



CONTRACTOR & VISITOR SAFETY STANDARD

ENVIRONMENTAL, HEALTH, FOOD SAFETY, AND SAFETY PROTECTION

NEW BELGIUM BREWING COMPANY

500 LINDEN STREET • FORT COLLINS, CO 80524 • USA
91 CRAVEN STREET • ASHEVILLE, NC 28806 • USA



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INTRODUCTION

New Belgium Brewing Company (NBB) expects all contracted personnel and their employers to:

- Provide safe and workplace free from safety and health hazards, harassment, and physical threats
- Provide the necessary equipment, tools, protective measures, and knowledge for assigned tasks
- Comply with all applicable OSHA, DOT, CDOT, EPA, FDA, CDPHE, and other state, county, and city regulations, standards, and ordinances
- Make every attempt to reduce the occurrence, frequency, and severity of incidents, injuries, and illnesses
- Recognize that shortcuts and expediency are not acceptable arguments for a failure to maintain high occupational safety and health standards at all times
- Conduct tasks in manner that will reduce frequency and severity environmental impacts

This document is approved for use at all NBB controlled facilities and applies to all contracted or guest workers.

PURPOSE AND SCOPE

This program provides occupational safety and health, environmental health, food safety, and physical security policies, guidelines, expectations, and best practices for all work at NBB who create and are exposed to hazards or are exposed to known hazards present at NBB.

THIS POLICY IS NOT AN ALL-INCLUSIVE DOCUMENT. ALL PERSONNEL PERFORMING WORK AT NBB ARE EXPECTED TO ABIDE BY ALL ENVIRONMENTAL, HEALTH, AND SAFETY POLICIES THAT MEET OR EXCEED ALL APPLICABLE LOCAL, STATE, AND FEDERAL REGULATIONS AND CODES REGARDLESS OF WHETHER OR NOT THEY ARE DISCUSSED IN THIS DOCUMENT, INCLUDING FEDERAL OSHA STANDARDS FOUND AT 29 CFR 1926 AND 29 CFR 1910.

REFERENCES

1. NBB Environmental, Health, and Safety (EHS) specifications shall also be considered an integral part of this Specification. If necessary, contractors, vendors, and other types of service providers shall request copies of these specifications to supplement job planning and safe work efforts
2. NBB shall be notified in writing if portions of this specification are found to be out of accordance with codes, standards, and regulations
3. Design, installation and testing of facilities, equipment, and processes shall be in accordance with the requirements of this specification unless superseded by more stringent local regulations
4. When a conflict exists between specifications, NBB shall be notified in writing. In the case of conflicts NBB will then notify Vendor in writing which requirement takes precedence

DEFINITIONS

- **“Contractor”** means an employee of a general contractor, subcontractor, or the trades (plumbing, mechanical, carpentry, concrete, masonry, drywall, etc.), and the company, that works in the construction industry or that provides reoccurring facilities or utilizes services such as HVAC servicing, utilities, and facilities equipment maintenance and related.
- **“Professional”** means an employee of a company, and the company, that provides completed or partial facilities or utilities designs, architectural drawings, engineering or technical advice and consultation, collects environmental samples, performs environmental or geotechnical work or studies, conducts land surveys, or performs other consultation or professional services or supplies designs and specific advice relied upon by NBB.
- **“Vendor”** means an employee of a company, and the company, that provides new or used production, facilities, or utilities equipment, installs the equipment, provides warranty work, technical work, retrofits, technical or installation oversight or that provides chemicals or raw materials used in the production process.



- “Temporary Personnel” means any individual assigned work at NBB through a temporary staffing agency or similar organization and their company.
- “Delivery Personnel” means an employee of a delivery service, over-the-road (“OTR”) trucking company, or a logistics firm that is engaged in providing transportation of goods to and from NBB via OTR truck, straight truck, or cargo van- regardless of the type of goods or their company.
- “Independent Contractor” means an individual that contracts directly with NBB as an individual or a sole proprietor.
- Contractors, Professionals, Vendors, Temporary-Personnel, Delivery-Personnel, and Independent-Contractors together with any other individual or company that provides goods and/or services to NBB and that works on NBB property that are not otherwise called out in the aforementioned list are referred to collectively in this document as “Personnel”.
- Confined Space means a space that: (1) Is large enough and so configured that an employee can bodily enter and perform assigned work; (2) Has limited or restricted means for entry or exit and (3) Is not designed for continuous occupancy.
- Entrant means an individual listed on the entry permit that is listed as such and who will be performing work inside the confined space.
- Attendant means an individual who will be standing by outside the confined space to monitor the situation.
- Competent Person means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective measures to eliminate them. See 29 CFR 1926.32(f), 1926.450(b), 1926.650(b) and 1926.751.
- IDLH means “Immediately Dangerous to Life and Health”
- OSHA means “Occupational Safety and Health Administration”
- PEL means “Permissible Exposure Limit” which is an OSHA established regulation
- Qualified Person means one who is knowledgeable in the construction and operation of the equipment and hazards involved. See 1910.332(b), 1910.339 and 1926.449.
- SCBA means “Self-Contained Breathing Apparatus”
- SOP means “Standard Operating Procedure”
- STEL means “Short-Term exposure Limit”. 15-minute TWA exposure that should not be exceeded at any time, even if it falls within TLV.
- TLV means “Threshold Limit Value”. Time weighted average (TWA) for 40-hours per week, 8 hours per day and Short-Term exposure Limit (STEL) or limit that an individual can be exposed to within a 15-minute time-period. STEL may not be exceeded even if they are below TWA. This is a recommendation and is not a lawful number. Usually lower than PEL.
- TWA means “Time Weighted Average”. Represents the amount of a substance that an individual can be exposed to for an 8-hour day in a 40-hour week. One of two components of the TLV.
- JHA means Job Hazard Analysis which is a planning document describing hazards and controls to be performed early enough for proper controls to be put in place
- PTW means Permit to Work which is a high accountability tool used to ensure proper hazard recognition, risk mitigation, and communication between involved parties
- Permit Issuer means NBB personnel authorized to issue a Permit to Work, as well as any other permits indicated by Permit to Work
- Permit Receiver means recipient of Permit to Work, as well as other permits indicated by Permit to Work
- Merchant describes an entity who sells NBB patrons their goods



PROGRAM ADMINISTRATION

The responsible person and Program Administrator in charge of coordination and maintenance of this program and related tasks are the responsibility of the Enterprise Safety Coordinator, who may designate one or more individuals to fulfil the tasks described within this program.

PERIODIC REVIEW

This plan is subject to periodic review and modification as necessary to ensure that NBB is compliant with all applicable regulations, standards, best practices, permit requirements; and that the plan is sufficient in detail and scope. Periodic review and updates are performed as needed by Program Administrator.

REVISION HISTORY

Rev #	Effective Date	Reason for Revision	Responsible Person
1	24 Jan 2000	Initial issue	Andy Troccoli
2	1 May 2002	Add alcohol policy	Andy Troccoli, Bruce Clark
3	2 Jul 2003	Periodic review & update	Andy Troccoli
4	15 May 2008	Periodic review & update	Jason Tomsic
5	26 Nov 2008	Add 100% fall protection rule. Add contractor prequalification requirements. Refine program scope	Andy Troccoli
6	21 Feb 2010	Add references to Cal/OSHA regulations	Andy Troccoli
7	13 Sep 2010	Add independent contractors, temporary staffing, and OTR/delivery drivers. Integrate delivery-driver and malt driver rules. General update.	Andy Troccoli, Jason Tomsic
8	3 Jan 2012	Periodic review and update.	Andy Troccoli
9	29 Feb 2012	Add clarification on subcontractors and PICS.	Andy Troccoli
10	3 Apr 2012	Add JHA requirements	Andy Troccoli
11	26 Nov 2012	Periodic review and update.	Andy Troccoli
12	7 Nov 2014	Periodic review and update.	Nick Ampe, Eric Allstott
13	12 Jan 2015	Removed references to PICS	Nick Ampe
14	13 Jan 2015	Updated with contractor type descriptions	Eric Allstott
15	5 May 2015	Updated with Asheville specific information	Nick Ampe
16	17 Aug 2018	Periodic review and update.	Eric Allstott
17	10 May 2019	Periodic review and update.	Eric Allstott
18	8 Aug 2019	Add food safety information	Kelly Stewart
19	9 Sep 2019	Crosslink Programs / New Template	Eric Allstott
20	2 Jun 2021	Updated Hazard Analysis and Permit requirements	Eric Allstott
21	20 Jan 2022	Review and Update	Eric Allstott
22	5/19/2023	Review	Eric Allstott
23	10/13/2023	Changed SWMS to JHA	Eric Allstott
24	11/4/2024	Removed JHA requirements from Contractor Approval	Eric Allstott



RESPONSIBILITIES

The overall responsibilities of all Personnel include all the following.

