

**Energizer Battery
Manufacturing, Inc**

**Contractor Safety
Compliance Program (CSCP)**

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CONCLUSION AND ACKNOWLEDGEMENT

WELCOME

Energizer Battery Manufacturing, Inc. maintains a safe, secure, and environmentally protective facility. Contractors doing business at Energizer properties are responsible for ensuring that their employees and subcontractors are familiar with all applicable local, state, and federal laws, and with the attached Energizer Battery Policies and Procedures. A safe, healthful and environmentally protective worksite is a shared goal. Energizer continues to expect that our contractors will take the necessary measures and actions to ensure the safety of their employees and at the same time, protection of the environment.

This handbook summarizes some key procedures with which all Contractors performing construction, renovation, and equipment installation or maintenance shall comply when working for Energizer. Facility specific procedures may be found in the “House Rules” section of this document. In addition to the regulations specified in this handbook, acceptable safe business practices shall be maintained at all times.

The terms “Contractor”, “Contractor personnel”, or “Contractor employee” shall include all contractors and subcontractors hired by the Contractor, the respective employees of either, and any other personnel requested, permitted, or hired by the Contractor in connection with the project for which the Contractor is retained.

INTRODUCTION

ENERGIZER CONTRACTOR REPRESENTATIVE (ECR)

The Energizer Contractor Representative is the primary liaison between Energizer and the contractor for matters involving Safety Health and Environmental Affairs. The objective of this approach is to support the delivery of consistent Safety Health and Environmental Affairs messages and performance expectations across all facilities and to all contractors.

ENERGIZER EXPECTATIONS

Contractors are expected to abide by all applicable regulatory standards as well as the Energizer “Rules and Requirements” and “Specific Safety Rules” described in later sections of this document. Energizer expectations describe specific performance requirements in areas such as:

Reporting of accidents	Lockout/Tagout	Use of EBC Equipment
Confined Space Entry	Cutting & welding	Hazardous Work Permits
Hazard Com	Personal Protective Equipment	Roof Work
Environmental issues	Condition of equipment	Evacuation Procedures
Etc.		

Contractors are expected to address/correct unsafe conditions and acts for which they have control. The Contractor must advise Energizer of any unique hazards or job requirements presented by the Contractor's performance of work.

Contractors are expected to immediately report to Energizer supervisors the existence of any known unsafe condition or act for which Energizer has control.

All injuries and near-misses involving Contractor employees are to be immediately reported to Energizer.

Contractors are **obligated** to refuse to take any action they consider unsafe or to perform a task for which they have not properly trained or do not have the proper tools and to report those concerns to the Energizer Contractor Representative (ECR) or nearest Energizer supervisor.

REQUIREMENT FOR “COMPETENT PERSON”

Contractors performing “High Risk Work” shall provide for a Contractor “competent” safety, health & environmental person/representative.

The contractor will provide for the presence of a “competent person” to represent the contractor in managing SHEA issues on the work site and to work with the Energizer Contractor Representative (ECR) to assure safe healthful and environmentally protective conditions and practices.

“Competent person” means a contractor designated person who by way of training and/or experience is knowledgeable of applicable standards, is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them. Additionally, certain government SHEA regulations may require a “formal-certified” competent person: example, lead abatement, asbestos abatement, fall protection/arrest systems, explosives, etc

TRAINING

Contractors shall comply with appropriate government regulations regarding training their employees on both General Safety and Health measures **and** requirements directly related to the work being performed.

The High Risk contractor must conduct routine Safety Health & Environmental Meeting for their employees. It is expected that such construction safety training will include topics such as general construction safety, hazard communication, personal protective equipment, hearing conservation, electrical safe-work practices, fire prevention including hotwork, lockout awareness, or their equivalents. It is further anticipated that satisfactory training would required 4-5 hours of instruction.

Contractor employees involved in jobs where specific government described training is required (Energy Control-lockout/tagout, confined space, elevated work, asbestos, etc) must conduct such training in compliance with that regulation. Documentation of such training must be presented to the Energizer Contractor Representative.

Energizer reserves the right to require the contractor to submit records demonstrating appropriate training for their employees as a pre-condition to permitting those employees to work on an Energizer work site.

Contractors performing High Risk work shall train their employee on the Job Safety and Health Analysis (JSHA) required for the work being performed.

“HOUSE RULES”

“House Rules” are those facility specific rules, procedures, practices that are unique to the subject location. Due to the conditions, geographic location, political subdivision, etc. there may exist specific work requirements for this particular location. The Energizer Contractor Representative (ECR) will provide you with those “rules”.

CLASSIFICATION OF WORK

In order to facilitate an efficient and effective management approach to contractors, their work is divided into 2 classifications, based on risk. The level of training, oversight, monitoring will be different across those classifications.

- a) **High-Risk Work:** Work at an Energizer site involving construction, alteration, and/or repair of Energizer equipment or facilities. Examples include, but are not limited to, activities having a direct potential impact on the health and safety such as electrical work, activities where a fire hazard exist, LOTO is required, Hazardous Work Permits may be required, machinery installation, building construction/demolition, HVAC installation/demolition, removal of guards or safety devices, trenching, elevated work, painting, steel erection, installation of temporary structures, use of hoisting equipment, long term maintenance activities, security guards, fork truck repair, landscapers, etc. Final risk determination is the responsibility of the ECR.
- b) **Low-Risk Work:** Any work, which does not require a safe work permit (Hot Work, Confined Space, LOTO, etc.) and which does not involve construction, alteration, and/or repair of Energizer equipment (other than routine office machines).. Examples include: administrative work, copy machine repair, consultants, trainers, “vendor managed inventory” personnel, routine water system checks, routine security system checks, etc. Risk determination is the responsibility of the ECR.

