

# Pactiv's Contractor/Vendor EHS Manual



Applies to all Contractors/Vendors performing work at a Pactiv facility.



# Pactiv's Contractor/Vendor EHS Manual

## PART I – General Requirements and Obligations

# Overview

- Pactiv is committed to:
  - Maintaining a world-class level of safety in its workplace;
  - Sustaining environmental excellence; and
  - Operating at all times in compliance with applicable Environmental, Health and Safety (EHS) laws and regulations, as well as all other applicable laws and regulations.
- Pactiv expects its contractors and vendors to make these same EHS commitments when working at a Pactiv facility.
- To that end, Pactiv has developed this Contractor/Vendor EHS Manual, which outlines the EHS Requirements for contractors and vendors when they perform work at a Pactiv facility.

*NOTE – this Pactiv Contractor/Vendor EHS Manual is purposely provided in Powerpoint (PPT) format, for ease of review and to facilitate training.*

# Pactiv's Contractor/Vendor EHS Manual

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- All Contractors/Vendors working for Pactiv must comply with the EHS Requirements included in this Manual.
- However, Contractor/Vendor agrees that:
  1. This Pactiv EHS Manual is provided as a general overview of EHS requirements, as well as specific EHS requirements applicable while working at a Pactiv facility, without any warranty as to its completeness or accuracy.
  2. Pactiv's EHS Manual does not relieve or change the Contractor/Vendor's duty to comply with all applicable regulations.
  3. Contractor/Vendor will rely solely on its own independent training and expertise with regard to the conduct of its work and compliance with applicable regulations.
  4. Contractor/Vendor will be solely responsible for its own actions.
- Contractors/Vendor will also be provided with facility-specific EHS Requirements, which must also be complied with.

# Pactiv's Contractor/Vendor EHS Qualifications

- In addition to complying with the EHS Requirements in the EHS Manual, Pactiv may also require its Contractors/Vendors to confirm that they meet Pactiv's EHS Qualifications, which may include, but are not limited to:
  - Experience Modification Rating (EMR) (most recent) – 1 or less
  - OSHA Total Case Rate (most recent calendar year) – 3.5 or lower
  - OSHA Lost Work Day Case Rate (most recent calendar year) – 1.0 or lower
  - Fatalities (current year plus past 3 years) – 0
  - OSHA (Federal or State) Citations (current year plus past 3 years) – 0
  - OSHA (Federal or State) Penalties (\$\$) (current year plus past 3 years) – 0
  - Federal, State or Local Environmental Agency Notices of Violation (current year plus past 3 years) – 0
  - Federal, State or Local Environmental Agency Penalties (\$\$) (current year plus past 3 years) – 0

*NOTE – Pactiv reserves the right to change these EHS Qualifications and associated acceptable criteria, at any time, with or without notice.*

- Contractors/Vendors selected to confirm that they meet Pactiv's EHS Qualifications will be separately notified.

# Pactiv's Contractor/Vendor EHS Training

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- Pactiv facilities may elect to provide Contractors/Vendors with training on the requirements included in this EHS Manual and associated facility-specific EHS requirements, or may require that its Contractors/Vendors attend this training.
- Contractor/Vendor agrees that:
  - Any Pactiv training, if provided, is provided as an initial orientation without any warranty as to its completeness or accuracy.
  - Pactiv's training, if provided, does not relieve or change the Contractor/Vendor's duty to comply with all applicable regulations.
  - Contractor/Vendor agrees that it will rely solely on its own independent training and expertise with regard to the conduct of its work and compliance with applicable regulations.
  - Contractor/Vendor will be solely responsible for its own actions.
- Contractor/Vendor (including sub-contractors and all employees) must complete documentation to verify that they have been informed of the Pactiv and facility-specific EHS requirements and that they agree to abide by them.

# Contractor/Vendor EHS Reporting Obligations

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- Contractor/Vendor's EHS incident reporting obligations include, but are not limited to:
  - Reporting of all environmental releases, spills or similar events, whether or not reportable to an environmental agency, immediately to Pactiv upon their occurrence.
  - After prior notification to Pactiv, reporting of all environmental releases, spills or similar events as required by applicable environmental regulations to the appropriate environmental agency, within the required regulatory timeframes.
  - Reporting of any injuries of Contractor/Vendor employees, or injury of Pactiv employees caused by Contractor/Vendor personnel or activities, immediately to Pactiv upon their occurrence.
  - After prior notification to Pactiv, reporting of all Contractor/Vendor injuries as required by applicable health and safety regulations to the appropriate health and safety agency, within the required regulatory timeframes.
  - Immediate reporting to Pactiv of any environmental or health and safety agency inspections, audits or similar events that occur at a Pactiv facility.
- Contractors/Vendors must not communicate with any EHS agency regarding an incident at a Pactiv facility without prior notification to Pactiv. Contractors/Vendors must also immediately advise Pactiv of any communication received from an EHS agency regarding an incident at a Pactiv facility.

