



Contractor Safety Handbook

Smurfit Westrock Safety Excellence System
Health and Safety Implementation Tool



Contents

Contractor Safety Handbook	4
Introduction	4
Definition	4
General Expectations	4
Pre-Qualification	4
ISNetworld Subscription	4
Insurance and Indemnity	4
Environmental Requirements	5
Skills and Qualifications	5
Site Access and Orientation	5
Contractor Start Briefing and Permit to Work	5
Personal Protective Equipment	6
Chemical Management	6
Housekeeping Requirements	7
Noise and Dust Prevention	7
Safety Barriers and Barricades	7
Incidents, First Aid and Medical	7
Emergency Evacuation	7
Tools and Equipment	8
Tool and Equipment Use Agreement	8
Hand Tools	8
Portable Power Tools	8
Pneumatic Tools/Compressed Air	8
Specific High-Risk Activities and Procedures	8
Hot Work – Welding, Cutting, Brazing	8
Scaffolding, Ladders, and Work at Height	9
Powered Industrial Trucks	10
Energy Control (Lockout/Tagout)	10
Work on Electrical Installations	11
Confined Space Entry	11
Cranes, Hoists and Rigging	11
Trenching and Excavations	12
Demolition	12
Painting	12
Asbestos	12

Conduct	12
Closing.....	12
Reviewers	13
Revision Record.....	13

Contractor Safety Handbook

Introduction

Welcome to Smurfit Westrock. It is our goal to provide a secure and safe work environment for all of our employees, contractors, and visitors. This Contractor Safety Handbook applies to contractors performing activities at Smurfit Westrock locations including service suppliers, contingent personnel, and sub-contractors. This Contractor Safety Handbook provides a brief summary of the common safety practices required for working for Smurfit Westrock at a Smurfit Westrock site. Individual sites may have specific rules and procedures that may be different from, or supplemental to, those included in this Handbook based on local regulatory requirements and circumstances. The requirements in this Handbook are in addition to any legal obligations and requirements that may apply to a contractor's activities and any site-specific safety requirements. For additional information, like site specific procedures and information, please contact the Smurfit Westrock Site Safety Leader.

Definition

For this document and the safety program described in it, the term "the Contractor" includes the service provider and anyone engaged by or through the provider to perform, including those retained to perform subcontract work.

General Expectations

The Contractor remains responsible for ensuring its services are performed safely and in full compliance with applicable regulatory requirements. Further, it is Contractor's responsibility to ensure that it has carefully reviewed the practices set forth in this Handbook and determined whether different or additional safety procedures, equipment, or other actions are necessary to perform its activities and work in a safe and compliant manner

Pre-Qualification

As part of pre-qualification for work for Smurfit Westrock, the Contractor will be asked to provide information related to their health and safety programs. The following information will be requested:

- a. A questionnaire on health and safety management
- b. (Copies of) written programs and certifications
- c. Injury statistics
- d. Insurance

ISNetworld Subscription

Where determined as a condition to the service agreement, the Contractor is required to maintain in good standing, at its own expense, a subscription to ISNetworld. In such case, ISNetworld is tasked with pre-qualification and will be the one requesting the relevant information to be provided by the Contractor. For more information on ISNetworld, see <https://www.isnetworld.com>.

Insurance and Indemnity

The Contractor that performs work or provides a service on Smurfit Westrock property is required to meet the requirements of the **Smurfit Westrock Contractor Indemnity and Insurance program** before they can begin their work. These requirements will be communicated in the pre-qualification or quotation phase and will become part of the agreement for the work.

Environmental Requirements

A Contractor that performs work or provides a service on Smurfit Westrock property may be required to meet the requirements of the Smurfit Westrock Environmental Guidelines for Contractors. These requirements will be communicated in the pre-qualification or quotation phase and will be part of the agreement for the work.

Skills and Qualifications

The Contractor must ensure that the assigned contractor personnel have the appropriate skills, qualifications, certifications, licenses, experience, and training to conduct the assigned services prior to the commencement of the work. The Contractor must promptly remove (or to require any sub-contractor to remove) from its services in connection with the work, any individual who does not meet the foregoing requirements. In addition, after receipt of written notice from Smurfit Westrock, the Contractor must promptly remove from the work any contractor personnel (including sub-contractors) who, in Smurfit Westrock's reasonable opinion, are working in a manner that is unsafe, incompetent, careless, creates an unsafe work environment, disregards the safety procedures, or is interrupting, interfering with, or impeding the timely and proper completion of the work or Smurfit Westrock's operations.

