

Document Riktlinje	Published 2026-03-26	Valid for Frövi, Gruvön, Gävle, Karlsborg, Rockhammar, Skärblacka
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Billerud's safety rules for contractors

Welcome to Billerud!

At Billerud, we put safety first. The reason for this is simple: No one who works at Billerud should injure themselves because of their job. Our business – developing and producing sustainable and recyclable paper materials – is complex, but our focus on safety is correspondingly simple and natural for us.

This document describes Billerud's common protection and safety rules for Swedish mills, in a version adapted for contractors. The document defines rules of conduct and basic principles. In addition to what is stated here, Swedish legal requirements must always be followed, as a minimum.

1 Access to Billerud mills

1.1 SSG training

Before work can begin at a Billerud mill, contractors must complete SSG's entire basic course. When working at Gruvön, Gävle, Frövi, Karlsborg, Rockhammar or Skärblacka, a local SSG course/safety information is also required before access is granted.

1.2 SSG access card

Upon arriving at and when working at a Billerud mill, contractors must be able to present a valid SSG access card and valid ID upon request. For EU/EEA nationals, the following ID documents are accepted: an ID card issued by the Swedish Tax Agency, a Swedish SIS-marked ID card, a driver's license issued in a Nordic country, a national ID card or a passport. Non-EU/EEA nationals must be able to present their passport and a valid work permit for EU/EEA countries.

1.3 SSG app

Billerud recommends that everyone read through the information in the SSG On site app for the relevant mill. Enable push notifications to receive news and important information directly on your cell phone.

1.4 Advance registration prior to entering the mill area

Before arriving, contractors must always be notified to the gate in advance. This registration is submitted via the contact person at the mill. The notification list must include the company name and the VAT number/corporate ID number of the main contractor and any subcontractors. Notification provided about staff must state their name, social security number/passport number and SSG access card number well in advance of the work being carried out. If the notification relates to a completely new company, the company's address and telephone number, and the name of the site manager responsible for the company, must also be provided.



2 Risk management

2.1 Risk assessment

As a preventive measure, a risk assessment must be carried out before any work begins at Billerud's mills. To fulfil its employer responsibility, the contractor company shall assess the risks associated with its planned works and working methods and communicate the risk assessment to the contact person at Billerud. The risk assessment can be documented using the contractor's own template and procedure, or using a template provided by Billerud. Billerud includes the contractor's risk assessment in the risk assessments carried out in different stages, and issues work permits where necessary. Risks and deficiencies identified in the risk assessment must be eliminated or minimized to an acceptable level before any work begins. It must be clear which of these measures are the responsibility of Billerud and which of them are the responsibility of the contractor.

In addition to the above risk assessments, a personal risk assessment called "Take 2" should be carried out by the individuals carrying out the work, prior to the task being carried out. This can be done using the template in e.g., SSG On site, IA app or a Take-2-risk assessment note pad. If the "Take 2" is done together by a small group, it should be made clear that all the individuals have participated. The purpose of the "Take 2" is to provide the chance to give extra thought to the risks and safety to the job in question. If there is remaining risk after own measures have been implemented, the contact person should be contacted for further measures. The "Take 2" must be available for viewing if requested by Billerud.

2.2 Coordination

Billerud has coordination responsibility for its mills and facilities. Contractors must inform Billerud of the risks that the planned work poses to other people in the vicinity, so the work can be planned and coordinated; see above about risk assessment. Billerud's representative for coordination ensures that contractors are made aware of known hazards that exist at the work site relating to the work that is to be performed and other work that is taking place in the same area at the same time. The contractor shall ensure that information about risks and applicable regulations is provided to the individuals performing the work. Approval to start work must be obtained from Billerud's representative for coordination. The relevant control room must also be contacted by the individuals who will be in the premises before work begins, so-called duty to report.

Each mill has designated people who carry out coordination tasks, and these are named on noticeboards at the workplace. Coordination arrangements may vary depending on whether the work is performed while machinery is in operation, when the plant is shut down or in large projects. The local contact person provides information about how the coordination will work for each individual case. In cases where a contractor is appointed to be the building work environment coordinator, documented competence for the assignment must be proven.