# Contractor/Vendor Security at Pactiv Facilities

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- Contractor/Vendor personnel must sign Pactiv's Standard Facility Visitor Agreement prior to working in Pactiv facilities.
- Contractors/Vendors must also follow the local Pactiv facility security procedures regarding:
  - Required registration and "sign-in" for contractor/vendor employees and subcontractors who are on site at any given time;
  - Required identification of contractor/vendor employees and subcontractors while on site;
  - Required escort of contractor/vendor employees and subcontractors while on site.
- When required by Pactiv, Contractors/Vendors who are going to be working and/or supplying materials in the facility must sign appropriate confidentiality and/or non-disclosure agreements.



# Contractor/Vendor Work Areas at Pactiv Facilities

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- Contractor/Vendor is responsible for maintaining a safe and clean work site. This includes Contractor/Vendor responsibility to:
  - Designate an on-site supervisor to oversee the job site activities, including training requirements, and other responsibilities identified below.
  - Know and comply with all applicable EHS Requirements, including, but not limited to, those outlined in this manual and facility-specific requirements
  - Exercise reasonable care to detect and promptly correct EHS hazards, including hazards caused by its subcontractors.
  - Promptly notify Pactiv of any hazards to Pactiv employees, regardless of who created the hazard.
  - Hold pre-job meetings with their employees and subcontractors to discuss EHS requirements, hazards, obligations, expectations, and procedures.
  - Conduct and document regular EHS inspections, as required by applicable regulatory requirements, Pactiv's EHS Requirements, and facility-specific requirements.
  - Review EHS inspection reports and ensure that deficiencies are corrected.
  - Resolve all EHS hazards identified by Pactiv within a reasonable time frame agreed to by Pactiv.
  - Discontinue immediately, and until a suitable corrective action is implemented, any unsafe or environmentally hazardous activities that place any personnel, equipment, property or the environment in immediate harm.

# Contractor/Vendor Coordination with Pactiv

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- Contractors/Vendors are required to closely coordinate all activities with local Pactiv facility personnel. This includes, but is not limited to:
  - Obtain a list of key local Pactiv facility contacts, including the Project Sponsor and EHS personnel, and make this contact list readily available to Contractor/Vendor employees and subcontractors.
  - Prior to coming on-site, provide the appropriate local Pactiv facility contacts with details on planned activities, schedules, etc.
  - Follow all local Pactiv facilities security requirements related to registration/sign-in, identification and escorting.
  - While working on-site, closely coordinate all activities, scheduling, etc. with the appropriate local Pactiv facility contacts.
- In addition to local facility coordination, Contractors/Vendors are also required to closely coordinate all activities with other Pactiv personnel, as appropriate, including Pactiv Corporate Engineers, Pactiv Corporate EHS Staff, etc.

# Contractor/Vendor EHS Documentation

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- From time to time, Pactiv may request copies of relevant Contractor/Vendor EHS documentation, including, but not limited to, training, procedures, certifications, licenses, permits, etc. Examples of potential document requests include:
  - A contractor performing electrical work may be asked to provide copies of their Qualified Employee training records and their Written Electrical Safety Plan
  - A contractor performing earthwork may be requested to provide a copy of their Storm Water Pollution Prevention Plan (SWPPP) and SWPPP training records.
- Pactiv's request for and potential review of Contractor/Vendor EHS documentation does not relieve or change the Contractor/Vendor's duty to comply with all applicable regulations.
- Regardless of Pactiv's request for and potential review of Contractor/Vendor EHS documentation, Contractor/Vendor will rely solely on its own independent training and expertise with regard to the conduct of its work and compliance with applicable regulations and be solely responsible for their own actions.



# Pactiv's Contractor/Vendor EHS Manual

## PART II – Environmental Requirements

# Contractor/Vendor Environmental Requirements

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<b>Section</b>	<b>Title</b>
E-1	Contractor Environmental Responsibilities
E-2	Waste Handling and Disposal
E-3	Chemicals Brought on Site (including SDSs)
E-4	Storm Water Discharges
E-5	Sanitary Sewer Discharges
E-6	Dust Control
E-7	Air Emissions
E-8	Ozone Depleting Substances
E-9	Spills
E-10	Asbestos and Lead Based Paint
E-11	Oil or Diesel Storage/SPCC
E-12	Facility Specific Environmental Requirements

## E-1. Contractor/Vendor Environmental Responsibilities

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- Always follow all applicable Federal, State and Local environmental laws and regulations.
- Conduct all work with care and respect for the environment.
- Ensure that all employees and subcontractors, prior to entering Pactiv property to perform work, have received instructions on environmental expectations and performance required while at the facility.
- Follow established environmental procedures as noted in the following sections of this Manual, and as provided by facility-specific instruction.
- Provide to Pactiv copies of a Safety Data Sheet (SDS) for every chemical or compound which will be brought on site as part of the project.
- For larger projects, submit a proposed setup plan to the Pactiv Project Sponsor to identify, as applicable, location of temporary offices, sanitary facilities, parking, break/smoking areas, where materials, oils and chemicals are to be staged, procedures for temporarily storing materials, oils and chemicals outside, etc.

