



PRAYON

# GENERAL HEALTH AND SAFETY REGULATIONS FOR CONTRACTORS AND SUBCONTRACTORS

REG.45.316 – JANUARY 2026 VERSION  
ENGIS SITE

RÈGLE DE BASE :

 **Je le fais en  
Sécurité  
ou je ne le fais pas**

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This English version is a translation from the original French regulations. In case of discrepancy, the French version shall prevail



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## 1. Scope of application

This document applies to every contractor performing work or services on the PRAYON site in Engis and to any subcontractors. Before commencing work, the workers of the contractor and any subcontractors are required to have read and understood the information contained in this document.

It is the contractor's responsibility to ensure that the information in these regulations is communicated to the workers of his subcontractors, and to ensure that they are complied with.

## 2. Definitions & Abbreviations

- ADRAC: Pre-Order Risk Analysis.
- Atex zone : Zone with a potentially explosive atmosphere.
- A.W. : Authorisation to Work.
- Contractor: an external employer or independent contractor who carries out work at PRAYON, on behalf of or with the consent of PRAYON, and in accordance with a contract concluded with PRAYON.
- ESTC : External Service for Technical Control.
- External company: contractor or subcontractor.
- GREI : General Regulations on Electrical Installations.
- HSP : Health and Safety Plan.
- Intervenant: any person working on behalf of a contractor or its subcontractor.
- ISPP : Internal Service for Prevention and Protection.
- L.M.R.A. : Last Minute Risk Assessment = Last-minute risk analysis before starting work ("One Minute" at PRAYON).
- PPE : Personal Protective Equipment.
- Safety coordinator (CS): PRAYON personnel in charge of coordinating work and issuing work authorizations and associated permits.
- SHSP : Specific Health and Safety Plan.
- Subcontractor: an external employer or independent contractor who carries out work at PRAYON on the basis of a contract concluded with a contractor.
- TMW : Temporary and Mobile Worksite.
- VCA : Veiligheid Checklist Aannemers - Safety/Health/Environment checklist for contracting companies.

## 3. Legal and regulatory aspects

External companies undertake to comply with the laws and regulations in force in Belgium relating to the environment, safety and the well-being of workers during the performance of their work.



## 4. For all contractors and subcontractors

### 4.1. Prayon safety rules

#### 4.1.1. The « Life Saving Rules »

PRAYON has defined 5 “Life Saving Rules”: a final line of defense to prevent serious or fatal accidents. Safety is non-negotiable: breaking a Life Saving Rule puts lives at risk and engages everyone’s responsibility.

These **5 Life Saving Rules** are detailed in a booklet entitled “The 5 Life Saving Rules”, available at the reception desk, from the PRAYON representative, and summarized below:

1. Working at height: In the absence of collective protection, wearing a safety harness attached to a secure anchorage point is mandatory from a height of 2 meters.
2. Access to confined spaces: Never enter without a confined space entry permit and without having verified all safety conditions.
3. Coordinated lockout/tagout: Understand, verify, and control the risks before any intervention.
4. Never stand under a suspended load: Keep a safe distance and respect the safety perimeter, without exception.
5. Wearing a seat belt: Mandatory for all drivers and passengers, in all vehicles and equipment

#### 4.1.2. The 11 safety expectations

PRAYON has defined 11 safety requirements that must be followed by external companies. These are summarized in a booklet entitled “Mandatory Safety Instructions” available at the reception desk from the PRAYON representative.

#### 4.1.3. Cigarettes, drugs and alcohol

- Smoking is prohibited (including in vehicles) except in designated smoking areas.
- The introduction and consumption of alcoholic beverages (zero tolerance) or narcotics is strictly forbidden in the plant.
- Working under the influence of alcohol or drugs is prohibited.

#### 4.1.4. Taking photos or videos

- It is forbidden to photograph or film without written authorization and without being accompanied by a PRAYON manager.
- No transmission, retransmission or external use of footage is permitted without prior written approval from a PRAYON manager, in particular on social networks, news media, for advertising purposes, etc.
- Where necessary, the introduction and use of camera equipment in production, research and storage areas where there is an ATEX risk (these areas are identified by ATEX warning signs) must be authorized in advance by the PRAYON manager of the area concerned, by means of a work permit. A fire permit must be drawn up.