SUBSTANCE ABUSE SCREENING AND BACKGROUND CHECKS

Contractors performing “High Risk Work” must have a **Substance Abuse Program** (unless drug testing is prohibited by local government regulations) requiring that their employees have a “10-Panel” drug test for any reported concentration of marijuana, cocaine, opiates, amphetamines, phencyclidine, benzodiazepines, methadone, methaqualone, barbiturates, and propoxyphene or their metabolites. Energizer’s standard is zero “0” tolerance of drugs and/or alcohol in the workplace. Additionally, the contractor must conduct criminal background tests for their employees as described below. Contractors are to maintain records of substance abuse testing and background checks and make them available for periodic verification by Energizer.

- a) Contractors not having a Substance Abuse Program (unless drug testing is prohibited by local government regulations) must be agreeable to adopting Energizer criteria. Substance Abuse-Background Checks are not normally required for Low Risk Contractors

(NOTE: International Country-specific alternatives to the drug tests and background checks may be considered where country regulations apply or capability is not readily available.)

Application criteria for contractor employees: 1) employees entering an Energizer site for the first time, 2) contractor employees who have been away from the Energizer site for more than 6 months, 3) immediately following all recordable injuries.

- a) The search must identify all felony convictions and all “serious misdemeanor” convictions such as...
 - i) Restraining orders
 - ii) Drug related charges
 - iii) Theft, breaking & entering, shoplifting
 - iv) Embezzlement
 - v) Check fraud

- b) The Criminal Record Search must be completed before any contractor employee may begin work at Energizer
- c) A “Statewide” 5 year search is to be conducted (OPTION: a “county” search may be conducted when the candidate has lived within the same county for 5 years)
- d) Any potential contractual worker with a past criminal record of felony or serious misdemeanor convictions must be reviewed and specifically approved by the facility Energizer management prior to assignment at Energizer.

JOB SAFETY & HEALTH ANALYSIS (JSHA)

The JSHA Procedure is an important accident prevention tool that works by finding hazards and eliminating or minimizing them *before* the job is performed, and *before* they have a chance to become accidents. The JSHA can also be used for job clarification and hazard awareness, as a guide in new employee training, for periodic contacts and for retraining of employees, on jobs which run infrequently, as an accident investigation tool, and for informing employees of specific job hazards and protective measures. JSHA’s must be reviewed with all new employees prior to beginning work and every 6 months thereafter. Documentation of reviews must be maintained.

Contractor JSHA’s are to be developed by the contractor for work “above and beyond” daily maintenance activity type of work. Examples may include the use of scaffolding, placement of equipment on the building roof, confined space entry, building or demolishing structures, jobs requiring a Energizer Hazardous Work Permit, jobs with a potential for creating large quantities of dust or any quantity of toxic dust, asbestos abatement, elevated work, moving/relocating equipment, potential for falling objects, construction projects, etc. A blank JSHA form and instructions for developing JSHA’s will be provided by the Energizer Contractor Representative.

The “Draft” JSHA is to be reviewed and approved by the Energizer Contractor Representative (ECR) as describing the contractors safe work practices (to the extent of knowledge of the ECR) with appropriate precautions for work on the Energizer site.

Additionally, contractors “normally on-site” performing tasks that are similar in nature and scope to tasks regularly performed by Energizer colleagues will be required to read/understand Energizer JSHA’s that have been developed for similar jobs (electrical JSHA’s, millwright JSHA, scissors lift, Shop Equipment JSHA, etc)

JSHA’s must be reviewed by all contractor employees on the site prior to beginning work and every 6 months thereafter. Documentation is required to be maintained by the contractor.

PRE-QUALIFICATION OF CONTRACTORS

The Energizer Contractor Representative (ECR) and Project Engineer (or requisitioner) will conduct a “Pre-Qualification Review” of potential contractors to judge their safety health and environmental culture and past performance as an indicator of their capability to work safely at this worksite. This is the most important performance measure in the control of Energizer to assure safe performance.

The Contractor Safety Compliance Program (CSCP) will be provided to potential contractors *before* bidding. It is recommended that the CSCP be provided to the contractor at least 30 days prior to your review.

The Pre-Qualification Questionnaire is to be used for a specific job—not for broad or general application. The capability of a contractor to work safely and competently at one type of work does not apply to all types of work.

In regard to contractor Safety Health and Environmental Affairs (SHEA) training, the Energizer Contractor Representative will:

- a) Verify that the High Risk contractor conducts annual routine Safety Health & Environmental Meeting for their employees. It is expected that such construction safety training will include topics such as general construction safety, hazard communication, personal protective equipment, hearing conservation, electrical safe-work practices, fire prevention including hotwork, lockout awareness, or their equivalents. It is further anticipated that satisfactory training would required 4-5 hours of annual instruction.
- b) Verify that contractor employees involved in jobs where specific training is required, have had current training (LOTO, confined space, elevated work, asbestos, etc)
- c) The “Contractor Safety Training Documentation Form” must also be completed “per job” for the same reasons as the Pre-Qualification Questionnaire. That form will assist in identifying training requirements for the specific job. Note: the above mentioned basic course is not adequate for job specific or site specific training requirements.

Disregard of Energizer rules may result in disqualification, removal from worksite, prohibition from future work at Energizer, etc.

High-Risk Work Contractors must pass the following specific SHEA “hurdles”:

- a) Contractor must provide government required injury “logs” (OSHA 300) for the 3 most recent years plus current year
- b) Have a total recordable injury/illness rate better than (lower) than the national average for the contractors specific type of work being performed at the Energizer site (as classified by NAICS). Visit the North American Industry Classification System (NAICS) website at [...http://www.census.gov/epcd/www/naics.....](http://www.census.gov/epcd/www/naics.....) to obtain your code (anticipated to be in the 23 group) and subsequently visit the Bureau of Labor Statistics—Injury & Illness date site at www.bls.gov for pertinent statistics.

NOTE: International locations not having safety performance data similar to a)-c) should identify/adopt similar safety performance statistics such that statistical evaluation of contractor performance can be accomplished.