## E-2 Waste Handling and Disposal

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- Contractors/Vendors are never authorized to dispose of any waste on Pactiv property.
- All waste generated by the Contractor/Vendor during Contractor's work on Pactiv property must be properly stored, managed and disposed of off-site by the Contractor, except for certain "co-generated" wastes.
- Certain wastes generated during Contractor's work may be considered "co-generated". When notified by Pactiv that these co-generated wastes may be generated during Contractor's work, the Contractor will coordinate all on-site waste storage and management with Pactiv, and Pactiv will be responsible for all off-site recycling/disposal. Examples of co-generated wastes include:
  - Used oil and oil filters generated by a contractor/vendor during maintenance of Pactiv-owned forklifts or emergency generators
  - Used lamps removed by a contractor/vendor during a re-lighting project at a Pactiv facility
- General trash must not be placed in the Pactiv facility trash containers or dumpsters without prior Pactiv approval

## E-3. Chemicals Brought on Site (including SDS)

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- Contractors/Vendors must follow standard industry practices when unloading, transporting and storing chemicals, liquids, compressed gases, etc., which include, but are not limited to:
  - Securing vehicles during unloading
  - Using proper unload and handling equipment
  - Using proper containers for storage, with secondary containment (if required); and
  - Ensuring appropriate spill kits are available for chemicals and liquids.
- Pactiv must be notified by Contractor/Vendor prior to any unloading of a DOT hazardous materials (HM) – and Pactiv must be provided with a copy of the HM bill of lading, upon request.
- Contractor/Vendor must obtain pre-approval from Pactiv for any new chemicals planned to be brought on-site.
- Contractor/Vendor must maintain a file of SDSs for all chemicals stored at the Pactiv facility, along with a master SDS/chemical list.
- Upon request, Contractor/Vendor must provide Pactiv with a copy of any of these SDSs, or the master SDS/chemical list.
- Contractor/Vendor must comply with all Global Harmonization System (GHS) requirements for their chemicals, including secondary container labeling.



## E-4. Storm Water Discharges

- Contractors/Vendors are not allowed to discharge any liquids, chemicals, etc. onto the ground or into storm drains. This includes wash water, process water, cooling water, etc.
- Pavement or vehicle wash-downs with associated storm water discharge are NOT permitted.
- All materials that could potentially contaminate storm water (chemical containers, scrap equipment, resin pellets, etc.) must be stored above ground level, such as on a pallet, and covered to prevent rainwater contact.
- Water from steam cleaning, water blasting, outdoor welding/burning areas, etc. must be contained and not be allowed to contaminate the soil nor enter storm water runoff areas. The contained water must be properly disposed of by the Contractor/Vendor.
- During roof activities, the discharge of cleaning water into roof drains is not allowed; this water must be contained, and then properly disposed of by the Contractor/Vendor.
- Air conditioning condensate may be an allowable stormwater discharge – this decision will be made by the local Pactiv EHS personnel.
- All outside spills of oil, chemicals, etc. must be quickly contained to prevent storm water discharge, and then cleaned up by the Contractor/Vendor. Pactiv must be immediately notified of any spills.
- For projects where a Construction Storm Water Permit is required – the Contractor/Vendor is responsible for all permitting, permit fees, Storm Water Pollution Prevention Plan (SWPPP) development, implementation, training, etc. and all other requirements under the permit.

## E-5. Sanitary Sewer Discharges

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- Contractors/Vendors are not allowed to discharge any liquid or solid material down any sanitary sewer drain or line at a Pactiv facility without prior approval from Pactiv. This prohibition includes:
  - Pactiv facility bathroom or production area sinks, drains or toilets.
  - Pactiv facility sanitary sewer manholes or drain lines.
- For projects where a discharge to the sanitary sewer is required, and pre-approved by Pactiv – the Contractor/Vendor must closely coordinate all permitting activities with Pactiv, as a permit modification will typically be required to Pactiv’s Sanitary Sewer Discharge Permit.
  - The Contractor/Vendor will have primary responsibility for obtaining any required permit modification, including submittal of permit applications, drawings and fees.
  - Pactiv must pre-approve all sanitary sewer permit submittals.

