training certificates of completion for competent persons must be submitted to the Company prior to beginning work and upon additional Contractor competent persons being added. All excavations 4-feet deep or greater (or otherwise determined by the competent person) must be planned, properly evaluated, inspected, and documented by the competent person and authorized by the site through the issuance of an Excavation and Trenching Permit-to-Work before entry of any personnel. Contractors must provide their own atmospheric monitoring equipment and perform atmospheric monitoring of the excavation prior to entry.

Water-Based Work

Contractors working in or around the owner's pond or lagoon must adhere to strict safety protocols to prevent accidents and environmental harm. Prior to commencing any work, a hazard assessment of the area must be performed, including evaluation for unstable banks, deep water, or the presence of hazardous substances. Appropriate PPE, such as H2S monitors, life jackets and waterproof boots, must be worn at all times when near or in the water. Contractors must ensure that a rescue plan is in place and that a trained attendant is present on-site, equipped to respond to water-related emergencies. Entry into the pond or lagoon is permitted only for qualified personnel with documented training in water safety and rescue procedures. All work activities must be authorized by the site through the issuance of a Water-Based Work Permit-to-Work and monitored for compliance with environmental regulations. Any spills or contamination must be reported immediately to the site Environmental or EHS Manager.

C. ENVIRONMENTAL

Environmental Permits

Contractors shall perform their work in a manner that does not adversely affect the Company's ability to maintain compliance with its environmental permits and environmental plans, including, without limitation, any applicable Storm Water Pollution Prevention Plan ("SWPPP") or Spill Containment and Countermeasure Plans ("SPCC"). At Contractor's request, the Company shall provide Contractor with copies of the site's environmental permits and environmental plans applicable to the work.

Hazardous Conditions

The discovery of previously unidentified environmental impacts (e.g., free product, stained soils, asbestos, PCBs, evidence of hexavalent chromium (e.g., bright yellow scale or deposits) or conditions that may be hazardous to the Company's employees, Contractor's Representatives, members of the public or any other third party. In each case, Contractor shall cease work immediately.

Container Management

- **No Tanks.** No chemicals, fuels or materials may be stored on the Company's property in aboveground storage tanks ("ASTs") or underground storage tanks ("USTs") unless the use/installation of such AST or UST is approved in advance by the site's Environmental or EHS Manager in writing. Additionally, Contractor shall not use any drums, tanks or other containers belonging to the Company, unless such usage is specifically approved by the Company.
- **No Rinsing.** Contractor shall not rinse or otherwise clean any drums, tanks or containers used for chemical storage on Company property, unless such cleaning procedures are approved in advance by the site Environmental or EHS Manager.
- **No Personal Use.** No tanks, drums or containers used in performance of work for the Company shall be transported off-site for personal use by Contractor or its Representatives, regardless of whether they have been rinsed or otherwise emptied.

Cleanup / Remediation

If Contractor or any of its Representatives causes a spill or release to the environment in, on or under Company property (including a release into any facility sewers), Contractor shall immediately take the following actions and any others as may be required to contain or minimize the extent of the spill:

- **Qualified Personnel.** Contractor shall retain qualified personnel to perform any and all required remediation work.
- **Expenses.** Contractor shall be solely responsible for any cleanup actions and related expenses arising from or relating to the release, regardless of whether the release must be reported to a governmental authority.
- **Waste Management.** All spill cleanup materials generated by Contractor must be properly disposed in a timely manner in accordance with applicable Laws. All manifests, bills of lading and other waste disposal and shipping documents shall identify Contractor as the “generator” of waste resulting from the remediation of a spill caused by Contractor or any of its Representatives, and Contractor shall assume any and all liability associated with disposal of such waste.

