

Hands Free Policy	Number: HSPP-460-029
	Date of Issue: March 20, 2026
	Effective Date:

Prepared by: Todd Lansie	Supersedes Date:
Approved by:	Approved Date:

1.0 PURPOSE

This standard establishes Domtar Howe Sound site's minimum requirements to prevent hand, finger and body injuries by eliminating exposure to pinch, crush, and line-of-fire hazards. This shall be achieved through:

- The implementation of strict, documented controls when guiding suspended loads, as well as eliminate/reduce severe incidents due to being crushed or struck by the sudden movement of a suspended load.
- The systematic elimination of hands as direct tools wherever reasonably practicable.

2.0 SCOPE

This policy applies to all employees, contractors, supervisors, and managers engaged in maintenance, operations, and facility services activities where:

- Hands or body parts may be exposed to pinch, crush, struck-by, or line-of-fire hazards; and/or
- Loads are lifted, transported, or positioned using cranes, hoists, lift trucks, monorails, or any other lifting or positioning devices.

3.0 DEFINITIONS

- 3.1 **Component/piece that is an integral part of the design AND installed or to be installed on manufacturing equipment** – Components/pieces that are required in the design of equipment to ensure they are used in accordance with Operating and Maintenance criteria established in Original Equipment Manufacturers' manuals, operating data sheets or design plans.
- 3.2 **Ergonomic Lifting with Lifting Equipment**- The action of lifting, lowering and positioning a **≤ 75 lb** load with lifting equipment controlled by a person positioning the suspended load, the goal being to avoid the physical effort of lifting load manually.
- 3.2 **Final adjustment** – The action of positioning a load still suspended by a *lifting device* that is confirmed in stable position both horizontally AND vertically, without any movement, and at <3 inches from its tie off / contact points.
- 3.3 **Guiding Device**- Any device that is used to remotely guide a suspended load without direct hand contact on the *suspended load* and *lifting devices*. Such device is not considered an integral part of the *lifting system*. Guiding devices include: tag line, short or long positioning/guiding pole, guiding handle, guiding straps, C-clamp and

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hand hoist chain. A detailed list of these devices and their applications is attached in Appendix II.

- 3.4 **Heavy Suspended Load-** Any object that weighs ≥ 1 metric ton (≥ 2204 lb) being transported or lifted/lowered using lifting equipment and has not being mechanically fixed or supported.
- 3.5 **Lifting Device-** Any device that is designed to be used directly or indirectly to secure a load to *lifting equipment* and is not an integral part of the *suspended load*, e.g. hook, sling, shackle, jib crane for lift trucks, etc.
- 3.6 **Lifting Equipment-** Any mechanical device with the capacity of lifting or lowering a **suspended load**, including the following: crane, overhead crane, lift truck, manual or electric hoist, monorail hoist, hydraulic crane (tripod) for motors.
- 3.7 **Lifting System-** Assembly consisting of *lifting equipment*, *lifting devices* and a **suspended load**.
- 3.8 **Load to be lifted between 55-75 lb (25-34 kg)** – If load to be manually lifted by an employee weighing between 55-75 lb (25-34 kg) AND there is no lifting equipment/ device existing or available for the job, employee must perform ensure their PJRA includes ergonomic safety factors and controls of the job before starting the lift. Whenever possible, the presence of two (2) persons shall be prioritized when manually lifting such loads.
- 3.9 **Manufacturing equipment** – Equipment that is designed and used throughout the processing chain, from raw materials to finished products.
- 3.10 **Maximum weight for manual lifting** – Maximum weight (part, equipment, object, tool or container [load]) an employee may lift manually is set at 55 lb (25 kg).
- 3.11 **Minimum Safe Distance from a Transported/Lifted Suspended Load** - Minimum distance of 5 ft to be kept at all times between the torso of a person and the suspended load being transported or lifted.
- 3.12 **Moving/positioning >75 lb suspended loads when hand contact is unavoidable** – Where it is IMPOSSIBLE to move/position a suspended load without hand contact on the load, work MUST be stopped and the Job Supervisor immediately notified.
- 3.13 **Suspended Load-** Any object that weighs >75 lb being transported or lifted/lowered using *lifting equipment* and has not been mechanically fixed or supported.
- 3.14 **Lifting Suspended Load-** The action of moving a **suspended load** vertically by lifting or lowering it using *lifting equipment*.
- 3.15 **Positioning Suspended Load** - Precise adjustment operations to position a load at a slow/inch speed using *lifting equipment* and within 5 feet and less from the **suspended load** over a distance of ≤ 24 " horizontally or vertically AND between the