The contractor must ensure that there is always at least one Swedish or English-speaking supervisor available for work performed at a Billerud mill.

2.3 Safety rounds

The contractor shall, upon request, participate in the safety rounds carried out by Billerud during the period in which the contractor is working there, based on local procedures. The forms and frequency of



these vary depending on the nature of the work and the current operating mode of the mill. During major projects, special safety round procedures apply. The local contact person provides information about how to carry out safety rounds in individual cases.

2.4 Equipment subject to inspection and operating permits

Contractors who have with them and use mobile cranes, lifting gear, pressure vessels, vehicles or other equipment that are subject to inspection must be able to present an approved inspection certificate.

For all equipment for which an operating/training certificate is required, this must be presented upon request. When using a forklift, powered lift or mobile work platform, an operating permit is required for each individual using the equipment. This shall be issued by the individual's employer or the contracting company that hired the individual. The permit must indicate the type of vehicle or equipment, the tasks and the location/area that are covered. In addition to the contractor's operating permit, an operating permit must also be issued by Billerud.

2.5 Reporting incidents

Incidents, i.e. personal injuries, risk observations and near misses, must be reported *immediately* to the contractor's management and to the contact person at Billerud. Together, we can thereby help create a safer working environment for everyone in the area. Incidents are documented in SSG On site, the IA app, or in the IA system.

3 Personal protective equipment

Contractors provide personal protective equipment for their staff and ensure that any subcontractors have the correct personal protective equipment. Personal protective equipment must be properly designed for the task and, if necessary, individually adapted.

The following requirements for personal protective equipment apply in general, as a minimum level. The mills can issue higher requirements, based on local circumstances.

3.1 Protective clothing and mandatory equipment

When moving around on a designated and safe walkway in the mill area:

- High-visibility clothing of at least class 2 on either the upper or the lower part of the body, or at least class 1 on the upper and the lower parts shall be worn, see EN ISO 20471.

When performing work in all environments, the following general requirements apply:

- High-visibility clothing of at least class 2 on either the upper or the lower part of the body, or at least class 1 on the upper and the lower parts shall be worn, see EN ISO 20471.
- Safety glasses, or visors, must be worn.
- Full-cover work clothing, with a protection class suitable for the identified level of risk.
- Helmet attached to the head with a buckled chin strap in multi-point attachment. In board and paper mills, the minimum level of head protection is bump-cap, during regular operation. In storage rooms, warehouses, workshops, maintenance depots, laboratory rooms and loading, there is no general requirement for head protection.



- Ear protectors must be worn if the noise level exceeds 80 dB. It is not permitted to play music or listen to the radio or audio books in the ear protectors or via in-ear headphones inside them.
- Protective footwear with safety toe cap, fully enclosed heel, slip- and penetration-resistant sole, and based on risks in the area: water resistant and ESD (electrostatic discharge) certified.
- Protective gloves when needed and based on the identified risk, e.g. cut-resistant gloves when carrying out work associated with a risk of being cut.
- Tight-fitting safety glasses/goggles must always be carried and worn for tasks that cause flying particles or where splashes of hazardous chemicals may occur (e.g. liquor, hot pulp, hot water, dirty surfaces, dusty work).
- Ice cleats must be worn during the winter season when moving within the factory areas whenever weather conditions require it (icy surfaces, sudden weather changes, etc.).

A work risk assessment determines whether additional PPE is required, depending on the nature of the work or environment. For example: boots when performing drainage, chemical-resistant clothing, fall protection equipment, tight-fitting safety goggles, respiratory protection, visor, gloves, or equipment specified in the rescue plan.

3.1.1 Definitions

Moving on a designated and safe walkway in the mill area means the level of personal protective equipment required to move to and from work, changing room and lunch canteen, as well as to move as part of one's work, on these designated walkways. Each mill indicates safe walkways and clarifies these with a map and/or markup. When moving within Billerud's sites, handrails must be used when walking in stairways.