Site Access and Orientation

Site specific procedures for access control apply to contractors on all Smurfit Westrock sites. All contractors are required to sign-in and sign-out of a Smurfit Westrock facility. Safety orientation is an integral part of these access control procedures for contractors. Understanding Smurfit Westrock safety requirements is a prerequisite for contractor personnel to access the assigned workplace. An examination of understanding of the requirements stated in this Contractor Safety Handbook can be an integral part of orientation for contractors, in a method and form as determined by the individual site. Such examination can be administered on-line, as part of the ISNetworld training program or may be required prior to accessing a site for the first time.

An access badge or other approved means of access identification like a card, will be provided after sign-in (visitors) and orientation (contractors). The access badge or card has a limited timeframe validity with a maximum of one year (twelve calendar months). After completion of the project or at the end of the contract the access badges/cards are to be returned to Smurfit Westrock.

Smurfit Westrock has the right to revoke access and remove from the premises any contractor personnel who engage in misconduct, violence, or violation of Smurfit Westrock safety policies.

Contractor Start Briefing and Permit to Work

For all contractors performing activities at Smurfit Westrock locations, the Contractor Permit to Work procedure is applicable. This procedure addresses:

- a. The Contractors are assigned a Smurfit Westrock Person in Charge, to whom it should communicate any work and safety concerns while they are on site.
- b. A Start Briefing (sometimes called pre-mobilization meeting) is held with the Contractor and the Person in Charge PRIOR to starting any work (all contractors, all work). During this start briefing, the facilities' safety rules and Personal Protection Equipment (PPE) requirements are discussed, as well as specific safety aspects of the work the Contractor will be performing.
- c. Safe method work statements such as safe work instructions, Job Hazard Assessment, or task procedures for the work to be undertaken must be available on site. Such safe method work statements will be requested for review during the Start Briefing.
- d. For any specific work, a Contractor Permit to Work (general, cold work) is prepared in cooperation with the Smurfit Westrock Person in Charge and the contractor personnel assigned for the task. Hazards and required safety controls (PPE, barriers, etc.) will be described in the

Permit to Work. This Contractor Permit to Work is valid for the duration of the task, with a maximum duration of one week (seven calendar days) unless otherwise agreed by the Smurfit Westrock Person in Charge and written into the Permit. After completion of the work the Permit to Work must be returned to the Smurfit Westrock Person in Charge for assurance the workplace is left in a safe and clean condition, and that all conditions of the Permit have been met.

- e. In the case of high-risk activities like: Hot Work, Roof Access, Line and Equipment Opening, Confined Space Entry or Work on Energized Electrical equipment, Special Permit to Work are required to be used in addition to the Contractor Permit to Work.

If the Contractor employs non-English speaking workers, the Contractor will provide and identify a translator who must be present whenever its non-English speaking workers are present, including during any Start Briefing, Orientation, site-specific orientation, Permit to Work preparations or job safety analysis.

Personal Protective Equipment

The Contractor must provide for their personnel all personal protective equipment (PPE) needed for the work. The following PPE is ALWAYS required and must be worn properly at all times. All PPE is to be supplied by Contractor to their personnel:

- a. Safety shoes with rated toe protection.
- b. High visibility orange vest or orange high visibility clothing (Yellow vests are not allowed for Contractors in Smurfit Westrock).
- c. Safety eyewear with side shields.

The following additional PPE can be required in designated areas and must be provided by Contractor to their personnel:

- a. Hearing protection.
- b. Head protection, including hard hats or bump caps.
- c. Proper clothing, including gloves, shirt (with sleeves covering the shoulders and upper body), and long pants must be worn as necessary for the work being performed.
- d. When handling any type of chemical including solvents, contractors are required to wear the recommended PPE as per the Safety Data Sheet (SDS).
- e. A full body harness with stirrup and a Self-Retracting Lanyard (SRL) with auto stop must be worn when working at unprotected heights at or above 4 feet/1.2 meters.
- f. Depending upon Smurfit Westrock site requirements the Contractor is responsible for compliance with the required Food Safety or Quality protective clothing policies (i.e., hair nets, gloves) and Good Manufacturing Policies.