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suspended load and its tie off or contact points.

3.16 **Safe Guiding of Suspended Load** - The action of guiding a suspended load using **guiding devices** without direct hand contact on the **suspended load** or its **lifting devices**.

3.17 **Transporting Suspended Load** - The action of moving a **suspended load** horizontally using **lifting equipment**.

4.0 RESPONSIBILITIES & ADMINISTRATIVE DUTIES

4.1 The Maintenance Manager is responsible for developing, implementing, reviewing and updating this program based on the minimum requirements set forth in this Policy.

4.2 All supervisors and managers are responsible for ensuring that employees and contractors on their sites comply with this Policy.

4.3 It is up to each employee, qualified by training, to guide any suspended load without direct hand contact, in compliance with the general and specific requirements of this Policy. Finally, employees are expected to report any situations that prevent them from complying with the requirements of this Policy to their Immediate Supervisor(s), and to stop work until appropriate control means can be determined.

4.4 It is up to all employees, qualified by training, to not use their hands as a tool directly on manufacturing equipment or any of their components, by complying with the general and specific requirements of this Policy.

4.5 Employees are expected to report to their Immediate Supervisors any situation that prevents them from complying with the requirements of this Policy, and to stop work by applying one of HSP's 7 Stop-Job Triggers until appropriate control means can be determined.

5.0 General Requirements- Suspended Load

5.1 The use of hands is forbidden to handle/guide a **suspended load** and any component of the **lifting system** while load is being **transported** or **positioned** or **lifted** using **lifting equipment**. If impossible, the exception process steps listed in Section 5.7 - Detailed Process must be applied.

5.2 At no time is one to position his body or any body part under a **suspended load**.

5.3 Persons guiding a **suspended load** must use a **guiding device**, i.e. tag line, short or long positioning/guiding pole, guiding handle, guiding straps, C-clamp, hand hoist chain, etc., to keep their bodies and especially their hands/fingers out of any potential pinch point in the line of fire of the **suspended load** movement.

5.4 When **transporting a suspended load**, persons involved in guiding it must ensure the position of their torso remains at the authorized minimum safe distance of 5 ft

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from the suspended load while load is being moved/transported horizontally or vertically to its positioning location.

- 5.5 During the adjustment operations required for *positioning the suspended load*, the person guiding it is authorized to come within 5 ft of the *suspended load*, provided:
- 5.5.1 They comply with the requirements in the definitions of Suspended Load Safe Guiding and Suspended Load Positioning, and do not use their hands to guide the load.
 - 5.5.2 Exception - Final Load Positioning Adjustment
When positioning a load still suspended *to a lifting equipment BUT being confirmed immobilized in the vertical AND horizontal axis without any movement of the lifting equipment*, and within 3 inches and less of its tie off or contact points, it is then authorized to touch with hands the suspended load to finalize the positioning.
- 5.6 During the *ergonomic lifting* of a ≤ 75 lb load with *lifting equipment* that is directly controlled by the person moving and positioning the ≤ 75 lb load, the use of hands is allowed to guide that specific load, subject to the following conditions:
- 5.6.1 During *movement/transportation* of the ≤ 75 lb suspended load, *lifting system* must be in stable position horizontally and vertically, and *lifting devices* must be fully tensioned vertically.
 - 5.6.2 During *positioning* of the ≤ 75 lb suspended load, *if there is hand contact*, hands must be *positioned on the load* so as to never be in a potential line of fire of being pinched between the load and its tie off/contact points or an adjacent structure.
 - 5.6.3 When guiding this type of load, *pinch hazards must be identified and the required safe position of hands (e.g. on top / on the side / on the back of the suspended load, etc.)* must be clearly indicated in the Pre-Job Risk Analysis completed by the person guiding the load and co-signed by a co-worker (co-signature required only when guiding is done outside a Maintenance Shop or Store Room).
- 5.7 The Detailed Process for safely guiding/moving a suspended load without hand contact is the basic reference that explains how to perform all types of guiding and movement of suspended loads, see [appendix](#) .

