

INSTRUCTION
on pass system, rules of staying on the company premises and rules of material
movement for CMC Poland sp. z o.o.
(Traffic Instruction)

PART I

Instruction on pass system and rules of staying on the company premises

§1. General provisions- objective of instruction:

1. Developing principles of pass system organization for pedestrian and car traffic and movement of Materials on the Premises of CMC Poland sp. z o.o.
2. Determining detailed courses or manners of bringing in (by car or personally) and taking out (by car or personally) the Company Premises Materials, goods and other assets of the Company, External Entities or Companies.
3. Identifying rules concerning pedestrian and car traffic, rights and obligations of those participants and identification of main tasks for the Security Service in relations thereto.

§2. Definitions and abbreviations

Company	CMC Poland Sp. z o.o.
Company premises	the area of the company and facilities thereon managed or owned by CMC Poland Sp. z o.o.
External company	natural or legal persons without registered seat or place of conducting business activity on the Company premises
External entity	legal or natural persons conducting business activity or having registered seat on the ground located within the external outline of the company property and the property does not have any other access to the public road but through the real properties the Company has title to; and which has no capital relations with the company or its subsidiaries,
Security Service	each entrepreneur having a license for services related to people and property protection and has concluded with the company a contract on providing such services
External inspection institution	entities authorized to conduct, pursuant to effective law regulations, an inspection on the Company premises and to enter the premises on the basis of the relevant authorization or work ID card: - Supreme Audit Office , - National Labor Inspectorate , - Environment Protection Inspectorate, - Technical Supervision Office, - Railway Technical Supervision Office , - Railway Transportation Office, - National Sanitary Inspectorate , - tax inspection authorities, - law enforcement agencies, - Internal Security Agency, <i>as well as:</i> - members of local fire brigade conducting firefighting action, - police officers and ambulance assistants entering the company premises due to an accident or law-breaking incident,
Control point	place of control of Traffic Participants (documents, cars) by Security Service, also referred to as a „guard”
Materials	Any goods and equipment, including those designated for production, investments, finished goods, low-value assets, fixed assets, office supplies
Buffer car park	The company premises located by the Logistics Dept. designated for trucks parking during loading of Materials; equipped with computer system (outdoor screen).
Delivery note (DD)	A document confirming giving out Materials of the Company outside, generated from SAP system, which contains information on the recipient and confirmed by authorized persons (copy in attachment no. 7 hereto)
Goods Issue Document (Wz)	A document confirming giving out Materials of the Company outside, which contains information on the recipient and is confirmed by authorized persons; it is issued manually.
Document DW	A document used by fabshop departments, which contains information on the recipient- and identifies weight of the Material and diameter tolerances.
Magnetic card	The card is given to the carrier who comes to collect Material by the Security Service- it entitles to enter the buffer car park.

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Picking list	A document entitling an External Company (carrier) to load the Materials of the Company in the finished goods warehouse/ or billets yard in the Melt Shop
Traffic Instruction	This instruction concerning the pass system, rules of staying on the company premises and rules of material movement for CMC Poland sp. z o.o.
Traffic Participant	Company employees, external companies and entities and persons acting on their behalf as well as any other persons such as: carriers, representatives of state authorities or emergency rescue teams moving within the premises of the Company.
Material pass MP	A document entitling to move within the company premises Materials owned by the Traffic Participants, except for items assigned to Company employees based on material liability for the entrusted property (e.g. laptop)
Bill of lading	A document, together with attached specifications, confirming realization of Material movement by rail to/ from the Company premises.

List of abbreviations and sings:

PS1	Guard at ul Piłsudskiego –pedestrian traffic service
PS2	Guard at ul Piłsudskiego- goods, vehicle and pedestrian traffic service
PS3	Guard at ul Łośnicka –internal vehicle traffic
PS4	Guard at ul Kolorowa /slag road /
PS6	Guard at ul Okólna - pedestrian traffic service
PS7	Guard at ul Okólna - goods, vehicle and pedestrian traffic service
PS8	Guard at ul Piłsudskiego –Management Building- pedestrian (employee and guests) traffic service
PS9	On-site guard near warehouses- pedestrian and vehicle traffic service
PS10	Guard at the buffor car park –vehicle traffic service
MWGiE	Finished Goods and Shipment Warehouse
MWG	Finished Goods Warehouse
RCP	Time Keeping System

§3. Scopes of obligations

1. Unless explicitly excluded from observing particular traffic organization on the Company premises indicated herein or pursuant to individual authorizations, Traffic Participants are entitled and obliged to:
 - a) Apply relevant documents entitling them to enter the Company premises and leave the Company premises,
 - b) Fulfill instructions of the Security Service regarding management of pedestrian and vehicle traffic on the Company premises, including giving consent to relevant controls and tests,
 - c) Not to bring into (by car or individually) or take away any Materials without required documents, proper registration and observing prohibitions concerning bringing in Materials specified in § 5 section 6,
 - d) Have protective equipment required on the premises of the Company and defined in § 3 section 1 letter f.
 - e) **Apply general principles of internal company traffic:**
 - ✓ Unconditional observance of traffic regulations, regulations governed by the road signs on the Company premises and provisions hereof,
 - ✓ Observance of getting to the target by shortest possible way, according to instructions of Security Service employees, exclusively to places related with formalities and documentation process and Material movement;
 - ✓ All vehicles moving within the premises must be technically fit i.e. have current technical tests. The owner of the vehicle or the driver is responsible for ensuring safe technical condition of the vehicle.
 - ✓ Speed limit to 50 km/h for cars/ motorcycles and to 30km/h for trucks,
 - ✓ Obligations to use dipped beam and high beam headlights throughout the year,
 - ✓ Unconditional restriction concerning parking in places other than indicated,
 - ✓ Unconditional restriction concerning driving unauthorized vehicles inside production bays;
 - ✓ No pictures or films with any recording equipment, in particular cameras or video cameras,
 - ✓ Others, as required in particular period or by the Security Service.
 - f) **Apply general principles for persons driving vehicles:**
 - ✓ While entering the Company premises Traffic Participants who deliver or collect Materials (except for those heading for administration buildings or section of acceptance by the technical warehouse) should be absolutely equipped with:
 - Protective helmet, Kask ochronny,
 - Protective shoes, Obuwie ochronne,

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- Fluorescent jacket/ vest

NOTE: Security Service has the right to control whether the Traffic Participant has the aforementioned equipment, and if they do not have it, the guards may deny their admittance to the Company premises.

