



MANUAL OCCUPATIONAL HEALTH AND SAFETY

1. PURPOSE

This Manual aims to inform and guide employees regarding minimum Occupational Health and Safety procedures.

2. FIELD OF APPLICATION

This manual applies to all areas of the SIMPAR and companies controlled by it ("SIMPAR" or "Company"). This document applies to all company employees who work on any Company premises.

3. DEFINITIONS

NR - Regulatory Standard of the Ministry of Labor

SESMT – Specialized Service in Safety Engineering and Occupational Medicine

CIPA - Internal Accident Prevention Commission

SIPAT - Internal Workplace Accident Prevention Week

PPE - Personal Protective Equipment

ASO - Occupational Health Certificate

CAT - Work Accident Communication

OSH - Occupational Health and Safety

COLLABORATOR / EMPLOYEE - Individual who provides services of a non-contingent nature to the Company, in a personal way, under dependence and for a salary , in accordance with the provisions of the CLT



CONNECTED IN YOU – SIMPAR Group Program aimed at Health, Well-Being, Quality of Life and Personal and Professional Satisfaction

INCIDENT - Work-related event(s) that, regardless of severity, cause or could have caused damage to health

ACCIDENT – An incident that resulted in injury, injury, damage to health or fatality.

DOCNIX – Document Management System (the processes, instructions and/or policies mentioned in this document can be found at this link: documents.jsl.com.br).

4. REFERENCE DOCUMENTS - APPLICABLE LEGISLATION

- ✓ Law No. 6,514, of 12/22/1977
- ✓ Regulatory Norms - NR, of Ordinance No. 3,214, of 06/08/1978 issued by the Ministry of Labor and Employment - MTE
- ✓ Code of conduct

5. RESPONSIBILITIES

5.1 It is incumbent upon the Specialized Service in Safety Engineering and Occupational Medicine (SESMT):

- Identify and implement the most appropriate safety measures to preserve the health and physical integrity of employees;
- Guide the various areas of the company in matters related to Work Safety;
- Propose internal rules and regulations for Work Safety;
- Carry out safety inspections at the facilities of SIMPAR and its subsidiaries, in order to avoid unsafe conditions;
- Provide Personal Protective Equipment for all employees, according to the nature and risks presented by the service to be performed;
- Ensure the mandatory use and correct use of Personal Protective Equipment, as well as their conservation and hygiene during the execution of the work;

- Ensure that the Work Safety Equipment provided is suitable for the risk agents present in the work environment and has the numbers of the respective Certificates of Approval stamped;
- Guide and train employees on work safety procedures, monitoring and inspecting compliance with the procedures;
- Disseminate Work Safety matters;
- Analyze and investigate the causes of accidents and propose measures to avoid their repetition;
- Issue the Work Accident Report - CAT, according to INSS normative instruction;
- Maintain a permanent relationship with CIPA, making the most of their observations, in addition to providing support, providing training, as provided for in NR 5;
- Collaborate in the projects and implementation of new physical and technological facilities of the company;

5.2 It is incumbent upon the Internal Commission for Accident Prevention (CIPA):

- Inspect the work environments, identifying and communicating situations that may bring risks to the safety and health of employees, as well as making proposals for improvements in the work environment;
- Participate in the implementation and quality control of the necessary preventive measures, as well as in the assessment of priorities for action in the workplace;
- Develop a work plan that enables preventive action in solving occupational safety and health problems;
- Annually promote, together with SESMT, the Internal Week for the Prevention of Occupational Accidents – SIPAT;
- Educate employees on accident prevention.

5.3 People and Culture/Connected in You Area is responsible for:

- Provide assistance to the employee, the victim and the family in the event of accidents, hospitalization or death.

5.4 It is up to the Managers:

- Guide your team members and ensure compliance with safety standards;
- Ensure and ensure that activities are carried out in conditions of safety and hygiene, not allowing the performance of activities that expose employees to serious and imminent risk of accidents or damage to health;
- Request technical support from SESMT, whenever necessary, to assess security conditions;
- Participate in the analysis and assessment of accidents that have occurred and in the implementation of recommended corrective measures, if applicable;
- Be aware of any work accident that occurred in your area;
- Encourage the prevention of incidents and accidents at work;
- Consult and encourage the participation of its employees in the implementation of preventive and/or corrective actions proposed resulting from incidents and accidents;
- Ensure the availability and delivery of personal protective equipment to employees under their management;
- Supervise, together with SESMT, the correct use of personal protective equipment by employees under its management.