Vehicle Fueling and Maintenance

- **Approvals.** Contractor shall not perform vehicle or equipment fueling, washing or maintenance activities on Company property without prior written permission from the site’s Environmental or EHS Manager. The Company’s approval of such activities is not intended, and shall not be construed, to make the Company liable for any such activities, nor shall it waive, modify, or otherwise limit Contractor’s obligations.
- **Authorized Operations.** If Contractor obtains the Company’s permission to wash, fuel or maintain vehicles or equipment on-site, Contractor shall comply with the following requirements:
 - **Approved Locations/Times.** Contractor shall conduct any approved fueling, washing or maintenance activities only in areas designated by the Company during daylight hours.
 - **Monitoring.** Contractor or a Contractor Representative must stay with the vehicle/equipment during the entire time that fueling, washing or other maintenance operations are being conducted.
 - **Spill Response.** Prior to initiating any approved fueling, washing or maintenance activities, Contractor must develop procedures for responding to spills and releases and properly managing waste or recyclable materials generated by the activities. Contractor must provide the Company with documentation evidencing that its Representatives have been trained on these procedures. Contractor must maintain adequately stocked spill kits in or around the fueling, washing and/or maintenance locations.
 - **Containment.** Contractors will perform all fueling, washing and other approved maintenance activities only when vehicles and equipment are parked on top of tarps or other impervious surfaces and/or employ secondary containment devices to capture all fluids, rinsates, and other wastes from such activities.
 - **Weather Considerations.** Contractor shall refrain from performing any vehicle or equipment fueling, washing or outside maintenance activities when it is raining, and Contractor shall immediately cease any ongoing fueling activities during rain events.

Paint Management

- **Waste Minimization.** Contractor shall use water-based, latex or other paints that are not hazardous waste when disposed, unless the scope of work agreed to by the Company and Contractor specifies an alternative paint type (e.g., epoxy, oil-based, etc.). Contractor shall conduct all painting activities in a manner that minimizes the amount of paint waste generated (e.g., through application of multiple coats of paint until the inventory is depleted, etc.).
- **Jobsite.** No paint removal (e.g., sandblasting), painting or fiberglass work may be performed over exposed soil or sewers and must be conducted over an impervious surface. All sandblasting activities must be performed in a manner that minimizes fugitive air emissions and in compliance with any applicable Smurfit Westrock air permit requirements. Additionally, all used sandblasting media must be collected, characterized and promptly shipped off-site for proper disposal.

2. Erosion and Sedimentation

Erosion or soil runoff from any major earth moving, excavation or other work must be prevented from entering any storm sewer systems or waterbodies by using silt fences, sedimentation basins, or other appropriate erosion control measures.

3. Fill Material

- **Clean Fill Only.** Clean fill from construction and demolition work must consist solely of uncontaminated earth, concrete, gravel, bricks, masonry and/or rocks. No metal, plastic, asphalt, wood, paper, sheet rock, rebar extending beyond the concrete, scrap metal, trash or garbage is allowed.
- **Clean Fill Certification.** Before finishing the work, Contractor must provide the Company with a written certification, in a format acceptable to the site Environmental or EHS Manager, confirming that all fill material at the facility meets this section's requirements.
- **Prior Authorization.** Contractor shall not bring any fill material onto a Company facility or apply such material without prior authorization from the site Environmental or EHS Manager.

4. NORM and Nuclear Devices

- **NORM Management.** If any naturally occurring radioactive material (NORM) is identified during the course of the work, Contractor must notify the site's Environmental, Safety or EHS Manager as soon as possible. All NORM-containing piping and other materials must be stored in a lay down yard approved by the Company and Contractor must cover all such materials during the period when it is present in the laydown yard. The Company will arrange for the disposal of any NORM- containing materials, as appropriate.
- **Radioactive Sources.** The maintenance, relocation, removal, or disposal of gauges or equipment containing radioactive source material is strictly regulated by federal and state laws. Only contractors who are properly licensed - typically the original equipment vendor - are permitted to perform these tasks. All activities involving nuclear devices must be scheduled in advance and coordinated with the site Environmental, Safety, or EHS Manager.