#### 4.1.5. Traffic

- The traffic rules apply on the site.
- Using a mobile phone while driving is strictly prohibited.
- Maximum speed on site is 30 km/h.
- The train has priority.



- Outside company vehicles using the site must be authorized by PRAYON. They must be registered and in order of maintenance and technical inspection. They are clearly identified with the company's name.
- The personnel of external companies are required to use only the authorized parking areas marked "subcontractors".
- Only vehicles transporting materials or tools required for the worksite are allowed access to the plant. Vehicles intended for transporting people and personal vehicles must be parked in the visitors' parking lot at the factory entrance.
- If a mobile machine is to be used only on site, it must be restricted to 30 km/h. PRAYON may request proof of this restriction.

## 4.2. Site personnel

### 4.2.1. Service

- PRAYON authorizes a maximum of one level of subcontracting.
- The external company undertakes to comply with Prayon's general terms and conditions for the purchase of services, which are available on the Prayon website.

### 4.2.2. Limits of responsibility between Prayon & the outside company

- The subcontractor must designate an authorized person (called the subcontractor's manager (REE)) who will be responsible for the day-to-day management and supervision of its personnel, and will have full authority to act in its name and on its behalf, so that no operation, action or decision can be delayed or suspended due to the absence of his or her superior. She must be reachable at all times during the intervention.
- They must have sufficient skills, within the limits of the specific problems posed by the work, to ensure compliance with health and safety regulations.
- The outside company's workers will be subject exclusively to its authority.
- Without in any way undermining the authority of the outside company, and in accordance with the law, PRAYON reserves the right to give instructions to workers exclusively on the following points:
  - Planning of services and intermediate results [e.g.: specifications,] ;
  - Office/plant/workshop opening and closing times and general times of interruption;
  - Access to PRAYON premises and/or facilities according to service requirements [e.g.: badges, registration system, ...] ;
  - Circumstances, procedures and methods specific to PRAYON that must be taken into account when carrying out the services [e.g.: existing safety instructions, food quality requirements, confidentiality requirements, other work in progress that determines the chronology of the work, ...]. ;
  - Intermediate changes to be taken into account during performance of services [e.g. adaptation of schedule, adaptation of performance methods, etc.];
  - Technical instructions concerning the use and/or maintenance of certain machines and materials and/or concerning customized work, including the specific training required for the performance of the services and which is specific to PRAYON [e.g.: mandatory use of certain maintenance products, instructions for the use of machines, ...]. ;
  - Technical information on the use and/or maintenance of certain installations and infrastructures and/or concerning processes, including specific training required for the performance of services and specific to PRAYON [e.g.: project management methodology, ...] ;



- Urgent interventions to prevent/limit economic damage [e.g.: work stoppage in the event of mishandling, ...].

#### 4.2.3. Access

- No later than the day on which work begins, the contractor will provide the PRAYON manager in charge of the site with a list of the names of all persons who will have access to the site.
- It is compulsory to register (and clock in and out) all persons entering and exiting a vehicle, using an individual “subcontractor” badge. If several people are present in a vehicle on entry, each of them must sign in. Personnel on site must wear their badges visibly at all times.
- To gain access to the site, subcontractor personnel must have attended the basic training (screening of the safety film in the guard's lodge) and passed the test :
  - Number of tests allowed: 3;
  - Result to gain access: 70% min.;
  - Validity period: 12 months.

#### 4.2.4. Training and accreditation

- Before visiting the site during annual shutdowns, outside company personnel are required to undergo site-specific risk training organized by PRAYON.
- External company personnel have the skills and authorizations required for the task in hand. These authorizations must be made available to PRAYON on request.

#### 4.2.5. Language of use

- The language used at PRAYON in Engis is French.
- Workers from outside companies must be able to communicate in this language (understanding work instructions, emergency instructions, calling for help, etc.). External companies will therefore give priority to staff who speak and understand French.
- In the event that an external company nevertheless calls on non-French-speaking personnel, the external company must guarantee the permanent presence of an external company manager (REE) who must understand and speak the workers' language correctly.
- For certain specific tasks, such as security or vigilance posts, the person in question must necessarily speak French.
- Derogation: For special one-off assignments or tasks of limited scope which must be carried out by specialized personnel, another language is authorized if the work is carried out under the direct and permanent supervision of a member of the PRAYON team. This must be mentioned in the ADRAC and or SHSP in the case of a TMW.