## E-6. Dust Control

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- For projects involving land disturbance, the Contractor/Vendor must implement dust control measures as required by local requirements, agency permits and/or Pactiv facility standards.
- The Contractor/Vendor is responsible for obtaining any required permits or approvals related to land disturbance, dust control, etc., including payment of all fees.
- As noted in Section 4:
  - For projects where a Construction Storm Water Permit is required – the Contractor/Vendor is responsible for all permitting, permit fees, Storm Water Pollution Prevention Plan (SWPPP) development, implementation, training, etc. and all other requirements under the permit.

## E-7. Air Emissions

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- For projects where an air permit is required by environmental agencies for Contractor/Vendor equipment (example – portable generators)
  - The Contractor/Vendor is responsible for properly permitting this equipment, and complying with all permit requirements
- For projects where an air permit is required by environmental agencies for Pactiv equipment being installed or modified by Contractor/Vendor equipment (examples – storage silos, printing presses, extruders, etc.):
  - Pactiv will be responsible for properly permitting this equipment, and complying with all permit requirements
  - However, Contractor/Vendor must provide Pactiv with all requested information on the equipment that will be required by Pactiv to obtain proper air permits (e.g., BTU ratings of gas-fired equipment).

## E-8. Ozone Depleting Substances

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- For projects involving Ozone Depleting Substances (ODSs), the Contractor/Vendor must comply with all applicable Federal, State and Local ODS requirements.
- Refrigerants can only be handled by certified ODS technicians – Contractor/Vendors are NOT allowed to work on ODS equipment unless certified.
- Contractor/Vendor certified ODS technicians working on ODS equipment must provide Pactiv with purchase/recovery records, testing records, leak rate calculations, technician certifications and appliance disposal records.
- ALL Contractor/Vendor records of maintenance on ODS equipment must be provided to the Pactiv facility environmental contact.

## E-9. Spills

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- Contractor/Vendor must IMMEDIATELY notify Pactiv of any spills, regardless of the quantity.
- The Pactiv facility environmental contact, in conjunction with the Pactiv Regional Environmental Manager and contractor, will then determine cleanup and reporting requirements.
- If the Contractor/Vendor is bringing liquid materials on site, spill containment materials such as absorbent, absorbent pigs, etc. must to be kept near the work site.
- Contractor/Vendor are required to clean-up all spills.
- If needed, Contractor/Vendor can utilize available Pactiv spill kits. However, Contractor/Vendor will be required to reimburse Pactiv for the costs associated with spill cleanup (disposal, replacement spill kit materials, etc.)

## E-10. Asbestos and Lead Based Paint

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- Contractors/vendors must only install asbestos free materials.
- Asbestos Containing Materials (ACM) are known to be present at certain Pactiv facilities. The Pactiv facility EHS representative will inform Contractor/Vendor if ACM is known to be present in, on or near equipment or areas where the Contractor/Vendor will be working.
- Regardless of whether or not Pactiv provides ACM information, the Contractor/Vendor is still required to inspect all building structures, areas and/or equipment that they will be working on (include building structures to be renovated or demolished) for indications of potential ACM.
- If potential indications of ACM are noted, Contractor/Vendor must immediately notify Pactiv.

## E-10. Asbestos and Lead Based Paint (cont)

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- If ACM is identified by Pactiv or the Contractor/Vendor, all ACM removal, handling, storage and disposal must comply with all applicable Federal, State and Local ACM requirements.
  - Contact the Pactiv Project Sponsor at least **45-60 days** prior to any planned work. Do not disturb any existing building materials at the facilities prior to this inspection.
  - Only qualified Contractors/Vendors can be used to repair, remove, and dispose of any asbestos-containing materials (ACM). Disposal of any ACM must be coordinated with the Pactiv facility environmental contact.
  - A certified Asbestos Project Manager must be used to oversee the Contractor performing the ACM remediation project, and who must provide Pactiv with all the required ACM documentation (e.g. licenses, monitoring results, daily logs, etc.).
- Certain equipment and structures at Pactiv facilities may contain Lead-Based Paint (LBP) (storage silos, etc.). Contractor/Vendor is required to inspect all building structures, areas and/or equipment that they will be working on (include building structures to be renovated or demolished) for indications of potential LBP
- Contractor/Vendor must immediately notify Pactiv if indications of LBP are found.
- If LBP is identified by Pactiv or the Contractor/Vendor, all LBP removal, handling, storage and disposal must comply with all applicable Federal, State and Local LBP requirements.