ADDENDUM B

ASBESTOS SERVICES

The following additional requirements shall apply to Contractor's performance of Services involving the removal or other handling of asbestos, asbestos-containing material and/or asbestos waste (collectively, "ACM") at any Company facility or site.

1. **Permits**. Contractor shall hold all current licenses, permits and other authorizations required by law, including a general contractor's license, if necessary, for the performance of sampling, renovation, removal or other management work involving ACM. True and correct copies of all such licenses, permits and authorizations shall be delivered to the Company prior to commencement of the Services.
2. **Trained Personnel**. All ACM work shall be done under the direct supervision of a professional with experience and training in ACM abatement and shall be executed by skilled personnel who are familiar with and experienced in asbestos removal and related work. Further, Contractor and all of Contractor's Representatives who will, or have the potential to, encounter or contact any ACM shall have received training on asbestos hazards and the proper performance of ACM-related work, regardless of whether such training is required by law. Contractor shall provide the Company with evidence of such training prior to commencement of the Services.
3. **Project Notifications**. Contractor shall be responsible for providing timely notification (or renotification as the case may be) to all appropriate governmental authorities as required by law for the performance of ACM removal, and the transportation, recycling, disposal or other management of residuals and wastes resulting from such activities. Contractor shall provide the Company with copies of all notifications made to government authorities in connection with the ACM work.
4. **Project Verification**.
 - 4.1 Prior to initiating any ACM work, Contractor shall visually inspect the area where the work is to be performed to become familiar with the location of the ACM and verify the quantity of ACM to be removed. **IT IS CONTRACTOR'S OBLIGATION TO REQUEST A COPY OF ANY FACILITY ACM SURVEY**. If such a current survey does not exist for the area where the work is to be performed, Contractor shall work with the Company to develop the required information to safely initiate the ACM work in compliance with applicable Laws.
 - 4.2 Following the site inspection, Contractor shall deliver to the Company for review and approval a work plan containing the following information and any other information a Company facility may reasonably require: (i) the sequence of removal activities, (ii) a description of the work methods and removal procedures to be used, (iii) decontamination procedures to be used, (iv) health and safety procedures to be followed, (v) a description of the waste handling and disposal procedure to be used, (vi) a list of notifications, permits and other authorizations required for the project, and (vii) a project schedule. The Company's review and approval of a work plan shall not make Smurfit Westrock or any of its employees, parents, subsidiaries, successors, affiliates or assigns liable to Contractor or any other person or entity for any defects (including, but not limited to, latent defects) in the design or performance of any ACM work.
5. **Work Areas**. Contractor and its Representatives shall use an area designated by the Company for mobilization, decontamination, staging and other management of equipment used in any ACM work. Use by Contractor or any of its Representatives of any other area of a Company facility for such activities is strictly prohibited without prior authorization by a duly authorized Company representative.
6. **Containment**.
 - 6.1 Prior to initiating the ACM work, inventory, equipment and other property shall be removed to a designated alternative location if requested by the Company.
 - 6.2 Contractor and its Representatives shall take such actions as may be required to prevent any areas of a Company facility from becoming impacted, contaminated or cross-contaminated with ACM, ACM dust or other debris. Contractor shall be responsible for cleanup, at Contractor's sole cost and risk, of any impacts, contamination, or cross-contamination (including, without limitation, any contamination of Company products) due to its failure to comply with this requirement.