### 4.3. Risk analyses

- For work that is not considered a temporary or mobile worksite or part of a Controlled Hourly Rate (THOR) contract, a Pre-Order Risk Analysis (PRAYON PAPI 45.329) must be supplied with the offer. This document must be validated BEFORE the work is ordered by the person requesting the work.
- The specific safety measures to be taken are determined by the contractor and the PRAYON manager during the site visit, with the support of the ISPP on request, and formalized in the TA.
- The contractor implements a “Last Minute Risk Analysis” procedure, known as “One Minute” at PRAYON.
- If the service (at the outset or during execution) requires the dismantling and/or bridging of one or more safety components on a machine, or part of an installation, requiring its controlled movement,



PRAYON requires a written risk analysis, based on the intervention procedure, from the technician in charge of the work. This must be submitted to the person in charge of the PRAYON job, before the work in question begins.

## 4.4. Work and other permits

Any contractor or subcontractor working on the site must have all the required authorizations, completed and signed by PRAYON, before starting work. It is imperative that each worker complies with all preventive measures imposed by the work authorization and the necessary permits.

All participants must :

1. Report to the PRAYON person in charge of the work BEFORE starting work;
2. Report to the control room, crossing guard room or lockout room BEFORE entering the facility AND at the end of the work (or when leaving the facility).

### 4.4.1. Work authorization

- A work permit (W.P.) is required for all work.
- The contractor or subcontractor can only agree to sign an A.W. if it has been done at the place where the work is to be carried out and in the presence of the people involved.
- A T.A. is valid for the break / the day of work.
- For any work carried out on equipment requiring energy isolation, the worker must use a black lockout padlock and affix it to a lockout box when signing the A.W. with the PRAYON safety coordinator.
- The padlocks will be distributed by PRAYON. The following two special cases may arise:
  - If several people are working at the same time, and the person in charge remains on site at all times, a single padlock will be issued to the team leader;
  - If the supervisor does not remain on site at all times, each worker will receive a padlock and must affix it to the lockout box.
- By placing their padlock on the lockout box, each worker undertakes to ensure that the instructions on the A.W. are respected.
- At the end of work, the worker must close the A.W., remove the padlock from the lockout box and return the padlock. In case of omission, PRAYON will try to contact a representative of the outside company (or the PRAYON site manager) to remove the padlock according to the “cutting” procedure. A request for corrective action will then be sent by PRAYON to the subcontractor.

### 4.4.2. Fire permit

- A fire permit must be drawn up and signed for any work involving heat, naked flames or sparks (this includes, but is not limited to, the following activities: drilling, disk grinding, welding, grinding, drilling, cutting with a blowtorch, heating with a thermal stripper, etc.).
- The subcontractor is responsible for providing his own fire-fighting equipment in the work area, in sufficient numbers and in order for periodic checks to be carried out.
- It is strictly forbidden to move fire-fighting equipment belonging to PRAYON.
- In particular, it is forbidden to remove lead from cabinets containing fire-fighting equipment, except in the event of an outbreak of fire.



### 4.4.3. Confined space (C.S.) entry permit

- A permit to enter confined spaces must be drawn up and signed before entering production equipment such as tanks, reservoirs, vats, pits, sewers, wells, etc.
- Atmosphere monitoring measures will be carried out by the PRAYON prevention department.
- A lookout must be present outside the equipment. For identification purposes, the lookout must wear an orange vest with the words “LOOKOUT + company name” printed on the back.
- The wearing of a harness is mandatory in confined spaces to allow for rapid extraction in an emergency.
- The harness may be connected to a rope or any other suitable means of restraint. If the harness and connecting rope hinder the rescue of the worker, an exception may be made and will be noted on the Work Authorization and Confined Space Entry Permit.
- A risk analysis must be carried out to determine the appropriate measures: type of lookout, ventilation, means of access, monitoring and rescue plan, etc.
- This permit is validated by the PRAYON Safety Coordinator and is valid for one day or one break.

### 4.4.4. Excavation permit

Any excavation, earthwork, trenching or drilling work requires a digging permit. This permit is issued by the PRAYON manager in charge of the work.