5.5 It is incumbent upon the Employees:

- Do not perform activity that exposes your safety or that of other people, including visitors and service providers, to risk;
- Guide the person responsible for carrying out the activity, whenever there is a deficiency in the materials, equipment, tools, machines or individual or collective protection devices likely to cause an accident;
- Notify the area manager whenever there is an unsafe condition;
- Not access or leave the workplace by means other than those established by the company;
- Use the personal protective equipment specified on a mandatory basis, during the time you remain in the workplace;
- Respect existing safety signs;



- Keep the work area and vehicles always clean and tidy, equipment and materials always in order, as well as throw garbage in the appropriate places for this purpose;
- Use the appropriate places for personal hygiene;
- Keep away from live wires and cables;
- Do not use or repair any machine, electrical device or equipment for which you are not authorized and authorized by the company;
- Ensure the conservation of protective equipment in their possession;
- Immediately notify the person in charge and, if not possible, within a maximum period of 24 hours, the occurrence of an accident at work, even if there is no injury or absence;
- Whenever possible, participate in the analysis of occurrences.

6. DESCRIPTIONS

SIMPAR is responsible for complying with the Laws, Regulatory Norms (NRs) of the Ministry of Labor and Technical and Normative Instructions of the competent bodies committed to the matter, and must ensure:

- The professional practice of the components of the Specialized Services in Safety Engineering and Occupational Medicine (SESMT);
 - The constitution and execution of the activities of the Internal Commission for the Prevention of Accidents at Work (CIPA);
 - The constitution, training and practice of fire prevention and firefighting teams.
-
- **Specialized Service in Safety Engineering and Occupational Medicine (SESMT)**
- SESMT's objective is to promote health and protect the physical integrity of employees in their workplace, and the rule that governs this service is NR 4, approved by Ordinance No. of work. In other words, the dimensioning follows the criteria established in table II (SESMT Dimensioning) of NR 4. SIMPAR's SESMT is composed of Technicians and Occupational Safety Engineer.



- **Internal Accident Prevention Commission (CIPA)**

It is the company's representative in matters related to health and safety and its objective is to prevent accidents and illnesses resulting from work, in order to make work permanently compatible with the preservation of life and the promotion of worker health.

- **Risk Management Program (RMP)**

The PGR is a basic document that must be prepared by the responsible SSMA area. It aims at the anticipation, recognition, assessment and control of existing environmental risks or that may exist in the work environment. This document must be revised whenever necessary or when there is a change in the process and an original copy must be stored in the operation for a minimum period of 20 years, for the inspection bodies of the Ministry of Labor in employment.

- **Personal Protective Equipment (PPE)**

For operational areas such as mechanical maintenance, painting, bodywork, etc. , it is mandatory to provide personal protective equipment - PPE appropriate to the risk, and the company must provide guidance on the use and conservation of PPE's , as well as record the supply.

The operation must verify in the Risk Management Program - PGR, the existing risks in each function and the pre-determined PPE's . In case of doubt, the HSE Team of the respective company will provide the necessary support.

Below, SIMPAR standard model of PPE's control sheet .

FICHA DE CONTROLE <i>Equipamentos de Proteção Individual</i>		SSMA Ver. 0 12/05/2017
Nome:		Registro:
Função:		Sector:

TERMO DE RESPONSABILIDADE

Declaro ter recebido gratuitamente da **JSL S.A.**, através do SESMT, o uniforme e os Equipamentos de Proteção Individual (EPIs) abaixo registrados, reconhecendo que os mesmos são adequados e de uso obrigatório durante o exercício da minha atividade profissional. Declaro, ainda, que recebi orientação quanto ao uso, finalidade, higienização, guarda conservação e ocasiões de substituições, estando ciente que a falta de uso dos EPIs fornecidos constitui ato faltoso, sujeito às sanções disciplinares previstas em legislação, regulamentos internos e normas de segurança da empresa, conforme a Port. Nº 3214, de 08/06/78, NR 06, do Mtb.

