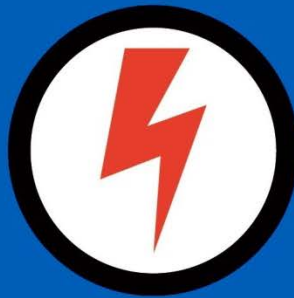


# Choose ZERO



## EHS on non-Eaton-controlled sites Guideline



*Powering Business Worldwide*

# Table of Contents

1. Foreword
2. Definitions
3. Life Saving Rules
4. EHS standards to be applied by Eaton
  - 4.1. Provision of information relating to EHS
  - 4.2. Risk assessment / safety checklist
  - 4.3. Work environment, welfare and housekeeping
  - 4.4. Emergency preparedness
  - 4.5. Coordination of reciprocal risk
  - 4.6. Personal Protective Equipment
  - 4.7. Drugs, alcohol and mobile phone policies
  - 4.8. Working hours
  - 4.9. Electrical safety
  - 4.10. Lockout / Tagout (LoTo)
  - 4.11. Lifting operations
  - 4.12. Working at height and scaffolding
  - 4.13. Confined spaces
  - 4.14. Hazardous substances
  - 4.15. Asbestos
  - 4.16. Areas with potentially hazardous or explosive atmospheres
  - 4.17. Areas protected by fire suppression systems using hazardous gases as extinction agent
  - 4.18. Cold and heat stress management
5. Deviations
6. EHS inspections and audits

## 1. FOREWORD

Eaton implements world-class EHS standards throughout its operations, and as such considers the protection of the health and safety of Eaton personnel, as well as the integrity of its property, continuation of its activities and minimization of its impacts on the environment of the utmost importance.

When present on sites controlled by customers or other parties, Eaton expects the Site Lead Authority to support its endeavor of protecting all persons, property and environment from harm. **This guideline defines the standard EHS controls to be applied by Eaton for which the Site Lead Authority would have a role to play in order to achieve such target.**



## 2. DEFINITIONS

Abbreviation / Terms	Definition
Confined space	An enclosed space which has limited means of egress and access, is not designed for continuous employee occupancy, and is large enough to permit full body entry to perform assigned work. A permit-required confined space is a confined space that poses some significant hazard, such as an atmospheric hazard (e.g., explosive atmosphere or asphyxiating hazard) and/or other serious safety hazards (e.g., electrical hazard).
CPR/AED	Cardio-Pulmonary Resuscitation / Automated External Defibrillator
Eaton personnel	In the context of this document the term 'Eaton personnel' will include Eaton employees, subcontractors of Eaton and Authorized Service Providers performing services on behalf of Eaton
EHS	Environment Health and Safety
Electrical works	Any work in which any exposed part of an energized circuit greater than 24 volts AC and 50 volts DC may be touched with the hands, tools or equipment and/or approached in close proximity such that accidental body, tool or equipment contact is possible. This includes repair, maintenance, fault finding, or testing on electrical circuits, components, or systems while energized (i.e., live).
Hazardous or explosive atmosphere	Hazardous or explosive atmosphere are defined as any atmosphere: <ul style="list-style-type: none"> <li>- containing less than 19.5% in volume or more than 23.5% in volume of oxygen, or;</li> <li>- contaminated by flammable gases, vapors, fumes or mists at levels equal to or greater than 10% of the Lower Explosive Limit of the concerned substance, or;</li> <li>- contaminated by corrosive, harmful or toxic gases, vapors, fumes or mists at levels equal to or greater than their occupational exposure limit, accepted threshold limit value or dose (whichever is the lowest) or;</li> <li>- otherwise identified as hazardous in accordance with the applicable EHS regulation (e.g. "Explosive Atmosphere" as per European regulations).</li> </ul>
Hazardous substances	This term refers to those substances that have intrinsic biological, chemical or physical properties that could cause an injury or ill-health to persons, or damage to the