- c) A review of the Contractor SHEA Program by the ECR to verify that it adequately addressed the risks, precautions and requirements for the work being performed at Energizer
- d) Contractor has signed off on the purchasing terms and conditions agreement confirming current insurance in appropriate amounts and coverage for 1) Workers Compensation, 2) Auto Liability, 3) General Liability, and 4) Product Liability. (The ECR does not need to collect these documents)

Low Risk Work

- a) The low-risk contractor safety process provides a systematic method for managing contractors who perform low-risk work, as determined by the ECR. Low-Risk classification does allow the ECR flexibility on the formality level of the process.
- b) The Low-Risk Contractor Safety process is not intended to bypass any safety concerns associated with the work to be performed. Energizer regards safety as a core value and will clearly communicate these values to all contractors visiting and performing work at the facility.
- c) No specific safety “hurdles”. The ECR may require a SHEA performance review based on their judgment.

The ECR must evaluate the work and determine if specific precautions are necessary. For example, LOTO may apply to work on a copier machine; escorts may be required for visitor entry into operational areas of the facility.

Contractor (High Risk only) must have a background check procedure and substance abuse policy (unless drug testing is prohibited by local government regulations) as outlined above. If the contractor has no policy, they must agree to adhere to the Energizer Substance Abuse Policy and background check procedure—(at their cost)

PRE-JOB COMPLIANCE REVIEW

Prior to contractors entering the Energizer facility to perform work, the Energizer Contractor Representative (ECR) will perform a “Pre-Job Compliance Review”. The objective is to verify that the contractor has met Energizer requirements as outlined above (“Pre-Job Compliance Review Checklist” available)

ECR will provide “Site Orientation” to contractor management and supervisors

FOR HIGH RISK CONTRACTORS THE ECR WILL:

- a) Verify that all contract documents are complete and signed by Energizer and Contractor management.
- b) Ensure comprehensive orientations for contractor personnel are completed) and job specific hazards are reviewed.
- c) Ensure all contractor personnel have received appropriate training relative to hazards and SHEA requirements of the job. These requirements include but not limited to Hot Work, Lockout/Tagout, Elevated Work, Confined Space, Trenching and Excavation, etc.
- d) Ensure all contractor personnel understand specific job requirements.
- e) Determine safety hazard level and specify safety analysis requirement (JSHA) for the work to be done.
- f) Verify substance abuse screening documentation.
- g) Verify tool and equipment inspection requirements are met, compliance documentation requirements are satisfied and that contractor facilities on-site meet requirements.
- H) Review the Pre-Job Compliance Checklist for applicable requirements.

FOR LOW RISK CONTRACTORS THE ECR WILL:

- a) Verify that all contract documents are complete and signed by Energizer and Contractor management.
- b) Ensure site orientations for contractor personnel are completed.
- c) Ensure all contractor personnel understand specific job requirements.
- d) Verify tool and equipment inspection requirements are met, compliance documentation requirements are satisfied and that contractor facilities on-site meet requirements, if required.
- e) Review the Pre-Job Activities Checklist for applicable requirements

CONTRACTOR AUDITS/INSPECTIONS

This process is intended to provide a systematic approach for both Energizer and the contractor to monitor and evaluate work practices at the contractor's worksite to ensure that Energizer's expectations are being met during the execution of the work.

The intent of the Audit/Inspection is to:

- a) Promote the development of a close mutually beneficial cooperative relationship between Energizer and the contractor.
- b) Enable the contractor and Energizer to effectively monitor the contractor's worksite performance to identify SHEA improvement opportunities and eliminate unsafe conditions and practices.

If the contractor does not have the ability to meet our expectations, is unwilling to work toward achieving our expectations, or does not wish to meet our expectations, it will be necessary to utilize other contractors.

Compliance with Energizer expectations will also be monitored by Energizer colleagues and deviations addressed with the contractor or reported to Energizer supervisors.

Audits are required for all High Risk jobs. Audits for Low Risk contractors are to be determined by the ECR. These audits can include:

- a) Job site visits with verbal discussions based on the established expectations/requirements for the job.
- b) Written audits of any form based on the established expectations/requirements for the job.

In addition to audits, an accident, injury, incident, spill, or near miss may trigger the need to complete an evaluation of the contractor performance. ECR must participate in the investigation

Prior to the beginning of work, the Contractor and the Energizer Contractor Representative will establish the type (verbal/written/combo) and frequency of audit to be performed based on:

- a) Established SHEA requirements
- b) Classification of contractor (high or low-risk)
- c) Past performance of contractor
- d) Inputs by and discussion with contractor
- e) Length/Duration of project

During actual work execution, the Contractor and ECR will conduct periodic assessments and walkthrough inspections to identify areas for improvement. Deficiencies must be addressed promptly.

Use the completed audit checklists during the Performance Evaluation Process.

PERFORMANCE EVALUATION & FEEDBACK

This process provides a systematic approach for the evaluation and feedback to the contractor of the contractor's actual performance for accident prevention and for referral by Energizer in future projects.

Performance evaluation and feedback discussions with the contractor are critical elements in ensuring continuous improvement. In addition, these performance evaluations are used to determine whether or not the contractor remains a preferred vendor. Actual performance at the location will become an ever-increasing factor in future contractor selections.

Performance evaluations will be required for completed jobs, according to the following criteria:

- a) At least annually for all blanket/no choice contractors classified as high-risk.
- b) All high-risk work.
- c) ECR determines extent of evaluation for low-risk contractors.
 - (1) Verbal feedback and/or
 - (2) Formal documented evaluation and feedback.

Audits shall be used as input for performance evaluation reports.