## 4.5. Use of equipment

- Outside companies must bring all equipment required for their own activities.
- No personnel from outside companies may use PRAYON handling equipment (wheel loaders, forklifts, aerial work platforms, etc.) without official written authorization. PRAYON will ask the person in charge of the operators to sign a receipt for any equipment loaned.
- The user must be in possession of the appropriate authorization. This authorization must be shown to PRAYON on request.
- The user of the outside company is responsible for ensuring that the equipment is in good condition and in good working order.
- This equipment is used at the risk and under the responsibility of the outside company.
- Equipment that has not been returned at the end of work, or that has been damaged, will be replaced or repaired at the outside company's expense.
- All containers must be identified and labeled in accordance with legislation (in particular CLP).
- Gas cylinders must be properly secured at all times. Gas cylinder connection hoses and accessories must be in perfect condition and inspected annually. Proof of mandatory inspection must be provided on request.
- Portable power tools must be in proper condition (e.g. no tape on cords) and inspected by competent personnel. Proof of inspection must be provided on request.
- All equipment brought onto the site must be listed and identified with the name of the company that owns it, and must have a system for checking that the equipment complies.
- For lifting equipment and accessories, a copy of the latest ESTC inspection report must be made available on request.

## 4.6. Personal protective equipment

All personnel must wear the standard PPE, as well as any additional PPE required by the work permit. |



Contractors are responsible for providing their own PPE.

If a contractor does not have the standard PPE, PRAYON can provide it; it will be billed at twice the cost price plus a €100 administrative fee.

Specific PPE (gas-proof coveralls, respiratory equipment, escape masks) may be provided by PRAYON at no charge, provided they are returned in good condition.

- On the PRAYON site, contractors are required to provide their personnel with CE-certified personal protective equipment. The minimum equipment required (standard PPE) on site is :
  - Helmets (caps may be tolerated depending on the activity, based on a risk assessment);
  - Safety glasses ;
  - Safety shoes. ;
  - Hearing protection.

They are compulsory for all workers, for the entire duration of their work on our site.

- The wearing of a fall arrest safety harness in the event of a fall from height is compulsory for any risk of falling from a height that is not protected by collective protection. These harnesses are subject to periodic inspection by a ESTC. This inspection must be made available to PRAYON on request.
- The safety harness worn at the workstation must also be strictly worn and fastened (with accessories adapted to this type of use) each time an aerial work platform is used.

## 4.7. Work clothing

- Workers must be provided with clean work clothing suitable for the work to be carried out, in accordance with the risk analysis.
- Shorts are not permitted on the premises.
- Work clothing (upper and/or lower parts) must enable the worker to be seen in low-light conditions.

## 4.8. Collective Protection Equipment

- The outside company ensures that collective protection equipment is appropriate to the risks to be prevented, and guarantees that it is installed and used in accordance with instructions. It will ensure that the equipment is in good condition throughout the worksite.

## 4.9. Beaconing and signage

- The subcontractor will be responsible for erecting markings and providing protection against all hazards associated with the site, such as falls from height (roofs, floors, ground openings, excavations, etc.), falling objects, projections, etc.
- In all cases, marking must have the same protective features as fixed collective protection. Ribbon marking is not permitted in these cases.
- The outside company will affix a sign to the marking indicating the name of the company and its site manager, his or her telephone number and the risks protected.
- The outside company is required to inform the PRAYON site manager of the presence of any dangerous obstacle on any work site located on the site.



- The outside company must anticipate the need for storage and inform the PRAYON site manager of any need for storage space, handling, setting up containers, etc., so that the latter can organize requests for authorization.
- Tape is accepted for marking purposes only and in the absence of the risks mentioned in the above paragraph, such as crane marking (in accordance with PRAYON's existing marking sheets).

#### 4.10. Use of hazardous products

- The contractor will mention in the ADRAC the hazardous products used/stored and/or transported on site.
- For any use of hazardous products, a safety data sheet must be provided for PRAYON's approval.
- The contractor or his subcontractor must be in possession of the Material Safety Data Sheets (MSDS) on site.

#### 4.11. Use of scaffolding

- The contractor will mention in the ADRAC the need to use scaffolding as a means of access for the work.
- Scaffolding must be erected in accordance with current legislation by an approved erection company.
- For any use of scaffolding, the outside company's personnel must be in possession of a "user" authorization issued by their employer and made available to PRAYON on request.