	<p>environment. However, this does not take into account the environment or the condition the substance is in at the moment of exposure.</p> <p>Hazardous substances are defined and classified by local regulation, depending on the risks and impacts associated with their handling or usage.</p> <p>If there is no applicable regulation that defines hazardous substances in the location of operation, the following European regulation shall be used as a reference: Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures).</p>
Non-Eaton-controlled Sites	<p>A site where Eaton is not in control of the premises, of the works or of EHS.</p> <p>Examples include:</p> <ul style="list-style-type: none"> <li>- Customer locations where Eaton is installing, commissioning or servicing products</li> <li>- Project sites where Eaton is working as a subcontractor or equipment supplier</li> </ul>
Site Lead Authority	<p>The non-Eaton organization that is responsible for the premises, site works or EHS, for instance:</p> <ul style="list-style-type: none"> <li>- The customer;</li> <li>- The main or principal contractor.</li> </ul>

### 3. LIFE SAVING RULES

The Eaton Safety Policy outlines the expectation for a safe work environment and reporting obligations. Within the Safety Policy, we have included the following Life Saving Rules, which are a set of rules that all Eaton employees are expected to follow:



**Safety Devices and Guards:** Devices installed to assure safe machine operation shall not be removed, tampered with or bypassed.



**Lock-out/ Tag-out:**  
Lock-out tag-out procedures must be followed.



**Electrical Work/Arc Flash:** Appropriate Personal Protective Equipment must be used when electrical work is being done or there is arc flash potential.



**Fall Protection:** Fall-arrest systems must be used when working at unprotected heights of 6 feet (1.82 meters) or greater.



**Permit-Required Confined Spaces:** No person shall enter a permit-required confined space without an approved permit.



**Seat Belts/Restraints:** All operators and passengers of powered industrial trucks and equipment must use available seatbelts and restraints.

Eaton expects and firmly request the Site Lead Authority to provide all reasonable endeavors, means and resources so that Eaton personnel can deliver their scope of work in compliance with the Eaton EHS policies for service activities. Eaton will provide all relevant EHS policies to the Site Lead Authority upon request.

## 4. EHS STANDARDS TO BE APPLIED BY EATON

Eaton will deliver the work on site only when the Site Lead Authority will fulfill its duties to (i) **comply with applicable laws** and (ii) **provide safe access and places of work** as required for Eaton personnel to safely perform their duties. In addition, the EHS standards listed hereafter that apply to Eaton personnel would need to be considered by the Site Lead Authority as they would require some form of action from him. Non-compliance with Eaton's expectations set out in this section would potentially prevent Eaton from performing the service activities.

### 4.1 Provison of information relating to EHS

4.1.1 Prior to start work Eaton personnel shall be taken through a proper site EHS induction or similar process, all relevant EHS information, including but not limited to:

- Identification of EHS hazards and aspects, and assessment of EHS risks and impacts to which Eaton personnel, property, equipment and activities may be exposed to during the execution of Eaton scope of work;
- Comprehensive collection of all applicable site EHS rules and regulations for the execution of the work;
- Applicable signs, notices and registers;
- Existing buildings / structures / plant containing operating hazardous processes and / or containing hazardous substances;
- Location of temporary site accommodation areas, welfare facilities (sanitary conveniences, washing facilities, drinking water, areas for changing and storing, clothes, rest areas, heating / air conditioning);
- Hazards or concerns related to the site's environment (industrial, natural, property, etc.);
- All applicable site Permit to Work and/or Lockout / Tagout processes;
- Local accident/incident reporting regulations and all applicable emergency procedures, including location of first aid equipment and availability of first-aid personnel;
- Any applicable incentive or disciplinary scheme;
- All applicable site access control or security procedures;
- All applicable traffic rules (for pedestrian and vehicles)
- The provision of any other EHS training required by law or by the Site Lead Authority's own regulations, and/or specific to hazards or conditions particular to the site;
- Any other relevant EHS information to allow Eaton personnel to safely perform the work.