- ✓ Should it be required by relevant safety regulations, they should also have:
 - Working clothes,
 - Individual protection clothes, in particular glasses and ear plugs;
- ✓ In production bays and department yards where works are conducted, drivers should:
 - Wear protective helmet,
 - Wear protective clothes and shoes,
 - Use individual protection equipment,
 - Fulfil instructions given by the Company employees who are responsible for loading/ unloading, conducted works
 - Observe regulations concerning permitted speed limit in production bays- 5km/h,
- ✓ In production bays and department yards the following activities are prohibited:
 - Staying on the truck platform during loading,
 - Staying in the car during loading,
 - Moving alone on the area of the production bay,

NOTE!

The driver during loading/ unloading must be beyond the danger zone.

The operator of transporting equipment (cranes, lifting trucks) has an obligation to make the driver leave the car and stay beyond the danger zone.

- ✓ The driver is responsible for proper fixing and protecting Material and vehicle to prevent any relocation of the Material during transportation.

2. The Security Service is authorized and obliged to, among others :
- manage pedestrian and vehicle traffic within Company premises in compliance with Traffic Instruction provisions,
 - exercise due diligence in observing principles of entering/ leaving the premises of the Company by all and any Traffic Participants,
 - check identity of Traffic Participants,
 - control of all and any documents authorizing to enter/ bring in or exit/ take out and to stay on the premises of the company, including also issuing and registering single-entry passes, confirming phone authorization of appropriate person to enter Company premises and making sure each pass is returned,
 - checking persons with breathalyzer in case of justified suspicion that the person is under the influence of alcohol,
 - reacting to any violations of Traffic Instruction principles by Traffic Participants,
 - control of carried or transported items,
 - protect against crossing of the control point by persons attempting to bring into the Company premises alcohol, weapon and other hazardous materials defined in detail in §5 section 6, and in case the documents presented at the point of entry raise concerns as to their authenticity, are not in compliance with formal requirements, or were issued for another person, vehicle or Material
 - refuse entry to the Company premises to people without documents authorizing to enter/deliver/stay on the Company premises.
 - keep records of Traffic Participants (in form of the register), who obtained entry to the Company premises on the basis of single-entry pass or who entered without necessity of passes on the basis of ID work cards and respective authorizations of External Inspection Institutions,
 - the register, mentioned in point j above should be maintained in an electronic form and contain at least the following information: date of entry into the company Premises, name and surname of the Traffic Participant, number and series of ID/ work ID card, name of External Inspection Institution, purpose of entry into the Company Premises.
 - Security Service archives the register, defined in point j above, for the period of six months upon the lapse of the period indicated in § 4 section 5 letter e, and afterwards destroys it.
 - keep and give keys to office rooms and place this information in the key register.
 - provide necessary information and explanation to the external companies related to the place of delivery or collection of Materials from the Company Premises,
 - notifying respective rescue teams or law enforcement agencies (including operation of emergency phone) in each justified case, at the request of Company employees or at its own initiative,
 - control of external companies in terms of individual protection equipment,
 - undertake any interventions requested by Safety service or employees from other departments which refer to violations of the provisions hereof by the Traffic Participants.
 - exercise due diligence in taking care for the property of the Company, reporting noticed acts of vandalism or of property damage to the manager of the organizational office (noting down any accidents/ car crashes, body injuries or property damage as well as other incidents e.g. attempts to enter the Company premises under the influence of alcohol, attempts of theft etc.),
 - distribute an information leaflet which contains rules to be obeyed on the premises to the persons entering the Company for the first time
 - inform about the prohibition to bring items that are not allowed on the premises and necessity to leave them in deposit;
 - control correctness (also time of the stay) and stay confirmation, and in case of any irregularities, confirmation of staying on the single-entry pass,
 - in case of any justified need, stop the Traffic Participants passing the control points in order to explain document or material discrepancies.

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§4. Documents authorizing people to enter and stay at the premises of CMC are and principles for issuing and invalidating thereof