GENERAL RULES AND REQUIREMENTS

A. ACCIDENTS AND FIRST AID

1. All injuries and near miss incidents involving Contractor's employees are to be reported immediately to a member of Energizer Management and a written report promptly submitted to the Energizer Human Resources Department.
2. All Contractor employees shall fully cooperate with any safety investigation conducted by Energizer.
3. The Contractor is responsible for providing any medical assistance required by the Contractor's employees.

B. CONTRACTOR BADGES

For identification purposes, each Contractor employee must receive an Energizer approved badge prior to when they commence work on Energizer property and must wear the badge at all times when on the premises.

C. ENVIRONMENTAL ISSUES

Energizer facilities comply with a variety of federal, state, and local environmental laws, rules, and regulations. Prior approval of Contractor's clean-up procedures for the work being done must be obtained from the designated Energizer Company Representative (ECR).

Most Energizer facilities generate, treat, and/or store hazardous wastes as defined by the Environmental Protection Agency in 40 CFR Part 261 under the Resource Conservation and Recovery Act of 1976 (RCRA). The Contractor should be aware of any possible liability under RCRA. All wastes, hazardous or otherwise, generated by the Contractor are the responsibility of the Contractor and must be disposed of in accordance with all local, state and federal regulations.

Contractor employees are not allowed to discharge any toxic or harmful contaminant into the air, waste water (sewer) systems, or storm water systems. Chemicals and/or toxic materials must be disposed of properly and shall not be placed in ordinary trash containers. Any accidental spill and/or discharge shall be reported immediately by contacting the Energizer Contractor Representative (ECR), the facility Environmental/Safety Coordinator or any Energizer Supervisor.

D. EVACUATION PROCEDURES

Prior to the commencement of any work, Contractor shall review the facility's emergency evacuation procedures.

The Contractor must know what to do in case of an emergency and must instruct its employees on emergency procedures, including:

- a. Location and operation of fire alarms.
- b. Procedures for reporting fires.
- c. Procedure and signal for evacuating the plant and evacuation routes from the plant.
- e. Telephone numbers to call in the event of an emergency.

E. HAZARDOUS WORK PERMITS

The Contractor must obtain Hazardous Work Permits signed by an authorized Energizer representative to perform any of the following operations:

1. Use of ignition sources in restricted spaces **(including all welding and cutting in the facility).**
2. Entering vessels or confined spaces.
3. Opening process equipment.
4. Electrical hot work.

5. Making excavations and trenches.
6. Moving radioactive sources.
7. "Hot pipe" tapping.
8. Operating heavy equipment around electrical power lines.
9. Working in electrical manholes or other confined spaces.
10. Working in oxygen-enriched, oxygen-deficient, or other potentially hazardous environments.
11. Breaking or cutting lines or opening equipment which did or could contain toxic, corrosive, flammable, hot, or pressurized materials.
12. Observing energized & unguarded or open exposed electrical equipment.

F. HOUSEKEEPING/SANITATION

The Contractor shall maintain all work areas and equipment in a clean and sanitary condition at all times. The Contractor is responsible for all trash or wastes he/she may generate. Trash and wastes must be disposed of it in accordance with all local, state and federal regulations

1. All areas being used for equipment fabrication and installation must be carefully marked and maintained in a neat and orderly fashion.
2. No food or drink is permitted to be consumed in the Energizer plant work areas except in designated areas.
3. Any metal work (i.e. grinding, welding, threading, cutting, etc.) must be contained in an enclosed area. These areas are to be kept clean.
4. Nails shall be bent over or removed on form lumber, crating, and similar materials in or near production areas.
5. Equipment must not block electrical panels, fire extinguishers, aisles, doors, emergency eye wash stations, fixed ladders, or stairways.

G. PROCESS SAFETY

If equipment or tools get into the process flow, the Contractor shall immediately contact the Energizer Contractor Representative or Supervisor in the immediate area so that the necessary corrective action can be taken. To prevent potential product contamination, materials or tools shall never be stored on material handling equipment. Contractors should take every precaution to prevent production contamination by dust, scrap metal, slag, etc.

Only approved work appliances or equipment are allowed in either production or maintenance areas.

H. RULES OF CONDUCT

The following Rules of Conduct will be observed to insure the efficient, orderly, and safe operation of the plant. Listed below, without any attempt to show order of severity or seriousness, are representative infractions which may justify sanctions.

1. Theft, or removal of any Energizer property or property of Energizer personnel from the premises without the authorization of the designated Energizer representative.
2. Falsifying Energizer documents and/or Energizer records, including but not limited to work records, production records, or time cards.
3. Use or possession of alcohol or illegal drugs in the plant; reporting for work under the influence of alcohol or drugs.
4. Possession of weapons on Company property.
5. Gambling on Company property.
6. Presence on Company property when not authorized and without permission.
7. Loitering is not allowed in the parking lot.
8. Distributing any literature or soliciting for any cause.
9. Insubordination, threatening, intimidating, or coercing, including fighting or provoking a fight on Company property.
10. Acts of horseplay or carelessness.
11. Destroying or damaging the property of another person or of the Company, including contamination of product.
12. Unauthorized use of, or destruction of Company property, including operating, possessing, or using machines, tools, or equipment to which the individual has not been approved.
13. Violation of plant traffic or parking regulations.
14. Violating Energizer's Equal Employment Opportunity policy, including unlawful harassment in any form, including sexual and racial harassment.

I. SECURITY

1. Non-Disclosure Policy

All contractors, including but not limited to subcontractors, shall sign a copy of the Energizer "Confidentiality Agreement". The nature, cost, size, schedule, and purpose of the project are often of a sensitive nature and are not public information and; therefore, should not be discussed with any non-Energizer personnel.

2. Photographs

No cameras or videotaping are allowed in the plant at any time unless authorized by the Energizer Plant Manager.

3. Contractor Equipment

The Contractor is responsible at all times for the security of materials, tools, and personal belongings. Energizer accepts no responsibility for any loss of Contractor's items.