4.1.2 Eaton personnel is entitled to receive and shall be provided with all the relevant EHS information related to any changes that might occur on site, as well as the identification of hazards/aspects and the assessment of associated EHS risks and impacts. This may include but shall not be limited to: hazardous works / processes undertaken on site, new companies / organizations present on site, changes in legal or Site Lead Authority's own EHS regulations.

### 4.2 Risk assessment / safety checklist

4.2.1 If not already covered by an equivalent site process Eaton personnel will perform a risk assessment or follow a safety checklist prior to start work and may ask the Site Lead Authority to participate and sign onto it for implementation of agreed control measures.

### 4.3 Work environment, welfare and housekeeping

- 4.3.1 Eaton personnel will perform work only where an adequate standard of housekeeping is implemented and maintained at all times. This includes but shall not be limited to:
- Safe, clean, well lit, unencumbered access and egress to work areas;
  - Areas shared by several organizations maintained in conditions that minimize EHS risks and impacts, including but not limited to slips, trips, falls, fires, high noise levels and contaminations.
  - Waste produced at site, including waste generated by Eaton activities, and from areas where Eaton personnel undertakes work activities, stores material and equipment, as well as from welfare areas used by Eaton personnel collected and regularly removed;
  - Welfare areas and facilities provided with adequate size, number and level of equipment, and maintained clean and safe;
  - Hazardous areas identified and marked, including but not limited to areas used for storage and usage of hazardous substances, waste disposal areas, areas where there is a risk of interference between pedestrians and moving vehicles, areas where persons are working overhead with a risk of falling objects, lifting areas and excavations;
  - Physical segregation of vehicle and pedestrian access ways provided, so far as is reasonably practicable, with marked pedestrian access walkways and crosswalks to include signs, barriers, and rules, and/or otherwise providing the sufficient means to that Eaton personnel are able to maintain a safety distance of at least 2 meters from moving vehicles.

#### 4.4 Emergency preparedness

- 4.4.1 Eaton personnel shall be made aware in due time of all reasonably foreseeable emergency situations they might be confronted with and informed about associated emergency response procedures. This should include plans made for the site evacuation, including but not be limited to:
- Established method for raising and sounding the alarm;
  - Location of muster or assembly points, and emergency evacuation routes;
  - Name and contact details of emergency response team members;
  - Process for ensuring that all personnel (including Eaton personnel) have evacuated the site and are accounted for and, whenever necessary, search and rescue procedures for any personnel unaccounted for (including Eaton personnel).
- 4.4.2 Eaton personnel shall have permanent and full access to emergency equipment (e.g. telephones/alarms, safety showers, eyewash stations, fire extinguishers, fire hoses) and exits as necessary due to the nature of service activities. Eaton personnel shall be entitled to inspect and test emergency equipment at any time.

#### 4.5 Coordination of reciprocal risk

- 4.5.1 Eaton personnel shall only work in workplaces where activities from others which might affect its own personnel health and safety are managed so that reciprocal risks are controlled through coordination and risk assessment, through a permit to work system or similar formal process.
- 4.5.2 Eaton personnel shall be made aware of communication channels and procedures to be used if confronted with coordination issues, which may include the regular exchange of information in appropriate forums such as coordination meetings. The information exchanged shall include, but not be limited to:
- Any disruption to essential services on site (site access and egress, fire protection, emergency services, etc.),

- Any particularly high-risk activities undertaken on site (demolition, radiography testing, pressure testing, steam blow, etc.),
- Lessons learned from EHS Events (including near-misses),
- Any other relevant EHS information.

#### 4.6 Personal Protective Equipment

- 4.6.1 Eaton shall provide its employees with personal protection equipment (PPE) associated to its own activities and as defined in risk assessments and ensure its subcontractors will do so in accordance with Eaton EHS policies and relevant legal requirements.
- 4.6.2 Eaton personnel shall only be exposed to other risks controlled through the provision of specific PPE if provided with such and informed/trained on proper usage.