## E-11. Oil or Diesel Storage/SPCC

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- Contractors/Vendors that bring oil, diesel fuel or other petroleum products on-site must provide secondary containment for any container used to store these materials that is 55 gallons or greater.
- Contractors/Vendors must keep all petroleum handling equipment, like hoses and hand pumps, in good condition.
- Contractors/Vendors must properly label all petroleum containers.
- Contractors/Vendors must maintain appropriate and readily available spill kits near each petroleum container 55 gallons or greater.
- Contractors/Vendors must inspect all petroleum containers 55 gallons or greater **at least weekly**.
- If the Contractor/Vendor requires any on-site petroleum storage tank greater than 55-gallons, prior approval must be obtained from Pactiv.
- Certain Pactiv facilities maintain a Spill Prevention Control and Countermeasures (SPCC) Plan. If requested, Contractor/Vendor must comply with the applicable SPCC Plan requirements.

## E-12. Facility Specific Environmental Requirements

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- In addition to the requirements in this EHS Manual, Contractors/Vendors will also be provided with facility-specific EHS Requirements, which must also be complied with.
- Facility-specific environmental requirements that may be provided to Contractors/Vendors include, but are not limited to:
  - Facility-specific areas that must be used to store petroleum, chemicals, etc.
  - Facility-specific instructions for on-site storage and management of co-generated wastes and/or contractor-generated wastes
  - Facility-specific environmental inspection requirements and/or
  - Facility-specific requirements related to air permit compliance



# Pactiv's Contractor/Vendor EHS Manual

## PART III – Health & Safety Requirements

# Contractor/Vendor Health & Safety Requirements

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<b>Section</b>	<b>Title</b>
H&S-1	Contractor Health & Safety Responsibilities
H&S-2	Personal Protective Equipment (PPE)
H&S-3	Smoking Policy
H&S-4	Emergency Procedures
H&S-5	Pactiv Critical Safety Rules
H&S-6	Safety Incident Reporting
H&S-7	Right-To-Know/SDS
H&S-8	Machine Safeguarding
H&S-9	Lock-Out/Tag-Out
H&S-10	Electrical Safety
H&S-11	Confined Space
H&S-12	Mobile Equipment Safety
H&S-13	Hot Work
H&S-14	Process Safety Management (PSM)
H&S-15	Other Safety Requirements
H&S-16	Facility Specific Health & Safety Requirements

# H&S-1. Contractor/Vendor Health & Safety Responsibilities

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- Always follow all applicable Federal, State and Local health & safety laws and regulations.
- Work safely at all times, and protect the safety of both Contractor/Vendor employees as well as Pactiv employees and all other personnel working at Pactiv facilities.
- Ensure that all employees and subcontractors, prior to entering Pactiv property to perform work, have received instructions on health & safety expectations and performance required while at the facility. This includes ensuring all Contractor/Vendor employees have been trained on Pactiv's Critical Safety Rules (CSRs, See H&S-5).
- Follow established health & safety procedures as noted in the following sections of this Manual, and as provided by facility-specific instruction.
- Do not allow any drugs, alcohol or weapons on any Pactiv facility.
- Never unexpectedly interrupt Pactiv facility operations, as this could create health and safety risks.

## H&S-2. Personal Protective Equipment (PPE)

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- Contractor/Vendor personnel must wear all PPE that is required by the relevant OSHA standard. Examples include, but are not limited to, Arc Flash PPE, Fall Protection, etc.
- In addition, Pactiv requires Contractor/Vendor personnel to wear the following PPE:
  - Steel Toed Shoes – all Pactiv facilities
  - Safety Glasses – all Pactiv facilities
  - Safety Goggles – when using compressed air
  - Bump Caps (red color) - all Pactiv facilities
  - Hearing Protection – within Pactiv manufacturing facilities, or as directed by Pactiv
  - Safety Vest – as directed by Pactiv

## H&S-2. Personal Protective Equipment (PPE) (cont)

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- Notes on Pactiv-required PPE:
  - Regular prescription glasses with slip onside shields cannot be used as safety glasses - over glasses will be required.
  - ANSI-certified prescription glasses with permanent side shields are acceptable and can be used as safety glasses
  - Contractor hard hats can be used in lieu of bump caps with the approval of the Pactiv facility safety coordinator.
  - Earbuds, headphones and other similar devices are not suitable hearing protection devices.

## H&S-3. Smoking Policy

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- Contractor/Vendor personnel are only allowed to smoke in smoking areas specifically designated by Pactiv.
- The Pactiv facility safety contact will provide specific information on the location of the designated smoking area for the facility.
- Violations of this policy are serious and can result in termination of the Contractor/Vendor employee(s) found to be in violation.
  - Smoking policy violations may result in a Critical Safety Rule (CSR) Violation – see H&S-5.