Performing work means the level of personal protective equipment required to perform all different types of tasks that occur at the mill, except work in an office environment and driving/going in closed vehicles. Examples of the meaning of performing work are: working with process and production equipment, mechanical, electrical, building and installation work, rounds, sampling, working in warehouses and with stock management, etc. Moving between meeting rooms/office rooms and buildings at different parts of the mill, outside designated and safe walkways, is also included in the requirements for performing work.

3.1.2 Exceptions to general requirements

There are work areas, tasks, and situations where it is not reasonable, appropriate, or safe to use the general personal protective equipment listed in this document. Local permanent and temporary exceptions can be made by mills in accordance with Group-wide procedures and subject to risk assessment. An individual or a contracting company is not permitted to decide to deviate from the PPE requirements.

3.2 Gas detector

Everyone must use a personal gas detector if they perform work or are in premises/process areas where this is required. Note that the risk assessment may state the need for gas detector even if there is no general requirement for them.

Contractors themselves procure the necessary gas detectors before arrival and the start of the assignment. The contractor must also ensure that the correct type of gas detector is used. In the event



of an alarm being issued by a personal gas detector, the shortest safe route from the risk area is to be taken and the control room is to be informed that the alarm has been triggered.

3.3 Respiratory protection

There is a risk of legionella infection when working in or around the mill's environmental facilities, and in some other areas. Because of this, respiratory protection with at least class P3 should always be used in areas where local safety rules and/or signage call for it.

4 Safety rules

Billerud's employees and contractors have the right to expect not to be injured at work. We do not accept the occurrence of work-related deaths or injuries that affect people's quality of life and health. Life Saving Rules (LSR) are a mandatory minimum set of rules in selected high-risk areas. The rules help save lives and prevent accidents in our business.

The requirements of Billerud's Life Saving Rules must be followed, as must the local safety rules at the particular mill. If Billerud's Life Saving Rules, local safety rules and/or national laws and regulations differ, the strictest interpretation of the rules will apply. Compliance with these rules helps us enhance our safety with the aim of achieving zero injuries. Billerud has zero tolerance for deliberate breaches of these rules.

4.1 Billerud's 10 Life Saving Rules



1. Safe operation of vehicles and mobile equipment: Follow safe driving rules, both on the company's premises and on public roads.



2. Follow safe driving rules, both on the company's premises and on public roads: Working under the influence of alcohol or drugs poses an increased risk of accidents



3. Handle chemicals safely: Protect yourself when working with chemicals.



4. Work with a valid permit for high-risk work: Work permits are important to ensure that hazardous tasks are coordinated properly and carried out safely.



5. Work safe in confined spaces: A confined space, such as a vessel, tank, or pipe can contain explosive gas, poisonous air or other dangers such as a lack of oxygen.





6. Protect yourself when working at height: Use fall protection measures or equipment when working at height (>= 4' for BNA or 2m for BEU).



7. Only carry out work on equipment that has been safely shut down: Equipment must be safely shut down and a zero-energy state achieved prior to the start of work.



8. Perform all lifts safely: Plan lifting operations and control the area.



9. Maintain a safe distance from moving machine parts and materials: Avoid situations in which you risk being pulled into rotating or moving equipment and materials (e.g. paper rolls, machine components).



10. Suspend unsafe work: Intervene or stop work that cannot be done in a safe way.

4.2 Hot work and ATEX area

Billerud complies with the rules of insurance companies and the Swedish Fire Protection Association for hot work. This means, among other things, that the person performing the task must have a personal certificate for hot work and that a permit must always be issued by the mill for the specific work.

Work in an ATEX area requires a written permit issued by the mill and other measures related to the zone classification.

4.3 Local safety rules

The local contact person provides the contractor with additional local safety rules that are applicable to the relevant mill.

5 Requirements regarding chemicals and work performed in hygiene zones

5.1 The bringing in and handling of chemicals requires authorization

Approval from the mill's chemicals group is required before chemicals can be brought onto the site.

At least one month before starting work, the contractor must send the safety data sheet, and information about the quantity and area of use, to the mill's chemicals group. The contractor must also perform a risk assessment regarding handling the chemicals. Safety data sheets must always be available in workplaces where chemicals are used. Any chemical residues shall be disposed of by the contractor, unless agreed otherwise.