#### 4.7 Drugs, alcohol and mobile phone policies

- 4.7.1 Eaton personnel shall not deal with any person being under the influence of alcohol or drugs and will stop his activities if being disturbed by such person.
- 4.7.2 Eaton personnel must be informed about any applicable mobile phone policy and be indicated with the nearest safe place for taking calls if authorized within the premises.

#### 4.8 Working hours

- 4.8.1 Eaton personnel will not engage in or continue any activity which would reasonably result in working more than legal working times or outside of authorized hours.

#### 4.9 Electrical safety

- 4.9.1 Eaton personnel will only render service on equipment not bearing any electrical load. As such the Site Lead Authority is responsible for providing a competent person in charge of switching off and on any isolation device under his scope. Any derogation shall be agreed in writing between both parties upon provision by the Site Lead Authority of sufficient information required to allow safe performance of such activity by Eaton.
- 4.9.2 Eaton personnel shall perform work in areas where temporary or permanent electrical installation (cabinets, distribution boards, etc.) are present and may expose Eaton personnel to risk only if such installation:
  - have means of electrical isolation accessible from outside of the equipment,
  - are protected by fuses or circuit breakers and a Ground Fault Circuit Interrupter (GFCI) rated at 30 mA,
  - have lockable doors, and
  - are grounded.
- 4.9.3 Eaton personnel shall perform work in areas where activities not under the Eaton scope of works may expose Eaton personnel to hazards which could cause injury due to electric shock, burns, or failure of electrical equipment and associated components only if:
  - Safety signs compliant with the local regulation are applied to all concerned equipment, and;
  - Suitable physical delineation is implemented in order to prevent or limit the access to areas where they may be exposed to bare energized conductors. Conductive barricades should not be used where there is an increased likelihood of exposure between live electrical parts and the barricade. Any conductive barricade shall be grounded to be prevented from being charged by induction.
- 4.9.4 Eaton personnel is not allowed to work alone in potentially hazardous conditions or near equipment that has potentially dangerous voltages. Therefore, whenever Eaton

personnel would perform energized electrical works as a lone worker, a standby person shall be located at a close distance and be knowledgeable in:

- methods of de-energizing circuits and releasing victims from contact with live parts,
- first-aid and CPR/AED methods,
- methods of initiating emergency response.

Eaton recommends such persons to be also knowledgeable about bloodborne pathogens.

- 4.9.5 Eaton personnel shall perform energized electrical works only in areas where an automatic (or semi-automatic) external defibrillator is available. It must be located so that first-responders are able to use it within 5 minutes after a person has started to show symptoms of electrical shock.
- 4.9.6 If performing safety-critical steps during electrical works Eaton personnel shall immediately stop service activities if anyone would engage in any action that may cause disturbance to the Eaton personnel.
- 4.9.7 Eaton personnel will only perform full load tests being performed as part of commissioning activities if a competent person will be present during the first five minutes of such test in order to identify any issue that may arise upstream the product(s) being commissioned in areas not under direct sight of Eaton personnel.
- 4.10 Lockout / Tagout (LOTO)
- 4.10.1 Eaton personnel will implement its own LOTO process on the equipment and systems under its full control and scope of responsibility during the works.
- 4.10.2 To achieve and maintain electrically safe work conditions for Eaton personnel where isolation means would be located outside of Eaton's system / scope of responsibility, a safe and reliable LOTO on equipment and systems must be in place under the Site Lead Authority control or scope of responsibility (e.g. for equipment and systems under the control or scope of responsibility of other organizations).
- 4.10.3 Eaton will only perform work on equipment deemed to be provided in an electrically-safe condition if the personnel involved in such provision (e.g. operating electrical breakers for isolation purpose) is competent and authorized to do so.
- 4.10.4 LOTO implemented at the request of Eaton, and in particular the verification of absence of residual energy, must be witnessed by Eaton personnel.
- 4.10.5 Eaton personnel shall be able to secure the isolation(s) with the application of locks under his / her sole control, unless such isolation (s) is under his direct permanent supervision. If not reasonably practicable a safe system of work needs to be defined and agreed together between the Site Lead Authority and Eaton personnel, which should include a documented authorization to start work (e.g. permit to work).
- 4.11 Lifting operations
- 4.11.1 Eaton personnel shall be prevented from inadvertently being exposed to suspended loads, e.g. by ensuring that lifting zones are suitably controlled with physical delineation, warning signs and/or stand-by person.
- 4.12 Working at height and scaffolding
- 4.12.1 Eaton personnel shall not be exposed to a risk of free fall from more than 1.8m or any lower height where local conditions would create similar risk. Whenever workplaces,