São Paulo, ____ de ____ de 20 ____

ASSINATURA

Data	Descrição Material	C.A.	Qtd.	Assinatura

- **Medical Control and Occupational Health Program (PCMSO)**

The PCMSO is also a basic document that must be prepared by the health area. It is one of the legal programs established by the CLT and governed by NR 07, which aims to take care of the occupational health of workers.

It is through this program that it is possible to determine the exams that each position must carry out in the admission, periodical, change of function and dismissal, in addition to several other possible actions to guarantee a healthy work environment.

This document must be revised whenever necessary or when there is a change in the PGR and the original copy must be stored in the operation for a minimum period of 20 years, for the inspection bodies of the Ministry of Labor in employment and a copy of the PCMSO must be forwarded to the Headquarters for corporate control.

- **Occupational Health Certificate (ASO)**

Its purpose is to certify whether or not the employee is able to perform the professional functions for the indicated position.

The company will send all employees to carry out occupational examinations (admission, periodical, change of function, return to work and dismissal) and later, issue the ASO Occupational Health Certificate.

All exams for carrying out the ASO are provided for in the PCMSO.

The ASO must be filed in the employee's medical record, its frequency is pre-established in the PCMSO.

- **Unhealthy Report**

The Unhealthy Report is mandatory when the environmental risks mentioned in the PGR exceed the tolerance limits, or do not have adequate protection measures.

The branch security technician, or the person responsible for the operation, will make sure that the existing protections are effective against the existing risks.

The Unhealthy Report must be prepared by an Occupational Safety Engineer or Occupational Physician.

If, through a report, the Employee's unhealthy working condition is evidenced, and there is no possibility of neutralizing or eliminating the condition, by adopting PPE or improving the process, the addition of the percentages below unhealthy will be stipulated:

- 10% Minimum Degree
- 20% Middle Grade
- 40% Maximum Grade
- The percentages are levied on the regional minimum wage.
- Whenever possible, reports of insalubrity must be prepared internally, or by a specialized outsourced company, and in these cases, the contracting authorization must be made by the SSMA area.

- **Hazard Report**

Dangerous activities and operations are those contained in the Annexes of this Regulatory Standard - NR. 16.2 (tables below).

The exercise of work in hazardous conditions guarantees the worker the receipt of an additional 30% (thirty percent), levied on the base salary, without the additions resulting from bonuses, awards or participation in the company's profits.

It is mandatory to prepare a Hazard Report for activities with explosive, flammable materials and activities considered high voltage.

Whenever possible, hazard reports must be prepared internally, or by a specialized outsourced company, and in these cases, the contracting authorization must be made by the SSMA area.

ANNEX No. 1

ACTIVITIES	30% ADDITIONAL
a) in the storage of explosives	all workers in this activity or who remain in the risk area.
b) in the transport of explosives	all workers in this activity
c) in the priming operation of explosive cartridges	all workers in this activity
d) in the explosives loading operation	all workers in this activity
e) on detonation	all workers in this activity
f) checking for failed detonations	all workers in this activity
g) in the burning and destruction of deteriorated explosives	all workers in this activity
h) in explosives handling operations	all workers in this activity

ANNEX No. 2

Activities	30% surcharge
a) in the production, transport, processing and storage of liquefied gas.	in the production, transport, processing and storage of liquefied gas.
b) in the transport and storage of flammable liquids and liquefied gases and of empty non- degassed or decanted containers.	all workers in the area of operation.
c) at aircraft refueling stations.	all workers in these activities or who operate in the risk area.
d) at the loading sites of tankers, tank cars and tank trucks and filling containers with flammable liquids or liquefied gases.	all workers in these activities or who operate in the risk area.
e) at the unloading sites of tankers, tank cars and tank trucks with flammable liquids or liquefied gases or from empty non- degassed or decanted containers.	all workers in these activities or who operate in the hazardous area
f) in the operations and maintenance services of tankers, tank cars, tank trucks, pumps and containers, with flammable liquids or liquefied gases, or non - degassed or decanted voids.	all workers in these activities or who operate in the risk area.
g) in the operations of degassing, decanting and repairing non- degassed or decanted containers.	All workers in these activities or operating in the hazardous area.

h) in the testing operations of gas consumption appliances and their equipment.	All workers in these activities or operating in the hazardous area.
i) in the transport of flammable liquids and liquefied gases in tanker trucks.	driver and helpers.
j) in the transport of containers (in a cargo truck), containing flammable liquid, in a total quantity equal to or greater than 200 liters.	driver and helpers
l) in the transport of containers (in a trailer or cargo truck), containing flammable gases and liquids, in a total quantity equal to or greater than 135 kilos.	driver and helpers.
m) in operations at service stations and supply pumps for flammable liquids.	pump operator and workers operating in the hazardous area.