Chemical Management

All chemicals along with the estimated amount to be brought on site must be mentioned as part of the Scope of Work statements and approved by Smurfit Westrock as part of the contract agreement to work, prior to the material being brought into the site. The Contractor must provide Smurfit Westrock with a copy of a current SDS for each chemical brought on site. Chemicals must be properly and conspicuously labeled and stored in accordance with all applicable legal requirements. Residual chemicals and leftovers remain the responsibility of the Contractor and must be removed from the Smurfit Westrock facility by the Contractor in compliance with applicable laws and regulations. SDS for chemicals used by Smurfit Westrock are maintained and will be made available to contractor personnel upon request. Before handling or disposing of any unidentified material or waste present at a job site, the Contractor must first consult with the Smurfit Westrock Person in Charge. Any unknown liquid is to be treated as

dangerous, and any exposure or contact with any unknown liquid should be followed by immediate care to wash, rinse, or remove the liquid.

Housekeeping Requirements

The Contractor is expected to maintain good housekeeping in their work area(s). Materials 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 and tools that remain on site must be neatly stacked, safely stored, and identified with the Contractor name. Hoses and cables must be located so as not to present a tripping hazard. Burn barrels are not permitted.

Noise and Dust Prevention

Where activities are conducted that can give rise to excessive noise and/or dust, measures must be taken by the Contractor to control and minimize the same. Potential measures are moving the activity to a closed environment or providing screens or separations.

Safety Barriers and Barricades

The Contractor has primary responsibility to erect barriers and warning signs to prevent incidents in or adjacent to the area where the Contractor's work is being performed. The Contractor will supply all necessary signs, warnings, and barricades to properly alert surrounding personnel of hazards created by the work. Barricades are required around all excavations, holes, or openings in floors, roof edges, elevated platforms, and wherever necessary to warn people against falling in, through or off. Barricades must be a minimum of 42 inches/104 centimeters high and erected at least 6 feet/2 meters from the edge.

- a. Yellow (USA) or Yellow/Black (Int'l) barricade tape (CAUTION HAZARD) must be used where entry is permitted under certain conditions. A tag or sign must be posted on the Yellow, Yellow/Black tape, or barrier to indicate the potential hazards and entry requirements on all 4 sides/access points.
- b. Red (USA) or Red/White (Int'l) barricade tape (SERIOUS HAZARD, NO ENTRY) must be used to indicate that entry into an area is prohibited. A tag or sign must be posted on the Red or Red/White tape/barrier to indicate entry prohibition on all 4 sides/access points.

Barriers or tape must be removed by the Contractor as part of job/work completion.

Incidents, First Aid and Medical

All on-site, work-related injuries, medical emergencies, fires, releases, spills, or damage must be immediately reported to the Smurfit Westrock Person in Charge. The Smurfit Westrock Person in Charge will initiate the emergency response team and call emergency services as appropriate. The Contractor is responsible for arranging for (follow-up with) outside medical services for contractor personnel as well as transportation to such services as needed. The Contractor is required to have first aid supplies as well as first aid trained personnel to always administer basic first aid on the job site when work is being conducted.

The Contractor must cooperate with Smurfit Westrock in its investigation of any on-site incident.

Emergency Evacuation

In the event of fire, gas, or other incident that warrants an evacuation, a warning will sound in the area where the Contractor is working. When the evacuation signal is given, contractor personnel must evacuate to the Smurfit Westrock identified muster location. At the Smurfit Westrock identified muster location, contractor personnel must identify themselves to an emergency point coordinator for headcount purposes.

Tools and Equipment

The Contractor must provide all tools and equipment, including, without limitation, aerial lifts and scaffolding, required to complete the job unless alternative contractual provisions have been made. All equipment must be inspected regularly by the Contractor and repaired and removed from service if it is defective. Smurfit Westrock employees do not repair tools or equipment for third party personnel. The Contractor is required to provide the skill and necessary labor to rig, install, and use said equipment. The Contractor is prohibited from operating any Smurfit Westrock equipment, such as electric power switches or valves, unless otherwise instructed by a Smurfit Westrock Authorized Employee.