Exception- Moving/positioning a > 75lb suspended load without the possibility of avoiding hand contact.

Where it is impossible to move/position a *suspended load without hand contact on the load*, it is mandatory to stop work and notify Job Supervisor immediately so he can:

- 5.7.1 Assess the situation and determine if safe guiding of the suspended load cannot be completed without hand contact.
- 5.7.2 If so, the Safe Work Permit for guiding a suspended load with hand contact (appendix III) must be completed by all employees involved, reviewed by the Supervisor, and approved by the Superintendent or Manager.

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- 5.7.3 The person guiding the suspended load being transported/positioned is required to wear approved cut/impact-resistant gloves.
- 5.7.4 Supervisor must be present on the jobsite during the entire movement and/or positioning with hand contact on the suspended load to ensure compliance with all conditions in the Permit for guiding a suspended load with hand contact.

6.0 General Requirements- Hands as a direct tool

- 6.1 **General Guideline:** Before using their hands in direct contact with objects during operation or maintenance jobs, employees shall validate whether a tool preventing direct manual contact designed for the task is available and use it if existing.
- 6.2 **Direct hand contact PROHIBITED:** To avoid any kind of exposure to a high-risk primary or secondary line of fire:
 - hands shall not be used as a direct tool to release, unjam, strike, rotate, push or pull when installing / extracting / moving a component/piece that is an integral part of the design on manufacturing equipment.
 - a. Use of a distancing/grabbing/lifting tool (e.g. hammer, sledgehammer, lever, grip hand-held cup, etc.) is mandatory when performing such jobs.
 - b. Jobs performed directly on manufacturing equipment where the level of risk is higher due to the use of physical effort and potential risks. Various general risks that need to be considered are:
 - Deficient lighting;
 - High ambient heat and noise (harder to communicate or focus);
 - Work in a cold environment (slippery surfaces, frozen equipment, etc.);
 - Tight and cluttered work space;
 - No lifting equipment, grab or grip devices and tools available nearby;
 - Work in a confined space or at heights;
 - c. Considering these elements, general requirements 6.2 and 6.3 are not required for jobs performed on a component/piece that is:
 - In a Shop;
 - Stored in a location designed for that purpose (pallet, shelving);
 - Consideration of general requirement 6.1 is however mandatory.
- 6.3 **Unavoidable use of hands:** If a job cannot be performed without using hands as a direct tool on a component/piece that is an integral part of the design and installed on manufacturing equipment, a *“Safe Work Permit Authorizing Direct Hand Contact with a Component/Piece Installed on Manufacturing Equipment”* must be completed and signed by a Supervisor/Lead hand or designated Manager ([Appendix 3](#)).

The Permit identifies hazards/risks related to potential pinching, sudden release of energy, struck by, striking against, etc. lines of fire for upper limbs. It also allows identification of potential secondary lines of fire while performing a job with hands

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touching equipment, e.g. a part dropping, twisting, getting stuck/unstuck, falling, rotating or slipping. This SWP, in addition to the initially completed 360° PJRA, details situation-specific control means.