- **Ergonomic Work Analysis (AET)**

The elaboration of the Ergonomic Work Analysis is mandatory in all workplaces.

This assessment aims to establish parameters that allow the adaptation of working conditions to the psychophysiological characteristics of workers, in order to provide maximum comfort, safety and efficient performance.

The issuance of the ergonomic report can only be performed by a professional specialized in Ergonomics.

To request the elaboration, the branch must follow the guidelines of SSMA SIMPAR.

In the case of hiring a specialized third-party professional, the approval of the hiring must be carried out by the SSMA SIMPAR department.

- **Accident and Incident Communication Process**

All guidelines for the accident and incident reporting process are described in the internal procedure PRO-O250 available on Docnix.

All occurrences are recorded, monitored and indicators generated to monitor the evolution of the frequency rates of accidents with and without lost time and vehicle accidents, using the following metrics below:

$$\text{Accidents with Leave} = \frac{(\text{N}^{\circ} \text{ de Acidentes dias perdidos} + \text{dias debitados}) \times 1000000}{\text{Homem Horas Trabalhadas}}$$

$$\text{Accidents without Leave} = \frac{\text{N}^{\circ} \text{ de Acidentes} \times 1000000}{\text{Homem Horas Trabalhadas}}$$

$$\text{Vehicle Accidents} = \frac{\text{N}^{\circ} \text{ de Acidentes} \times 1000000 \text{ km}}{\text{km rodado}}$$

- **Fire Department Inspection Auto (AVCB)**

The AVCB is a document issued by the Fire Department and aims to prove that the installation has fire safety conditions provided for by legislation, when carrying out the inspection.



The branch manager is responsible for requesting the AVCB.

The building facilities must reflect the reality according to the elaborate project.

Submit the following documents when requested for approval from the Fire Department:

ART (Annotation of Technical Responsibility) of the system, signed by a responsible technician.

ART and Generator Scope Report, if the building has the same.

ART of LPG (Liquefied Petroleum Gas), if you make use of it.

ART and Application Report / Maintenance of passive protection. If the building has a metallic structure and it is coated with fire resistant products.

Brigade formation certificate, with names and IDs . of the brigadistas and xerox of the functional of those who signed the same.

- **Emergency Response Plan (PAE)**

The Emergency Response Plan is a plan designed to provide guidelines, strategies, information and data that allow the adoption of logical, technical and administrative procedures to be adopted in cases of accidents and emergency situations.

It is a document that must be made public to the participants of the entire operational process and to those responsible for emergency actions in the company and disseminated at all functional levels so that, at the time of an accident and emergency situations, everyone is aware of their actions and responsibilities.

The PAE must also keep updated mechanisms to deal with the occurrence of accidents and emergency situations, being critically analyzed every simulation or, at most, every 12 months.

It must identify the potential of these occurrences in order to provide prompt response to any emergency situation involving victims, material damage or damage to the environment.

It should prevent, minimize or neutralize the effects associated with these occurrences. All plan guidelines are described in internal procedure PRO0358 available on Docnix .

- **Fire brigade**

Fire Brigade is an organized group of people trained and qualified to act in the prevention, abandonment and combat of a fire outbreak and provide first aid, within an area.

It is up to the fire brigade to: (i) prevent and fight fires; (ii) evacuate a hazardous environment; (iii) checking fire extinguishers and emergency exits; (iv) emergency care and first aid (iv) periodic inspection of escape routes, keeping them cleared and signposted; (v) report the irregularities found with proposals and appropriate corrective measures and subsequent verification of the execution; among others.

The fire brigade is functionally organized as recommended by the Technical Instruction of the Fire Department.

- **Safety Signage**

All workplaces must have adequate safety signs. Signage is intended to indicate risks in the workplace, delimit areas and warn and/or motivate people to prevent accidents . The signage can be horizontal or vertical executed through plates, panels, posters, paintings of machines and equipment, ground signs, etc.