Mill	Email address to chemicals group
Frövi/ Rockhammar	Kemkom.Frovi@Billerud.com
Gävle	GavleSDS@Billerud.com



Gruvön	GruvonSDS@Billerud.com
Skärblacka	SkarblackaSDS@Billerud.com
Karlsborg	KarlsborgSDS@Billerud.com

To import and storage of flammable goods and large quantities of chemicals, the handling and storage location must be approved by the mill organization.

5.2 Food safety and hygiene zones

Billerud's mills are certified according to FSSC 22000 food safety, which must always be adhered to when working in processing areas. Materials and residues from maintenance work must always be removed from the production areas after work has been completed. It is the responsibility of the individual contractor to ensure that this is done.

Special rules apply in marked hygiene zones. Contractors at Gävle, Frövi, Gruvön and Skärblacka mills must provide a completed health declaration if maintenance work is to be carried out during ongoing operation. The use of jewelry is also prohibited within the marked areas. Ask the contact person for more information about local hygiene rules. In the event of contamination of products, Billerud's contact person must be informed immediately.

6 Other safety rules

6.1 Victimization

Diversity and inclusion enrich our business. They benefit the company, our employees, and our external relationships. Discrimination is not allowed in our business. Victimization and harassment are not tolerated and must be reported immediately to the relevant manager/supervisor. This applies to everyone on our premises - our employees, contractors, customers, and other relevant parties.

6.2 Smoking

Smoking is prohibited at Billerud mills, apart from in specially marked areas. E-cigarettes are treated the same as regular tobacco cigarettes and are included in the general smoking ban.

6.3 Theft

In the event of burglary or theft of equipment or materials, the mill's gate must be contacted immediately, and the contact person informed. All theft is reported to the police.

6.4 Cyber security (Ref GLN-39104)

It is **not** allowed to:

- Connect any equipment, (computers, mobile phones, modems, wireless routers etc.), into Billerud's network. File transfers are managed by Billerud personnel.
- Use any kind of modems/equipment, (including mobile phones), that could be used for introducing Internet into Billerud's environments.

For more information, contact the local OT Cyber Security Responsible.

6.5 Photography

Photography without permission is prohibited within the industrial area. Permission may be granted by a representative of the mill management, or the communications or security departments.



6.6 Waste management

Contractors are responsible for their housekeeping and waste management when carrying out work in Billerud's area. The work is not considered complete until waste has been removed from the site and sorted at source in accordance with Billerud's guidelines and instructions. Information on the handling of the different types of waste can be obtained from the mill's contact persons and in local instructions.

6.7 GDPR

Gates and parts of the industrial area are covered by camera surveillance. The Group company indicated on the information at each location where camera surveillance is performed is the data controller.

More information about Billerud's personal data management and other external privacy information is available, and updated from time to time, at www.billerud.se/externintegritetsinformation.

6.8 Speak-Up Line

Billerud strives to ensure transparency and high business ethics. Employees and other company representatives are encouraged to report suspicions if they discover or suspect actions or behavior that may violate laws, regulations and/or our Code of Conduct, at or relating to Billerud's business operations. Billerud's Speak-Up Line whistle-blower function enables confidential reporting whereby individuals can report suspicions anonymously. More info: <https://www.billerud.se/om-billerud/uppforandekod/speak-up>.

7 Local emergency numbers

All mills except Rockhammar have local emergency numbers that should be used if the emergency services, ambulance or fire service need to be called.

Mill	Local emergency numbers
Frövi	+46 (0)581 - 37 112
Gävle	+46 (0)26 - 15 15 15
Gruvön	+46 (0)555 - 417 00
Karlsborg	+46 (0)923 – 66154
Skärblacka	+46 (0)11 - 24 55 55
Rockhammar	112, then the Production Manager should be contacted, on 070 - 377 0559

8 Disciplinary measures

Repeated or serious breaches of applicable documents or local protection and safety regulations may result in suspension at the individual or company level and penalty payments as stated in agreement. Decisions on disciplinary measures are taken in consultation between the mill management and the safety officer.

Billerud has zero tolerance for alcohol and drugs. In the event of a breach, the individual will be suspended from all Billerud mills for (12) months.