Contractors shall provide their own equipment for receiving and unloading of construction materials.

The area for equipment and materials storage must be pre-approved by the Manager of Engineering, or his/her designated representative.

Any theft or misappropriating of Contractor equipment shall be reported immediately to the Energizer Manager of Engineering, or his/her designated representative.

4. General

No product, premiums, coupons, wrappers, or packaging material are to be removed from the plant.

Contractor personnel shall be limited to the job work area and are not allowed in other areas of the plant unless authorized.

J. SIGNS, SIGNALS, AND BARRICADES

Danger signs shall be used only where an immediate hazard exists. Signs should meet applicable government standards.

Caution signs shall be used only to warn against potential hazards or to caution against unsafe conditions. Proper barriers must be constructed in all work areas where debris, etc. from construction activities could contaminate the product or disrupt production flow or equipment or cause harm to other area facility personnel.

No contractor employee shall deface, remove, or move a warning sign, signal, or barricade unless they ensure that the hazard for which it was placed no longer exists.

Signs, signals, and barricades shall be removed promptly after the hazard is no longer present (this includes caution/danger tape).

K. SMOKING AND OPEN FLAMES

SMOKING IS ABSOLUTELY PROHIBITED IN THE PLANT OR ON THE PLANT ROOF. Designated smoking areas are provided outside the plant.

Cigarettes, cigars, and matches shall be disposed of in designated receptacles and shall not be thrown in trash containers.

L. TELEPHONES

The plant intercom or telephone system shall not be used by Contractor personnel except to report an emergency or as instructed.

M. VEHICLE AND TRAFFIC SAFETY

Contractor personnel will park only in pre-assigned designated areas. Contractors must comply with all speed limits and other traffic/weather related regulations on Energizer property. Vehicles must yield to pedestrians.

When working in the vicinity of railroad tracks and cars, Contractor shall ensure that no railroad vehicles are being moved or switched. Never crawl under, over, or between rail cars which are on plant tracks.

SPECIFIC SAFETY RULES

A. ASBESTOS/LEAD

1. Energizer maintains a survey of Asbestos Containing Materials (ACM). Prior to working on plant premises, the Contractor shall (if applicable) review the survey.
2. All work involving potential Asbestos Containing Materials (ACM), including roofing, drywall, and floor tile, must be approved by the Energizer Contractor Representative prior to initiation of work activities. If any material is suspected by the Contractor of containing asbestos, the Contractor will contact the Energizer Contractor Representative (ECR) for directions.
3. Only pre-approved licensed Asbestos Abatement Contractors are allowed to disturb ACM.
4. Structures that may have been painted with lead paint are to be tested prior to demolition to determine if lead abatement is necessary.
5. Lead based paints are not to be used in or outside any facility.

B. COMPRESSED AIR USAGE

All standards set forth in OSHA or applicable government regulations in regards to the use of compressed air, shall be followed including; but not limited to, the following:

1. Compressed air shall not be used to clean clothing or self.
2. When using pneumatic tools, the following safety precautions shall be complied with:
 - a. Goggles or safety glasses equipped with side shields shall be worn at all times when compressed air is used.
 - b. Compressed air hoses shall not be stretched across walkways or aisles.

C. CONFINED SPACE ENTRY

Before entering a confined space, each Contractor shall have and follow a confined space procedure and entry plan which complies with OSHA 1910.146 and any other applicable government standards. The plan shall include, but not be limited to, means for isolation, cleaning, ventilation, monitoring, attendants, and emergency rescue.

Contractors must:

1. Provide the Energizer representative with a copy of their program.

2. Before entering a confined space, the Contractor must notify the designated Energizer representative of the Contractor's intent to enter a confined space and complete a Hazardous Work Permit and/or a Confined Space Entry Permit. Facility Specific "House Rules for Outside Contractors" must be followed.
3. Obtain from the Energizer representative a list of specific hazards associated with entry into the subject confined space.
4. Make arrangements for their own rescue service and inform the designated Energizer representative of the plans.
5. Contractors to conduct their own "pre-entry" and periodic air monitoring and document it on the Permit Form.
6. Provide the Energizer representative with a copy of the completed Permit.
7. Conduct a "post-entry" debriefing with the Energizer representative.

At Energizer, confined spaces include, but are not limited to, storage tanks, bins, sewers, boilers, vessels, manholes, pits, and other spaces which fall within the OSHA definition of a confined space. A confined space:

1. Is large enough and so confined that an employee can bodily enter and perform assigned work;
2. Has limited or restricted means for entry or exit;
3. Is not designed for continuous employee occupancy;
4. Has one or more of the following characteristics:
 - a. Contains or has a known potential to contain a hazardous atmosphere;
 - b. Contains material with the potential for engulfment of an employee;
 - c. Has an internal configuration such that an employee could be trapped or asphyxiated by inwardly converging walls, or a floor which slopes downward and tapers to a smaller cross-section;
 - d. Contains any other recognized serious safety or health hazard.

D. CUTTING AND WELDING

Contractors shall comply with all standards set forth in OSHA or other applicable government regulation.

1. Because of fire hazards, no cutting, welding, or any other spark producing operation is allowed until the Manager of Engineering, or his/her designated representative has approved the location and issued a Hazardous Work Permit. The area must be clear of all dust and combustible materials prior to cutting, welding or burning. Compressed gas cylinders are to remain upright and secured at all times, and capped when being transported or when not in use.
2. During any of these operations, a fire watch must be maintained by the Contractor with suitable fire extinguishers, approved by Contractor, at the site. The Contractor's EBC approved fire watch must remain at the site of the cutting or welding for at least 60 minutes after the work is complete to detect and extinguish possible smoldering fires. An Energizer

fire extinguisher may be used only in an emergency situation. If such occurs, the designated Energizer representative shall be immediately notified and the extinguisher returned promptly to the Maintenance storeroom for inspection and recharge.