1. Ensure that your company provides the NBB EHS department with all relevant information including appropriate/requested certificates of insurance and other applicable information and documentation before work commences by following steps at www.newbelgium.com/contractors.
2. Comply with procedures detailed in this document and any other additional guidance provided by NBB.
3. Conduct all work in a safe and professional manner and, at a minimum, follow all relevant standards, regulations, and laws found in 29 CFR 1926, 29 CFR 1910, 21 CFR 110, as well as all relevant federal, state, and local standards.
4. Ensure all workers have appropriate/applicable environmental, health, food safety, and safety training.
5. Ensure that all employees come to work with appropriate personal protective equipment (PPE) and that they know how to use it properly.
6. Conduct all work in a manner that minimizes or eliminates environmental pollution.
7. Dispose of any hazardous waste that may be generated at an appropriate and approved off-site facility. NBB is not responsible for disposal of contractor-generated hazardous waste.
8. All material that can be recycled must be recycled in appropriate containers on site. 100% of all cardboard must be recycled (per city of Fort Collins regulations).
9. Conduct all work in a manner that prevents and precludes product adulteration.
10. Maintain a safe alcohol, firearm, weapon, and drug-free workplace.
11. Ensure that victim(s) of any incident or near-miss are promptly cared for, that all incidents and near-misses are promptly reported, and that all incidents and near-misses are thoroughly investigated and reported to both on-site management and NBB management immediately.
12. When working on a General Contractor's jobsite that is contracted with NBB, all contractors must conform to the General Contractor's safety and health and other programs.
13. Workers will not come to work if ill with communicable disease or close contact of someone who is ill with communicable disease. Additionally, workers will self-report if onset of symptoms is noticed while at work.

EHS PREQUALIFICATION PROCESS FOR ALL PERSONNEL

NBB maintains an internal contractor prequalification system, which collects, reviews, and stores relevant information relating to all contractors who perform work for NBB. Information collected includes general company information, contact information, insurance certificates, OSHA metrics, and safety manuals.

ONLY THOSE COMPANIES WHO HAVE SUCCESSFULLY COMPLETED THE PREQUALIFICATION PROCESS CAN BE PLACED OR REMAIN ON NBB'S APPROVED CONTRACTOR LIST AND PERFORM WORK ON SITE AT NBB.

More information relating to the contractor prequalification process as well as the required documentation needed can be found at <http://www.newbelgium.com/contractors>.



HAZARD COMMUNICATION FOR ALL PERSONNEL

There are many hazards at breweries. However, there are three hazards present throughout most NBB facilities.

These hazards result from:

1. Chemicals (especially corrosives and oxidizers)
2. Carbon dioxide, and
3. Work-created hazards

This section explains these hazards in detail and contains specific guidance. Please note that this information is a supplement to your companies' hazard communication training required by OSHA (and this plan) and is not a substitute for this OSHA Hazcom training.

All chemicals shall be approved for use and disposal prior to being brought onsite. Contractors and sub-contractors must train their personnel on:

4. The hazards of the chemicals they are working with
5. Means to protect themselves from exposure to these chemicals
6. How to read and understand MSDS/SDS

CHEMICAL HAZARDS

NBB uses several types of oxidizers and corrosives for cleaning and sanitation. These chemicals are hazardous if they contact the skin, the eyes, or if they are inhaled. Additionally, oxidizers react vigorously with certain metals and organic materials, they can create a fire hazard, and upon decomposition can pressurize a container to the point of failure.

A closed storage and dosing system is employed, called a clean-in-place ("CIP") system. However, there is still significant potential to encounter these materials in certain areas of the brewery. Use the following guidelines to prevent contact with corrosives and oxidizers.

- DO NOT store materials or tools in chemical storage or CIP areas.
- DO NOT cut through the chemical storage or CIP areas to get to other locations.
- No eating or drinking in any production, facilities, CIP, or chemical storage area.
- DO NOT use chemical barrels and totes as work rests or shelves.
- DO NOT lean on or touch chemical barrels, totes, or chemical equipment such as pumps and lines.
- DO NOT work within close proximity of chemical containers.
- Unless preapproved, contractor and subcontractor personnel are FORBIDDEN from moving chemical containers. If a chemical container is in the way, notify NBB Staff.
- Avoid walking through puddles and pools of standing liquid. They could contain residual corrosive materials.
- DO NOT conduct hot work in any CIP or chemical storage area without consultation of approved NBB Staff.
- No hot work within thirty-five feet of any chemical storage container.
- If you come in contact with a chemical (skin or eyes), you must rinse with water or eyewash solution for a MINIMUM of twenty (20) minutes and seek immediate medical attention. Report the incident immediately to your Supervisor and NBB Staff.

CARBON DIOXIDE (CO₂) SAFETY

Carbon dioxide is an odorless, colorless, heavier-than-air gas that excludes oxygen. The results of carbon dioxide overexposure can be rapid and severe, causing loss of consciousness, coma, and death in extreme circumstances. Symptoms of overexposure can include the following:



- Dizziness
- Headache
- Increased heart rate
- Nausea/Vomiting
- Lethargy/Disorientation
- General feeling of being unwell

If you experience any of these symptoms, evacuate the area, seek fresh air, and report the incident to your Supervisor and NBB personnel immediately.

Please note that NBB maintains carbon dioxide sensors throughout its facilities in locations where carbon dioxide can build up to unsafe levels. If the horn/strobe is activated, all personnel must evacuate to safe area immediately.



WORK-CREATED HAZARDS

There are several common work-created hazards that present significant risk to NBB operations. All Personnel must pay particular attention to these areas. Listed in no particular order, some of these hazards involve general fire hazards, hot work, hazards related to working at heights, hazards related to confined spaces and confined space entry, electrical hazards, arc-flash hazards, energized electrical work hazards, and the control of other hazardous energies.

Please review the relevant sections of this document and ensure that all Personnel sent to a NBB controlled site are properly trained, have the appropriate PPE, and understand these hazards and the safe work practices that eliminate or reduce exposure to the hazards.

NBB MAINTAINS A ZERO-TOLERANCE POLICY FOR SAFETY VIOLATIONS THAT INVOLVE THESE HAZARDS. VIOLATIONS RESULT IN SUBSTANTIAL REPERCUSSIONS UP TO AND INCLUDING PERMANENT EXPULSION FROM THE SITE FOR OFFENDING PERSONNEL, POSSIBLE LOSS OF THE CONTRACT, AND POSSIBLE LEGAL ACTION

EMERGENCY PROCEDURES FOR ALL PERSONNEL

All Personnel are expected to follow their own incident and injury reporting procedures and must also follow NBB reporting procedures. All incidents, injuries and near-hits shall be reported to NBB immediately. This includes medical, fire, chemical, security and related problems and process-interruptions. If the injury is life threatening or incident requires immediate outside assistance, call 911 immediately.

Emergency Contact for Fort Collins and Asheville Facilities: 877-245-7809

FOLLOW-UP REPORTS

A follow-up written report may be required. The contractor may choose to use their own incident reporting form or an NBB incident reporting form. NBB incident reporting forms may be obtained from the contractor's primary NBB contact. Send follow-up correspondence to:

New Belgium Brewing Company
EHS Department
500 Linden Street
Fort Collins, CO 80524 USA
E-Mail: thegnome@newbelgium.com
Fax: 970.494.7860

ALARMS

NBB has three primary forms of alarms located at the facility. These include

1. Fire Alarms
2. Gas Detection Alarms
3. Process Signals

FIRE ALARMS

Fire alarms are located throughout the facility. These alarms are clear strobes encased in red or white housings with loud horns. In the event of a fire alarm all employees and contractors are required to immediately exit the affected building and report to the head count area.

GAS DETECTION ALARMS

Fixed gas detection monitoring/alarms is located in areas that could potentially host a hazardous atmosphere; the hazardous gasses and vapors that NBB can measure include the following.

- Carbon Dioxide (Simple Asphyxiant)
- Carbon Monoxide (Chemical Asphyxiant)
- Ammonia (Corrosive)
- Biogas contains >80% Methane (Flammable)
- Natural Gas (Flammable)



Gas detection alarms are red and include an audible signal. If a gas detection alarm is activated, employees and Personnel are required to immediately evacuate the room in which the alarm is sounding and notify their primary NBB contact.

PROCESS SIGNALS

Process signals are located throughout the production areas. Process signals are amber/yellow strobes that may or may not have an audible alarm; they are typically mounted on equipment or found in the general work area. In certain circumstances, process signals are mounted on equipment as light stacks. Evacuations are not required for active process signals.

EVACUATION & HEADCOUNT PROCEDURES

Personnel evacuate the facility (or room) upon notification from any of the following.

- Gas-detection alarm,
- Fire alarm,
- Visible fire or smoke with or without an alarm and
- Upon notification by the overhead address system or an NBB coworker for any other reason.



Fort Collins Facility Evacuation:

- From FTC Bottling Hall, proceed to Volleyball Court
- From FTC Brewery and Offices, proceed to corner of Linden and Buckingham
- From FTC Distribution Center, proceed north of the building toward the fence line
- From FTC Medical Clinic, proceed to Volleyball Court
- From FTC PWTP, proceed to Volleyball Court

Asheville Facility Evacuation:

- From AVL Brewery, proceed to employee parking lot or truck court directly west (away from) the Packaging Hall dock office/glass crushing room
- From AVL Distribution Center, proceed to entrance gates
- From AVL Liquid Center, proceed to employee parking lot
- From AVL PWTP, proceed to truck court directly west (away from) the Packaging Hall dock office/glass crushing room

Supervisors are required to know the total headcount of all contractors and subcontractors in their employ, working at the site and must report this information, along with the status of any missing Personnel. Personnel report to their Supervisor, who, in turn, reports to their NBB contact. Personnel do not reenter the building (or room) until the all-clear is given.

CONTRACTOR CLASSIFICATIONS

ON-CALL RESOURCES

These resources are emergency-based, have supervision 100% of the time, and may be exposed to hazards. There is no insurance, JHA, safety manual, NBB orientation, or certification need for this type of contractor. Roto-Rooter and D&K Pumping are examples of on-call resources.

SERVICE PROVIDER 1

These contractors are working independently, may need card access, and are not exposed to great hazard. Ice, coffee, and milk delivery services are examples of this type of contractor. Contractor approval and site safety orientation is required for these providers.