7. **Housekeeping**. Contractor shall remove all loose ACM, dust and debris from the work area (and any other areas as applicable) at the end of each work shift. If applicable to the scope of work, Contractor shall dispose of any ACM, dust or debris in accordance with all applicable Laws, including, without limitations, using disposal facilities that are properly permitted to accept such ACM wastes. Contractor shall provide the Company with copies of all waste disposal documents relating to the work, including, without limitation, any manifests.
8. **Cleanup**. Upon completion of the ACM work/project, Contractor shall complete an inspection of the jobsite(s) to look for ACM debris, residue on surfaces, dust or other ACM matter and shall take appropriate actions to ensure that the jobsite and other relevant areas of the Company's facility and the job site are free of any of the same. Following the performance of all cleaning and inspections, Contractor shall remove any decontamination unit and all equipment, materials and debris from the jobsite.
9. **Waste Disposal**. If required by the Contractor's scope of work, all waste materials derived from the ACM work shall be disposed in an approved, properly permitted landfill or other disposal facility. Prior to off-site transportation, all ACM waste shall be packaged in sealed, leak-proof containers conspicuously labeled with the words "CAUTION – CONTAINS ABESTOS" or other wording that complies with applicable Laws. The outside of all ACM waste containers shall be visibly clean before they are transported off-site.

ADDENDUM C

LEAD-BASED PAINT SERVICES

The following additional requirements shall apply to Contractor's performance of Services involving the removal or other handling of lead-based paint material and/or waste (collectively, "LBP") at any Company facility or site.

1. **Permits**. Contractor shall hold all current licenses, permits and other authorizations required by law, including a general contractor's license, if necessary, for the performance of sampling, renovation, removal or other management work involving LBP. True and correct copies of all such licenses, permits and authorizations shall be delivered to the Company prior to commencement of the Services.
2. **Trained Personnel**. All LBP work shall be done under the direct supervision of a professional with experience and training in LBP abatement and shall be executed by skilled personnel who are familiar with and experienced in LBP removal and related work. Further, Contractor and all of Contractor's Representatives who will, or have the potential to, encounter or contact any LBP shall have received training on lead-based paint hazards and the proper performance of LBP-related work, regardless of whether such training is required by law. Contractor shall provide the Company with evidence of such training prior to commencement of the Services.
3. **Project Notifications**. Contractor shall be responsible for providing timely notification (or renotification as the case may be) to all appropriate governmental authorities as required by law for the performance of LBP removal, and the transportation, recycling, disposal or other management of residuals and wastes resulting from such activities. Contractor shall provide the Company with copies of all notifications made to government authorities in connection with the LBP work.
4. **Project Verification**.
 - 4.1 Prior to initiating any LBP work, Contractor shall visually inspect the area where the work is to be performed to become familiar with the location of the LBP and verify the quantity of LBP to be removed. **IT IS CONTRACTOR'S OBLIGATION TO REQUEST A COPY OF ANY FACILITY LBP SURVEY**. If such a current survey does not exist for the area where the work is to be performed, Contractor shall work with the Company to develop the required information to safely initiate the LBP work in compliance with applicable Laws.
 - 4.2 Following the site inspection, Contractor shall deliver to the Company for review and approval a work plan containing the following information and any other information a Company facility may reasonably require: (i) the sequence of removal activities, (ii) a description of the work methods and removal procedures to be used, (iii) decontamination procedures to be used, (iv) health and safety procedures to be followed, (v) a description of the waste handling and disposal procedure to be used, (vi) a list of notifications, permits and other authorizations required for the project, and (vii) a project schedule. The Company's review and approval of a work plan shall not make Smurfit Westrock or any of its employees, parents, subsidiaries, successors, affiliates or assigns liable to Contractor or any other person or entity for any defects (including, but not limited to, latent defects) in the design or performance of any LBP work.
5. **Work Areas**. Contractor and its Representatives shall use an area designated by the Company for mobilization, decontamination, staging and other management of equipment used in any LBP work. Use by Contractor or any of its Representatives of any other area of a Company facility for such activities is strictly prohibited without prior authorization by a duly authorized Company representative.
6. **Containment**.
 - 6.1 Prior to initiating the LBP work, inventory, equipment and other property shall be removed to a designated alternative location if requested by the Company.
 - 6.2 Contractor and its Representatives shall take such actions as may be required to prevent any areas of a Company facility from becoming impacted, contaminated or cross-contaminated with LBP, LBP dust or other debris. Contractor shall be responsible for cleanup, at Contractor's sole cost and risk, of any impacts, contamination, or cross-contamination (including, without limitation, any contamination of Company products) due to its failure to comply with this requirement.
7. **Chemical Strippers**. Non-hazardous chemical paint strippers approved for lead-based paint may be utilized; provided that, if a chemical stripper is used, Contractor shall be responsible for ensuring that necessary