#### 4.12. Environment

##### 4.12.1. Order and cleanliness

- The outside company is required to maintain a clean environment throughout the worksite and to carry out a complete clean-up at the end of the worksite.

##### 4.12.2. Noise

- The noise level of site equipment supplied or rented complies with the relevant regulations.
- The contractor will mention in the ADRAC the noise level of any machinery/equipment exceeding 85 dB.

##### 4.12.3. Liquid spill

- Discharge into the sewer is strictly forbidden.
- The outside company will ensure full compliance with all relevant regulations and will bear full responsibility for this.

##### 4.12.4. Waste

- The contractor is liable for any damage to the environment resulting from pollution caused by any wrongful act or omission on the part of his employees or subcontractors.
- All recyclable waste (wood, metal and plastic) must be sorted according to recycling category and taken to the PRAYON container park after prior written approval by an Environment Department manager.



- Disposal of excavated soil (earthworks) requires the prior written agreement of the Environment Department manager.
- All other waste must be disposed of (or arranged for disposal) by the outside company, in compliance with current legislation.

#### 4.12.5. Waste processing :

- By accepting the order, the contractor undertakes to comply with legislation on waste treatment.
- When hazardous waste is evacuated, a certificate of destruction issued by an approved center must be given to the PRAYON site manager.

#### 4.12.6. Environmental incident

- In case of pollution :
  - Immediately take appropriate measures to contain and limit the pollution;
  - Immediately notify the Environment Department Brigadier (0496/58.62.86) or the Environment Department Manager (04/273.92.16 or 0499/98.74.18).

### 4.13. Health and hygiene

#### 4.13.1. Social premises

- Social facilities include changing rooms, toilets, washrooms, showers and refectories.
- External companies must comply with the instructions given by the PRAYON work manager.
- In certain cases, PRAYON will make facilities available to companies. The use of PRAYON facilities is always subject to prior authorization by the PRAYON works manager. Where appropriate, temporary facilities may be set up by external companies with the agreement of PRAYON.

#### 4.13.2. Medical supervision

- All persons occupying safety positions (drivers of motor vehicles, cranes, lifting equipment, etc.) or working in specific conditions (confined spaces, working at heights, etc.) must be able to produce a medical examination form, issued by an occupational physician, stating that they are fit to drive, use machinery or perform specific work.
- This is why it is imperative that the company's occupational physician contacts PRAYON's occupational physician to obtain information that will enable him/her to ensure proper monitoring of the personnel for whom he/she is responsible.
- It is the responsibility of the outside company's management to ensure that its employees working on the site have the skills required for their job.

#### 4.13.3. Asbestos and asbestos inventory

- PRAYON is in possession of an asbestos inventory. External companies should ensure that they are aware of the relevant information extracted from this inventory, which should be passed on to them by the PRAYON people responsible for supervising the work.
- On the basis of this information, companies will have to assess the impact of their intervention in their risk analysis, and will have to inform their personnel of the location of applications and the preventive measures to be taken.
- Despite the inventory, it is still possible that asbestos-containing applications may have escaped investigation. In the event of suspicion or doubt, any work that could jeopardize the integrity of



suspect elements must be suspended, and the PRAYON site manager must be informed immediately, who will make the necessary arrangements with the ISPP department (occupational medicine).

- The contractor is responsible for ensuring that his personnel, and those of his subcontractors, have received adequate training in asbestos-related risks and in the correct use of personal protective equipment (PPE). It undertakes to comply with asbestos-related directives and regulations.
- In the event of accidental exposure to asbestos, the contractor must have an emergency plan in place, which must be communicated to PRAYON's ISPP department (occupational medicine).
- All asbestos-related interventions must be documented in detail, including the preventive measures taken and the names of the workers involved.
- These documents must be kept for a minimum period, in accordance with current legislation, and must be available for inspection by the relevant authorities and PRAYON's ISPP department.
- In the event that a known or suspected material is damaged during work, and contamination of the working environment with asbestos is possible, the outside company must stop work, evacuate and arrange for the evacuation of all persons in the area affected by the incident, and immediately notify their PRAYON work supervisor.
- The outside company will record the identity of workers exposed to asbestos in the event of any incident, and immediately communicate this information to their prevention consultant/occupational physician, so that any follow-up action required can be assessed.