6.4 **Exceptions for using hands as a tool:** Requirements 6.2 and 6.3 do not apply for jobs involving direct hand contact:

- a. With Pulp Bales;
- b. With hand tools and powered hand tools (electric/pneumatic);
- c. With bolts or similar materials (e.g. probe, pressure gauge);
- d. With electric/electronic components ≤ 5 lb;
- e. With seals;
- f. With loose cables / clothing components on the pulp machine;
- g. With loose belts;
- h. When opening/closing a process / utility services valve;
- i. When removing from manufacturing equipment a ≤ 5 lb component/piece that is not fixed and is already stable.
- j. Work inside MCC rooms

6.5 **Direct hand contact when lifting/carrying objects:** Requirements 6.2 and 6.3 do not apply in the following situations:

- a. Weights up to a maximum of 55 lb (25 kg) to be lifted manually;
- b. Loads between 55-75 lb (25-34 kg) to be lifted with lifting devices.

7.0 TRAINING

- 7.1 Any employee who is likely to guide suspended parts or is likely to perform operational, facility service, or maintenance jobs that require direct hand contact with equipment, or a process component/part is required to follow initial training on the requirements of this Standard.
- 7.2 Training will consist of the review of the program, permits and tools. Training can be computer based, in the classroom, on the shop floor or a combination there of.
- 7.3 Refresher training may also be deemed necessary if it has been documented that an employee has failed to safely guide/move a suspended load as required by this Standard.
- 7.4 Curriculum for refresher training shall cover the same topics as the initial training.
- 7.5 Training shall be documented and recorded.

8.0 ATTACHMENTS

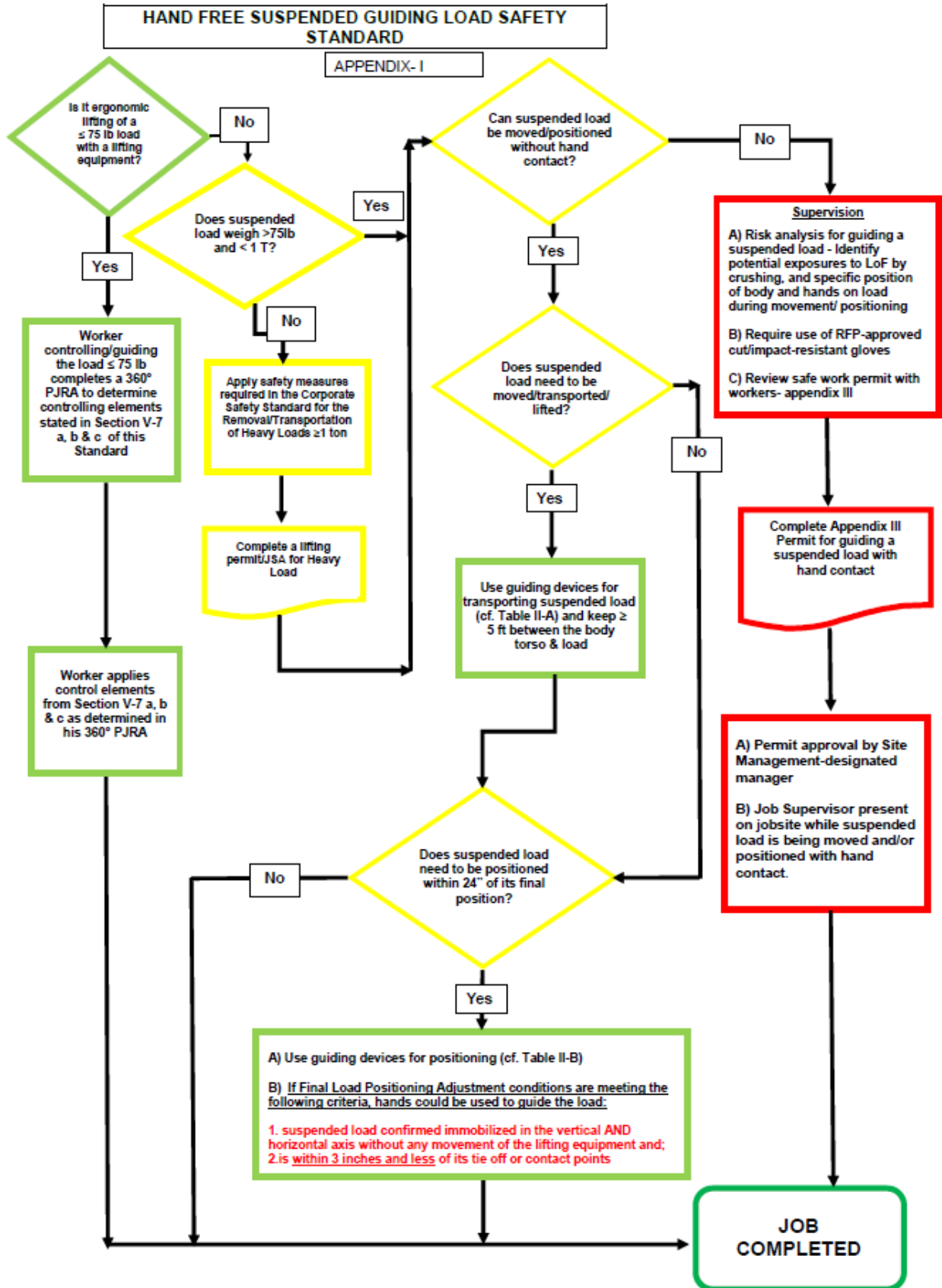
- 8.1 Appendix 1 – Hands Free Suspended Load- Flowchart
- 8.2 Appendix 2 – Safe Work Permit for Guiding a Suspended Load with Hand Contact
- 8.3 Appendix 3 – Using Hands as a Direct Tool- Flowchart
- 8.4 Appendix 4 – Safe Work Permit- Using Hands as a Direct Tool