## H&S-4. Emergency Procedures

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- The Pactiv facility safety contact will provide specific information on facility-specific emergency procedures, including evacuations (emergency exit paths and doors, as well as rallying/muster points) and shelter-in-place (for tornados, etc.).
- Contractor/Vendor personnel are required to be familiar with these facility-specific emergency procedures.
- Contractor/Vendor personnel are required to follow these facility-specific emergency procedures.
  - In the event of a fire, fire alarm or instructions to evacuate, Contractor/Vendor personnel must proceed to the nearest safe exit and move to the rally point outside of the facility.
  - In the event of a weather emergency or order to take shelter, Contractor/Vendor personnel must proceed to the designated shelter-in-place location.
- In the case of all other emergencies, Contractor/Vendor personnel must follow the orders of Pactiv.

## H&S-5. Pactiv Critical Safety Rules

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- Because violating certain health & safety policies and procedures or engaging in other types of unsafe behavior risk serious consequences, Pactiv has adopted the Critical Safety Rules (CSRs).
  - “Critical Safety Rules” are defined as rules that, if violated, risk causing serious or life-threatening injury to employees or other individuals or serious damage to property.
  - Following an appropriate investigation, a confirmed violation of a Critical Safety Rule will result in immediate termination.
- Contractors/Vendors will be held to Pactiv’s CSR standard.  
***Consequently, if a Contractor/Vendor is found to have violated a Pactiv CSR, they will not be allowed to work at any Pactiv location.***
- Pactiv’s CSR are listed on the following slides.

## H&S-5. Pactiv Critical Safety Rules (cont)

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1. Failure to follow written, equipment-specific "Lock-out & Tag-out" ("LOTO") procedures (such as failing to isolate all energy sources, failing to test controls for de-energization, etc.) where such failure either: (a) occurs when an employee performing work on the equipment places any portion of their body in a position with potential for serious or life-threatening injury or (b) occurs when an employee conducts an act that places another employee or employees performing work on the equipment in a position with potential for serious or life-threatening injury.
2. Reaching into an energized grinder, shredder or chopper or similar piece of equipment. This rule does not prevent authorized personnel from reaching into a grinder, shredder, chopper or similar piece of equipment in order to troubleshoot, maintain, repair or modify equipment as long as all established EHS policies and procedures for these activities are followed in doing so.
3. Failing to properly use approved blocking devices where required by written EHS policies and procedures.

## H&S-5. Pactiv Critical Safety Rules (cont)

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- 4 Allowing any part of a person's body or clothing to come into contact with, or risk coming into contact with, an "in-running" nip point or a rotating shaft on operating equipment. This risk may arise, for example, by an employee using emery cloth or wearing unauthorized attire near an "in-running" nip point or a rotating shaft on operating equipment.
- 5 By-passing or disabling any guard, switch, alarm, interlock, start/stop switch, emergency stop or other safety device intended to prevent injury or property damage. This rule does not prevent authorized personnel from by-passing or disabling these safety devices in order to troubleshoot, maintain, repair or modify equipment as long as all established EHS policies and procedures for these activities are followed in doing so.
- 6 Unauthorized entry into a permit-required confined space. "Entry" includes any part of a person breaking the plane of an opening to any confined space labeled as "Permit-Required Confined Space" or with a similar warning.

## H&S-5. Pactiv Critical Safety Rules (cont)

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7. Smoking anywhere inside a Pactiv facility or smoking in the parking lot or elsewhere on company premises where doing so creates a risk of fire, explosion or other hazard. Smoking includes, but is not limited to, using cigarettes, cigars, pipes and other smoking devices.
8. Failing to follow EHS policies and procedures in the operation of any lift truck or other mobile equipment or vehicle inside a Pactiv facility or in the parking lot or elsewhere on company premises where the failure results in, or risks causing, serious or life-threatening injury to the driver or other individuals or serious damage to property.
9. Failing to properly secure a trailer as required under written EHS policies and procedures prior to entering the trailer on foot or with a lift truck or other mobile equipment.
10. Engaging in any other unsafe behavior that results in, or could have resulted in, serious or life-threatening injury to an employee or other individuals or serious damage to property as determined by management.

## H&S-6. Safety Incident Reporting

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- It is the responsibility of the Contractor/Vendor to immediately report all health & safety incidents, including injuries, property damage and near misses, to Pactiv.
- These health & safety incidents must be reported to the Pactiv Project Sponsor, safety contact, or facility management.
- Contractor/vendor personnel must fully cooperate in all incident investigations.
- Reporting health & safety incidents to Pactiv does NOT relieve the Contractor/Vendor from required reporting to appropriate authorities.

## H&S-7. Right-To-Know/SDS

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- Contractors/Vendors have the right to know about and be aware of all chemicals and materials used at Pactiv facilities.
- Pactiv maintains Safety Data Sheets (SDSs) for chemicals utilized at their facilities.
- Upon request, Pactiv will provide Contractors/Vendors copies of requested SDSs. Requests should be made to the Pactiv facility safety contact or Project Sponsor.