SPECIFIC INSTRUCTIONS: CONTRACTORS

GRINDING, FLAME CUTTING, FLAME WELDING, MIG & TIG WELDING PRECAUTIONS

GENERAL

Contractors performing any welding, cutting, or brazing operations must comply with all applicable provisions of the appropriate government standards (in the US...29 CFR General Industry 1910 Sub-Part Q Welding, Cutting, and Brazing standard). General welding and cutting is considered to be using those materials, such as mild steel, that does not contain or have the potential to release the following toxics: lead, zinc, beryllium, cadmium, stainless steel, fluorine compounds, or mercury. *Contractors must read and understand the Energizer JSHA for welding and comply with the requirements for a fire watch during and after any welding or metal cutting activities.*

SURFACE COATINGS – Primers, Paints

Prior to conducting any welding, cutting, grinding, the contractor should inspect the surfaces where welding, cutting, or brazing will occur for any chipping, flaking, or peeling of surface coatings or paints. Assume all paints and coatings may contain toxic metals such as lead, zinc, or chromium unless otherwise advised by Energizer.

Cleaning of lead painted surfaces should be performed using HEPA vacuums followed by wet methods (i.e. use of wet towels, sponges or cloths). To specifically clean lead dusts from surfaces, a detergent such as Spic and Span is recommended. Disposable gloves must be worn during cleaning. Respirators are not considered necessary for small cleaning jobs. Larger cleaning jobs where exposures to lead dusts may require respiratory protection. HEPA vacuums should be used whenever possible to minimize dust exposure.

Gloves, sponges, disposable towels and other potentially contaminated materials used in the cleaning of lead painted or contaminated surfaces must be placed in plastic bags, labeled as “HAZARDOUS WASTE PAINT MATERIALS” and dated. The waste will be collected and disposed by Energizer.

Cleaning compounds and/or the use of degreasers should be evaluated by the contractor and Energizer for their toxicity and/or flammability. Degreasers that contain chlorinated compounds should not be used for cleaning. All chlorinated degreasers must be located away from the welding/cutting area so that no degreaser vapors enter the atmosphere where welding occurs.

This will minimize the potential for generating phosgene gas. When welding or cutting painted surfaces, try to ensure that at least 12” on either side of the cut is cleaned and that all paints or coatings are removed, if possible.

Welding, Cutting, and Brazing of Coated Metal Surfaces:

All painted metal surfaces (I-beams, pipes, etc.) should be assumed to be lead-containing unless sampling, manufacturer’s specifications, or Energizer says otherwise. Industrial coatings often contain other hazardous ingredients in addition to or in place of lead. These might include, but are not limited to, chromium, beryllium, cadmium, zinc, lead and mercury.

When welding and/or cutting lead painted surfaces, powered air purifying respirators (PAPR’s) with HEPA filters are required. PAPR’s are recommended for all welding and cutting operations unless ventilation is in place to control contaminants. If welding or cutting is done in an occupied building, proper exhaust ventilation must be supplied. Similar guidelines apply to soldering of sheet metal, tubing, or other piping that involves the use of lead solder or other lead containing materials.

Grinding and Sanding Operations:

Contractors that are required to grind or sand mild metal steel are not required to wear respirators. However, if the grinding or sanding activity generates toxic metals or dusts (e.g. lead, zinc, beryllium, cadmium, nickel, chromium, mercury, etc.), then the use of respiratory protection is required. Check with the Energizer facility contact for information concerning the presence of toxic metals on coatings and paints.

All persons who sand metal surfaces, fixtures, or parts must wear all of the required PPE (safety glasses with side shields, gloves, hearing protection, etc.). A face shield, hearing protection, and goggles are required for all grinding jobs.

Torch Cutting Operations:

Oxy-acetylene torch use for cutting or welding requires **full** PPE as described in the JSHA for such work and the use of “Smog Hog” (or equivalent equipment) fume collectors or local exhaust ventilation. Sufficient mechanical (i.e. HVAC) ventilation should be provided for all general welding and cutting operations when the use of local exhaust is not available. (See “Ventilation Guidelines” section.)

Ventilation Guidelines:

For general welding and cutting operations, the contractor must provide general, mechanical ventilation at a minimum of 2000 cubic feet per minute per welder where welding is done in small spaces (defined by US-OSHA as less than 10,000 cubic feet per welder, a ceiling height of less than 16 feet, or impairments to cross ventilation), mechanical ventilation is required. This requirement can be met by using roof or wall fans with a minimum capacity of 2000 cubic feet

per minute (cfm) per welder, or by using local exhaust hoods (movable exhaust hoods or fixed enclosures). These hoods must provide a minimum air velocity away from the welder of not less than 100 feet per minute. Where welding and cutting are performed in confined spaces, ventilation must be provided to prevent the accumulation of toxic materials or possible oxygen deficiency. Air exhausted from confined spaces must be replaced with clean air.

Oxygen cutting on *stainless steels* using either a chemical flux or iron powder or gas shielded arc cutting, must be done using mechanical ventilation that is adequate for the removal of fumes. If conditions exist where the fume collectors cannot be used, the contractor performing the cutting or welding must, at minimum, use ventilation fans equipped with “elephant trunks” in order to provide adequate ventilation for the immediate work area. Local exhaust hoods and booths used by contractors should comply with the ventilation requirements of applicable government standards [in the US, OSHA 1910.252 (c) (3)]. Free-moving hoods be placed as close to the welder as possible and provide an air flow velocity of 100 feet per minute in the zone of the welding when the hood is at its most remote distance from the welding.

Respiratory Protection and PPE:

Welding in *elevated areas* or *confined spaces* poses special and unique hazards that must be appropriately addressed using the contractor’s confined space program and Energizer’s Hazardous Work Permit. At a minimum, all contractors must follow the ventilation requirements as outlined in applicable government standards [in the US, OSHA 29 CFR 1910.252(c)(4)]. The use of air-line respirators must be provided by the contractor in the event that general or local exhaust ventilation cannot be provided in the confined space.