## 4.14. Emergencies, accidents and incidents

### 4.14.1. Emergency situations

- In the event of a potential or imminent hazardous situation arising during the execution of the work, the outside company's personnel must cease their activities and follow the evacuation or confinement instructions given to them by PRAYON personnel.
- If the outside company's activities accidentally generate a dangerous, potential or imminent situation, its personnel must immediately notify PRAYON personnel in the control room and the PRAYON manager in charge of the site.
- Similarly, in the event of a serious imminent danger generated by the outside company, whether or not it is absent from the site, PRAYON will take the necessary emergency measures. Any costs thus incurred will be charged to the outside company's account.
- The outside company's personnel must be informed beforehand of the emergency instructions specific to the unit where the work takes place (warning signals, location of safety shower and containment area, etc.).

### 4.14.2. Accidents and incidents

- In the event of a medical emergency, if the injured person's life is in danger, call 112 directly and then notify the duty office via 13 (from any PRAYON landline) or 0497 591 220 (mobile phone).
- All accidents, incidents or anomalies must be reported immediately to the PRAYON manager in charge of the site.
- All injuries must be reported to PRAYON.
- If, in the opinion of the PRAYON care provider, external care is required, the injured person and his/her supervisor must comply. Transfer to an external care provider chosen by PRAYON (hospital, specialist doctor, other) must be made by cab, on call from PRAYON.
- Any employee of an outside company visiting the infirmary must be accompanied by a member of PRAYON's staff, ideally a first-aider.



- In the event of an accident, the contractor, or his subcontractor, is required to forward a copy of an accident report in writing within 24 working hours to PRAYON's ISPP.
- For all work-related accidents (serious<sup>1</sup> or not), the causes must be analyzed at the Engis site as quickly as possible, ideally on the working day following the accident. PRAYON will summon the contractor responsible for the victim. The outside company will delegate any person with authority to represent it in this analysis.
- In the event of a serious workplace accident, the contractor or his subcontractor must also:
  - Immediately notify ISPP PRAYON;
  - Within ten days of the accident, submit a detailed report to DCRC<sup>2</sup>, with a copy to ISPP PRAYON;
- In the event of an accident involving a PRAYON machine or installation, the PRAYON manager in charge of the site must be notified immediately, and will complete an internal accident report (PAPI.26.013 "accident report"). This report is signed by both parties.

## 4.15. Temporary or mobile work sites

### 4.15.1. At the prize-giving ceremony

The contractor's Health and Safety Plan (Plan Particulier de Sécurité et de Santé - SHSP) must accompany the award ceremony.

The SHSP must include in particular :

- Presentation of proposed work methods.
- Preventive measures planned to control risks.
- The number of people expected to work on the site.
- Whether or not subcontracting is intended. If so, a list of subcontractors must be attached.
- Etc.

The completed SHSP is to be returned to the PRAYON job applicant.

On the basis of these documents, the Health & Safety Coordinator will provide the project owner with an evaluation of the bidder in terms of workplace safety.

### 4.15.2. To order

During the execution phase and before work begins, the following documents must be sent to the site's Health and Safety Coordinator:

- Appendices detailing the costs of prevention and protection measures required by the SHSP.
- Certificate of receipt of the HSP PRAYON dated and signed.
- Declaration of good intentions regarding compliance with and application of the SHSP.
- Copy of prior notification sent to Contrôle du Bien-Etre and CNAC.
- Copy of inspection reports for lifting equipment and accessories.
- Copy of the report of the conformity examination by a SECT of the temporary worksite electrical connection (GREI articles 270 to 273 inclusive).
- Work schedule.
- SHSP of the contractor or other parties involved, with dates of intervention.
- List and technical data sheets for all products used.
- Any other documents required by the health and safety coordinator.

<sup>1</sup> According to the criteria set out in the Royal Decree of February 24, 2005.

<sup>2</sup> DCRC: Chemical Risk Control Division - SPF ETC - Directorate-General for Occupational Well-being - address: rue Ernest Blérot, 1 – 1070 Brussels



- Proof of basic safety training for temporary or mobile site workers, or VCA certificate (A.R. April 7, 2023).