## H&S-8. Machine Safeguarding

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- Contractors/Vendors installing or modifying Pactiv equipment **must** comply with **Pactiv's Machine Safeguarding Standard**, as well as relevant OSHA and industry standards.
- Pactiv will provide Contractors/Vendors copies of **Pactiv's Machine Safeguarding Standard**. Requests should be made to the Pactiv facility safety contact or Project Sponsor.
- Existing machine safeguards on Pactiv equipment and machinery (physical guarding, interlocks, light curtains, etc.) are intended to help protect workers from intentional and unintentional contact with hazardous points of operation on equipment and machinery.
- Consequently, regardless of the scope of work/services, all Contractors/Vendors must follow basic machine guarding safety, which includes, but is not limited to:
  - Never operate equipment with missing or faulty guarding.
  - Do not reach around, under, through or over any machine guarding.
  - Immediately notify the Pactiv facility safety contact or Project Sponsor if a machine safeguard is found to be defective (e.g., physical guard missing, interlock malfunctioning, etc.).



## H&S-9. Lock Out/Tag Out (LOTO)

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- All Contractors/Vendors are required to follow OSHA's LOTO Standard. This includes, but is not limited to:
  - Contractors/Vendors must train their employees who will perform LOTO to be LOTO Authorized Employees.
  - Contractors/Vendors must train their employees who are not expected to perform LOTO as LOTO Affected Employees.
  - Contractors/Vendors must provide appropriate LOTO locks to their LOTO Authorized Employees.
- Only Contractor/Vendor employees with current LOTO training are allowed to conduct LOTO at Pactiv facilities. Pactiv reserves the right to request copies of LOTO training records for Contractor/Vendor employees.

## H&S-10. Electrical Safety

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- All Contractors/Vendors are required to follow OSHA's Electrical Safety Standard and associated industry standards. This includes, but is not limited to:
  - Contractors/Vendors must train their employees who will perform work on electrical equipment to be Electrically "Qualified Persons".
  - Contractors/Vendors must provide the required PPE to their Electrically "Qualified Persons", as required to protect against arc flash and shock hazards.
- Only Contractor/Vendor employees with current electrical safety training as "Qualified Persons" are allowed to conduct electrical work at Pactiv facilities. Pactiv reserves the right to request copies of electrical safety training records for Contractor/Vendor employees.

# H&S-11. Confined Space & Permit Required Confined Spaces

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- All Contractors/Vendors that are required to enter confined spaces as part of their work at a Pactiv facility are required to comply with OSHA's Confined Space Standard.
- Unauthorized entry into a permit required space may result in a Critical Safety Rule (CSR) Violation – see H&S-5.
- Pactiv must be notified prior to any Contractor/Vendor confined space activity.
- Pactiv employees will NOT enter a Permit Required Confined Space, nor assist Contractors/Vendors in their confined space activities

Per OSHA's Confined Space Standard, a Confined Space is an enclosed space that:

- Is large enough and so configured that an employee can bodily enter and perform assigned work.
- Has limited or restricted means for entry or exit.
- Is not designed for human occupancy.

Per OSHA's Confined Space Standard, a Permit-Required Confined Space is a confined space that has one or more of the following characteristics:

- Contains or has the potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an entrant.
- Has an internal configuration that could cause entrapment or asphyxiation.
- Contains any other recognized serious safety or health hazard.

## H&S-12. Mobile Equipment Safety

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- All Contractors/Vendors are required to comply with OSHA's Standard for Powered Industrial Trucks (PITs, which includes forklifts) and Aerial Lifts (which includes scissor lifts).
  - *For purposes of this EHS Manual, PITs and Aerial Lifts are collectively referred to as "Mobile Equipment"*
- Contractors/Vendors must train their employees who will operate PITs or Aerial Lifts in accordance with OSHA regulations.
- Only Contractor/Vendor employees with current OSHA training are allowed to operate PITs or Aerial Lifts at Pactiv facilities. Pactiv reserves the right to request copies of applicable Mobile Equipment training records for Contractor/Vendor employees.

## H&S-12. Mobile Equipment Safety (cont)

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- In addition, Contractors/Vendors must follow the following Pactiv Mobile Equipment Safety Precautions:
  - Forklift and other mobile equipment speed can never exceed 6 mph in manufacturing areas or 10 mph in warehouse areas. However, Pactiv reserves the right to require slower speeds
  - No passengers are allowed on mobile equipment.
  - Mobile equipment must be operated in designated areas and away from pedestrians
  - Pedestrians must always use marked pedestrian walkways when available.
  - All Contractor/Vendor forklifts are required to have documented daily inspections completed daily or per shift
  - No person shall be allowed to stand or pass under the elevated portion of any lift truck or clamp truck, loaded or empty.