Dependent upon the job and conditions present at the job site (i.e. types of air contaminants, amounts generated, exhaust ventilation, etc.), the colleague/contractor must (at a minimum) wear one of the following respirators:

- 3M model # 8210 N95 disposable filter mask (or equivalent) (APF 10) ~\$165 for case of 160 respirators.
- 3M model # 9200 N95 disposable filter mask (or equivalent) with exhalation valve (APF 10) ~\$209 for case of 120 respirators.
- 3M model # 8515 Particulate Welding Respirator (or equivalent) (N95 approved with APF 10) ~\$218 for case of 80 respirators

MIG and/or TIG welding require full PPE as described in the JSHA for welding **and** the use of “Smog-Hog” (or equivalent) fume collectors. If the welding job location makes the use of “Smog-Hog” fume collectors and other ventilation devices impossible, the colleague/contractor must (at a minimum) wear a 3M Speedglas Helmet 9000 HWR with Adflo System (Auto-darkening filters with respiratory protection). See next page for full description. Cost is ~\$1,210 for a complete system (hood with ADF filter, belt with powered air purifying respirator, filter and connecting hose)

NOTE: Contractors wearing respirators must be medically qualified to wear them and be fit tested annually if the respirator is tight-fitting. Loose-fitting PAPR's do not require fit testing. Training for the proper use and care of respirators is also an annual requirement.

E. DEMOLITION

Contractor shall comply with all standards set forth in OSHA or appropriate government regulation.

1. All utility and power service lines shall be disconnected, capped, and/or otherwise controlled outside the building prior to commencing with the demolition.
2. Prior to commencing the demolition operation, a thorough walk-through inspection with the Energizer Project Engineer is required.
3. All potential asbestos containing materials, including drywall and floor tile, is to be tested before any work is initiated. If any material is suspected by the Contractor of containing asbestos, the Contractor will contact the Manager of Engineering for directions. Structures that may have been painted with lead paint are to be tested prior to demolition to determine if lead abatement is necessary.

F. ELECTRICAL SAFETY

Contractor shall comply with all standards set forth in OSHA or applicable government regulation.

1. Extension cords and temporary lighting cords shall not be run across aisle ways or corridors where they pose a tripping hazard. Extension cords must have GFCI protection.
2. Temporary electrical power generation may only be used with the written approval of the Manager of Engineering, or his/her designated representative. In addition to specific approval, temporary electrical power generation must be clearly marked and protected against damage from traffic.

G. ELEVATED WORK / FALL PROTECTION

Contractor shall comply with all standards set forth in OSHA or applicable government regulation.

All Contractor employees working at levels of four (4) feet or more above ground level, or using a non-standard method of access or egress, or working on a non-standard work surface shall be protected by fall protection equipment. The body harness, anchor point, and shock absorbing lanyard must be attached above the point of operation, and be secured to a structural member capable of supporting a load of at least 5,400 pounds. The free fall distance shall not exceed four (4) feet. Fall protection equipment shall not be secured to sprinkler lines and/or utility piping. This same procedure shall be followed for the operation of JLG lifts or other lift equipment; however, tie-off may be made to the basket of the rig.

H. ENERGIZER COMPANY EQUIPMENT

Under no circumstances may Energizer tools and/or equipment, or the tools and/or equipment of Energizer personnel, be used without the express written approval of the designated Energizer representative and then such tools or equipment can only be used if an Energizer Equipment Loan Agreement is signed indicating that its terms are accepted.

Energizer automotive equipment (forklift trucks, scissors lifts, etc.) shall be operated **only** by Energizer employees.

Any work being performed which will impact plant monitoring or alarm systems must be approved with the designated Energizer representative prior to performing the work. This would include any connections to plant fire sprinkler systems, water, steam, electric, or compressed air systems.

I. FLOOR/WALL OPENINGS/HOLES

Contractor shall comply with all standards set forth in OSHA or applicable government regulation.

1. Any time there is work where there is a potential for a person to walk in the area, to fall through a floor, roof, wall opening, or from a stairway or runway, the opening shall be protected by barriers, railings, and/or covering materials.
2. Floor openings and holes shall be guarded on all exposed sides, except entrances to stairways with standard railings and toe boards. The floor below the opening shall also be guarded.
3. Where a danger of falling exists, elevated floor areas must be provided with guard rails. In addition, toe boards should be provided when the possibility exists of falling objects striking individuals below.

J. FORKLIFTS (Powered Industrial Vehicles)

Contractor shall assure all forklift operators are trained in compliance with the applicable government standard.

1. Contractor forklift trucks shall be driven at all times with forks low to the ground. Riding as a passenger on a fork truck or power worker is not allowed.
2. All forklifts must be equipped with appropriate lighting.
3. All forklifts must be operated at a safe speed and must reduce speed and sound horn at intersections and blind corners.
4. All forklift operators must utilize safety platforms secured to the forklift mast, provided with guardrails, when elevating personnel to conduct overhead work.
5. Contractor Operators must be in compliance with the new OSHA training requirements in 1926.602.

K. HAND AND POWER TOOLS

Contractor shall comply with all applicable government standards.

1. Safety devices or guards on a tool shall never, for any reason, be bypassed or rendered inoperative. Hand and power tools shall be kept in safe operating condition at all times.
2. All power tools and equipment shall be grounded or UL approved as double insulated.
3. The appropriate personal protective equipment shall be used when necessary, particularly for eye, hand, and hearing protection.

L. HAZARD COMMUNICATION

Contractor shall comply with all standards set forth in OSHA Section 1910.1200 and other applicable government regulations.