- **Material Handling and Storage**

The storage of products and materials must be carried out in an appropriate place, as well as observe the correct arrangement that guarantees their stability and access roads are unobstructed; Material handling must be carried out in accordance with safety precepts, regarding the use of personal protective equipment, and appropriate mechanical means, as described in the Safety Data Sheet for Chemicals (FISPQ).

- **Electrical Installations**

Electrical installations must be built and maintained in compliance with current technical standards, observing in particular the criteria for grounding, protection against contacts, protection against atmospheric discharges and protection of circuits and components.

When carrying out work close to energized electrical sources, adequate protection must be provided.

Any maintenance, repair, testing, inspection, repairs and other electrical work will only be allowed to properly trained, qualified, authorized and identified employees for these services, in accordance with Regulatory Standard No. 10, of MTe Ordinance 3,214/78.

- **Fire Prevention and Fighting Equipment**

Fire prevention and fighting equipment must be installed, inspected and maintained in perfect condition. There must also be free access locations.

Firefighting activities and the evacuation of people in case of emergency is the activity of the fire brigade, when possible, under the direct coordination of SESMT.

Any use, defect or inoperability of fire-fighting equipment must be immediately reported to the HSE area of the respective company.

- **Alcohol and Drug Policy**

SIMPAR, in the duty to fulfill its role of promoting safety in the work environment, preventing accidents or incidents, protecting the environment, the physical integrity and health of its employees, implemented the “Alcohol and Drugs Policy”. All guidelines are contained in policy POL0020 available on Docnix, applicable to all SIMPAR employees, contractors and subcontractors acting on their behalf.

Our “Policy on Alcohol and Drugs” aims to:

- Promote an alcohol and drug-free environment;
- To act in the prevention of accidents and incidents;
- Increase safety in the work environment.

When it comes to the work environment, especially one that involves risks in its operations, the use of alcohol and drugs can represent a serious impact, which can lead to an increase in accidents, incidents and a drop in productivity.

- **Toxicological Test for Professional Driver**

The toxicological test for professional drivers in categories “C”, “D” and “E”, is mandatory by law and is required (i) admission, (ii) upon renewal of the employee's CNH and (iii) upon termination.

The guidelines are contained in procedure PRO0169 available on Docnix .

7. COMMUNICATION CHANNELS



The Company expects its employees and other related persons to avoid any and all risk situations and comply with applicable legislation. Employees and third parties have the duty to: (i) resolve any doubts before acting, (ii) immediately communicate risk situations and (iii) report illegalities and irregularities to the Company's policies.

To this end, the following communication channels are followed:

- i. **Transparent Line:** It is a free channel intended to answer questions and seek guidance on topics related to the Compliance Program, Code of Conduct, Anti-Corruption Policies and other internal rules of SIMPAR. It is accessible to the internal and external public, from Monday to Friday, from 8 am to 5:48 pm, through the following contacts: telephone 0800 726 7250 and e-mail conforme@SIMPAR.com.br (each controlled company has its e-mail address, consult our company communication channels or in the Code of Conduct);
- ii. **Point the Risk Channel:** The Point the Risk channel is a means of communication made available for employees and third parties to point out possible situations of structural risks in units or operations that could cause damage to employees, third parties, the environment, property or the image of SIMPAR and its subsidiaries. Use the telephone number 0800 5127720 or the website www.contatoseguro.com.br/aponteoriscoSIMPAR;

Whistleblowing Channel: The Whistleblower Channel operates 24 (twenty-four) hours a day and 7 (seven) days a week, and the whistleblower is given the possibility to formalize his complaint through the following communication channels: telephone 0800 726 7111 and website [www .contatoseguro.com.br/](http://www.contatoseguro.com.br/) SIMPAR (each controlled company has its own website, consult the company's communication channels or the Code of Conduct), all managed exclusively by an outsourced company. Anonymity is guaranteed to the whistleblower in good faith, as well as the possibility of monitoring the handling of the whistleblower, independently, by means of a protocol number.

8. GENERAL PROVISIONS

The Occupational Health and Safety Manual brings together SIMPAR's guidelines on safety. However, this is a vast topic and should not be limited to this material alone. It is



essential to be aware of each procedure, guidance, practice and policy made available on our information channels, as well as to know the legal requirements in force.