1. Documents authorizing people to enter and stay at the premises of CMC in the area of pedestrian traffic include:
 - a) electronic permanent pass in the form of a magnetic card legic,
 - b) temporary pass- for individuals (green),
 - c) electronic temporary pass with the notice VISITOR with blue stripe,
 - d) permanent pass issued to internal entities with registered seat located on the Company premises, authorizing to enter the Company premises,
 - e) single-entry personal pass,
 - f) single-entry personal pass for members of group tours,
 - g) new hire orientation checklist,
 - h) work ID card of representatives from external inspection Institutions accompanied by relevant authorization to control/ search warrant etc.
2. Documents authorizing people to enter and stay at the premises of CMC in the area of vehicle traffic include:
 - a) electronic permanent pass in the form of a magnetic card legic with blue stripe
 - b) temporary pass- vehicle (yellow);
: cars owned by the Company enter and leave the Company premises on the basis of the driver's pass (irrespective of blue stripe on the employee's pass).
3. Types of passes, discussed in section 1-2 above:
 - 1) **Electronic permanent passes** are issued in the form of legic magnetic cards used within TKS, are issued to:
 - a) Company employees by the Personnel Department,
 - b) External Companies and Entities- their employees or people completing tasks mandated by them- if the Management Board decides such passes are necessary for the aforementioned Companies or Entities.
Details concerning visual form of magnetic cards, data included, principles concerning their issue and their adoption by employers as well as consequences concerning their loss or damage are specified by a separate Instruction concerning Work Time Keeping System.
Financial conditions of using legic magnetic cards by external Companies or Entities and costs of preparing cards or TKS reports by the Company for their benefit shall be each time settled between the Company and those Companies or Entities in separate contracts.
 - 2) **Temporary pass- for individuals:**
 - a) issued by the Manager of Personnel Department for:
 - ✓ students having workshops, professional practice or hands-on training within the Company premises – following written application of the organizer ,
 - ✓ Company pensioners and retired employees, who perform some functions in trade unions- following written application of those organizations,
 - ✓ Employees providing services for the Company under civil law agreements; employees of External Companies and Entities working within the premises of the Company- at the written request of the respective Company, confirmed by the Manager of the organization unit mandating works to this Company as well as employees of External Entities if those entities failed to issue own permanent passes.
 - b) issued for the period not longer than 12 months, and possible extension period,
 - c) does not include the holder's photo, and they are valid when accompanied by personal ID card, school ID card, or student ID card ;
 - d) has to be registered according to the time of issue and is confirmed by the person who collects it;
 - e) is valid until the date indicated therein or until it is cancelled pursuant to rules stipulated in § 5 section 9 below.
 - f) Specimen of temporary pass constitutes ***attachment no. 1 hereto.***
 - 3) **Electronic temporary pass with the notice VISITOR with blue stripe:**
 - a) Issued by the HR Department at the request of the Personal Director to the guests of the Company, at the request of the employee who invites the guest,
 - b) Employee of the Company, at whose request the pass was issued, is responsible for the aforementioned people as regards their compliance with the company trade secret, taking photos or making films with the use of recording equipment such as cameras or video cameras,
 - c) authorizes the Guests to enter the Company Premises,
 - d) the Visitor with temporary electronic pass with the notice VISITOR is obliged to register the time of entrance and exit from the Company Premises on the TKS readers,
 - 4) **Permanent passes for individuals :**
 - a) **are issued by the External Entities.**
 - b) are for employees of those entities within the period of employment. Upon confirmation of the scope and identity of particular person in the External Entity, Company HR Department confirms the validity of the passes with the Company business stamp,
 - c) External Entities are obliged to place the logo or its name on the pass,
 - d) External Entities keep records of permanent passes for individuals.
 - e) authorize to move to/ from the place exclusively by following the road that is pursuant to right-of-way they are entitled to or pursuant to conditions stipulated in the contract with the Company.
 - 5) **Single-entry personal pass:**
 - a) is issued by the pass office employee of the Security Service to the Traffic Participant if there are grounds for the issuance as indicated in point b below,
 - b) grounds for issuance of the single-entry personal pass:
 - ✓ document authorizing to deliver/ collect Materials to/ from the Company premises;
 - ✓ reporting the necessity to enter the Company Premises in order to arrange things related to activity of PUTEX Sp. z o.o. or trade unions- upon prior phone confirmation by the persons entitled to confirm on behalf of those companies. Company submits the list of persons entitled to the Security Service.

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- ✓ present business trip of the External Company and personal identity card or other identity document-confirmed by the phone by the person they are getting to;
 - ✓ disposition of the Director of the organizational unit of the Company, however it is necessary to determine the person responsible for that person from their entrance to the Company premises till they leave the company;
 - ✓ phone confirmation of the invitation of the visitor (who do not have an electronic pass). The employee should inform his/ her direct supervisor each time the visitor is invited to the Company (it does not refer to Directors and Members of Management Board).
 - ✓ phone confirmation of the invitation of the visitor to the External Entity (who do not have an electronic pass). Security Service receives confirmation each time from persons authorized by the External Entities and the Company submits the list of those persons to the security Service.
 - ✓ statements submitted by the employee of the Company, External Company of Entity concerning lack of the permanent or temporary pass because it was forgotten or lost. However the Security Service should inform about this fact employee's direct supervisor by the phone and obtain consent to admit that person to Company premises,
- c) is issued in two copies and should contain following information: time of entry and exit (return of the pass), name, surname and position title of the employee and organizational unit (name and surname of the person who gave consent to the entry);
- d) must be confirmed by the employee of the organizational unit the person/ employee intends to go and then returned to the Security Service employee who gives it back to the Manager of the shift together with its copy,
- e) Security Service destroys the passes after 90 days of its issuing.
- f) specimen of the single-entry personal pass constitutes **attachment no. 2 hereto**.

In case of any doubts concerning the possibility to allow the persons to enter the Company Premises, each time the final decision is made by the HR Office Manager.

Should the Manager of HR Office be absent or it is just past four o'clock, the decision is made by the Director/ Manager/ Chief foreman of the Department/ Office the person is intending to visit.

6) Single-entry personal pass for members of group tours:

- a) single entry to the Company premises for group tours is permitted on the basis of application of tour organizer approved by the President of the Management Board/ Member of the Management Board;
- b) the application should contain the list of tour participants (by surname) and statement on personal accident insurance (or copy of insurance policy) that covers all tour participants;
- c) staying of tours on the Company premises is permitted only when accompanied by the guardian-guide appointed by the Company, within the defined deadline;
- d) tour guide, from the Company, is obliged to provide the tour participants with safety training and inform the participants about the requirement concerning leaving at deposit items which cannot be brought to the premises. The participant should also be instructed to stay calm, keep increased vigilance, observe instructions and not to move away from the group;
- e) Single-entry passes for group trip members are registered according to the sequence of issue, and are signed by the person collecting the passes.