Tool and Equipment Use Agreement

The Contractor is prohibited from using Smurfit Westrock vehicles, equipment, or tools without prior written permission from an authorized Smurfit Westrock representative. The Contractor may request to use Smurfit Westrock tools and equipment in performing the work at the site, if absolutely necessary. Such requests must be made by submitting a completed Tool and Equipment Use Agreement Request Form to the Person in Charge. The Contractor must provide documentation that personnel are trained and fully qualified to use loaned equipment or tools in accordance with applicable regulatory requirements.

Hand Tools

All tools, supplied by the Contractor, must be kept in good condition – sharp, clean, oiled, and dressed. Tools may not be thrown from one location to another, from one person to another, or dropped to lower levels. Tools must not be forced beyond their capacity. “Cheaters” must not be used to increase tool capacity. All tools must be inspected regularly by the Contractor and repaired or removed from service if found to be defective.

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. Safety guards must be in place on all power tools before use. 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/Compressed Air

Pneumatic tools and hoses, supplied by the Contractor, must be secured together by a positive means (whip check, Chicago clips) to prevent the tools from becoming accidentally disconnected. Compressed air may not be used for cleaning personnel or clothing. All pneumatic tools and hoses must be inspected regularly by the Contractor and repaired and removed from service if found to be defective.

Specific High-Risk Activities and Procedures

Hot Work – Welding, Cutting, Brazing

Before starting any hot work activities outside of a designated hot work area, a hot work Permit to Work must be obtained from the Smurfit Westrock Person in Charge. The hot work Permit to Work is valid for one shift and must be posted in the area where the work is being performed. Minimum Hot Work requirements include:

- a. No hot work may be performed while plant fire protection systems have been disabled unless impairment permission (Insurance company) is provided.
- b. All flammable and combustible materials within a radius of 35 feet/10 meters of the hot work site must be removed or covered. Wall and floor openings (including grating) within a radius of 35 feet/10 meters of the hot work must be protected.
- c. A fire extinguisher and/or water hose of adequate size and pressure must be immediately available at the jobsite.
- d. A fire watch must be present for the duration of the hot work plus 60 minutes after the hot work is completed.
- e. The area must be monitored for an additional 4 hours following the fire watch.
- f. Protective blinds must be used around welders.
- g. Local exhaust ventilation (LEV) must be used when welding or cutting in enclosed areas or confined spaces.
- h. Filter respirators or local exhaust ventilation must be used when welding or cutting on materials containing stainless steel, high-alloy specialty steel, or galvanized steel.
- i. Such other precautions as may be required for the particular work to be performed, as well as compliance with all applicable codes, regulations, and other legal requirements, must be maintained.

The Contractor is responsible for furnishing all safety equipment needed for such work including welding shields, fire extinguishers, fire hoses, and fire watch personnel.

All fuel and oxygen cylinders must be secured in an upright position. When oxygen and fuel gas cylinders are not connected for use, they must be separated by at least 20 feet/6 meters or separated by a fire barrier with a 30-minute rating.

Scaffolding, Ladders, and Work at Height

Except as provided herein, Contractors are required to provide their own scaffolding. Scaffolding must not be erected, moved, dismantled, or altered except under the supervision of a designated contractor representative with appropriate qualifications. The Contractor must not use scaffolding erected by Smurfit Westrock or any Smurfit Westrock service provider except when absolutely necessary and only after the Contractor executes a written **Crane, Lift and Scaffolding Use Agreement**.

Scaffolds must be equipped with guardrails, mid-rails, and toe boards. Scaffold platforms must be tightly planked with scaffold plank grade material or equivalent. Scaffolds must always be at least 10 feet/3 meters from electric power lines. Scaffolds must be erected on solid footing. 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. Barricade or tape (Red or Red/White) is required around all scaffolding in use or any work at height, to prohibit people from entry underneath ongoing work.

A designated contractor representative, with appropriate qualifications, must inspect the scaffolding upon completion and at least daily thereafter. Permission to use and specific warnings on hazards must be noted on the scaffolding tag. Where scaffolding is incomplete or there are fall hazards that require tie-off this must be noted on the scaffolding tag (This tag will then be indicating NOT SAFE, typically yellow). In such case fall protection equipment using a twin fall protection lanyard with scaffold hooks must be used to navigate the scaffolding.