worker protections for stripper use are implemented and all waste stripper is disposed in accordance with applicable Laws.

8. **Housekeeping**. Contractor shall remove all loose LBP, dust and debris from the work area (and any other areas as applicable) at the end of each work shift. If applicable to the scope of work, Contractor shall dispose of any LBP, dust or debris in accordance with all applicable Laws, including, without limitations, using disposal facilities that are properly permitted to accept such LBP wastes. Contractor shall provide the Company with copies of all waste disposal documents relating to the work, including, without limitation, any manifests.
9. **Cleanup**. Upon completion of the LBP work/project, Contractor shall complete an inspection of the jobsite(s) to look for ACM debris, residue on surfaces, dust or other LBP matter and shall take appropriate actions to ensure that the jobsite and other relevant areas of the Company's facility and the job site are free of any of the same. Following the performance of all cleaning and inspections, Contractor shall remove any decontamination unit and all equipment, materials and debris from the jobsite.
10. **Waste Disposal**. If required by the Contractor's scope of work, all waste materials derived from the ACM work shall be disposed in an approved, properly permitted landfill or other disposal facility. Prior to off-site transportation, all ACM waste shall be packaged in sealed, leak-proof containers conspicuously labeled with wording that complies with applicable Laws. The outside of all LBP waste containers shall be visibly clean before they are transported off-site.

ADDENDUM D

MOLD ABATEMENT SERVICES

The following additional requirements shall apply to Contractor's performance of Services involving the removal or other handling of mold, mold-containing material and/or waste generated by or derived from mold abatement activities at any Company facility or site.

1. **Abatement Materials.** Contractor shall use only non-hazardous materials (e.g., walnut hulls/shells) for removing mold in the identified service areas. No chemical cleaners, disinfectants, mold inhibitors, fungicides, encapsulants, spray adhesives, odor masking agents, air fresheners or similar materials are authorized for use in performing the mold abatement services, unless there is a strong justification to do so and when approved in advance by the Company. Also, when approved by the Company prior to use, small quantities of low odor consumer-type hand dishwashing detergent may be used when mixed with water for the purpose of wetting cleaning cloths used for damp wiping surfaces.
2. **Permits.** Contractor shall hold all current licenses, permits and other authorizations required by law, including a general contractor's license, if necessary, for the performance of sampling, renovation, removal or other management work involving mold. True and correct copies of all such licenses, permits and authorizations shall be delivered to the Company prior to commencement of the work.
3. **Trained Personnel.** All mold abatement work shall be done under the direct supervision of a professional with experience and training in mold remediation and shall be executed by skilled personnel who are familiar with and experienced in mold removal and related work. Further, Contractor and all of Contractor's Representatives who encounter, or have the potential to encounter or come into contact with mold, shall have received training on mold-related hazards and the proper performance of mold abatement work, regardless of whether such training is required by law. Contractor shall provide the Company with evidence of such training prior to commencement of the work.
4. **Containment.**
 - 4.1 Prior to initiating the mold abatement services, inventory, equipment and other property shall be removed to a designated alternative location if requested by the Company.
 - 4.2 If requested by the Company, the surface of all remaining inventory, equipment and other property in each service area shall be vacuumed or damp wiped, as appropriate, and then covered with 6-mil polyethylene prior to the start of any mold remediation/abatement activities.
 - 4.3 Contractor and its Representatives shall take such actions as may be required to prevent the contamination of any areas outside the immediate work area, or any other portions of the Company's facility or site from becoming impacted or contaminated with mold, dust, debris, or other project-generated waste. Contractor shall be responsible for cleanup, at Contractor's sole cost and risk, of any contamination of the Company's facility, site or products resulting from the performance of the services.
5. **Housekeeping.** Contractor shall remove all loose mold, dust and debris from the work area (and any other areas as applicable) at the end of each work shift. If applicable to the scope of work, Contractor shall dispose of any mold-related materials, dust or debris in accordance with all applicable Laws, including, without limitations, using disposal facilities that are properly permitted to accept such wastes. Contractor shall provide the Company with copies of all waste disposal documents relating to the work, including, without limitation, any manifests.
6. **Cleanup.** Upon completion of the mold abatement work/project, Contractor shall complete an inspection of the jobsite(s) to look for mold-related materials, dust or other debris and shall take appropriate actions to ensure that the jobsite and other relevant areas of the Company's facility and site are free of any of the same. Following the performance of all cleaning and inspections, Contractor shall remove any decontamination unit and all equipment, materials and debris from the jobsite.
7. **Waste Disposal.** If required by the Contractor's scope of work, all waste materials derived from the work shall be transported and disposed in an approved, properly permitted landfill or other disposal facility. Contractor is responsible for proper packaging, temporary storage, transport, and disposal of all waste generated as the result of the services.