## H&S-12. Mobile Equipment Safety (cont)

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- In addition, Contractors/Vendors must follow the following Pactiv Mobile Equipment Safety Precautions (cont):
  - Contractors/Vendors must always ensure that there is at least 3 feet between any person and operating mobile equipment:
    - This is referred to as Pactiv's "3-ft Rule", and must be complied with.
    - If a pedestrian needs to speak with a forklift/PIT operator, they must wait until the operator has shut down their equipment before approaching closer than 3 feet
  - Scissors Lift (or other aerial lift) Operation
    - Contractors/vendors must implement a Lift Traffic Control Plan, using one of the following options (the selected option must be pre-approved by Pactiv)
      - Option 1 - Provide a spotter to prevent other workers or mobile equipment from getting too close to the lift
      - Option 2 - Section or cordon off the work area with caution tape or physical barriers
    - Contractor/vendor personnel in lifts must wear approved fall protection harnesses
    - No work is allowed to be performed over an occupied area.

## H&S-13. Hot Work

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- All Contractors/Vendors that are required to perform hot work as part of their work at a Pactiv facility are required to comply with OSHA standards, in addition to the following Pactiv requirement:
  - ALL hot work by a Contractor/Vendor requires a Pactiv Hot Work Permit – there are no exceptions.
  - Pactiv’s Hot Work Permit Form must be prepared by the Contractor/Vendor and provided to the Pactiv safety contact and/or Project Sponsor before starting any hot work.
  - Pactiv’s safety contact and/or Project Sponsor will review the Form and either approve or request changes. Once approved, the Contractor/Vendor can proceed with the hot work, under the following conditions:
    - Permits are valid for one shift and one area only (obtain new permit for each shift).
    - Ensure the area is free from combustible materials.
    - A fire extinguisher must be readily available.
    - Notify affected Pactiv and Contractor/Vendor employees of the work.
    - Contractor/Vendor personnel must maintain a fire watch:
      - For at least 30 minutes following the completion of the hot work
      - After the initial period, check the area every 30 minutes for 4 hours

## H&S-14. Process Safety Management (PSM)

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- Certain Pactiv facilities store chemicals that are used as the facility's blowing agent in the foam extrusion process. These chemicals are flammable/combustible, and Pactiv is therefore required to comply with OSHA's Process Safety Management (PSM) regulations as well as the similar EPA Risk Management Program (RMP) regulations.
- Only Contractors/Vendors specifically authorized by Pactiv are allowed to enter or work on the following "PSM Covered Process" Areas:
  - Above ground and/or underground tank area – including unload areas and low pressure pumps
  - High Pressure Pump rooms or areas
  - All associated piping, valves and controls
  - Foam Extrusion equipment controls



## H&S-14. Process Safety Management (PSM) (cont)

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- Pactiv will provide specific instructions and training to Contractors/Vendors authorized to perform work in “PSM Covered Process” Areas. However, the following precautions must be used, as a minimum:
  - No electronic devices are inside any of the PSM Covered Process Areas
  - Contractors/Vendors cannot clear any alarms unless qualified to do so by Pactiv
  - Only non-sparking tools can be used
  - No smoking is permitted
  - All incidents must be reported immediately
  - No cutting, brazing or any other spark generating activity can be performed without prior Pactiv approval, and issuance of a Pactiv Hot Work Permit.

## H&S-15. Other Safety Requirements

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- Contractors/Vendors are NOT allowed to borrow or use any of Pactiv's:
  - Ladders
  - Forklifts, mobile equipment or aerial lifts; or
  - Tools.
- Contractors/Vendors must remove all ladders after use and ensure safe storage.
- Contractors/Vendors must store all tools, mobile equipment and other items in a safe and secure location, including ensuring no fall risks. Pactiv must pre-approve all Contractor/Vendor storage locations.
- Contractors/Vendors must maintain all equipment in safe operating condition.
- Contractors/Vendors must keep work areas clean and well organized at all times and post caution tape as needed to prevent entry into work areas.
- When working overhead, Contractors/Vendors must ensure that tools, etc. are properly secured AND the work area below is clear of Pactiv personnel.

## H&S-16. Facility Specific Health & Safety Requirements

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- In addition to the requirements in this EHS Manual, Contractors/Vendors will also be provided with facility-specific EHS Requirements, which must also be complied with.
- Facility-specific health & safety requirements that may be provided to Contractors/Vendors include, but are not limited to:
  - Facility-specific PPE requirements beyond the Pactiv standard;
  - Required walkways for pedestrians, mobile equipment, etc.;
  - Facility-specific health & safety rules that must be followed;
  - Facility-specific health & safety inspection requirements; and/or
  - Facility-specific requirements related to specific OSHA compliance activities.