The Contractor is prohibited from using any Smurfit Westrock ladder. All ladders needed for the work must be supplied by the Contractor and must be equipped with safety feet and erected on solid footing. Individual sites may require non-conductive ladders only. All ladders must be in good condition and inspected prior to use. Ladders must be erected in a 4:1 ratio and extend 3 feet/1 meter beyond the top

of a structure. Extension ladders must be footed at the base by another person or tied off at the top to prevent tipping. The use of a fall arrest system with a full harness, stirrup pack, and Self-Retracting Lanyard (SRL) is required when working at unprotected heights of 4 feet/1.2 meters or greater, such as working from a ladder.

The Contractor is prohibited from working from the forks of a lift truck or standing on any platform, wood pallets, or other stacked materials. A manufacturer approved work platform with handrails and integrated power controls specifically designed for use with the lift truck will be allowed.

Before accessing or entry onto any roof, a Roof Access Permit to Work must be obtained from the Smurfit Westrock Person in Charge.

Powered Industrial Trucks

Smurfit Westrock Trucks: Powered Industrial Trucks (PITs) used at our sites can present a hazard to contractors working in the area. While working at Smurfit Westrock sites utilizing trucks (PITs), contractors must stay in the designated safe walkways or designated safe working areas. Smurfit Westrock-owned trucks (PITs) may not be operated by Contractor personnel except when absolutely necessary and only after the Contractor executes a written **Tool and Equipment Use Agreement**.

Contractor Trucks: Contractor provided PITs and mobile equipment, such as backhoes, must be inspected by the Contractor prior to each shift the equipment is used or operated. These inspections must be conducted and documented by a trained and knowledgeable individual. Defective equipment must be removed from service until repaired. When trucks (PITs) are parked, the ignition must be off, the forks or other attachments must be in the resting/lowered position, and the hand brake must be set. When operating PITs in an area where separation of pedestrians and PITs is not possible, additional safety measures must be taken to provide a safe work area like:

- a. Placing (Red or Red/White) barriers or cones to create separation.
- b. Providing a spotter when moving through a pedestrian area.
- c. Reducing the speed to a limit of 3 mph (5 km/h) at areas with pedestrian crossings.
- d. Using detection or governing electronics on the truck to govern safe working distances from pedestrians.

Energy Control (Lockout/Tagout)

The Contractor, when performing servicing and maintenance or line breaking activities at Smurfit Westrock sites must follow the requirements outlined in the site's Lockout/Tagout procedure(s). Copies of these procedures must be requested and reviewed by the Contractor as part of the Permit to Work. The Contractor must review the site's Lockout/Tagout procedures to ensure they are adequate for the work to be performed.

Lockout/Tagout must be performed by someone with the level of training required for a Lockout/Tagout Authorized person. Lockout/Tagout is performed using designated lockout locks and a lockout hasp(s) and/or lock boxes in accordance with the applicable equipment-specific lockout procedures. Contractor personnel must then install their personal lockout locks on the appropriate hasp or lock box prior to starting a job. Personal locks for contractor personnel must be provided by the Contractor. These personal locks must be identified (tag/label) with the name of the person applying the lock and their company name and telephone number. When the power source is to be re-activated, the Contractor must contact the authorized Smurfit Westrock employee so that the Smurfit Westrock job lockout can be removed, and the equipment can be re-energized.

Any work on energized equipment for testing purposes or the use of alternative protections must be agreed and permitted as part of the Permit to Work by the Smurfit Westrock Person in Charge.

Work on Electrical Installations

For work on the installation of electrical wiring and/or distribution systems the following requirements and procedures are applicable:

- a. Only qualified electricians engage in the work. This qualification (certification) is verified as part of the pre-qualification for the work.
- b. Before starting any work activities on or near exposed live part, an Energized Electrical Permit to Work must be obtained from the Smurfit Westrock Person in Charge.
- c. When the Contractor is performing work on or near exposed live parts under an Energized Electrical Permit to Work, an attendant trained in methods of release of victims from contact with live parts, first aid, use of AED and CPR must be readily available. This attendant must be provided by the Contractor.
- d. Red or Red/White barricade (tape) is used, with safety signs, to prevent unqualified persons access to work areas.
- e. Arc rated PPE provided by the Contractor must be used in accordance with the rating on the installation.
- f. All tools and equipment used in electrical work, including, without limitation, hand tools and ladders, must be nonconductive.