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APPENDIX I

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APPENDIX II

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Domtar	APPENDIX III – SAFE WORK PERMIT FOR GUIDING A SUSPENDED LOAD WITH HAND CONTACT	REVISION	01

Department: _____	Date: _____
Job or Procedure: _____	
Employee Name: _____	Signature: _____
Employee Name: _____	Signature: _____

Risk Assessor (Supervisor): _____ Signature: _____

Permit Approver (Superintendent/ Manager): _____ Signature: _____

Supervisor must remain on jobsite to ensure hands/body position stays out of any pinch/crush line of fire during the entire time suspended load is being transported/positioned with the lifting device.

Is safe guiding of the suspended load really impossible? (Circle your confirmation)		Yes	No
RISK ASSESSMENT			
1. Assess the size of the suspended load being transported/positioned (estimate)			
Height	Width	Length	Weight (lb)
2. List of equipment used / Inspection / Training			
EQUIPMENT	Check equipment used	CAPACITY Identify lifting capacity	INSPECTION Pre-use inspection completed AND compliant (Check to confirm)
Overhead crane			
Lift truck			
Hand/electric hoist			
Crane			
Monorail hoist			
Other: _____			
3. Risk Control Measures			Compliant/ Completed (Initials)
3.1 Person guiding the suspended load being transported/positioned wears HSP-460-approved cut/ impact-resistant gloves.			
3.2 Lifting system is in stable position horizontally and vertically, and lifting devices are fully tensioned vertically.			
3.3 When transporting/moving the suspended load vertically or horizontally , the body of the person guiding it shall be positioned so as to never be in a potential line of fire of being pinched between the load and adjacent structural elements : a. Body to be positioned on what side of the load being moved: _____ b. Body to be positioned at what level of the load being moved (in the front, middle or back): _____ c. Identify all structures that present a pinch hazard between the body and suspended load during the move: _____ d. Determine the safe distance to be kept between the load and adjacent structures during the move : _____			
3.4 When positioning the suspended load , the hands of the person guiding it shall be positioned so as to never be in a potential line of fire of being pinched between the load and its tie off/contact points or an adjacent structure : a. Indicate the required safe location of hands on the load being positioned (e.g. on top / on the side / on the back of load). (Circle safe position) b. Determine the safe distance (in inches) to be kept between the edge of the suspended load and its tie off/contact points or adjacent structures during load positioning over a maximum distance of 24": _____			