ADDENDUM E
REFRIGERANT SERVICES

The following additional requirements shall apply to Contractor's performance of Services involving the removal or other handling of refrigerants at any Company facility or site. As used in this Addendum, "refrigerant(s)" means any material or chemical used for transferring heat or maintaining cooling, including, without limitation, ammonia, carbon dioxide, hydrofluorocarbons and chlorofluorocarbons.

1. **Preference for Eco-Friendly Products.** Wherever possible, Contractor shall provide the Company with only legally compliant refrigerants and, where feasible, attempt to use eco-friendly refrigerants (i.e., those without ozone depleting substances and that have lower global warming potentials) to reduce emissions that contribute to global warming, including, without limitation, the following freon alternatives: R-134A, R-407C, R-404A and R-410A. Where the Contractor's scope of services requires the provision of equipment, Contractor also shall attempt to provide energy-efficient options to the Company, including, but not limited to, those certified under the U.S. Environmental Protection Agency's ("EPA") Energy Star® program.
2. **Technician Certifications.** Prior to the start of any service activities, Contractor shall provide the Company with true and correct copies of current U.S. EPA certification cards for all technicians who will perform activities on the Company's HVAC or other equipment containing refrigerants. Contractor shall update the technician certifications whenever appropriate, including whenever technicians change or certifications are renewed.
3. **Service Documentation.** Contractor shall provide the Company with the following documentation of its servicing activities, in addition to any other documents or information required by the Company's facility where the work is performed. This documentation shall be delivered to the Company regardless of the amount of CFC charge in a system (i.e., for systems with less than 50 pounds) and in a timely manner.
 - 3.1 Records documenting the full charge of any refrigeration equipment, including a description of how the full charge was determined.
 - 3.2 Leak rate calculations that include at least the following information: (i) pounds of refrigerant added, (ii) date of last refrigerant addition, (iii) date of most recent refrigeration addition, (iv) days between refrigerant additions, (v) repair date, and (vi) calculated leak rate.
 - 3.3 Initial and follow up verification test information, if applicable, including the test results and the date the test was conducted.
4. **Notification of Leak Rate.** If Contractor determines that any Company refrigeration equipment containing more than 50 pounds of regulated refrigerant is leaking at the following rates, Contractor shall promptly notify the Company in writing:
 - 4.1 For industrial process refrigeration equipment, when the loss of refrigerant exceeds 30% of the total charge during a 12-month period.
 - 4.2 For comfort cooling equipment, when the loss of refrigerant exceeds 10% of the total charge during a 12-month period.
 - 4.3 For equipment of any kind, when the loss of refrigerant exceeds 125% of the total charge during a 12-month period.