access thereto or egress therefrom, would present such risk the Eaton personnel shall be protected from the risk of falling at all times by the following - in order of priority:

1. Collective self-acting fall prevention systems, such as scaffolds, guard-rails, rigid barriers, etc.;
  2. Collective fall-protection such as safety nets, air mattresses;
- 4.12.2 When it is not reasonably practicable to implement collective measures and individual fall prevention or protection system would be required, this must be justified in writing by risk assessment, and appropriate measures to protect Eaton personnel from falling must be in place.
- 4.12.3 Whenever paths or workplaces are located underneath other work areas, Eaton personnel shall only access these if confident that the appropriate level of measures is provided to prevent the fall of objects from height, or to protect them from the same.
- 4.12.4 Eaton personnel shall only use scaffolding for the sake of getting access to its work location if it is designed according to its intended use, erected by competent persons, permanently maintained in good conditions, controlled by a competent person on a weekly basis as a minimum and equipped with colored tags at each of its access to indicate its status (e.g. green = safe to use / red = unsafe, do not use).
- 4.13 Confined spaces
- 4.13.1 Eaton personnel will not be allowed to enter or work in any confined space.
- 4.13.2 If exceptional circumstances would require Eaton personnel to enter a confined space, Eaton shall be informed 14 calendar days in advance of the expected date of works and a specific safe system of work shall be established in writing between the Site Lead Authority and Eaton.
- 4.14 Hazardous substances
- 4.14.1 Eaton personnel shall be provided with material safety data sheets (MSDS) of hazardous substances used or stored in areas where Eaton personnel may be present prior to starting the service activities or shall be available at the place of use / storage.
- 4.14.2 Exposure of Eaton personnel to such hazardous substances shall be prevented by ensuring:
- They are stored in locked cabinets or areas, and in the containers or receptacles in which they were supplied or that have been specifically designed for the purpose, in strict accordance with the requirements of their MSDS.
  - the storage areas and containers of hazardous substances are clearly identified and marked with the legally required signage and labelling representing the main hazards and control measures.
- 4.14.3 Eaton personnel shall be provided whenever necessary with personal monitoring / alarm devices suitable for the potential hazardous substances they might be exposed to in case of an emergency.
- 4.14.4 Eaton personnel shall not be exposed to hazardous substances in concentration above the most stringent occupational exposure limits set in the country where service works are being performed or the country in which the Eaton personnel is contracted.
- 4.14.5 If Eaton personnel would encounter unsafe exposure to hazardous substances at site, they are entitled to withdraw themselves from exposure to reach a safe place and may only resume work after being provided with evidence that such exposure no longer exists.

#### 4.15 Asbestos

4.15.1 Eaton personnel is not permitted to work in location where asbestos-containing material (ACM) is present with a potential for contamination by contact, ingestion or inhalation. If such conditions are present, the provisions of article 4.14.5 shall apply.

#### 4.16 Areas with potentially hazardous or explosive atmospheres

4.16.1 Eaton personnel shall be prevented from inadvertently entering areas with an actual or potential hazardous atmosphere, e.g. by having them clearly identified at each entry point, with the potential hazards and mandatory control measures being visibly posted.