7) New hire orientation checklist

New hire orientation checklist is issued by HR Office with reference to employment contract authorizes its holder to enter the Company premises for 3 consecutive days, of the date of its issuance in order to proceed with the employment procedure.

8) Work ID card of representatives from external inspection Institutions

In case of persons conducting external inspections who enter the Company premises on the basis of work ID cards, Security Service employees may allow for their entrance upon checking their ID cards, relevant authorizations for inspections and notifying the Director/ Manager of the organizational unit the inspection is to be conducted.

The persons who are going to inspect the Company are collected by the employee of organizational unit designated by the Director/ Manager or personally by the Director/ Manager of that unit.

9) Electronic permanent pass in the form of a magnetic card with blue stripe:

- a) is issued in the form of magnetic card legic which functions within the electronic Work Time Keeping System and entitles the holder to enter/ leave and move within the premises in a private car or motorcycle.
The motorcycle means a motor vehicle equipped with diesel engine with cubic capacity exceeding 125 cm³, two-wheeled or with sidecar – three-wheeled: the definition also refers to three-wheeled vehicle with symmetric wheel position. The pass does not authorize to enter/ leave and move within the premises in a car or vehicle of any other type e.g. truck, delivery van etc.
- b) is issued to employees on the positions of directors and managers as well as to employees, at their Director/ Manager's request, who due to their duties or work character, taking care of the Company interest, should move within the Company premises fairly fast,
- c) at each time it is issued pursuant to Personal Director's decision and granted to the organizational unit within its determined limit,
- d) it is also issued to some employees of External Entities and companies, which use electronic permanent personal passes, at the written request of those Entities or Companies approved by the Personal Director,
- e) specimen of electronic permanent pass constitutes **attachment no.3 to the Traffic Instruction**.

Each employee who obtained the right to enter and move within the Company premises in a private car or motorcycle is obliged to sign a proper statement in the HR Office. **The specimen thereof constitutes attachment no. 4 to this Traffic Instruction. The employee shall update such statement each time he changes means of transportation in comparison to the last statement.**

10) Temporary pass- vehicle (yellow)

- a) Temporary vehicle pass is issued by the Manager of HR Office for:
 - ✓ company cars of the External Entities with registered seat on the premises of the Company. The company car shall mean any vehicle registered as the company property, with a respective note in the registration document- upon the written application of those Entities;

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- ✓ Private cars and motorcycles of management board members and management Staff of the External Entities- upon their written application;
- ✓ company and technological cars of External Companies which deliver Materials or perform works (works and services) on the Company premises and to its benefit- upon written application submitted by the External Company accompanied with approval of the Director/ Manager of the organizational unit mandating this delivery/ service on the premises of the Company;
- ✓ company cars of Poczta Polska and courier companies delivering parcels to the Company, their employees and in justified cases External Entities and Companies- upon a written application of those companies,
- ✓ temporary vehicle passes are issued for the period not longer than 12 months with possibility of its extension;

b) the specimen of the temporary vehicle pass constitutes **an attachment no. 5 hereto**.

Passes for two-wheel vehicles (except for motorcycles) to enter Company Premises are not required.

- 11) In justified cases, **single-entry personal pass** may be issued by Security Service employee with handwritten note that the person is moving within the Company Premises in a private car. The aforementioned permission for single entry in a private car is issued in justified cases each time upon approval of the HR Office Manager. Should the Manager of HR Office be absent or it is just past four o'clock, the decision is made by the Director/ Manager/ Chief foreman of the Department/ Office the driver is intending to visit after 4p.m.
- 12) In case of loss of any aforementioned documents authorizing to enter and stay within the Company Premises, the person who held such document is obliged to immediately inform the unit issuing the document by submitting a written statement informing about loss as well as explain the reason and circumstances of the loss. On the basis of the statement and after completion of inspection activities, the unit issues (invalidating the previous pass in the computer system) another electronic pass (detailed rules are defined in TKS Instruction) or duplicate of documents issued in a written form. Until another electronic pass or duplicate is issued, the person who lost the document may stay within the Company Premises exclusively on the basis of single-entry pass effective as of the day of its issuing.