Contractor also shall provide Smurfit Westrock with any related leak rate calculations

5. **Equipment Disposal.** Contractor shall evacuate all CFC-containing refrigerant from any equipment to be disposed prior to transporting the equipment off-site. If the Contractor's scope of work includes the task of arranging for the disposal of equipment, Contractor shall deliver a Certificate of Disposal or Recycling for the same to Smurfit Westrock no later than thirty (30) days from the date of disposal/recycling

ADDENDUM F
PESTICIDE SERVICES

The following additional requirements shall apply to Contractor's performance of Services involving the removal or other handling of pesticides at any Company facility or site. "Pesticides" as used in this Addendum means any material or chemical used for preventing, destroying, or controlling any pest, including herbicides, insecticides, fungicides and rodenticides.

1. **Pesticides Products.** Wherever possible, Contractor shall attempt to use eco-friendly pesticides. Contractor shall not apply any pesticides classified as "restricted use" on Company property without the prior, written approval of the Company's Environmental Manger . All pesticides used by the Contractor must be registered with the U.S. Environmental Protection Agency and the state and local jurisdiction in which the pesticide will be applied. Prior to commencing work, Contractor shall provide the Company with copies of current labels and Safety Data Sheets (SDS) for all pesticide products to be used. In addition, brand names shall be provided for all application equipment, rodent bait boxes, monitoring and trapping devices, and any other control equipment that may be used to provide services.
2. **Application.** Contractor shall be responsible for application of pesticides in strict accordance with the product label and other applicable legal requirements. Contractor shall employ the least hazardous materials, most precise application techniques and use the minimum quantity of pesticide necessary to achieve control. All pesticides that will be used by the Contractor at a Company facility or site must be stored in a container(s) that is impervious to that pesticide and sufficiently strong to prevent leakage arising from the ordinary risks of handling and transport.
3. **Technicians.** All pesticide application work shall be performed by skilled personnel who are familiar with and experienced in pesticide application. Further, Contractor and all of Contractor's Representatives who will come into contact with pesticides in the course of the work shall have received training on pesticide-related hazards and the proper performance of pesticide application. Contractor shall provide the Company with evidence of such training prior to commencement of the services.
4. **Authorizations.** Contractor shall procure and maintain all commercial pesticide applicator certificates or licenses required to perform the work. Prior to commencing the work, Contractor shall provide the Company with photocopies of the relevant pest control licenses and dated pesticide applicator certificates for every employee who will be performing on-site services.
5. **Rodent Control.**
 - 5.1 Rodent control inside occupied buildings shall be accomplished with trapping devices only, unless otherwise approved by the Company's designated contact. All such devices shall be concealed and in protected areas so as not to be disturbed by the Company's ongoing business operations. Trapping devices shall be checked at reasonable intervals. The Contractor is responsible for disposing of all trapped rodents or rodent carcasses in an appropriate manner.
 - 5.2 All outdoor bait boxes shall be placed out of general view where they will not be disturbed by the Company's business operations. The lids of the boxes shall be securely locked or fastened shut. All bait boxes shall be attached or anchored to the ground, building wall or other immovable surface so that the box cannot be picked up or moved. All bait boxes shall be labeled on the inside with Contractor's business name and address. Contractor or its Representatives shall date the outside of the box at the time of installation and after each service.
6. **Recordkeeping.** Contractor shall be responsible for maintaining a logbook for each Company facility or site where pesticides are applied. The logbook shall document all chemical control methods used (brand name and formulation), as well as the dates, times, and locations of the application. Each entry in the logbook shall be signed and dated by the Contractor or its Representatives.