4.16.2 Where Eaton personnel shall enter such areas to perform service works, they shall be entitled to request formal evidence (e.g. through a permit to work process) that all control measures are in place to prevent a hazardous atmosphere to occur while performing works.

#### 4.17 Areas protected by fire suppression systems using hazardous gases as extinction agent

4.17.1 Where services are executed at a location protected by automatic fire suppression systems using hazardous gases (e.g. CO<sub>2</sub>), the Eaton personnel shall be entitled to request such installation to be set in manual made only, except if:

- A visual and audible alarm is present at the location the Eaton personnel is performing works,
- A temporization is set to provide sufficient time to the Eaton personnel to allow safe evacuation of the location prior to releasing the hazardous gases,
- The emergency route and exit are not obstructed in any way.

4.17.2 In all cases, the Eaton personnel shall be made aware of how to react in case of a fire emergency within the protected location.

4.17.3 After any gas release following operation of the fire suppression system, the Eaton personnel will re-entry the location to resume works only after the following steps have been completed by a competent person:

- Checking the fire suppression is completed,
- Checking the cause of the fire is no longer present,
- Ventilating the location to remove any hazardous gases,
- Measuring the oxygen level (and CO<sub>2</sub> where relevant)

#### 4.18 Cold and heat stress management

4.18.1 Where services are to be rendered in work areas exposing humans to cold or heat stress (as defined in the country of origin or country of execution of services), Eaton personnel shall be provided with:

- adequate hydration, with fresh or hot drinks,
- rest areas being suitably heated or cooled, allowing work / rest cycles of suitable duration and frequency, and
- a buddy system when working in extreme temperature conditions (working alone shall be prohibited). In such cases employees shall be trained on the identification of signs and symptoms of cold or heat stress illness, including what to do in the event of an emergency.

## 5. DEVIATIONS

- 5.1 Eaton personnel is entitled to stop service activities and withdraw themselves from the place of work whenever any requirement outlined in this document is not met, or whenever they would consider themselves or Eaton property to be exposed to unacceptable health and safety risks being generated by third-parties due to lack of appropriate control.
- 5.2 The Eaton personnel shall immediately inform the Site Lead Authority upon such decision and render all reasonable assistance and cooperation to the Site Lead Authority to resolve the unsafe situation and resume works within limited time.
- 5.3 If the non-compliance cannot be solved within such a time the Eaton personnel shall escalate the issue within Eaton in order for an Eaton responsible person to contact the Site Lead Authority for discussing on the next possible steps.
- 5.4 Eaton personnel will resume their activities in the concerned area only when the non-compliances will have been appropriately addressed.
- 5.5 No remedies, claims or any other prejudice against Eaton can be derived by the Site Lead Authority or any other party from any action or decision taken by Eaton personnel in accordance with this guideline and arising from any deviation thereof, with regard to the protection of the health and safety of Eaton personnel, or to prevent impacts on the environment.
- 5.6 When abnormal workplace or equipment conditions, due to the Site Lead Authority failing to comply with either applicable legal or Eaton's EHS-related requirements, would prevent performing service activities as per standard operating practices described in Eaton service manuals, the Eaton personnel will inform the Site Lead Authority immediately in order to reach an agreement on any action required to allow safe performance of the services, including stopping services where necessary. Such actions and overtime which may result from it cannot be claimed by the Site Lead Authority as being part of the service contract and may be charged by Eaton.

## 6. EHS INSPECTIONS AND AUDITS

- 6.1 While ensuring its obligations towards the Site Lead Authority for getting access to site, Eaton shall be entitled to perform EHS inspections and audits at any time to check compliance from Eaton personnel with the Eaton Safety Policy.
- 6.2 Any non-compliance observed in relation to standards listed in this guideline will result in actions as described in section 5.
- 6.3 EHS inspection or audit reports will be provided to the Site Lead Authority upon request.