SERVICE PROVIDER 2

These contractors are working independently, do not need card access, may be exposed to hazards, are on site for a short period, perform non-project-based tasks, and may be on a service contract. Malt delivery, transfer trailers, recycling services, trash removal, and other delivery/pick-up drivers are examples of this type of contractor. Contractor approval and site safety orientation is required for these providers.

SERVICE PROVIDER 3

These contractors perform independent work, need card access, are exposed to hazards, are on site for a short period, perform non-project tasks, and may be on a service contract. Examples of additional certification that may be requested include proof of confined space training, fall protection training, aerial lift training, powered industrial truck license, crane operator license, etc... Vendors performing delivery/stocking tasks, window cleaners, janitorial, HVAC services, arborists, and forklift maintenance are examples of this type of contractor. Contractor approval and site safety orientation is required for these providers.



PROJECTS, FACILITIES, CONSTRUCTION CONTRACTORS

These contractors are performing independent work, need card access (with daily check in/out responsibilities), are exposed to hazards, are on site for a long period of time (more than one week), and are under contract. Proof (upon request) of applicable additional certification are all required. Examples of additional certification include proof of confined space training, fall protection training, aerial lift training, powered industrial truck license, crane operator license, etc... Welders, HVAC installers, electrical installers, and programming services are all examples of this type of contractor. Contractor approval and site safety orientation is required for these providers.

TEMPORARY WORKERS

Information relating to temporary workers is covered in a separate document.

SITE CONTROL & SECURITY FOR ALL PERSONNEL

The following section addresses site control/security for existing facilities, those under remodel, and new facilities under construction.

CONTRACTOR ORIENTATION

Prior to the start of work, an NBB Contractor Safety Orientation is required for all Personnel. Orientations should be scheduled through the NBB primary contact and must be completed by all Personnel performing work on site at NBB. Re-orientation may be required in the event of process changes that may affect Personnel safety, if there is a failure in a safety process, or if Personnel are found in need of re-orientation for any other reason.

CONTRACTOR CARD ACCESS REQUIREMENTS

When applicable, all personnel must always carry a valid NBB security access card with them. Access cards are to be kept with your NBB primary contact when not in use. Personnel must sign in daily before receiving identification and must sign out and return access cards at the end of the day. All work must be scheduled with the contractor's primary NBB contact or the general contractor prior to arrival.

Facility access cards are only handed out at the request of the contractor's primary contact or general contractor. Access cards and keys may be issued to supervisors and supervisor at the discretion of the NBB primary contact. The individual that requests keys along with their supervisor must sign out the key.

NOTE - NBB access cards are only issued after Personnel complete safety orientation; orientation is only completed when Personnel have provided all required documentation and been approved to perform work at NBB.

EXISTING FACILITY ACCESS

Access to existing facilities is restricted. Personnel may only enter and work in designated areas as defined by NBB staff and based on their contract or other agreement. The following areas of the brewery are always OFF-LIMITS unless approved by NBB staff in advance and when work in these areas is required:

- Process Wastewater Treatment Plant ("PWTP")
- Malt Building
- Fermentation Cellars/Fermentation Tunnels/Filter Room
- All Chemical-Storage Rooms or Areas
- All CIP Rooms or Areas
- Yeast Propagation and Yeast Storage
- All Packaging Areas for All package Types

Do Not...



- Cut through production areas.
- Loiter in the retail area / tasting room before, during or after working hours.

PARKING

Fort Collins Facility Parking: All Contractors, Vendors and Delivery-Personnel enter the site at the Shipping and Receiving entrance on the northwest side of the property; parking is provided to the immediate left of the Linden Street Shipping and Receiving entrance and in front of the packaging hall shipping and receiving office.

Over-the-road and malt-delivery trucks stage along the curb line on the North side of the property in areas denoted by the purple signs. Oversize construction equipment stage in this area as well.

Unless approved by NBB EHS, no construction or delivery traffic or parking is permitted in the front (northwest) of the building or in the NBB coworker parking lot located at the in front of the main entrance of the packaging hall.

As a courtesy to our residential neighbors, whenever possible, DO NOT drive construction equipment along Buckingham Street – Enter from Linden Street.

Asheville Facility Parking: All contractor and Personnel must park in the designated parking areas just north of the facility across Craven St.

Over-the-road and malt-delivery trucks stage along the curb line on the West side of the truck docks.

No construction or delivery traffic or parking is permitted in the front of the Liquid Center building or in the NBB coworker parking lot.

USE OF THE NBB COWORKER PARKING LOT

Personnel may park passenger vehicles and light trucks in visitor parking areas when no work is being performed, for sales calls, meetings, and similar visits to the site. However, delivery vehicles, construction vehicles, buses and service vehicles are never allowed in any coworker parking or visitor parking areas.

CONSTRUCTION AREA ACCESS-CONTROL

CONSTRUCTION IN EXISTING FACILITIES

Construction areas are posted as such and barricaded with orange safety fence or a suitable substitute to prevent pedestrian access. Extremely hazardous areas within the construction area boundaries are also posted and barricaded appropriately for the hazard.

Personnel take reasonable precautions to maintain these boundaries at all times during construction.

Work or site conditions that pose a risk to Personnel will be barricaded with yellow/black tape that reads "Caution". Confined spaces will be barricaded, when no one is in working in them and the space is open, with red/black tape that reads "Danger Confined Space Do Not Enter".

NEW LOCATIONS UNDER CONSTRUCTION

The general contractor is expected to maintain site security during construction of all new facilities that are not contiguous with existing facilities. The general contractor should plan with NBB in advance and use the existing NBB security contractor. NBB project/construction management and EHS staff shall have access to all construction sites at all times.



SCHEDULING WORK; DAY, NIGHT, AND WEEKEND WORK

Most work is conducted during regular workdays and hours. Work on nights and weekends must be cleared with NBB primary contact. Unless pre-approved by EHS, qualified NBB Person(s) must be available and on the site during night and weekend work. Personnel shall schedule service or other visits in advance and at least one week prior to their arrival to facilitate careful pre-work task planning.

ILLEGAL DRUGS, FIREARMS, AND WEAPONS

The possession of illegal drugs and firearms is prohibited on NBB property. NBB Security escorts Personnel from the site and they are suspended from future work if found in possession of illegal drugs or firearms while on NBB property. NBB will contact law enforcement. Additionally, the employer may have their contract terminated.

INCIDENT INVESTIGATION

All incidents will be investigated by the general contractor and/or NBB with the purposes of:

1. Evaluating internal programs and practices.
2. Developing action items to prevent the incident from being repeated.

All information and findings gathered during the contract company's investigation will be provided to the general contractor and NBB's EHS Department.

MATERIAL STORAGE AND TRANSPORT

1. NBB will indicate areas for material storage on the Site for each individual Vendor.
2. It is the Vendor's responsibility to ensure that all materials and equipment are securely stored. NBB will accept no responsibility for any loss or damage however caused.
3. The positioning of large items shall be carried out in agreement with NBB, but this does not give the Vendors the right to demand extra payment for removal of materials so as to facilitate other work. The Vendors shall provide their own means of transporting materials on site.

ENVIRONMENTAL HEALTH & SAFETY POLICIES AND PROCEDURES FOR ALL PERSONNEL

BEER & ALCOHOL POLICY

NBB supports the responsible consumption of alcohol and appreciates the support Personnel provide in helping us create world class beer. The following rules apply to beer and other alcohol.

If the NBB primary contact deems it appropriate, bonus beer may be issued to contractors. Bonus beer may only be issued by the primary contact. The removal of bonus beer from our facility without the permission of a primary contact is prohibited and is considered theft and is addressed through all possible legal remedies.

NBB expects that bonus beer is consumed responsibly and prohibits the consumption of alcohol by contractors during work hours. Bonus beer, or any other alcohol, is not to be consumed on NBB property at any time. Bonus beer shall not be transported in a CDL vehicle. Bonus beer is a privilege, not a right.

The use of the NBB tasting room by contractors is prohibited unless special arrangements have been made with the primary contact; any such use is at the sole discretion of the primary contact.

TRAINING REQUIREMENTS

NBB expects all contractors and subcontractors to provide appropriate training to their own employees commensurate with the type of work and the associated hazards. In the case of multiple subcontractors working



for a general contractor, the general contractor is responsible for ensuring that the subcontractor is compliant with all regulations, standards, best practices, and related training requirements. The following certifications should be provided to NBB if applicable:

- Competent-person training certifications
- OSHA 10 or 30 training certifications for Foreman and Superintendents and other leadership roles

ASHEVILLE SPECIFIC TRAINING REQUIREMENTS

For earth work trades, during site preparation as well as post construction, this may include a 40-hour Hazwoper certification. The Asheville site was built on a Brownfields site, meaning potential contamination may be present in the soil. All earth work must be approved by the EHS department to determine if there are potentials for exposures and if additional approval through the NC DENR Brownfields group is required before work begins.

PERSONAL PROTECTIVE EQUIPMENT

NBB expects all contractors and subcontractors to supply the appropriate and required personal protective equipment (“PPE”) to their own employees and instruct those employees in the correct use of the personal protective equipment. Contractors and subcontractors are prohibited from using NBB PPE unless approved by EHS.

GENERAL PERSONAL PROTECTIVE EQUIPMENT GUIDELINES

1. Safety glasses, sleeved shirts, pants, closed toe shoes, and hardhats are required for all Personnel working in any construction or excavation area on NBB property.
 - a. Hardhats must meet/exceed current ANSI Z890.1 Class B/Class G standard for non-electrical workers.
 - b. Electrical workers must wear ANSI Z890.1 Class E hard hat.
 - c. Safety glasses must meet most current ANSI Z-87 standard.
 - d. A minimum of ANSI/ISEA 107 Class 2 high visibility is required on the job sites. Orange is preferred; however, yellow is acceptable.
 - e. Safety-toed work boots meeting current ASTM requirements must be worn by all steel workers and mill wright trades or as required by job hazards.
2. Non-construction Personnel are required to wear safety glasses, pants, sleeved shirts and closed (or safety) toed shoes in all production areas.
3. Additional PPE such as face shields, hearing protection, etc. are required based on the work hazards present.
4. Respiratory protection or portable ventilation equipment is required in areas where health hazards exist due to dust, fumes, and vapors. Personnel need to be trained on the limitations of their respiratory protection and be provided with Appendix D of the OSHA respiratory protection standard.
5. Contractors are also expected to use hearing protection if noise levels exceed 85 db.

HOUSEKEEPING & TRASH REMOVAL

1. Maintain the work area in a neat and orderly fashion at all times.
2. Always maintain adequate routes of egress.
 - a. DO NOT stack materials or rubbish in front of or around doorways.
 - b. DO NOT block or lock doors from the inside.
3. Remove trash and debris DAILY. The accumulation of spent or used construction material in and around the brewery is unacceptable.
4. Clean up equipment and tools DAILY.
5. DO NOT store construction materials, supplies or job boxes in chemical or production areas. Construction materials found in these areas during non-working areas are disposed of or recycled and the contractor is back charged for the disposal or recycling cost.
6. No food or drink in production, facilities, raw material, or process water treatment plant.
7. No smoking anywhere in the facility including new construction areas.
8. No smoking within twenty feet of an entrance to a building.



9. No smoking, eating, or drinking within twenty-feet of any chemical storage area, compressed gas cylinder area, biogas storage area, biogas handling area, fuel-storage area, or chemical storage container.
10. Store round stock such as pipes and threaded rod in racks or away from foot traffic areas to avoid slips, trips, and falls.
11. When cleaning up a work site, DO NOT drop materials from overhead unless the level below is properly barricaded, and someone is standing by to keep pedestrians safe.
12. Store building materials in pre-designated areas ONLY.

AUDITING NEW BELGIUM BREWERY

All sub-contracting companies will be randomly subject to NBB EHS periodic contractor management audits. These audits will focus on the highest risk activities and will be performed by site safety representative. The audit process will include:

- Gathering of all pertinent documents and records.
- Employee and management interviews.
- Summary meeting with the contractor management.
- Written report documenting findings.

Any negative findings will need to be addressed within a specified time period in order to close the audit. If the company fails to complete the required actions, they will be disqualified from working onsite. They may apply for re-qualification only if the findings have been addressed. All documentation from this process will be kept for a period of three years.



GENERAL FIRE-PROTECTION GUIDELINES

1. No open fires or burning of rubbish.
2. DO NOT allow oily rags and combustible waste to accumulate. Use a rated steel storage container. Empty daily.
3. All job sites have an appropriately rated fire extinguisher on site and within fifty (50) feet of the location of all work. Additional fire extinguishers are situated such that no individual must travel greater than fifty feet to reach an extinguisher.
4. Maintain routes of egress, exit, and discharges from all construction areas at all times.
5. Construction vehicles do not park in fire and no parking zones.
6. Construction vehicles do not block site access-driveways.
7. On-site storage of fuels and combustible or flammable liquids is restricted; do not store any combustible or flammable liquid without the proper precautions and without prior written permission from NBB.



PERMIT-REQUIRED CONFINED SPACE ENTRY

Contractors that enter confined spaces and permit-required confined spaces must follow the NBB Confined Space Entry program. Please refer to your NBB primary contact for program details.

Contractors will not use the alternate entry procedures specified in paragraph 29 CFR 1910.146(c)(5), (c)(5)(i) and (c)(5)(ii) to enter permit-required confined spaces. If the space is listed or labeled as a permit-required confined space by NBB, or, it meets the requirements of a permit-required confined space prior to the start of work, all rules apply, and the alternate entry procedures are disallowed.

PERSONNEL SHALL NOT PERFORM PERMIT-REQUIRED CONFINED SPACE ENTRY OPERATIONS UNLESS THEY POSSESS PERMIT-REQUIRED CONFINED SPACE ENTRY TRAINING AND OPERATE UNDER AN OSHA-COMPLIANT WRITTEN PROGRAM.



ELECTRICAL HAZARDS

This category includes shock, arc-flash, and associated fire hazards.

Personnel that work with electrical equipment and systems must be Qualified Persons as defined by 29 CFR 1910 Subpart S, 29 CFR 1926 Subpart K, latest revision of NFPA 70E, and meet all minimum training requirements found in these standards.

Vendor is responsible for all power needs beyond 120VAC single phase.

PERSONNEL SHALL NOT PERFORM ELECTRICAL WORK ON ANY ELECTRICAL SYSTEM THAT OPERATES OVER 50 VOLTS UNLESS THEY POSSESS ELECTRICAL-SAFETY QUALIFIED PERSONS TRAINING AND OPERATE UNDER AN OSHA-COMPLINAT WRITTEN PROGRAM.



TEMPORARY ELECTRICAL

1. Ground fault circuit interrupters are required in all temporary 115 – 220 v, single-phase construction receptacles. Pigtail GFCIs are required if a cord or power tool is not plugged into a GFCI circuit.
2. Temporary lights must have guards that protect the bulb and prevent accidental contact.
3. Temporary electrical wiring is installed so that it is protected from hazards and does not present trip hazard.
4. Electrical cords are in good repair. Splices are made as seamlessly as possible, in accordance with OSHA standards and must retain the original physical and dielectric characteristics of the cord.
5. Energized wiring must be enclosed in a junction box or other suitable method to prevent accidental contact.
6. Temporary electrical wiring and receptacles are installed in such a manner that they are protected from the environment and work activities.
7. All temporary electrical panels are marked and must have inspection tags affixed in a visible location.



ARC FLASH

An arc-flash is a short circuit through air that flashes over from one exposed live conductor to another conductor or to ground. Arc flashes can be caused in a variety of ways including:

1. Approaching a high-amp source with a conductor.
2. Dropping a tool that bridges two conductors or creates a ground.
3. Creating a spark.
4. Equipment failure due to use of substandard parts, improper installation or even normal wear and tear.

Qualified Persons that are exposed to arc-flash hazards are trained on those hazards and wear the appropriate flame-resistant PPE.

LIGHTNING

If lightning strikes within 10 miles of the Site, all work at elevation (i.e. roofing, cranes) must stop. If lightning strikes within 5 miles of the Site, then all Personnel must seek shelter and remain in shelter for 30 minutes after the last strike. Once lightning has moved at least 10 miles away, the “all clear” announcement will be made by the Site Supervisor.



HAZARDOUS MATERIALS HANDLING & HAZARDOUS WASTE DISPOSAL

Contractors must always handle hazardous materials and hazardous waste in a safe and compliant manner.

1. Personnel must provide copies of any SDS to NBB Staff before bringing chemicals on site. Every chemical **MUST** have an SDS. Additionally, general contractors are expected to maintain a complete set of SDS for the job site.
2. Hazardous materials must be stored appropriately for the particular hazard(s).
3. If Personnel have the possibility of exposure to hazardous materials, such as solvents and silica from concrete work, it's the contractor's responsibility to perform exposure monitoring for their employees per OSHA 1926 Subpart D.
4. No outdoor storage of hazardous materials.
5. Hazardous materials requiring special disposal are the responsibility of the Personnel using the chemical.
6. **DO NOT** accumulate hazardous materials on site.
7. **DO NOT** dump hazardous materials, oils, or solvents anywhere on site or in any drain or sump.
8. The dumping of residual paint, solvents or other materials in excavations or construction areas is **EXPRESSLY** forbidden.
9. Dispose of all hazardous waste that may be generated at an appropriate and approved off-site facility.
10. Report any chemical spills to NBB **IMMEDIATELY**

CONTAMINATION CONTROL

Since this is a beverage plant, dust and other contamination is a concern. Activities that generate large amounts of dust, vapors, fumes, or smoke must be conducted such that the contamination is excluded from production or raw materials storage areas. Use plastic sheet draping, ventilation fans and other techniques to control dust, fume and smoke generation and migration.

Unless otherwise instructed by NBB, only WET SAWS or vacuumed tools are used within the facility for concrete sawing and coring.

BLOODBORNE PATHOGENS

Unless trained in blood borne pathogens, Personnel should not attempt to administer first aid as it could create exposures to hazardous bodily fluids. In conjunction with first aid supplies, blood borne pathogen kits will be provided for treatment and clean up.

CURRENT GOOD MANUFACTURING PRACTICES

Contractors must always follow Current Good Manufacturing Practices (cGMPs). cGMPs include but are not limited to:

- Disease control – Do not come to NBB for work if you have diarrhea, vomiting, jaundice, sore throat with fever, infected wounds, cuts, or lesions on the wrist or exposed body part, however small, or if you have been diagnosed or exposed to Norovirus, Salmonella typhi, Shigella spp. infection, E. coli, or Hepatitis A.
- Personal hygiene and cleanliness – Maintain personal cleanliness, wear appropriate clothing and shoes, remove exposed jewelry and other loose items, and wear hair/beard nets and gloves where required.
- Hand washing – Wash your hands before starting work and after visiting the rest room, break room, smoking areas, and/or any activity where hands have become contaminated before starting your work again.
- Food and drink policy – Eating food, chewing gum, drinking beverages (except water), or using tobacco are allowed in designated areas only and not on the production floor.
- Personal belongings – Personal belongings must be stored in lockers or other designated storage area not on the production floor.
- Pest control – Keep doors and windows closed. Report any evidence of pests.



REGULATORY INSPECTIONS: PROCEDURES FOR ALL PERSONNEL

If the general contractor or subcontractor is the recipient of a regulatory inspection (i.e. OSHA, EPA, etc.) on NBB Company, Inc. property, please follow the following procedure.

1. If an inspection of the job site is imminent, notify your primary NBB contact and the NBB EHS Department immediately.
2. DO NOT begin the inspection until a representative of the NBB EHS Department is present. Also, the authorized representatives of the affected general contractor, and affected subcontractors must be present during an inspection.
3. The inspection is limited to the job site and immediate vicinity. The inspector does NOT have access to other areas of the facility or property. DO NOT allow the inspector access to any portion of the site NOT specifically covered by the inspection.
4. Take the most direct route to the job site, avoiding production areas. If possible, the inspector is led around the outside of the building, and not through the inside.

ADDITIONAL EHS PROCEDURES FOR CONTRACTORS & VENDORS

The topics within this section govern work performed by Contractors and Vendors and any other Personnel involved in construction, remodels, equipment installations, facilities and utilities services and related activities.

JOB HAZARD ANALYSIS

Site and job-specific hazard analysis and risk management plans are required of all for all construction, remodels, equipment installations; and for all other periodic and ongoing facilities/site/utilities services.

The primary purpose of a Job Hazard Analysis (JHA) is to help supervisors, workers, and any other persons at the workplace to understand the requirements that have been established to carry out intended tasks in a safe and healthy manner. The JHA sets out the work activities in logical sequences, identifies hazards, and describes control measures.

Both simple and complex activities can be broken down into a series of basic steps that will allow for full analysis of each part of the activity for hazards and potential incidents. The description of the process should not be so broad that it leaves out activities with the potential to cause incidents and prevents proper identification of the hazards nor is it necessary to go into fine detail of the tasks.

The aim of a JHA is to describe the activity or task to be undertaken, identify the resources, people-power, and skills associated with the task, assess and select control measures, as well as systematically plan the activity so it can be completed efficiently and effectively.

The JHA must be able to be easily read by those who need to know what has been planned to manage the risks and implement the control measures and ensure the work is being carried out in accordance with the JHA. This includes work supervisors, workers participating in planned activities, and the General Contractor (when applicable).

Contractors will provide a JHA for planned work that describes normal hazards and risks associated with the activities they are performing. The JHA shall be reviewed prior to work at NBB or issuance of any Permits to Work. If there is a scope change or new hazard discovered after initial review, a supplemental JHA will be completed and reviewed before work begins or restarts. The supplemental JHA will identify the new hazards, risks, and appropriate acts of mitigation and control and any issued Permits shall be updated or closed/restarted.

Please contact your NBB Owner's Representative, Project Manager, or Construction Manager to coordinate the submission and review of your Contractor JHA with NBB EHS. Failure to submit/update JHA will likely result in delay or disqualification from ongoing or future work with NBB.



In the case where subcontractors are working for a General Contractor, the General Contractor is responsible for ensuring the all requirements are being met and frequently reviewed with Sub Contractors.

If you need help developing your JHA program, please contact your NBB Owner's Representative, Project Manager, or Construction Manager for help or coordination with EHS personnel.

Please note that NBB requires substantial conformance with most recent revisions of ANSI/ASSP A10.1 and A10.33.

PERMIT TO WORK

New Belgium Brewing uses a Permit to Work system to ensure all proper precautions stated in Job Hazard Analysis, NBB policy, and those required by local, state, and federal regulations will be followed. The Permit to Work will guide workers toward other required Permits and must be completed by a NBB Permit Issuer and agreed to by service personnel Permit Receiver prior to the onset of work. A Permit to Work may remain open for up to one week, while other permits required may need to be closed at end of shift, daily, or at the end of continuous work. Durations are noted on Permits. JHA may be updated or appended on back of Permit to Work.

HAND AND POWER TOOLS

1. All electrically operated tools must be double insulated or grounded.
2. Use pigtail GFCIs.
3. All guards shall remain in place and in good repair.
4. If the use of a power tool creates hazards such as flying particles, dust, smoke, or other hazards, then personal protective equipment appropriate to the hazard must be worn by the operator and any other affected individuals.
5. Tools powered by gasoline, diesel or propane are only used within the building if pre-approved by the NBB Staff and adequate measures are taken to control any hazards.
6. Only wet concrete saws or vacuum tools are used when the concrete sawing is being performed as part of a modification, remodel or retrofit in an occupied space.

LADDERS

1. When ladders are used for access to different elevations, ladder side rails shall extend at least three feet above the landing.
2. Portable ladders must be tied off, blocked, or otherwise secured to prevent displacement.
3. DO NOT use stepladders in place of extension ladders. Stepladders are used only in the fully open position.
4. When working from a ladder, the ladder must be positioned to allow the work to be performed without positioning any part of the body except the arms beyond the side rails of the ladder.
5. Extension ladders are not be separated as two straight ladders.
6. Only Type I A extra heavy-duty ladders are acceptable.
7. Use of ladders with missing or broken rungs or steps, broken or split side rails, or other damage is prohibited.
8. When climbing ladders, there must be three points of contact with the ladder at all times. Both hands are used to hold the side rails. Material is lifted with a rope, not carried by hand.
9. Portable ladders shall be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is about $\frac{1}{4}$ of the working length of the ladder. The acute angle with the horizontal must not be less than 75-degrees.
10. Ladders are not to be used as work platforms, scaffolding or as structural members of platforms, scaffold, or walkways.



FALL PROTECTION



NBB maintains a 100% tie-off policy for all work that is six (6) feet or greater for construction activities. This requirement applies to all trades.

Alternate fall-protection plans described in 29 CFR 1926.502(k) for leading edge work are prohibited as a substitute for 100% tie-off unless agreed to with EHS personnel.

1. Fall protection equipment is required for any individual working over six feet in height or performing leading edge work where the unprotected leading edge is six feet or more from the ground or level below.
 - a. Adequate fall protection includes one or more of the following: personal fall arrest systems, guard rails, scaffold rails, man lift rails, scissor lift rails or nets. Engineered systems, such as guardrail systems and aerial lifts, to alleviate fall potential shall be the preferred method to manage fall hazards.
2. Adequate personal fall arrest systems (“PFAS”) consists of a full-body harness and a lanyard with a shock-absorbing component attached to an appropriate anchor point. Self-retracting lifelines, construction roof-anchors and other devices are permissible provided they are compliant.
 - a. All PFAS are rated for industrial use. Recreational climbing equipment is prohibited.
3. PFAS is required when working off a portable ladder six feet or higher from the ground if anchor point is available.
4. Handrails systems must include a top rail, mid rails, and toe boards; construction of handrail systems must meet OSHA specified dimensions.
5. The installation of fall arrest netting must meet all safety standards.
6. All floor holes 2 in. or more must be covered and sealed shut so no accidental openings occur while able to support, without failure, at least twice the heaviest expected weight.
7. Use of fall restraint system in scissor lifts is optional unless special needs are present. Use of fall restraint system is mandatory when driving a boom lift. Worker can transition to fall arrest system when basket is in place (provided worker cannot fall more than six feet or hit object below).
8. Scaffolds must be erected by a competent person and meet all safety regulations. Working sections of scaffolds must have top rails, mid-rails, and toe boards. A competent person must inspect scaffolding daily.
9. If wind speeds reach 20 mph or higher Personnel may still work at height but are not allowed to work with high surface area objects such as plywood, planking, and sheet metal.
10. No Personnel can work at height if lightning strikes within 10 miles of the construction site.

AERIAL WORK PLATFORMS AND SCISSORS LIFTS

1. When driving a boom lift, a FALL RESTRAINT system is required. When operating a scissors lift, a FALL RESTRAINT system is optional unless a special need is indicated.
2. Feet must always remain on the platform of scissor lifts and boom lifts. Climbing on rails and/or kick plate is absolutely prohibited.
3. If a lift is used in a production area, permission must be obtained from NBB prior to commencing work.
4. Consideration is given to overhead hazards that workers in the area are exposed to. These hazards must be mitigated, or accommodations made, before work can commence.
5. Area below lift operations must be sufficiently mark and barricaded.
6. Second floor or roof access with a scissor lift or other type of man lift is prohibited.
7. All Personnel using lift are required to have sufficient training.

PERSONNEL THAT DO NOT FOLLOW OSHA/ANSI/NBB AERIAL WORK PLATFORM STANDARDS ARE SUBJECT TO DISMISSAL AND PERMANENT EXCLUSION FROM THE SITE.

SCAFFOLDING

Scaffolding operations must follow all applicable OSHA 1926 Subpart L regulations.



1. Scaffolds must be erected by a competent person and meet all safety regulations. Working sections of scaffolds must have top rails and mid-rails and toe boards may also be required.
2. Scaffolding must be inspected daily by a competent person. All scaffolds will be inspected prior to using. Completed scaffolds that are safe to use will have a green or yellow scaffold tag prior to use. Any defective scaffolds will have a red tag and shall not be used under any circumstance.
3. Unattended floor openings must be covered; planking or sheathing strong enough to support twice the intended load must be used. The cover must be suitably marked and secured. If a cover isn't suitable then a guardrail system may be used if it follows OSHA 1926.502. Scaffolds will not be overloaded.
4. Materials will be brought up as needed. All excess materials and scrap should be removed from scaffold when work is completed each day. Scaffold will be erected to include proper ladder or stair access, guardrails, and decked fully. Barrels, boxes, kegs, horses, ladders, loose tile blocks or other unstable objects shall not be used as work platforms mounted on top of other work platforms improperly or offset.

Rolling scaffold units will be equipped with brakes on all casters and a diagonal brace for mobile scaffolds other than baker scaffolds.

1. Scaffolds will be fully decked/railed, or workers will wear fall protection consisting of full body harness with shock absorbing lanyard. All scaffolds installed on concrete or solid floors must have the manufacturer provided base plates for that system installed in addition to wood cribbing. Adequate mudsills and base plates of withstanding the maximum intended load must be provided. All scaffolds exceeding a height to minimum base dimension ratio of 4:1 will be secured.
2. Where employees are required to work or pass under a scaffold an orange fence or barricade tape will be erected 10 foot from the scaffold.
3. An identified competent person(s) will inspect scaffolds daily and supervise all erection and dismantling operations. Unauthorized personnel must not alter scaffolds or work platforms
4. All scaffolds will have to be inspected daily.
5. Scaffold shall not be used by any contractor if "Red Tagged"

CONTROL OF HAZARDOUS ENERGY - LOCKOUT/TAGOUT

NEW CONSTRUCTION

Personnel follow their own policies concerning the control of hazardous energy when working on new construction projects that do not involve NBB coworkers and that do not have an interface with existing mechanical systems or process equipment. The Personnel's lockout/tag out policy and employee training must be compliant with all federal and local regulations.

NBB reserves the right to place its own locks and tags, in addition to Personnel locks and tags, on any Personnel lockout/tagout during tie-ins with existing systems and when NBB coworkers are working alongside Personnel.

SERVICE WORK OR MODIFICATIONS TO EXISTING STRUCTURES & MECHANICAL SYSTEMS

The following rules apply to Personnel when working on existing equipment and systems.

1. Contractors and subcontractors are expected to apply their own locks and tags on equipment.
2. For existing systems, a New Belgium appointed primary Authorized Employee will be responsible for performing the lockout/tagout. To insure full employee protection, the contractors or their designated primary Authorized Employee will walk the lockout/tagout with the New Belgium primary Authorized Employee and will apply their locks and tags to each isolation point or will apply their locks and tags to a group lock box, once the keys have been secured.
 - a. Personnel are expressly forbidden from applying or removing NBB coworker applied locks/tags.
3. Personnel that require a lockout/tag out must seek permission from NBB and schedule a time to perform the lockout/tag out that does not interrupt production.



- a. An NBB representative discusses the locations to apply locks and tags and provide the appropriate schematics and drawings as appropriate to assist the contractor or subcontractor in familiarizing his or herself with the system and its features and hazardous energy potential before engaging in work.
4. Unauthorized lockout/tagout is not permitted.

PERSONNEL THAT DO NOT FOLLOW OSHA LOCKOUT/TAGOUT STANDARDS, THEIR OWN LOCKOUT/TAGOUT POLICY OR THIS POLICY MAY BE SUBJECT TO DISMISSAL, PERMANENT EXCLUSION FROM THE SITE AND POSSIBLE LEGAL ACTION.

PROCESS SAFETY

Many of the pipes in the brewery contain or could contain steam, chemicals, and extremely hot water, in addition to product. Be aware of this fact and take adequate precautions.

- To avoid burns, take note of any steam lines in the location you are working.
- Many of the pipes and equipment can contain corrosive chemicals, even if they are marked as a beer product. Exercise extreme caution when cutting into existing pipelines and/or equipment.
- Follow the control of hazardous energy procedure in this document and consult with NBB before conducting work on existing pipes and equipment.

COMPRESSED-GAS CYLINDER HANDLING

1. Valve protection caps must be in place and secured.
2. When cylinders are hoisted, they must be secured on a cradle, sling board, or pallet. They must not be hoisted or transported by means of magnets or choker slings.
3. Cylinders must be moved by tilting and rolling them on their bottom edges. They must not be intentionally dropped, struck, or permitted to strike each other violently.
4. When cylinders are transported by powered vehicles, they must be secured in a vertical position.
5. Valve protection caps must not be used for lifting cylinders from one vertical position to another. Bars shall not be used under valves or valve protection caps to pry cylinders loose when frozen. Warm, not boiling, water shall be used to thaw cylinders loose.
6. Regulators must be removed, and valve protection caps put in place before cylinders are moved.
7. A suitable cylinder truck, chain, or other steadying device shall be used to keep cylinders from being knocked over while in use.
8. When work is finished, when cylinders are empty, or when cylinders are moved at any time, the cylinder valve must be closed; remove regulators.
9. Clearly distinguish between full, in-use and empty cylinders by tagging all cylinders with a cylinder tag.
10. Compressed gas cylinders must always be secured in an upright position.
11. Oxygen cylinders in storage must be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet or by a noncombustible barrier at least 5 feet high having a fire-resistance rating of at least one-half hour.
12. Inside of buildings, cylinders must be stored in a well-protected, well-ventilated, dry location, at least 20-feet from highly combustible materials such as oil or solvents. Cylinders should be stored in assigned places away from elevators, stairs, or gangways. DO NOT store gas cylinders in production areas.

PLACING CYLINDERS (DURING WORK)

1. Cylinders must be kept far enough away from the actual welding or cutting operation so that sparks, hot slag, or flame do not reach them. When this is impractical, fire resistant shields must be provided.



2. Cylinders must be placed where they cannot become part of an electrical circuit. Electrodes must not be struck against a cylinder to strike an arc.
3. Fuel gas cylinders must be placed with valve end up whenever they are in use. They shall not be placed in a location where they would be subject to open flame, hot metal, or other sources of artificial heat.
4. Cylinders containing oxygen, acetylene, or other fuel gas must not be taken into confined spaces.

EXCAVATIONS

Excavation refers to any work inside an earthen trench, pit, or excavation. Trenches, pits, and excavations greater than four feet in depth will be treated as confined spaces and will require gas tests prior to allowing work. Those greater than five feet in depth require sloping or protective systems prior to allowing Personnel access. Excavations can have significantly higher heat load and heat stress needs to be considered.

All excavation work must follow OSHA 1926 Subpart P. Excavations must be inspected daily by a competent person.

EARTH MOVING EQUIPMENT AND TRUCKS

All earth moving equipment shall be maintained in safe working condition and will be appropriate and adequate for the intended use. Only Authorized Personnel will operate equipment. Operators of equipment, machinery or vehicles will be qualified and properly licensed for the operation involved. Operators must always wear seatbelts. No one can ride on light and heavy equipment other than the operator.

Equipment maintenance is to be performed only by qualified mechanics. Equipment operators and truck operators will make a pre-shift walk around safety inspection of their equipment and any conditions that effect safe operations will be corrected before use. All equipment safety devices must be in place and functioning properly. Before performing service or repair on the equipment, all equipment will be secured in place and tagged out of service. Manufacturer's instructions will be followed. When equipment is serviced or repaired the operator shall dismount until the service or repair is completed and then the operator will make a complete maintenance check on the equipment. When fueling equipment, the engine will be shut down.

All equipment on flat beds and trucks will be secured to their beds to prevent tools and equipment from fall onto the road.

All off-highway earthmoving equipment (i.e. dozers, scrapers, loaders) will be equipped with a ROPS (roll-over protective structure) and seat belts, per OSHA Standards. All heavy equipment will be equipped with a warning horn and an automatic back-up (reverse) alarm that can be heard above surrounding noise levels.

All mobile equipment will be securely parked when left unattended. All ground engaging tools will be lower to the ground, brakes set and the engine off. Equipment parked at night will be lighted, barricaded or otherwise clearly marked where exposed to traffic.

CRANE USE

The following crane safety requirements must be met by all contractors:

1. When wind speeds of 20 mph and/or gusts up to 25 mph, all crane lifts will be stopped.
 - a. The crane operator will evaluate the operating manual for the lift being made. If it is within the guidelines for the crane, the lift may continue.
2. Submit a copy of the crane certification and documentation of the most recent annual inspection prior to crane use. All defects will be noted during that inspection and corrected before use.
3. Cranes must receive regular, thorough, and periodic inspections, in accordance with the manufacturer's recommendations or applicable governing standards.



4. All rigging equipment (slings, softeners, bridles, blocking cables, etc.) shall be inspected prior to use and documented monthly.
5. All riggings shall be kept on good condition properly identified as to capacity and properly stored when not in use. Safety hooks shall be used on all operations where loads are being handle
6. All Personnel working with the crane operate will receive proper training on signaling.
7. All loads shall be controlled by tag lines of sufficient length to control the load.
8. The crane operators will be thoroughly trained and shall have related experience, in addition to being familiar with safe crane operation. Crane operators shall have a complete understand of all manuals, including maintenance and operating instructions for that crane.
9. Crane operations will stop if lightning strikes within 10 miles of the construction area.

HEAT STRESS

Contractors must be aware of the potential hazards of working in hot environments and the signs and symptoms of heat-related disorders. When assessing exposure, it is important to take environmental (i.e. high temperature, contact with hot objects) and job-specific (i.e. physical exertion, non-breathable PPE) heat sources into account. To reduce the risk of heat-related disorders supervisors need to provide their Personnel with:

- Work/rest schedules in accordance with the American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit values for heat stress.
 - A heat stress evaluation using the wet bulb globe temperature is needed to determine the appropriate work/rest schedule.
- Fluids for hydration.
- Areas where employees can cool down or other protective measures.
- Training to recognize signs and symptoms, methods to reduce heat stress, and how work safely in hot environments.
 - This includes factors that increase an individual's risk for heat-related disorders including but not limited to obesity, poor physical condition, metabolic rate categories, lack of acclimatization, and certain medication.

CUTTING, WELDING, BRAZING AND OTHER HOT WORK

Hot work presents several hazards to the individuals conducting the work, nearby workers, product, and the facility. The hazards are dependent on the type of hot work, the base metal, the filler metal, the type of electrode or wire, the flux, the type of anti-spatter compounds (if used), base-metal coatings (if present) and other factors.

SAFE WORK PRACTICES

Workers observe the following safe work practices, engineering controls and administrative controls prior to and during all hot work described in this document.

Follow all relevant fire safety and prevention practices.

1. If welding is occurring overhead or on an upper level, the welder ensures that all flammable and combustible material is removed below the location and barricades the area immediately below the work as appropriate. No individual works immediately below a welder when the welder is working overhead.
2. If the potential for flashing an uninvolved worker is possible, the welder sets up welding screens in areas of approach.
3. Wear all PPE as described in this document and any additional PPE that may be required based on the specific welding task.
4. Individuals that work in the immediate vicinity of hot work that are either helping the welder or performing related tasks must also wear PPE.



5. If one or more individuals are working nearby the hot work area, but are not necessarily in the immediate vicinity, the welder and his or her employer determines PPE requirements for those individuals based on the hazard exposures to these affected workers.
6. When applying, removing, and otherwise handling degreasing and cleaning solvents, workers wear PPE appropriate for this work.
7. Properly position and operate the fume extractor/smoke eater when welding in any indoor location or confined space or area in accordance with the manufacturer's directions and specifications.
8. Verify that the filter is properly installed before every use.
9. Welders select an appropriate anti-spatter product, if required.
10. Before bringing these products to the site, welders provide NBB with SDS for anti-spatter products.
11. Do not use methylene chloride containing anti-spatter products.
12. Be aware of heat-related illness when working in warm or hot conditions.



FIRE PROTECTION

Observe the following precautions before and during all hot work.

1. When practical, objects to be welded, cut, or heated shall be moved to a designated safe location or, if these objects cannot be readily moved, all movable fire hazards in the vicinity shall be taken to a safe place. If these objects cannot be moved and if all the fire hazards cannot be eliminated, positive means shall be taken to confine the heat, sparks, and slag through the use of fire blankets and other control methods.
2. Remove all flammable materials from the immediate vicinity of the welding area and for a distance of thirty-five (35 feet) in all directions, including any solvents that may be used in degreasing and cleaning processes and use fire blankets and other means to protect flammable or combustible items that are not movable or that may be damaged by hot slag and heat exposure.
3. No welding, cutting, or heating shall be done during painting operations, in and around chemical storage areas and when heavy dust concentrations create an explosion hazard.
4. A fire extinguisher remains available for immediate use by the welder and any assistants.
5. The fire extinguisher shall be type ABC and is no smaller than 4A/20B/C (10-pound dry-chemical).
6. The fire extinguisher shall have been inspected no longer than one year ago by a person qualified to perform such work and the inspection tag is present and legible.
7. The fire extinguisher shall be inspected prior to each day's welding.

When the welding, cutting, or heating operation is such that normal fire prevention precautions are not sufficient, additional personnel shall be assigned to guard against fire while the actual welding, cutting, or heating operation is being performed, and for a sufficient period of time after completion of the work to ensure that no possibility of fire exists. Such personnel shall be instructed as to the specific anticipated fire hazards and how the firefighting equipment provided is to be used.

When welding, cutting, or heating is performed on walls, floors, and ceilings, since direct penetration of sparks or heat transfer may introduce a fire hazard to an adjacent area, the same precautions shall be taken on the opposite side as are taken on the side on which the welding is being performed.

For the elimination of possible fire in enclosed spaces as a result of gas escaping through leaking or improperly closed torch valves, the gas supply to the torch shall be positively shut off at some point outside the enclosed space whenever the torch is not to be used or whenever the torch is left unattended for a substantial period of time, such as during the lunch period. Overnight and at the change of shifts, the torch and hose shall be removed from the confined space. Open-end fuel gas and oxygen hoses shall be immediately removed from enclosed spaces when they are disconnected from the torch or other gas-consuming device.

Except when the contents are being removed or transferred, drums, pails, and other containers that contain flammable liquids shall be kept closed. Empty containers shall be removed to a safe area apart from hot work operations or open flames.



Drums, containers, or hollow structures which have contained toxic or flammable substances shall, before welding, cutting, or heating is performed on them, must be thoroughly cleaned of such substances and be ventilated and tested.

Before heat is applied to a drum, container, or hollow structure, a vent or opening shall be provided for the release of any built-up pressure during the application of heat.

HOT-WORK PERMITS

Hot work permits are required in the following areas.

- Malt Building
- Brewery – Electrical Cogeneration Room
- Process Water Treatment Plant
- Warehouse areas containing pallets and cardboards storage within thirty (30) feet of hot work locations.
- Any additional areas designated by NBB

Contact NBB Staff to assist with implementation of a hot work permit. Failure to obtain a hot work permit from NBB prior to working in these areas may result in serious injury or death of the worker and considerable facility damage.

In areas where combustible dust may be a concern, contractors must submit their Combustible Dust plan prior to work.

FIRE WATCH

A fire watch is required on all jobs involving flame cutting, welding, or grinding in the following circumstances:

- Anywhere in a process area and tank farm.
- When combustible materials are within 35 feet.
- When combustible materials are more than 35 feet away and can be easily ignited by sparks.
- When wall or floor openings within 35 feet expose combustible materials in adjacent areas.
- When combustible materials are adjacent to opposite side of metal partitions, walls, ceilings, or roofs, and are likely to be ignited by conduction or radiation.

Fire watch Personnel must:

- Have been trained on duties of a fire watch and fire extinguishers.
- Remain alert, observe all warnings signs and alarms.
- Not be involved in the work.
- Put out sparks, watch for changing conditions, and notify other Personnel in the event of a problem.
- Wear an approved safety vest.

METALS AND COATINGS OF TOXIC SIGNIFICANCE

Many metals can contain hazardous constituents. Coatings also often contain hazardous constituents. When these constituents are vaporized through heating due to hot work or are entrained in the air because of activities that create dust, workers can be exposed to these contaminants and health effects can result. The following materials are of particular concern although this is not an exhaustive list.

- Zinc-bearing base or filler metals or metals coated with zinc-bearing materials
- Lead-based coatings and metals bearing lead as an impurity
- Cadmium-bearing filler materials
- Cadmium-bearing coatings
- Chromium-bearing metals or metals coated with chromium-bearing materials such as stainless steel



- Beryllium-containing metals

Appropriate safe-work practices are required to minimize exposure to both the welders and all others.

COATING REMOVAL

Workers remove all coatings prior to welding, burning, brazing, sweating or similar activity that could cause the coating to heat and vaporize or otherwise enter the air and breathing zone of the worker. Coatings are removed using a suitable method acceptable by NBB and the company doing the work.

At a minimum, coatings are removed in a four-inch (ten centimeter) to six-inch (fifteen centimeter) area around the location of the hot work.

VENTILATION

Adequate ventilation must be provided when working in the following locations:

- Confined spaces
- Inside buildings and other enclosed spaces that are not necessarily confined spaces, but the buildup of fumes and smoke is possible and could impact other people or create contamination.

Mechanical ventilation shall consist of either general mechanical ventilation systems or local exhaust systems, depending on the work being performed. Any portable ventilation equipment is acceptable provided it is equipped with an appropriate filtration system, all filters are in place and it is used in accordance with manufacturer's instructions.

Ventilation shall be deemed adequate if it is of sufficient capacity and so arranged as to remove fumes and smoke at the source and keep their concentration in the breathing zone within safe limits as defined in Subpart D of Part 1926, Occupational Health and Environmental Controls.

Contaminated air exhausted from a working space shall be discharged clear of the source of intake air.

Oxygen shall NEVER be used for ventilation purposes, comfort cooling, blowing dust from clothing, or for cleaning the work area.

PERSONAL PROTECTIVE EQUIPMENT

1. Welders and braziers are required to wear appropriate PPE. PPE usage is based on the type of welding being performed but may include: Gauntlet-style, flame-resistant welding gloves.
2. Long-sleeve shirt and pants of cotton or other natural fiber of a darker color to reduce UV exposure.
3. Appropriate welding helmet.
4. Appropriate respiratory protection.
5. Natural fiber or fire-resistant welding cap is worn under the welding helmet to protect the scalp and neck.
6. Ankle-length leather, safety-toe boots.
7. Hearing protection as appropriate for the work-created and the ambient noise level.
8. Any other personal protective equipment above and beyond the PPE listed above that may be desired by the welder or required to provide adequate hazard protection. If the welding operation produces excessive flying slag, leather sleeves, aprons and/or chaps may be indicated.

Other individuals working in the Immediate Vicinity of the hot work must wear the same PPE as the welder or brazer. Other individuals that are outside the Immediate Vicinity of the welding operation must wear PPE as follows.

1. If the individual is working in the same confined space or area, this is considered Immediate Vicinity, then the respiratory-protection requirements are identical to the welder.



- a. In addition, the individual wears any other PPE appropriate for the hazard exposures up to identical PPE (or greater) as the welder, if indicated.
2. If the individual is working in the General Vicinity of the welder and is not in a confined space or area and has negligible or no exposure to respiratory and other hazards, then the individual does not need wear specialized welding PPE however, the welder must set up one or more welding screens to ensure these affected individuals are not exposed to UV from the arc.

The term “Immediate Vicinity” means that the worker is close enough to the hot work that it is likely that his or her breathing zone is directly impacted by the work and exposure to higher concentrations of fume, UV radiation and other hazards occur.

The term “General Vicinity” means that the worker is working nearby the hot work, but far enough away so that he or she has minimal or no exposure to the hazards

WELDING, CUTTING AND HEATING IN CONFINED SPACES

1. Contractors and subcontractors are NOT permitted entry into any confined space without the express permission of NBB Staff.
2. If a contractor or subcontractor must enter a confined space, NBB procedures must be followed as detailed in the NBB Confined Space Entry procedure – The entrants are briefed prior to the entry as to the procedures, expectations, and proper use of equipment. The entrant must sign-off on the entry permit.
3. The contractor or subcontractor Supervisor MUST be on site for the duration of the entry procedure.
4. NBB personnel MUST be present for the duration of all confined space entries conducted by contractors and/or subcontractors.
5. Except where airline respirators are required or allowed as described below, adequate mechanical ventilation meeting the requirements described above shall be provided whenever welding, cutting, or heating is performed in a confined space.
6. When sufficient ventilation cannot be obtained without blocking the means of access, employees in the confined space shall be protected by airline respirators in accordance with the requirements of Subpart E of Part 1926, Personal Protective and Life Saving Equipment.
7. An NBB coworker trained in confined space entry remains on the outside of the confined space to maintain communication with those working within it and to aid them in an emergency.
8. Where a welder must enter a confined space through a small opening, means shall be provided for quickly removing him in case of emergency. When safety belts, PFAs and lifelines are used for this purpose they shall be so attached to the welder’s body that his body cannot be jammed in a small exit opening.
9. NBB confined space entry procedures must be rigidly followed. Contact NBB EHS Staff for details.



CONTROL OF ELECTRICAL HAZARDS

The brewery has many locations that are perpetually wet. Care must be taken to avoid electrical shocks when arc welding.

1. Ensure that all welding equipment is grounded.
2. DO NOT arc weld while standing in water or when wearing wet clothing.
3. DO NOT use damaged or bare cables and connectors.

ADDITIONAL EHS PROCEDURES FOR PROFESSIONALS

The topics within this section govern work performed by Professionals and any other Personnel involved in providing completed or partial facilities or utilities designs, architectural drawings, engineering or technical advice and consultation, collects environmental samples, performs environmental or geotechnical work or studies,



conducts land surveys, or performs other consultation or professional services or supplies designs and specific advice relied upon by NBB.

Professionals are not exempt from this plan; Professionals follow the rules, policies and best practices described in this document appropriate for their work.

ADDITIONAL EHS PROCEDURES FOR TEMPORARY-PERSONNEL

This section applies to Temporary-Personnel assigned work at NBB through a temporary staffing agency or similar organization and their company.

PROHIBITED ACTIVITIES

Temporary-Personnel DO NOT perform any of the following activities.

1. Work at heights greater than six feet from the floor or level below without fall protection.
2. Work that requires the use of an air-purifying respirator or self-contained breathing apparatus.
3. Exception: Temporary-Personnel may wear loose-fitting face pieces on a voluntary basis provided they meet the training requirements.
4. Work that involves handling cash, checks or credit-card receipts.
5. Use of a powered industrial truck, scissor lift, or man lift (unless trained and specifically authorized).
6. Operate NBB vehicles or construction equipment on or off NBB property.
7. Enter a permit-required confined space (for any reason).

PPE REQUIREMENTS

Each area that Temporary-Personnel are assigned to has a PPE requirement for anyone that works in that area. Temporary-Personnel adhere to each area's PPE requirements in addition to the minimum PPE listed below.

1. Safety-toe shoes
2. Long pants
3. Safety glasses (wrap-around style or approved prescription safety-glasses with riveted side-shields)
4. Hearing protection

NBB does not supply safety-toe footwear, prescription safety-glasses, or any other PPE. Temporary personnel must come prepared to work each day.

CONDUCT

Temporary-Personnel DO:

1. Adhere to NBB values and conduct themselves in a way that is professional and appropriate
2. Treat shared workspaces with respect and clean up after each use
3. Follow all 6S and sanitation guidelines
4. Notify their direct supervisor or manager and inform NBB primary contact of any occupational injuries, illnesses, equipment failures, near-hits, incidents involving property damage and other similar situations that are non-standard
5. Not come to NBB unless they are working assigned hours. No off-hours access is allowed

ADDITIONAL RULES FOR INDEPENDENT CONTRACTORS

Independent-Contractors must follow all applicable sections of this document and any other applicable NBB policies rules and safety programs that may apply to them based on the work that they are performing for NBB.



ADDITIONAL RULES FOR DELIVERY-PERSONNEL

Delivery-Personnel follow these additional rules as appropriate for their work.

1. Obey the speed limit at all times: 10 mph.
2. Please plan to arrive within 15-minutes (either side) of your scheduled appointment whenever possible.
3. No overnight staging of trucks on or adjacent to NBB property.
4. No trucks are allowed on the site before 6:00 am or after 4:00 pm without pre-approval.
5. Always yield to emergency vehicles, mobile equipment, and pedestrians.
6. Vehicles, which are parked, must be off the right-of-way sufficiently to allow safe passage of other vehicles and access to safety equipment.
7. Drivers are not permitted to work on, around or under their vehicle or trailer and do not perform preventative maintenance while parked on NBB property.
8. If a vehicle is not equipped with a backup alarm the operator must honk the horn twice before backing up.
9. No passengers are allowed to ride in the bed of a truck at any time.
10. Seatbelts must be used while operating or riding in any motor vehicle including golf carts and buggies.
11. Drivers are not permitted to drink alcohol, use illicit drugs, or possess the same while on site.
12. Weapons are not permitted on NBB property.
13. OTR Drivers and Transfer/Contract Drivers: It is OK to walk between your truck and the check-in station at the dock you are at however, DO NOT wander around other areas of the premises.
14. Tanker trucks delivering carbon dioxide or bulk chemicals have automatic preference for completing their delivery. Please yield to these vehicles.
15. Chemical tanker drivers do not hook up and begin chemical transfer activities unless proper PPE is used, and authorization has been granted by an NBB coworker and that coworker is present for the transfer.
16. NBB observes a no idle policy to the greatest extent possible. We kindly request that you shut down your engine once you are at the correct dock.
17. **DRIVERS OF ALL MALT TRUCKS, CHEMICAL TANKERS, SPENT-GRAIN TRUCKS AND YEAST TANKERS - DRIVERS ARE NOT ALLOWED TO CLIMB ON TOP OF OR IN ANY TRAILER FOR ANY REASON - NO EXCEPTIONS. FAILURE TO ADHERE TO THIS RULE RESULTS IN IMMEDIATE EJECTION FROM THE SITE.**



ADDITIONAL INFORMATION FOR BULK MALT-DELIVERY DRIVERS

The following additional rules apply to drivers of malt-trucks.

1. Drivers "stage" parallel to the red-curbed area on the North side of the property or as otherwise directed by New Belgium or Security Staff. Other OTR trucks may stage in this location as needed.
2. Only one malt truck may stage at the malt building for unloading - All other trucks must remain parked at the red-curbed area.
3. Malt truck drivers are not permitted to exit their vehicle at any time without notification.
4. If a driver needs to leave his\her truck to use the restroom or would like to wait in the driver rest area, the driver signals NBB staff or Security by honking his\her horn.

ADDITIONAL INFORMATION FOR SHORT-HAUL/TRANSFER AND SPENT-GRAIN CONTRACT DRIVERS

Please note the following.

1. Card access is only granted to the individual that is named on the card.
2. Card access is 24/7 365 except for Holidays, shutdowns, and non-working days.
3. Access is restricted to days and times when you are on shift and working; off-shift access is not allowed.
4. Drivers use only their own cards and do not share cards, even with other authorized individuals.
5. Drivers shall not let anyone else into the building for any reason, including friends and family – NO EXCEPTIONS.



6. Drivers are only permitted in the driver's lounge areas and adjacent restrooms; under no circumstance can drivers access any other portion of the buildings unless they have been specifically granted that access – If you don't know if you have this access for sure, then you don't!
7. Drivers report all lost or stolen cards as soon as possible after discovery.

SELF-INSPECTIONS AND DISCIPLINARY PROCEDURES FOR ALL PERSONNEL

Personnel are expected to act responsibly and self-inspect job sites for EHS issues and effectively deal with any problems.

NBB EHS staff may inspect any job site at their discretion and at any time, without limitation. If unsafe behaviors or situations are witnessed, the on-site supervisor or superintendent is immediately be notified.

If a trend develops with regards to violations or the violations are willful or egregious in nature, then the contracting or subcontracting employer may be precluded from performing work in the future at NBB, may be immediately ejected from the site, or may incur a financial penalty per contract specifications.

The following disciplinary procedures apply if Personnel fail to follow the guidelines in this document or applicable local, state, or federal regulations.

- ☒ **First Offense** - - - Verbal warning
- ☒ **Second Offense** - - Formal written warning
- ☒ **Third Offense** - - - Permanent ejection from the job site and legal remedies per the contract documents including liquidated damages.

The list does not imply that disciplinary action always proceeds in a stepwise fashion - NBB reserves the right to go directly to step 2 or 3, depending on the nature and severity of the infraction.

TRAINING

This plan is subject to periodic review and modification as necessary to ensure that NBB is compliant with all applicable regulations, environmental permits and that the plan is sufficient in detail and scope. Periodic review and updates are performed by the Program Administrator or designee.

CONFIDENTIALITY

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