§5. Principles of pedestrian and vehicle traffic on the Company Premises

1. Pedestrian and vehicle traffic is operated 24/7 through the following control points- guards: PS1,PS2,PS3,PS6,PS7,PS8,PS9, PS10;
2. The Security Service employee has the right to request any person passing the point to:
 - 1) present documents authorizing them to enter/ bring in, stay and leave/ take out items from and to the Company Premises;
 - 2) present documents proving their identity;
 - 3) present personal, baggage and cargo space of the car/ truck and any carried items/ cargo;
 - 4) to have a breathalyzer test.
3. Security Service is obliged to respect personal rights of people being controlled when performing their duties.
4. People crossing the control points and staying within the Company premises are obliged to:
 - 1) behave in a manner allowing to perform control procedures;
 - 2) present, without request, proper documents authorizing their entry to the premises
 - 3) comply with the instructions of the Security Service related to the request to show items or cargo or have breathalyzer test conducted.
5. Security Service employee is authorized to confirm personally, the identity of the person intending to enter the premises on the basis of the documents immediately presented and handed to his hands. Failure to fulfill this obligation shall be deemed an attempt to cross the control point without proper authorization.
6. It is absolutely forbidden to possess, bring or deliver to the Company premises the following items:
 - 1) alcohol;
 - 2) arms, weapon and objects used to overpower or injure people, including chemicals, electroshock weapon or other source of power, and cold weapon;
 - 3) explosives or any other materials of military origin even without explosive materials;
 - 4) other hazardous materials, substances, objects which may be dangerous to people's health or life, especially, but not limited to hazardous substances set forth in the Minister of Health Regulation of 28 September 2005 on the list of hazardous substances, including their classification and marking, as well as hazardous waste included in regulations to the Act of 27 April 2001 on waste, with the exception to those mentioned in Point 7 below, police and law enforcement agencies.
7. Prohibition stipulated in section 6 point 2-4 point does not apply to people, who carry weapon or explosives on the basis of agreements concluded with the Company or detailed permit granted by the Company, and they hold authorizations to carry out activities or perform services requiring the use of arms, weapon, explosives or other hazardous materials.
8. People entering the Premises of the Company who possess items which are not accompanied by relevant documentation to be brought in or items which are forbidden on the Premises are obliged to leave them at the deposit of the Security Service Manager, upon the confirmation of the transfer. The aforementioned items are returned at the exit upon acknowledgment in the deposit register (for items left before entering the Premises). To bring in items- not materials (e.g. projector, printer etc.) for which the person carrying them does not have required documents, it is necessary to obtain a written consent of the manager of organizational unit the employee works in.
9. The Security Service employee holds people, and the HR Office Manager, or any person authorized by him, invalidates documents authorizing to enter/exit/deliver/stay on the Company premises, hold by people, who were caught on the company premises, Company control points, in the following circumstances:
 - 1) In case of an attempt to bring in alcohol, possess alcohol on the Company premises, or attempt to enter the Premises under the influence of alcohol or in the state of insobriety;
 - 2) drinking alcoholic drinks within the Company premises and staying within the Company premises under the influence of alcohol or in a state of sobriety;

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- 3) attempt to bring in to the Company premises, possessing on the Company premises any materials not having the required documents ;
 - 4) attempt to enter the Company Premises without holding valid authorization documents or documents issued for other person/ vehicle;
 - 5) Non-compliance with the orders of the Security and Company Safety Dept.
 - 6) when using their documents permitting entry to the Company premises in a manner causing violation to the provisions of this Traffic Instruction, in particular, when staying within the premises in places not allowed for entrance;
10. The person, who has been caught in circumstances described in point 9 above, is entered on the list of people holding invalidated pass, kept by the HR Office, and must not enter the Company premises for the period of one year following the date of violation, unless there are other circumstances as stipulated in point 13 below. The holder of invalidated pass is allowed to apply for new pass upon the expiry of the period of 12 months following the violation, unless there are other circumstances as stipulated in point 13 below.
11. **People entering and staying within the Company premises are obliged to be absolutely sober.**
- 1) In case of suspicion that a person is under the influence of alcohol, the employees of Security Service are obliged to conduct breathalyzer test to measure alcohol content in exhaled air;
 - 2) If the aforementioned test reveals the alcohol content below 0,1 mg/l in exhaled air, then the person being tested will have their rights to enter the Company withdrawn for the period of 12 months of the date of the incident;
 - 3) If the breathalyzer test reveals the alcohol content above 0,1 mg/l in the exhaled air, the Company reserves the right to prohibit the right to enter the Premises for the person breaching sobriety obligation for an indefinite period of time and impose pecuniary penalty in the amount of PLN **5 000 PLN** (five thousand zloty), for each breach of sobriety obligation by an employee, External Company or Entity, who attempted to enter the Company Premises or stayed on the Premises under the influence of alcohol;
 - 4) Personal Director of the Company, in consultation with the Management Board, decides about the amount of penalty imposed on the External Company or Entity at the request of HR Manager
 - 5) In respect with other violations of the Traffic Instruction, Personal Director, having consulted with the Management Board, may decide as follows:
 - to impose pecuniary penalties in the amount from PLN 500 to PLN 5000;
 - to impose a ban to enter the Company Premises from one (1) month to twelve (12) months.
 - 6) The penalties discussed in point 4 and 5 above may be imposed on Company Employees with consideration of provisions of the Labor Code.
12. The provisions of section 11 shall apply as appropriate in case of the person staying on the Company Premises under the influence of intoxicating or psychotropic substances etc.
13. In case of violations which resulted in prohibition of movement within the Company premises, only a written application of the head of the department the punished employee works in, justified with extraordinary circumstances, may constitute grounds for reissuance of document authorizing to cross the control point. The decision in relation to this issue is made by the Personal Director in consultation with the Management Board of the Company.
14. Pedestrians moving within the Company Premises are obliged to move exclusively along mapped out routes on the premises and inside particular departments. The following activities are prohibited, in particular:
- 1) jaywalking the street or railway crossing ;
 - 2) moving under overhead weights;
 - 3) moving alone within the premises of the Company if they are visitors;

§6. Liability

1. The person who violates the provisions of the Traffic Instruction is liable therefor personally. However, in case the person who violates the provisions obtained documents authorizing to enter the Premises upon the request of the External Entity or Company, the External Entity or Company and the person who violates the provisions hereof shall be jointly and severally liable for the violation, including the penalties imposed on them.
2. The Traffic Participants, within the meaning of Art. 392 of the Civil Code, release the Company from the obligation to make any performance in favor of third parties, including their employees, subcontractors, suppliers if such performance is related to performance, non-performance or improper performance hereof by the Traffic Participant, including in particular any compensation for damage or destruction of third party property, death or body injury, violation of law regulations, violation of intellectual property of third parties etc.