The contractor must also respond to requests, suggestions and opinions issued by the Health and Safety Coordinator. All documents must be supplied.

#### 4.15.3. « CHECK-IN AT WORK” registration of persons present on site »

If the value of the work exceeds 500,000.00 EUR (excl. VAT), the contractor is required to set up a system for registering the presence of people on site for the ONSS, also known as “Check-in At Work”. He will inform the PRAYON site manager of the registration number.

### 4.16. Rules applicable to ATEX zones

- All work in ATEX zones is subject to a specific fire permit issued by the PRAYON work supervisor. Work must be carried out in accordance with the conditions laid down in the work permit (e.g. using explosion-proof tools, etc.).
- Safety shoes must have antistatic soles.
- Work in areas with potentially explosive atmospheres is carried out by personnel trained in the specific risks of such areas.
- The use of mobile phones is strictly forbidden in ATEX zones (except for “Ex” certified mobile phones).

## 5. For contractors with a specific authorized and permanent area on the Engis site :

- The contractor must have obtained VCA certification or be in the process of obtaining certification.
- Any contractor wishing to have an area on site must submit to the Maintenance Department and to ISPP PRAYON a project for setting up the area, including safety, environmental and well-being at work constraints.
- The contractor shall provide his personnel with appropriate sanitary facilities, refectories and changing rooms, in accordance with current legal obligations in terms of hygiene.
- Water, compressed air and other utilities may be supplied by PRAYON from existing sources, subject to prior formal authorization and conditions.
- Electricity, water and air supplies must be able to be cut off quickly at PRAYON's request.
- The area must be kept clean and tidy at all times.
- All hazardous liquids must be stored on retention tanks and clearly identified.
- Sufficient numbers of fire extinguishers must be available, and they must be checked in accordance with regulations. Proof of inspection must be provided on request.
- Electrical installations must comply with regulatory requirements. Proof of inspection must be provided on request.
- Any anomalies or incidents must be reported immediately to the person in charge of the area (PRAYON maintenance department).
- In the event of pollution, immediately notify the Environment Department Brigadier (0496/58.62.86) or the Environment Department Manager (04/273.92.16 or 0499/98.74.18).
- PRAYON reserves the right to carry out inspections (planned or unplanned) of the area at any time.

## 6. For contractors and their subcontractors working at PTA and Bi (food safety rules)

### 6.1. Work clothes and protective clothing

- Staff working in or entering these departments must wear suitable work clothing that is clean and in good condition (e.g. free from snags, tears and fraying). Sufficient work clothing must be available for each employee, and changed at regular intervals.
- Clothing required for food protection or hygiene purposes must not be used for any other purpose.
- Work clothing must be button-free. Nor should it include any outside pockets above the waist. Zippers and snap fasteners are acceptable. Otherwise, disposable overalls must be worn. If a subcontractor does not have disposable overalls, PRAYON will supply them, but they will be invoiced at double the cost price + a flat rate of 100.00 EUR for administrative costs.
- Work clothes must be laundered in accordance with industry practice and at intervals appropriate to the intended use of the garments.
- The tools used must be adapted to the requirements in terms of alimentarity, kept free from contamination and in a perfect state of cleanliness.
- PPE, when required, must be designed to prevent product contamination. They must be maintained and disinfected to remain in perfect hygienic conditions.
- When gloves are used to come into contact with the product, they must be clean and intact. Latex gloves should be avoided wherever possible, but in all cases gloves should be suitable for food contact, disposable, of a distinctive color and not shedding fibers. These gloves must be changed regularly.
- The external company must comply with the zoning rules in place at PTA. Hairnets, beard covers, and long sleeves are mandatory when working in critical areas where the production line is open and there is a risk of contamination of the product or process. These protective items are complementary to other PPE and help prevent contamination by hair, germs, bacteria, etc. Hairnets and beard covers are single-use and must not allow hair to pass through. Signs are in place to identify areas where wearing them is mandatory.



### 6.2. Health status

Workers from outside companies must have undergone a medical examination before being hired for activities involving contact with foodstuffs. These medical examinations must be carried out once a year.