Confined Space Entry

When the Contractor needs to perform work in a confined space the Contractor is required to follow all regulatory and site Confined Space procedures. For any work requiring entry into confined spaces the following requirements and procedures are applicable:

- a. Before entry into a Confined Space, a Confined Space Entry Permit to Work must be obtained from the Smurfit Westrock Person in Charge.
- b. Only qualified firms and individuals are allowed entry into confined spaces. This qualification (certification) is verified as part of the pre-qualification for the work.
- c. Entry into Confined Spaces requires an Entry Attendant. This attendant must be provided by the Contractor.
- d. A rescue plan, either to be performed by the contractor or by Smurfit Westrock, must be reviewed before permission for entry is granted.

Cranes, Hoists and Rigging

Cranes and hoists brought on site must have a valid inspection certificate. Only qualified (certificate holding) crane drivers are permitted to operate a crane. Rigging and lift planning must be established by the Contractor using designated qualified riggers. Where a critical lift plan is warranted, it must be created by the Contractor and must be discussed during the Start Briefing. The Contractor must not use Smurfit Westrock's house cranes except when absolutely necessary and only after the Contractor executes a written **Crane, Lift, and Scaffolding Use Agreement**.

Mechanical parts of the crane, hoists, and rigging must be inspected by the Contractor prior to each shift. 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. All accessible areas within the radius of the counterweight swing must be barricaded (Red or Red/White) by the Contractor to prohibit access.

Trenching and Excavations

A review or survey of underground utilities, sewers, and/or lines must be performed before digging a hole or trench. This review must occur well in advance (at least 48 hours) before the start of the digging work.

Protective shoring or approved sloping techniques must be utilized to protect personnel entering trenches 5 feet/1.5 meters deep or greater. Soil must be kept at least 2 feet/60 centimeters back from the edge of a trench.

A ladder or ramp must be provided to exit a trench. Trenches must be inspected by a designated Contractor representative with necessary qualifications, on daily basis prior to entry and after any hazard-increasing event such as heavy rain, vibrations, or excessive loads. Individual sites may have specific procedures that are more stringent based on local regulatory requirements and require the completion of an Excavation Permit to Work.

Demolition

Prior to starting demolition operations, the Contractor must survey the structure to determine its condition. A written demolition plan, identifying the safe work procedures to complete the demolition, must be developed by the Contractor and reviewed during the Start Briefing and Permit to Work. While conducting the work, the demolition area must be barricaded using Red or Red/White tape. Crane operators involved in demolition must be able to see the work, or a signal person must be utilized to direct the crane operator. Unstable structures may not be left in place without temporary support.

Painting

Appropriate PPE is required for contractor personnel/painters during spraying operations. Spray-painting equipment must be cleaned in an open, well-ventilated area at least 35 feet/10 meters from any ignition source. Static charge dissipation measures must be taken while cleaning spray-painting equipment.

Asbestos

Any uncharacterized or unlabeled insulation material or potential asbestos containing material (PACM) is to be treated as asbestos-containing material. Contractors may not remove or disturb material until the insulation or PCAM is determined to be asbestos-free. Asbestos-containing material may only be removed by licensed/certified asbestos contractors and must be removed in accordance with regulatory requirements.

Conduct

The Contractor is expected to conduct itself in agreement with the following Smurfit Westrock policies when on Smurfit Westrock premises:

- a. Smurfit Westrock Code of Conduct
- b. Smurfit Westrock Mutual Respect in the Workplace Policy
- c. Smurfit Westrock Substance Abuse Policy

Closing

This Handbook is an extension of Smurfit Westrock's effort to achieve a 100% safe workplace. Conformance with this handbook is the responsibility of every contractor performing activities at Smurfit Westrock locations.

Reviewers

This Contractor Safety Handbook was reviewed and approved by the following people.

Nina E. Butler – VP EHS, Chief Environmental Officer & Deputy General Counsel

James Strange - VP, SWNA Health and Safety

Stacy Fanchin – Director, SWNA Mill Operations Health and Safety

Joseph Mayberry – Manager, SWNA Consumer Packaging Health and Safety

Jeffrey Lawniczak – Director, SWNA Corrugated Packaging Health and Safety

Revision Record

Version	Date	Changes	Approver
0	August 2022	Initial Release	Reviewers
1	June 2025	Rebranding. No Change to Content.	C. Peck