HSP-460: Safety & Health/Forms/Permit – SWP for Guiding a Suspended Load with Hand Contact

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APPENDIX III

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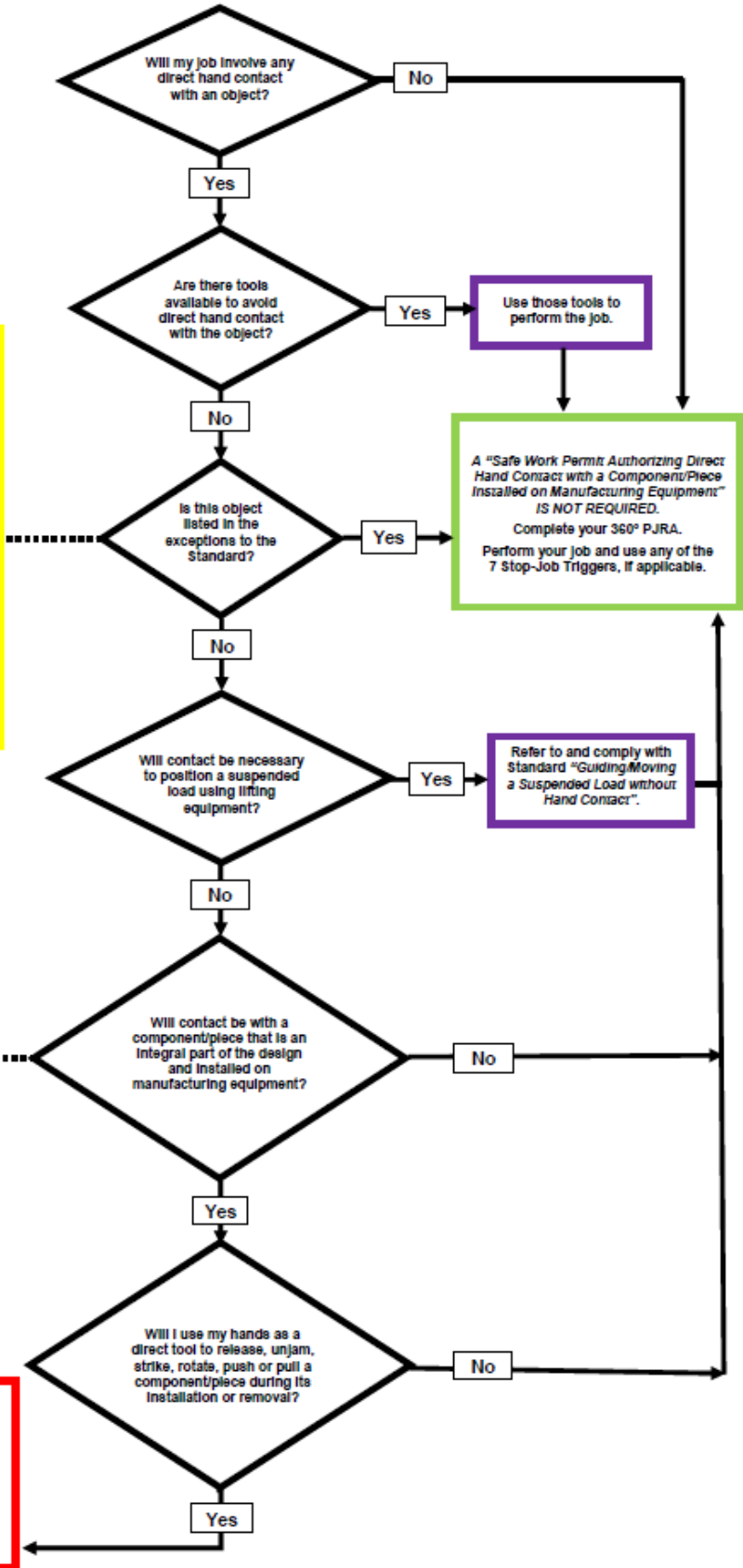
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- Exceptions to the Standard**
Hand contact authorized:
- With lumber or paper/tissue rolls;
 - With hand tools and powered hand tools (electric/pneumatic);
 - With bolts or similar materials (e.g. probe, pressure gauge);
 - With electric/electronic components ≤ 5 lb;
 - With seals;
 - With loose cables / clothing components on paper/tissue/pulp machines;
 - With loose belts;
 - When opening/closing a process / utility services valve;
 - When removing from manufacturing equipment a ≤ 5 lb component/piece that is not fixed and is already stable.