### 6.3. Illness and injury

- Workers from outside companies are asked to report the following medical conditions to PRAYON for possible exclusion from food handling areas: jaundice, diarrhea, vomiting, fever, sore throat with fever, visibly infected skin lesions (burns, cuts or wounds), and discharge from the ear, eye or nose.
- Persons infected or suspected of being infected, or of carrying a disease or condition transmissible through foodstuffs, must be prevented from entering food manufacturing and packaging areas, or materials in contact with foodstuffs.
- In food handling areas, personnel with wounds or burns must cover them with suitable dressings. Any lost bandages must be reported to PRAYON immediately. Brightly colored dressings that can be detected by a metal detector should be used. These dressings can be supplied by PRAYON.



## 6.4. Personal cleanliness

- Personnel present in food production areas must wash and, if necessary, disinfect their hands :
  - o before starting any food-related activity;
  - o immediately after using the toilet or blowing their nose;
  - o immediately after handling any potentially contaminated material.
- Personnel must refrain from sneezing or coughing over materials or products. Spitting is forbidden.
- Fingernails must be clean and short.



## 6.5. Staff behavior

It is forbidden :

- smoking, eating, drinking (except water), chewing ;
- to wear watches, piercings or jewelry (except smooth wedding rings);
- take any medication;
- use nail polish, false nails or false eyelashes;
- wearing writing implements behind the ears;
- urinating in the vicinity of or within the facilities. Toilets are provided for this purpose;
- throwing garbage on the premises. Garbage cans are provided for this purpose;
- to spit

It is mandatory :

- use only food-grade lubricants where there is a risk of accidental contact with foodstuffs. If in doubt, contact a PRAYON member;
- use only food-grade cleaners and disinfectants;
- close doors, gates and shutters after any use of the premises.

## 6.6. Staff training

All external company personnel must be properly trained in hygiene rules relating to food production environments. This training must take place before starting work, and be repeated at regular intervals (minimum 1 x/year). Records of all training must be made available to PRAYON. They must include at least :

- a) The name of the trainee and confirmation of attendance;
- b) Date and duration of training;
- c) Training title and content;
- d) The trainer.

## 7. Evaluation of external contractors

- The purpose of site inspections is to assess the proper application of HSE instructions by the personnel of external companies. Workers from external companies (contractors and subcontractors) may be assessed at any time by any person authorized by PRAYON management.
- Evaluations are communicated to external companies. These will be attached to the external company's file held by PRAYON's Technical Procurement Department.
- In its selection of suppliers, PRAYON will give preference to contractors who possess the VCA.

## 8. Controls and sanctions

PRAYON reserves the right, at any time, to carry out checks on personnel, on vehicles leaving the site, and on the construction site premises to ensure compliance with requirements. Any breaches observed are subject to Corrective Action Requests (CAR - PAPI.42.003) and are handled by the Technical Procurement Department. The scale of penalties is as follows:

1. Verbal comment, information to Technical Procurement and SIPP + information to subcontractor management.
2. Official letter from Technical Procurement to the subcontractor + action plan to be provided.



3. For the entire site, temporary or permanent removal of a member of staff (or temporary worker) from the subcontractor + confirmation by letter from Technical Procurement to the subcontractor indicating the duration + action plan to be provided.
4. For the entire site, temporary or permanent removal of the subcontractor + confirmation by mail from Technical Procurement to the subcontractor. If the removal is permanent, the subcontractor will be blacklisted.
  - All comments and penalties will be taken into account in the annual supplier evaluation carried out by Technical Procurement.
  - Depending on the severity, PRAYON reserves the right not to apply the first levels of penalty and to move directly to a higher level.
  - **For a major offense** (e.g., violation of a “Life Saving Rule” or smoking in an Atex zone), the penalty starts directly at level 3.

## 9. Final provisions

- If you have any questions, please contact :
  - ISPP - Risk Management Department: Mr Said Aferka [SAferka@PRAYON.com](mailto:SAferka@PRAYON.com)
  - Environment Department: Mr Thierry Garnavault [TGarnavault@PRAYON.com](mailto:TGarnavault@PRAYON.com)
  - Quality department - food requirements: Md Lutgarde Maistriau [LMaistriau@PRAYON.com](mailto:LMaistriau@PRAYON.com)
  - Technical Procurement Department: Mr Stéphane Coolen [SCoolen@PRAYON.com](mailto:SCoolen@PRAYON.com)

**The absence of any comment from you within 10 days is equivalent to your agreement to these requirements.**