PART II

Instruction concerning rules of material movement

§7. Documents authorizing to take away materials from the Company Premises

1. Documents authorizing to take away Materials from the Company Premises are issued by the following organizational units:
 - 1) Security Service- with reference to material passes MT – foreign materials
 - 2) Material Management Chief Specialist- with respect to Materials indicated for sale, optional and post-liquidation materials and equipment - value components of fixed assets, disposal of materials for recycling, and regeneration, return of materials to the supplier (delivery not compliant with the order or claim), for returnable packaging, firewood and non-ferrous scrap metals, their alloys, alloy steel scrap, partly used cleaning cloth and used oil from production departments and machines for maintenance, materials designated for processing, scrap from graphite electrodes,
 - 3) Finished Goods Warehouse and Shipment Manager for dispatching (by rail or truck) finished goods, semi-finished goods and II class goods- clippings,
 - 4) Melt Shop Department for furnace dust and scale (Production and Maintenance Coordinator, CO₂ Specialist),
 - 5) Rolling Mill Department for scale from rolling mill warehouse (Administration Chief Specialist).
 - 6) Documents authorizing for taking the material away, i.e.

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- Specimen of material pass MT- **constitutes attachment no. 6** hereto;
- Specimen of Delivery note- **constitutes attachment no. 7** hereto ;
- Specimen of goods issue doc- **constitutes attachment no. 8** hereto;

§8. Principles governing organization of finished goods and semi-finished goods transportation (sale of Company Materials)

1. Movement of finished goods and semi-finished goods (except for reinforcement constructions) intended for sale proceeds as follows:

- 1) The Recipient of the goods (carrier), who holds the loading number after entering the Company Premises through PS2, goes into the scale near this guard and is directed by the Security Service employee in order to set the weight of the truck- in case of billets loading (KN semi-finished goods).
- 2) In case of finished goods, after the Security Service checks if the driver has protective clothing, hard hat, glasses as pursuant to §3 section 1 letter f and giving a magnetic card, the driver drives on the Buffer Car Park, where the truck is weighed in the presence of the Security service employee and parks the truck.
- 3) The driver collecting the finished goods, receives access map from the scale operator and a Magnetic Card from the Security Service employee. In case of billets, the driver receives a scale ticket and Picking List and goes directly to the Melt Shop in accordance with the map. The Map- "Loading Plan" constitutes **Attachment no. 9** hereto.
- 4) Entrance onto the Buffer Car Park is possible upon the opening the gate by means of the Magnetic Card,
- 5) On entering the Buffer Car Park, the driver goes to the scale operator post (pursuant to the instruction of Security Service employee) in order to verify his personal data entered to the SAP system on the basis of notification from Road Transportation Office or Back Office. The driver has an obligation to present his ID card and license plate documents- truck-tractor and trailer. Having verified the data, the driver receives Picking List which authorizes him to load specific goods in the warehouse;
- 6) Entrance for loading on the Warehouse from the Buffer Car Park proceeds in compliance with the information displayed on the screen i.e. order, particular product mix, free loading place in the Warehouse marked on the map. The drivers who collect the Material in the amount of 6 tons (additional loadings, small recipients) are loaded out of turn and enter after display of the information on the screen which contains license plate number,
- 7) In case of export sale, after loading of the Materials, the driver leaves the Warehouse pursuant to marked communication route and goes to the Office of FG Warehouse to collect CMR, and in case of domestic sale goes directly to the scale near PS2 for control of weighing and clearing of the cargo.
- 8) After control weighing on PS2 and clearing, the driver with his own signature acknowledges the receipt of the Material on the Delivery Note, the copy of which is kept in archives of the Company. Then the driver returns the Magnetic Card, scale ticket and Picking List to the Security Service,
- 9) In case of a considerable weight difference than provided for by the applicable tolerances, the truck is turned back and directed to the FG warehouse to check loading compliance.
Permissible weight differences- weight tolerances- between Delivery Note and control weight amount to -100kg +260kg of net mass weighed in railway transport and -60kg +150kg in road transport. It refers to materials which do not have bar codes such as billets, angles, straightened wire rod and materials that were produced before bar code system implementation. In case of finished goods with bar codes, the weight differences of net weighed mass amount to -200kg +300kg for railway and road transport. In case of bigger weight difference, deliveries are inspected by the Shift Foreman. After checking the compliance with bar codes and writing down the information on the Delivery Note, Material leaves with the weight accordant with bar codes.

2. Movement of finished goods for sale- reinforcement constructions

- 1) The recipient of goods (carrier) enters the Company Premises through PS2 on the basis of personal authorization sent from the fabshop and then goes to the scale operator post to verify his personal data entered to the SAP system,
- 2) Security Service checks the driver and the vehicle as pursuant to §3 section 2 letter above,
- 3) The recipient of the goods (carrier) goes onto the scale as directed by the Security Service employee to determine the weight of the vehicle, receives a scale ticket and goes to the fabshop to load Materials,
- 4) After loading the Recipient receives: Delivery Note, Declaration of compliance and DW document for scale,
- 5) The Recipient (carrier) acknowledges the receipt of the Material from the fabshop warehouse with his personal signature on the Delivery Note and Declaration of Compliance,
- 6) After loading, the driver leaves the Fabshop Warehouse in compliance with indicated route and goes directly to the scale near PS2 for control weighing and cargo clearing,
- 7) In case of a weight difference exceeding the tolerances specified in the DW document, the Security Service employee directs the truck to the Fabshop warehouse to explain the difference,
- 8) After confirmation of the compliance of the cargo with a DW document on the Warehouse by the foreman, the truck can leave the company Premises through PS2,
- 9) The documents set forth in point 4 above are taken from the driver by the Security Service when leaving the Company and then submitted to the employee operating a scale on a given guard.

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- 10) As an exception, in case of the SAP system failure it is possible to take out the Material- reinforcement constructions on the basis of manually generated document „GID” by authorized employees, upon the approval of the Fabrication Director or Financial Director.
- 11) The specimen of DW constitutes **attachment no. 10 hereto**.