1. Energizer maintains a current listing of all of its chemicals, solvents, and reagents.
2. The Contractor shall provide the designated Energizer representative with Material Safety Data Sheets for all chemicals, solvents, or reagents brought on site.
3. Employees of the Contractor who are working in any area where chemicals are used shall be given the necessary hazard communication information. It is the Contractor's responsibility to train all of its employees in hazard communication information.
4. Material Safety Data Sheets are at various designated work areas/departments throughout the facility and are available for any person in the plant to review.

M. HEARING PROTECTION

Contractor shall comply with all applicable government standards.

Hearing protection must be worn in all designated areas. The Contractor must provide advance notice to the designated Energizer representative of any activity that produces noise levels above 85 decibels when working in non-hearing protected areas, to allow personnel sufficient time to utilize hearing protection.

N. HOISTING EQUIPMENT

Contractor shall comply with all standards set forth in OSHA or other applicable government regulation.

All hoisting equipment shall be operated in accordance with manufacturer's specification and only by qualified personnel. The lift area and swing radius of the hoist shall be appropriately barricaded so as to control traffic and prevent any unnecessary hazards.

O. LADDERS AND STAIRWAYS

Contractor shall comply with all applicable government standards.

1. All stairways shall be kept free of debris, slippery conditions, and tripping hazards. Work shall never be done from the top two rungs or steps of a ladder.
2. Contractors are expected to provide their own ladders, which must be kept in good repair and equipped with non-skid feet. Ladders must be constructed of fiberglass or wood.

3. Aluminum or metal ladders are not allowed in our plants.
4. All extension ladders greater than 8' in length shall be tied off or in some other way secured while in use to prevent displacement.
5. When using a ladder in an aisle or an area with heavy traffic, the area around the ladder must be identified with barricades, tape, cones, or other means to direct traffic around the work area. The use of ladders with broken or missing rungs or steps, broken or split handrails, or other faulty or defective construction is prohibited.

P. LOCKOUT/TAGOUT (LOTO)

Contractor shall comply with all standards set forth in OSHA Section 1910.147 and any other applicable government standards.

1. No equipment will be worked on without specific lockout protection at the electrical disconnect, compressed air shut-off valve, steam shut-off valve, hydraulic, and any other energy source. LOTO applies to servicing and maintenance of equipment in which the unexpected start-up or energization could cause injury—including the removal or bypassing of guards and when any part of employee's body is in the danger zone.
2. The lock and tag will identify the individual working on the equipment. Contractors must provide their own locks.
3. Locks shall only be removed by the individual who installed the locks. No Energizer installed lock shall ever be removed by the Contractor.
4. The Contractor must inform the designated Energizer representative the lockout procedures the Contractor will follow. The Contractor may be required to provide a copy of its energy control program. The procedures must be at least as protective as the Energizer lockout procedure. Also, the Contractor must be knowledgeable of the Energizer lockout procedures and understand any differences in the respective programs.

Q. MOVING PRODUCTION EQUIPMENT—UNSTABLE EQUIPMENT

A significant hazard potential exists for this operation. Detailed procedures are being developed. Contact the Energizer Contractor Representative for guidance.

R. PERSONAL PROTECTIVE CLOTHING AND EQUIPMENT

Contractor shall comply with all standards set forth in the applicable government regulations.

1. Contractor personnel must dress appropriately while on Energizer property including, but not limited to shirt and substantial shoes.
2. ANSI approved safety eye wear with side shields shall be worn at all times in designated areas.

3. The Contractor shall ensure that each employee has the personal protective equipment and/or clothing required, including for specialized work such as welding, torch work, cutting, etc.

S. RESPIRATORY PROTECTION

Contractor shall provide respiratory protection and training for its employees in compliance with the applicable government regulations if required.

Respiratory protection must be used in areas posted “Respiratory Protection Required.”

T. ROOF WORK

Contractor shall comply with all standards set forth in OSHA or other applicable government regulations.

1. Before penetrating any roof surface the Manager of Engineering and the Facility Safety/Environmental Coordinator shall be notified.
2. Fall protection shall be provided while performing work on unprotected roof edges if the roof work is within 6’ of the edge of a roof.
3. Areas directly below the hoisting area shall be taped off or barricaded to keep traffic out of the immediate area.
4. Extension ladders must be secured to the edge of the building to prevent slipping and must extend at least three feet above the roof line.
5. Any time roof work is being performed; appropriate protection must be in place to prevent punctures, tearing, etc. Any hot work done on the roof requires protective material to be laid down to prevent sparks and hot materials from falling on the roof.
6. Some roofing materials may contain asbestos and should be tested before any work is initiated.
7. Projects involving the placement of heavy equipment on the roof must be comprehensively evaluated to determine if the work is to be done when the building is empty or if colleagues are to be evacuated from that portion of the building during the equipment placement.

CONCLUSION

At Energizer Battery Manufacturing, Inc. safety is a critical and essential part of every job. As a contractor engaged to do business at our facility, Energizer expects that proper safety practices will be employed at all times. Any action, procedure, or occurrence which has the potential of exposing anyone on the premises to risk should be immediately corrected. While performing your duties, any unanticipated risks that become apparent should be reported immediately to the designated Energizer representative so that immediate corrective action can be taken. Any variance from Energizer’s rules and requirements must be secured in writing from the Facility Manager Prior to when an exception occurs.

ACKNOWLEDGMENT

I have read and understand the Energizer Battery Manufacturing, Inc. Safety Program, the Site Specific Safety House Rules and completed the Energizer Pre-Qualification Questionnaire and agree that these rules and requirements will be conveyed to all employees and/or contractors employed/retained by _____ Company to perform work for Energizer. I understand that any violation of the Energizer safety rules and procedures can result in sanctions, including but not limited to termination of Energizer’s contract with “the Company denoted herein” and disqualification from future business opportunities with Energizer.

Contractor Company Name: (print)

Contractor Representative Name: (print)

Title: (print)

Contractor Representative Signature:

Date:

Energizer Representative Signature:

Date: