



Innovative by nature

LIFE SAVING RULES

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1 Purpose and Scope

The International Association of Oil and Gas Producers (IOGP) published a set of Life Saving Rules with the intention of mitigating risk and reduce fatalities within the industry. Life Saving Rules remind staff of the measures they need to take to protect their own safety and that of colleagues. They draw attention to the activities most likely to lead to a fatality, and the life-saving actions which an individual has control over. Life Saving Rules are intended to support the existing Lenzing management systems. They are not intended to replace company management systems, policies, safety training programmes, operating procedures or work instructions, as the rules rely on this framework being in place.

Lenzing considers that the Life Saving Rules cover most relevant areas relating to safety performance and provides a benchmark of good practice for our company to work with. This has led to a single set of core Life Saving Rules across the group.

They help to:

- Enable better transfer of knowledge, experience and lessons learned
- Increase individual awareness ownership of critical safeguards that prevent fatalities
- Take a step towards an industry-wide common safety language
- Improve clarity and consistency, particularly for contractors and operators doing similar work across manufacturing industries.

The IOGP Life-Saving Rules can be accessed at the IOGP web site.

The objective of the Nine Life Saving Rules is to prevent harm to people working at or on behalf of Lenzing. They include information about:

- Nine activities conducted at Lenzing comprising of significant risk of fatality;
- A consistent set of rules and a culture of compliance; and
- Mandatory compliance for work-related activities.

These safety rules are applicable to:

- All operations under Lenzing’s operational and/or governance control;
- All activities conducted by Lenzing employees, contractors and subcontractors; and
- Visitors to the operations who are exposed to issues related to the rules.

Front-line managers shall communicate these rules and ensure understanding and compliance. Each reported non-compliance shall be investigated and consequence management action shall be considered for a failure to comply depending on the severity of the non-compliance.

2 Definitions

Term	Definition	Abbreviation
Life Saving Rules	Life-Saving Rules provide workers in the industry with the actions they can take to protect themselves and their colleagues from fatalities.	LSR
Life Saving Rule activity	Life Saving Rules are a set of guidelines which remind staff of the measures they need to take to protect their own safety. They draw attention to the activities most likely to lead to a fatality, and the life-saving actions which an individual has control over	
International Association of Oil & Gas producers	The International Association of Oil & Gas Producers is the petroleum industry's global forum in which members identify and share best practices to achieve improvements in health, safety, the environment.	IOGP
Personal Protective Equipment	Personal protective equipment, is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses.	PPE
Permit to Work	A documented procedure that authorises certain people to carry out specific work within a specified time frame. It sets out the precautions required to complete the work safely, based on a risk assessment.	PTW
Leadership team	Leadership team typically refers to individuals who lead and oversee an organization's activities. Amongst others, it is responsible for various functions: planning, organizing, leading, controlling, staffing, directing, decision-making, compliance and communicating. E.g. Site leadership team, Department or Area - Managers / Supervisors, local or Global functions.	
Operational team	Operational team refers to individuals who leads the operation at a site level. E.g. Production manager, Head of department, Line manager, Shift manager	

3 Directive governance structure

Governance Structure	Role(s)	Comments
Owner	VP Global QESH	Responsible for the, roll-out, compliance and rules definition
Reviewer(s)	Global OHS / Site SHE management	Accountable for the compliance and consequence management
Management team	Local teams at production sites	Consulted for the process design, Co-responsible for the roll-out, monitoring and maintenance

4 Directive details

4.1 Introduction to the Directive

Our Life Saving Rules are an important part of our LEAVE HOME HEALTHY, COME HOME HEALTHY ethos and it is up to everyone in Lenzing to know them, understand them and above all follow them. Compliance with the Life Saving Rules are a condition of employment within Lenzing and must be followed at all times. They must also be complied with by Lenzing's contractors, subcontractors and relevant third party vendors and Lenzing personnel involved in joint venture projects. We all have a responsibility to comply with the Life-Saving Rules and to personally intervene if we feel others may be working unsafely.

If a Life-Saving Rule is not followed, despite Lenzing providing all the necessary enabling conditions, then LSR consequence management standard shall be followed. This might be relevant for the individual, or for those responsible for providing the enabling conditions. Lenzing will always follow their respective site internal processes for dealing with such matters, as detail in section 6 and in the LSR consequence management standard.

4.2 Directive Rules descriptions

Lenzing operates in different countries and cultures around the world, with varying legal frameworks. The company rules related to LSR are the minimum standards that each site must follow, and when there is a difference with the local regulations where Lenzing operates, the site must follow the highest standard. Translation and implementation should be tailored to address cultural and literacy issues applicable for each operation.

The mandatory character of these rules is signified by the use of the word “must”. Supporting procedures align with this directive which sets out the requirement of each rule in more detail.

General Requirements	The following general requirements apply to all nine Life Saving Rules Multiple Life Saving rules may apply to an activity or work task
Critical Controls	Critical Controls are identified for each Life Saving Rule and are highlighted at the beginning of each set of minimum requirements Critical Controls help in the prevention of events that we can’t recover from or allow us to fail safely.
Risk Assessment	Prior to each Life Saving Rule activity a risk assessment must be performed The scope of the risk assessment must be appropriate for the task. Detail of risk assessment is contained within local or global procedures related to each rule.
Hazard Identification and Mitigation	Prior to and during each Life Saving Rule activity a system must be in place to: 1. Identify hazards 2. Provide mitigation for those identified hazards 3. Ensure the ongoing effectiveness of mitigations For control of work activities, ensure that acceptable work conditions are communicated to affected personnel
Changes in Work Scope and/or Conditions	For any changes in work scope and/or conditions: 1. Stop the work 2. Reassess the hazards 3. Verify effectiveness of existing and/or any new safeguards prior to recommencing work.
Training and Competency	Prior to any Life Saving Rule activity, confirm that all workers are trained and/or competent for the task they are to perform.
Fitness for Duty	Prior to any Life Saving Rule activity, confirm that all workers are fit for duty.
Life Saving Rules Verification	Each Business Unit must have in place a Life Saving Rules Verification process that addresses the Critical Controls and all Minimum Requirements.

4.2.1 Life Saving Rule 1 - Critical systems override



Obtain authorization before overriding or disabling safety critical equipment

Critical Controls	<p>The Critical Controls for Critical systems overrides are:</p> <ul style="list-style-type: none"> ● Perform a thorough risk assessment prior to bypassing, disabling, or inhibiting a safety protection device or system ● Communicate all bypasses between shifts and relevant personnel.
Risk Assessment and Authorization	<p>Prior to bypassing a safety protection device an authorized person must perform a risk assessment that includes the following:</p> <ul style="list-style-type: none"> ● Identifying the affected safety protection devices ● Understanding the impact of interaction with other safety protection devices and on the system as a whole ● Mitigating the associated risks ● Completing any required Management of Change processes <p>Authorization level must be based on risk assessment results.</p>
Common Safety Protection Devices	<p>Common safety protection devices include:</p> <ul style="list-style-type: none"> ● Emergency shutdown systems ● Fire and gas systems ● Process controls, alarm and safety systems ● Relief valves ● Crane operator aids (Load measuring indicator, Anti two-block)
Bypass logs and Management Reviews	<p>Bypassing safety protection devices requires:</p> <ul style="list-style-type: none"> ● A current log for bypassed safety protection devices. ● A routine management review for all bypasses or inhibits.
Communication and Shift Handovers	<p>The communication plan must cover all shift handovers and relevant personnel</p>

For further information, see Critical systems override procedure (LSR 1 Critical systems override 13216_EN / STD-10104)

4.2.2 Life Saving Rule 2 - Isolation & line breaking



Verify isolation before work begins and use the specified PPE

Critical Controls	<p>The Critical Controls for Isolation and line breaking are:</p> <ul style="list-style-type: none"> ● Identify all potential energy sources ● Isolate, Lock, and Tag all energy sources (energy control procedure) ● Verify absence of energy before start of work (Try).
Identifying Energy Sources	<p>Energy sources must be:</p> <ul style="list-style-type: none"> ● Identified by Authorized Persons ● Documented on applicable permits, LOTOTO plans, isolation certificates, etc.
Isolating equipment	<p>All isolations must be performed by an Authorized person.</p>
Locking and Tagging equipment	<p>Locks and Tags must:</p> <ul style="list-style-type: none"> ● Be placed on each isolating point while work is being performed ● Prevent the operation of the isolating device ● Clearly identify isolation points and lock owner ● Be removed only by Authorized Persons <p>Isolation locks and keys must be strictly controlled.</p>
Verify Zero Energy (Try)	<p>Absence of energy must be confirmed:</p> <ul style="list-style-type: none"> ● Prior to the start of work ● After work breaks, as necessary ● As required by permits or LOTOTO plan ● By opening bleeder valves, operating start/stop switches, testing for hazardous materials, testing for absence of voltage, etc. <p>A walk-through of the isolation and verification of zero energy must be performed, at a minimum, with the responsible person and the lead worker.</p>

For further information, see Isolation & line breaking procedure (LSR 2 Isolation and line breaking 13217_EN / STD-10105)

4.2.3 Life Saving Rule 3 - Permit systems



Work with a valid work permit when required.

Critical Controls	The Critical Controls for Work Permits are: <ul style="list-style-type: none"> ● Verify all isolations ● Perform, evaluate, and document Initial and periodic atmospheric testing as required by the permit.
Scope of work	The scope of work must clearly describe: <ul style="list-style-type: none"> ● The work to be performed ● The work location.
Competency	All persons working under the work permit must be competent to perform their assigned tasks.
Permit Requirements	Prior to the start of work, permit requirements must: <ul style="list-style-type: none"> ● Be communicated to all affected persons, including those that arrive after work has begun ● Account for interactions with other work permits and any non-permitted Simultaneous Operations ● Define methods for revalidation if needed.
Hazard Control /Mitigation	Confirm mitigation for all hazards identified on the permit prior to the start of work and as needed throughout the task
Hot Work	Prior to and during any Hot Work activities: <ul style="list-style-type: none"> ● Identify and control all ignition sources ● Remove or shield all flammable or combustible materials.
Changing Conditions	When conditions and/or work scope change: <ol style="list-style-type: none"> 1. Stop the work 2. Reassess the hazards 3. Revise the permit as necessary 4. Confirm/reconfirm original and any additional hazard mitigation measures.

For further information, see Permit systems procedure (LSR 3 Permit to work 13218_EN / STD-10106)

4.2.4 Life Saving Rule 4 - Driving Safely



A seat belt protects you from injury in the event of an incident while driving and keeps you safe.
Speeding or using your phone while driving increases the risk of losing control of your vehicle.

Critical Controls	The Critical Controls for Driving are: <ul style="list-style-type: none"> ● Wear a seat belt when vehicle is in motion ● Do not exceed the speed limit ● Do not use mobile devices while driving.
Seat Belts	All occupants must wear and keep their seatbelts properly fastened while in a moving vehicle
Driving Behaviours	Drivers on company business or property must: <ul style="list-style-type: none"> ● Observe speed limits ● Drive to accommodate weather and road conditions ● Never drive when fatigued ● Pull over and take a break when necessary Vehicle occupants must intervene if an unsafe situation arises
Mobile Devices	Do not use mobile devices while driving. These include: <ul style="list-style-type: none"> ● Mobile Phones ● Tablets ● Laptops Mobile devices may be used as navigational aids. Manual activation or manipulation must only be performed when the vehicle is parked.
Journey Management	Inspect vehicle prior to operating Complete a risk assessment when required.

For further information, see Driving Safely procedure (LSR 4: Driving safely 13219_EN / STD-10107)

4.2.5 Life Saving Rule 5 - Smoking & flammable materials



These rules will ensure that ignition sources are controlled to prevent fires and explosions

Critical Controls	<p>The Critical Controls for control ignition sources & hot work:</p> <ul style="list-style-type: none"> ● Smoking is only allowed at designated smoking areas. ● Flammable material must be stored in a suitable area, for the nature of the material, away from any sources of ignition. ● Hot work is strictly controlled under a permit to work.
Safe work practices	<ul style="list-style-type: none"> ● Know where the designated smoking areas are. ● Maintain hot work permit conditions and manage the risks of the activity. ● Identify, provide and use the correct earth points where equipment needs to be earthed ● Ensure vehicle access is controlled in classified areas ● Ensure that all generators are switched off and gas cylinders are closed when not in use
Hazard Control /Mitigation	<p>Carrying out hot work activities safely is an important part of fire safety in the workplace, but to do so, you need to identify hot work hazards and control measures that will effectively reduce risks and keep workers safe.</p> <p>Confirm mitigation for all hazards identified on the permit prior to the start of work and as needed throughout the task</p>
Hot Work	<p>Prior to and during any Hot Work activities:</p> <ul style="list-style-type: none"> ● Avoid hot work where possible ● Identify and control all ignition sources ● Carry out a gas test ● Remove or shield all flammable or combustible materials ● Monitor gas and vapour in the air as required
Changing Conditions	<p>When conditions and/or work scope change:</p> <ol style="list-style-type: none"> 1. Stop the work 2. Reassess the hazards 3. Revise the permit as necessary 4. Confirm/reconfirm original and any additional hazard mitigation measures.
Competency	<p>Ensure those carrying out hot work are trained to do so</p>

For further information, see Smoking & flammable materials procedure (LSR 5 Smoking and flammable materials 13220_EN / STD-10108)

4.2.6 Life Saving Rule 6 - Confined Space & Gas test



Obtain authorization before entering a confined space.
Conduct gas tests when required.

Critical Controls	The Critical Controls for Confined Space Entry are: <ul style="list-style-type: none"> ● Verify all isolations are in place and effective ● Perform all required initial, periodic, and continuous atmospheric monitoring ● Prevent unauthorized entry.
Energy Isolation	Verify that all energy isolations are in place and effective Acceptable isolation methods for confined space entries are: <ul style="list-style-type: none"> ● Blinding/Positive Isolation ● Disconnecting process piping ● Isolating all electrically driven/powered equipment.
Atmospheric Testing	Ensure Atmospheric testing equipment is calibrated, inspected, and maintained Perform, Evaluate, and Document the following atmospheric testing: <ul style="list-style-type: none"> ● Initial ● Periodic ● Continuous, as required Establish and maintain ventilation as required by permit.
Confined Space (Hole Watcher)	The confined space watcher's duties are: <ul style="list-style-type: none"> ● Maintain communication with entrants ● Evacuate the space in the event of an emergency ● Do not enter the confined space ● Prevent unauthorized entry.
Emergency Response	Emergency response procedures and resources are in place
Entry Authorization	The confined space entry permit requirements must be communicated to all entrants and the attendant(s) The permit must be posted at the point of entry A log of personnel in and out of the space must be maintained when required.

For further information, see Confined Space & Gas test procedure (LSR 6 Confined space 13221_EN / STD-10109)

4.2.7 Life Saving Rule 7 - Working at height



Protect yourself against a fall when working at height

	Protect yourself against a fall when working at height
Critical Controls	<p>The Critical Control for Working at Heights is:</p> <ul style="list-style-type: none"> ● Maintain 100% fall protection where required ● Plan for fall prevention and/or protection when working from ladders.
Equipment Selection and Inspection	<p>Before working at heights, a qualified person must:</p> <ul style="list-style-type: none"> ● Determine if work can be completed at grade or in a manner not requiring personal fall arrest equipment ● Identify rated anchor points, above the worker’s head, where possible ● Inspect all fall arrest equipment, including: <ul style="list-style-type: none"> Full body harness with a D-ring attachment point Lanyards with shock absorbers or fall limiting devices Dual action, self-locking snap hooks at each connection ● Remove any damaged equipment from service.
Dropped Object Prevention	<p>Protect against dropped objects by:</p> <ul style="list-style-type: none"> ● Securing tools and equipment from falling to a lower level ● Establish and maintain exclusion zones below overhead work.
Working at Heights	<p>All personnel working at heights must:</p> <ul style="list-style-type: none"> ● All personnel working at heights must be trained and competent ● Maintain 100% fall protection where required ● Only work on scaffolding built, modified, and inspected by a competent person ● Plan for fall prevention and/or protection when working from ladders ● Have an established rescue plan, including equipment to minimize suspension trauma in the event of an arrested fall ● Protect all wall and deck openings.

For further information, see Working at Height procedure (LSR 7 Working at height 13222_EN / STD-10110)

4.2.8 Life Saving Rule 8 - Suspended Load (Lifting Operations)



Rule 8

Do not walk under a suspended load

Protect yourself against a fall when working at height

Critical Controls	<p>The Critical Controls for Lifting Operations are:</p> <ul style="list-style-type: none"> ● Establish, maintain, and honour barriers and exclusion zones ● Do not walk under a suspended load ● Confirm all lifting equipment is rated for the load.
Competency Requirements	<p>Ensure all employees meet competency requirements for their tasks, including:</p> <ul style="list-style-type: none"> ● Lift plan preparers and approvers ● Lifting equipment operators ● Riggers ● Signalpersons ● Lift supervisors.
Equipment Inspections	<p>Conduct the required inspections of the following equipment:</p> <ul style="list-style-type: none"> ● Lifting equipment ● Rigging components ● The load to be lifted and any rigging attachment points <p>Ensure load limits and inspection dates, as required, are clearly marked, understood, and appropriate for the load. Ensure that third party certifications of all lifting equipment and components have been completed.</p>
Suspended Loads	<p>When loads are suspended:</p> <ul style="list-style-type: none"> ● Establish clear escape routes ● Establish an agreed upon set of standard hand signals ● Establish a communication plan for blind lifts ● Do not walk under a suspended load ● Utilize tag lines or other assist devices to guide and set load.
Critical Lifts	<p>Complete a Critical Lift plan when required.</p>
Barriers and Exclusion Zones	<p>Establish, maintain, and honour barriers and exclusion zones.</p>

For further information, see Suspended Load (Lifting Operations) procedure (LSR 8 Suspended load 13223_EN / STD-10111)

4.2.9 Life Saving Rule 9 - Line of Fire



Position yourself out of the line of fire

Critical Controls	The Critical Controls for Line of Fire are: <ul style="list-style-type: none"> ● Establish, maintain, and honour barriers and exclusion zones ● Position yourself and others to avoid line of fire hazards ● Protect against dropped objects.
Barriers and Exclusion Zones	When establishing barriers and exclusion zones consider the following: <ul style="list-style-type: none"> ● Overhead lifts, pressure testing, moving equipment, overhead work, etc. ● Completeness, maintenance, and communication of barricades ● Adherence to barriers and exclusion zones.
Positions of People	When determining proper position of people during work, consider:
<i>Pressure Releases</i>	Breaking flanges and hose connections, removing plugs, blowing down equipment, pressure testing
<i>Vehicles and heavy equipment</i>	Barricades, spotters, evaluation and planning of traffic patterns.
<i>Suspended and swinging loads</i>	Tethering of tools/equipment, management of loads with tag lines and guide poles, evaluation of centres of gravity and environmental conditions.
<i>Moving objects</i>	Unexpected movement of tools or equipment, securing of materials such as piping.
<i>Equipment in stress</i>	(compression, tension, or bent) – Expected direction of energy release in a failure scenario.
<i>Pinch Points</i>	activities that subject people to crushing injuries
Prevent Dropped Objects	Protect against dropped objects: <ul style="list-style-type: none"> ● Secure tools and equipment from falling to a lower level ● Establish and maintain exclusion zones below overhead work

For further information, see Line of fire requirements procedure (LSR 9 Line of fire 13224_EN / STD-10112)

4.3 The Life Saving Rules

The nine Life-Saving Rules are shown below. These rules focus on the activities which, through rigorous data analysis, have been shown to most likely result in fatalities. Each rule consists of an icon and simple life-saving actions individuals must take to prevent a work related fatality.

Bypassing Safety Controls


Obtain authorisation before overriding or disabling safety controls



- I understand and use safety-critical equipment and procedures which apply to my task
- I obtain authorisation before:
 - disabling or overriding safety equipment
 - deviating from procedures
 - crossing a barrier

Energy Isolation

Verify isolation and zero energy before work begins



- I have identified all energy sources
- I confirm that hazardous energy sources have been isolated, locked, and tagged
- I have checked there is zero energy and tested for residual or stored energy

Work Authorisation

Work with a valid permit when required



- I have confirmed if a permit is required
- I am authorised to perform the work
- I understand the permit
- I have confirmed that hazards are controlled and it is safe to start
- I stop and reassess if conditions change

Driving


Follow safe driving rules



- I always wear a seatbelt
- I do not exceed the speed limit, and reduce my speed for road conditions
- I do not use phones or operate devices while driving
- I am fit, rested and fully alert while driving
- I follow journey management requirements

Hot Work


Control flammables and ignition sources



- I identify and control ignition sources
- Before starting any hot work:
 - I confirm flammable material has been removed or isolated
 - I obtain authorisation
- Before starting hot work in a hazardous area I confirm:
 - a gas test has been completed
 - gas will be monitored continually

Confined Space

Obtain authorisation before entering a confined space



- I confirm energy sources are isolated
- I confirm the atmosphere has been tested and is monitored
- I check and use my breathing apparatus when required
- I confirm there is an attendant standing by
- I confirm a rescue plan is in place
- I obtain authorisation to enter

Working at Height


Protect yourself against a fall when working at height



- I inspect my fall protection equipment before use
- I secure tools and work materials to prevent dropped objects
- I tie off 100% to approved anchor points while outside a protected area

Safe Mechanical Lifting

Plan lifting operations and control the area



- I confirm that the equipment and load have been inspected and are fit for purpose
- I only operate equipment that I am qualified to use
- I establish and obey barriers and exclusion zones
- I never walk under a suspended load

Line of Fire

Keep yourself and others out of the line of fire



- I position myself to avoid:
 - moving objects
 - vehicles
 - pressure releases
 - dropped objects
- I establish and obey barriers and exclusion zones
- I take action to secure loose objects and report potential dropped objects

5 Directive management

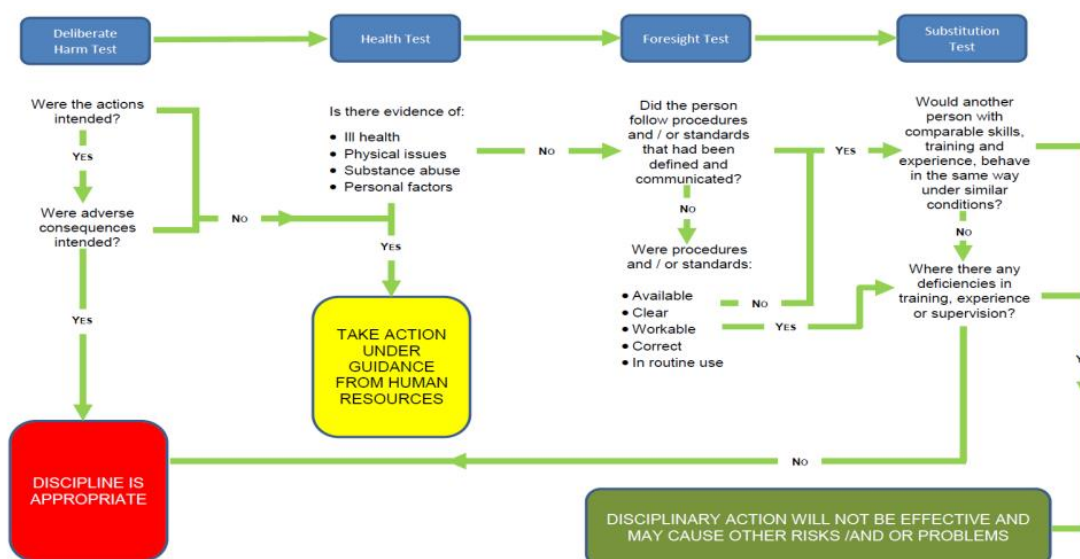
Activity type	Activity description	Responsible Role	Comments
Roll-out	Send relevant email to site teams	Global OHS	Text
Training	Presentation via teams	Global OHS	Text
Documentation Management	Via DMS	Global OHS	Text
Maintenance	First review after 12 months, then every 3 years	Global OHS	Text

Training method for training at the sites, will be defined locally.

6 Consequence of breaches

The Life Saving Rules are basic safety rules for high-risk work where failure to comply with the rules has the highest potential for serious injury or death. They also highlight simple actions individuals can take to protect themselves and others. Compliance with the requirements of the LSR is mandatory for everyone; this includes employees of the Lenzing Group, contractors and sub-contractor employees alike. We all have a responsibility to comply with the Life-Saving Rules and to personally intervene if we feel others may be working unsafely. Incidents and rule-breaking will be investigated thoroughly by an independent party, involving local or global SHE professionals.

Details can be found in the LSR consequence management guideline and disciplinary action will follow the deliberate harm test, health test, foresight test and substitution test as detailed in the flowchart below. In addition, if a supervisor or manager (Lenzing or contractor company) sets the conditions for rule breaking or fails to follow through if one is broken, the appropriate disciplinary action will apply.



Print copy only valid on: 09.11.2023

Associated documents

Document name	Type	Usage purpose	Comments
LSR 1 Critical systems override 13216_EN / STD-10104	Document	Detailed overview of requirements	
LSR 2 Isolation and line breaking 13217_EN / STD-10105	Document	Detailed overview of requirements	
LSR 3 Permit to work 13218_EN / STD-10106	Document	Detailed overview of requirements	
LSR 4: Driving safely 13219_EN / STD-10107	Document	Detailed overview of requirements	
LSR 5 Smoking and flammable materials 13220_EN / STD-10108	Document	Detailed overview of requirements	
LSR 6 Confined space 13221_EN / STD-10109	Document	Detailed overview of requirements	
LSR 7 Working at height 13222_EN / STD-10110	Document	Detailed overview of requirements	
LSR 8 Suspended load 13223_EN / STD-10111	Document	Detailed overview of requirements	
LSR 9 Line of fire 13224_EN / STD-10112	Document	Detailed overview of requirements	
LSR Consequence management 11725_EN / GUI-10252	Document	Detailed overview of requirements	

7 Signature

Lenzing, approved on 2023-06-26

[The document has been digitally approved]



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