§9. Principles governing organization of the disposal of waste from production processes finished goods and semi-finished goods transportation

1. Movement of waste from graphite electrodes:

- 1) The Recipient of waste from graphite electrodes who holds a loading number, when entering the Company through PS2 goes onto the scale as directed by the Security Service employee to determine the weight of the vehicle,
- 2) Security Service checks the driver and the vehicle as pursuant to §3 section 2 letter above,
- 3) The driver receives a scale ticket issued by the scale operators on PS2 and goes to the Melt shop for loading,
- 4) After loading the driver goes back to the scale for another weighing, then he receives a scale ticket and Picking List and goes to the Technical Warehouse where he collects Delivery Note generated from SAP system.
- 5) Upon the receipt of the Delivery Note, the driver leave the Company Premises through PS2.

2. Dust movement:

- 1) The Recipient of dust from the Melt Shop before entering the Company Premises goes onto the scale to verify his personal information and information concerning the vehicle,
- 2) The Recipient of dust (determined by P33- Environment Protection Office) who holds a loading number, after entering the Company through PS2 goes onto the scale as directed by the Security Service employee to determine the weight of the vehicle,
- 3) The Recipient of the dust receives a scale ticket (3 copies) issued by the scale operators at PS2 and goes to the Melt shop for loading,
- 4) After loading at the Melt Shop (Dedusting station) and receipt of manually generated document GID (5 copies), the Recipient of duct goes onto the scale at PS2 for another weighing,
- 5) After weighing the Recipient of dust leaves three copies of GID and scale tickets (3 copies) and leaves the company Premises.

3. Scale movement:

- 1) The Recipient/ scale Carrier who holds a loading number, after entering the Company through PS2 goes onto the scale as directed by the Security Service employee to determine the weight of the vehicle,
- 2) Security Service checks the driver and the vehicle as pursuant to §3 section 2 letter above,
- 3) The Recipient/ Carrier receives a scale ticket and a Picking List issued by the scale operators on PS2 and goes to the Rolling Mill/ Melt Shop for loading,
- 4) After loading the Recipient/ Carrier goes onto the scale at PS2 for another weighing and then receives a scale ticket and Delivery Note and leaves the Company Premises through PS2.

§10. Principles governing organization of the disposal of other waste:

1. Disposal of waste which belongs to the Company, other than specified in §9 above, is conducted by PS2.
2. The document which confirms the disposal of waste is delivery note generated from SAP or GID approved by authorized persons, issued for each type of waste.
3. Security Service is obliged to check the compliance of information on the waste transfer note with the Material being taken out.
4. External Companies generating their own waste on the Company Premises within the scope of services rendered for the Company, may dispose the waste from the Company Premises on the basis of required waste transportation documents and relevant environment protection regulations and upon confirmation by the Investment Department or any other competent Company department of the ownership title to the Material and the confirmation should be submitted to the Security Service.
5. External Entities generating their own waste on the Company Premises within the scope of services rendered for the Company, may dispose the waste from the Company Premises on the basis of required waste transportation documents and relevant environment protection regulations and upon confirmation by the authorized persons, specified in §5 section 4 letter that the waste belongs to the Entity or its contractor. The Confirmation should be submitted to the Security Service.
6. The disposal of the municipal waste from the Company Premises is conducted by specialist companies pursuant to agreements on providing services.

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§11. Principles of bringing in and taking away materials from and to the Company Premises.

1. When bringing in materials to the premises Security Service employee is obliged to check the compliance of goods with the specification and direct the goods to the Warehouses, however:
 - 1) In case if material weight is not the basis for settlement, the means of transport is not weighed on the scale at the particular guard,
 - 2) If it is necessary to specify the documentation of the material delivery, the employee of warehouse/ section of acceptance may direct the vehicle to the scale in case if material weight is not the basis for settlement.
2. The Security Service is obliged to issue a material pass MP at each delivery of materials which are to be used for services performance.
3. It is not allowed to bring in to the Company materials used by External or Unknown Entities for servicing the Company only on the basis supplier's specification, without issuing material pass MP. Material Pass, together with the attachment (invoice, delivery specification, delivery note, bill of lading, external GID etc.) must contain information such as: purpose of bringing in materials and place of destination (mark of the organizational unit of the Company or name of the External Entity or any other).

When checking the departure of goods, the Security Guard is obliged to control whether the delivery document is confirmed by the warehouse and whether no material property of the Company is taken out.

§12. Principles for transportation of materials constituting the property of External Companies and Entities.

1. External Companies, having their seat outside the Company, and performing services within the Company premises, are allowed to bring and take away only the materials required for performing duties ordered by the Company on the basis of material pass "MP". The pass "MP" must be issued on the basis of the contractor material management evidence /"Wz"/ other own material management evidence or collective list of materials. A copy of such evidence or list should accompany the copy of the pass. It is forbidden for these companies to produce goods within the area of the Company using their own materials and exporting the goods outside the Company premises.
2. External Entities having seat within the Company premises are allowed to bring in and take away materials belonging to them, on the basis of material pass MP, which are issued on the basis of documents allowed to be used in the material management evidence of the said Entity, issued by authorized employees of these Entities. A copy of an evidence of material management (circulation) should be attached to the copy of the pass.
3. In order to guarantee the proper material circulation (management), Entities having the seat within the area of the Company, should allow access to their own instructions or other normative acts which regulate material management, and circular of signature of people authorized to sign documents of material management evidence, to the following organizational units of the Company: BO and Security Service.
4. A copy of the "MP" material pass together with a copy of material management evidence is kept by the Security Guards for the period of 5 years and upon the lapse of the aforementioned period the documents are destroyed after consultation with the BO employee responsible for Company Archives.

§ 13. Sending Materials for repairs, overhauls and replacement beyond the Company Premises

1. The entity (carrier/ recipient) who comes to collect Material indicated for repair/ overhaul/ replacement pursuant to Company's order, collects the Material on particular department and then is directed to the warehouse to collect documents.
2. If the Material indicated for repair/ overhaul/ replacement pursuant to Company's order is located on the warehouse – the recipient goes directly to the Warehouse.
3. The Warehouse issues in SAP a document „Delivery Note“, which must correspond with the number of order and must be signed by an authorized employee; Delivery Note is issued in four copies and:
 - one copy remains on the Warehouse (first),
 - the driver, who collects the Material, receives two copies (second and third),
 - one is sent to the department (fourth).
4. At the control point, the Security Service verifies the documents with quantity and type of Material taken by the recipient and leaves one copy of the Delivery Note for the Security Service for control purposes, acknowledges the document with the signature and stamp and keeps it till the Material comes back to the Company.
5. The Delivery Note may not include the number of the order only in case emergency repair of the Material is necessary. The emergency denotes the situation when the Material must be taken away for repair outside regular working hours of administration employees and days other than business day. Such document must be signed by the Master, Manager or Maintenance Chief upon approval of the Director or Deputy Director of the department, who notifies the Security Service of the emergency situation.
6. In exceptional cases, it is possible to take the Material away on the basis of manually issued GID, which is signed by the Master, Manager or Maintenance Chief upon approval of the Director or Deputy Director of the department who notifies the Security Service of lack of possibility to issue the Delivery Note. The emergency transport must be justified, in cases the production continuity is at risk. This procedure is also applied to emergency situations and all required documents must be supplemented immediately (in the forthcoming business hours of administration employees).
7. „Delivery Notes“ are kept in archives by the Security Service in compliance with principles on Company documents archiving.

§ 14. Control of materials taken out from the Company Premises.

1. After confirming the compliance of the Material with the documents authorizing to take away the goods from the Company premises and after confirming proper filling in of the documents as well as the compliance of the driver's surname and number of means of transport with the actual state – Security Service confirms the transport by entering the date, hour and signing the document authorizing the take away the Material and lets the vehicle with the cargo out.

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2. When the quantity and the type of material does not comply with the documents authorizing exit of the materials, the Security Service is obliged to withhold the total cargo until the matter is explained, informing the shift manager about the aforementioned fact.
3. The permission for the exit of withheld goods may be given after all the explanations are satisfied and accepted by the shift manager of Security Service and agreed with the unit issuing the document and after the right document is presented for the cargo in question (with personal stamp of the warehouse employee). The Security Service Manager is obliged to prepare a memo concerning the aforementioned activities.
4. The Security Service employee is forbidden to allow the Material leave the Company in the following cases:
 - 1) the document authorizing to take the materials from the Company Premises has been improperly issued,
 - 2) the content of the document authorizing to take the materials from the Company Premises has been corrected,
 - 3) the document is issued and signed by the person not authorized to do so,
 - 4) the basis for the issue of the document authorizing to take the materials from the Company Premises has not been mentioned,
 - 5) the Material is incompliant with the content of the document authorizing to take the material away from the Company Premises.
5. Should it be difficult for the Security Guard to check the materials leaving the premises due to huge quantities of goods, they are obliged to perform control on the place of loading, and to escort the load until it leaves the Company premises. Respective managers of the departments should notify the Security Guards thereof.

§15 Monitoring and personal data protection

1. The monitoring systems are used on the Premises of the Company to ensure safety and protection of property.
2. The Traffic Participants are informed in advance about the monitored areas by information boards „monitored area/facility” put in visible places and symbols.
3. The company uses the following monitoring systems: Burglary and assault signaling system, Access control system, Supervised television system, Fire signaling system.
4. The records from the aforementioned systems are kept by the Company only for the period necessary for ensuring safety and in conditions that secure them against the access of the unauthorized persons.
5. In order to maintain safe and secure system of personal and material movement on the Company Premises, the Company maintains documentation connected with the pass system which is related to processing personal data of the Traffic Participant to guarantee high security level. The technical and organizational means, in particularly protections against unauthorized access to personal data as well as changes, loss, destruction or damage to personal data, are applied pursuant to the Act on Personal Data Protection.
6. The Traffic Participant, who the disclosed personal data refers to, is entitled to review, update their personal data as well as object to processing of the data and demand to cease processing of the data- pursuant to law regulations- by contacting the Company.
7. The obtained personal data are kept by the Company only for the period necessary for ensuring safety and control of moved Materials i.e. periods indicated herein.

§16 Final provisions

1. Bringing in and taking out business documentation by the Company employee to/ from the Company Premises shall be allowed pursuant to a written authorization of the manager of the unit mandating such material movement.
2. The provisions of this Traffic Instruction shall apply as appropriate to all divisions of the Company within the scope of business of particular divisions in particular locations on the territory of Poland.
3. The directors of departments shall be responsible for supervising the compliance with provisions of the Traffic Instruction, each in his own scope of activity.
4. This Traffic Instruction shall come into effect as of 20 January 2015. As of this date all previous conditions and provisions of current instructions on the pass system, rules of staying on the company premises and rules of material movement implemented by Regulation ZN/11/2008 shall expire.

Attachments:

Attachment no. 1	-Temporary pass for individuals (specimen)
Attachment no. 2	-Single-entry personal pass (specimen)
Attachment no. 3	-Electronic permanent pass with blue stripe (specimen)
Attachment no. 4	-Driver's- employee's statement CMC (specimen)
Attachment no. 5	-Temporary vehicle car (specimen)
Attachment no. 6	-OM document
Attachment no. 7	-Delivery Note
Attachment no. 8	-GID
Attachment no. 9	-map of the Loading Plan
Attachment no. 10	-Document DW

President of the Management Board

Jerzy Kozicz