- Manufacturing equipment:** Equipment within RFP operations that is designed and used throughout the processing chain, from raw materials to finished products.
- Non-exhaustive list:**
- Wood Products:** pump, planer, debarker, slasher, conveyor, die-scrambler, multi-saw edger, DDM, center edger, chipper, stacker, wrapper, sorters, twin saws, boiler, loader/lift truck and other similar equipment
- Pulp & Paper:** pump, refiner, dryer, press rolls, calenders, coiler, winder, conveyor, boiler, stacker, disc filter, pulp collector, pulp baler, guillotine, loader/lift truck and other similar equipment
- Tissue:** pump, conveyor, tissue paper machine sections, Yankee roll, rewinder, winder, wrapper, case wrapper, core machine, stacker lift truck and other similar equipment
- Exclusions: Jobs performed on a component/piece that is**
- In a Shop/Laboratory, OR
 - Stored in a location designed for that purpose (pallet, shelving), OR
 - Installed to be installed on equipment that is not defined as manufacturing equipment.

A "Safe Work Permit Authorizing Direct Hand Contact with a Component/Piece Installed on Manufacturing Equipment" IS REQUIRED.

Perform your job and use any of the 7 Stop-Job Triggers, if applicable.



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APPENDIX IV

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Safe Work Permit- Authorizing Direct Hand Contact

Employee/Contractor's Name: _____ Date of Work: _____		
Employee's Function: _____ Department: _____		
Piece of equipment in direct contact with hands: _____		
Specific Job at Hand: _____		
Job Supervisor/Lead Hand, designated coworkers or managers must remain <u>on jobsite</u> to ensure hands/body position stays out of any pinch/ crush line of fire during the entire time of handling.		
Validate the need to use hands as a tool before completing this SWP (Circle answer)		
> Is it possible to perform this job using a distancing tool instead of hands? <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, use the available tool and do not complete this Permit.		
Mandatory Risk Control Measures	YES	N/A
1. Did you secure the part before freeing it (e.g. leave a bolt in place, tie the part down, install a support, etc.)?		
2. Indicate the safe position of hands out of the LOF in relation with the part/equipment to be moved/removed. Circle the safe position: on top / on the side / on the back		
3. Indicate the safe position of body out of the LOF in relation with the part/equipment to be moved/removed: 3.1 Body to be positioned on what side of the part/equipment: _____ 3.2 Identify structures that present a pinch hazard between the body and equipment in case of sudden movement: _____		
4. Does the person whose <u>hands are in direct contact</u> with the part/equipment wear RFP-approved cut/impact-resistant gloves?		
Signatures: We confirm that all applicable control measures have been checked on the jobsite and will be maintained all through the job.		
Employee: _____ Date: _____ Time: _____		
RFP Designated Rep.: _____ Date: _____ Time: _____		