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# ENVIRONMENTAL MANAGEMENT SYSTEM



## I. INTRODUCTION AND SCOPE

Pactiv Evergreen’s Environmental, Health and Safety Management System (EMS) provides a means for effective management of environmental and safety matters throughout all Pactiv Evergreen locations. The EMS is designed to proactively address regulatory demands, maintain a high performance standard with the public and our employees, and minimize the EHS impact of our operations. Pactiv Evergreen’s EMS is designed to enable and assist its operations group (manufacturing and warehouse locations) to comply with all regulations. The scope of the EMS is to ensure compliance with EHS regulations, reduce Pactiv Evergreen’s environmental footprint, assist in continual cost improvement for the organization, and foster sustainability.

The Pactiv Evergreen EMS is part of the PEPS (Pactiv Evergreen Production System), which is a Plant Manufacturing System consisting of six elements (EHS, Quality, People, Asset Care, Continuous Improvement, and Supply Chain), leading to operational excellence at every level of the value stream. These elements are supported by several sub-elements, all of which contain the direction and expectations for the system called “requirements”. These requirements provide a roadmap for the Plant Management Team to understand gaps in performance against expectations and help sets priorities for developing and driving action plans leading to operational excellence and proven quality within Pactiv Evergreen.

The six elements of PEPS drive standardization and continuous improvement:

- Environmental, Health, Safety, and Sustainability – Creating and Maintaining a Safe Work Environment
- Quality – Keeping Customers Happy by Making Product to Spec
- People – Creating a Culture of Engagement and Performance
- Asset Care – Maintaining Assets to Maximize Efficiency
- Continuous Improvement – Optimizing Production Processes and Reducing Waste
- Supply Chain – Loading Trailers On-Time and In-Full per Order

The EMS is comprised of nine elements:

- Leadership
- Planning
- Resources, Competence, and Training
- Communications
- Documented Information (Documentation)
- Operations
- Performance Evaluation
- Improvement
- Business Continuity





These elements are aligned with both the ISO 14001 and 45001 standards, which are the foundation of our program. Our EMS supports our overall EHS Commitment and is tied to our company values.

## II. LEADERSHIP

Pactiv Evergreen has developed an [Environment, Health and Safety Statement](#) that has been approved by top management. This statement covers our employees' responsibilities for ensuring sustainment of EHS excellence and our commitment to continual improvement in minimizing our EHS impact.

## III. PLANNING

Pactiv Evergreen has several aspects to its environmental, health and safety management system that proactively address its compliance obligations and enable the system to achieve continual improvement. Each year environmental goals are set for each Pactiv Evergreen location with follow up to ensure each goal is tracked to completion. In addition, Pactiv Evergreen has a web-based compliance calendar system (Gensuite) that contains regulatory obligations for each location. All federal, state, and local compliance obligations have been identified and documented in this system. Finally, the company has established an approval system for all capital projects that ensures regulatory concerns are addressed at the planning level of any capital improvement project. All compliance tasks in Gensuite are tracked monthly with the expectation of 100% completion.

## IV. RESOURCES, COMPETENCE, AND TRAINING

Resources are committed to supporting the organization. The Corporate EHS structure is divided into two pillars: (1) Operational EHS Business leaders, and (2) Functional Leaders over three areas (Environmental, Safety and Industrial Hygiene/Occupational Health). These leaders and their associated teams report directly to the Vice President of EHS&S. Pactiv Evergreen continues to evaluate its EHS resources to ensure they meet the needs of the organization. Pactiv Evergreen's public website is designed to share information with its customers and the public.

The Pactiv Evergreen Corporate Environmental Health and Safety team provides EHS Management training to members of management at all facilities on an annual basis. This training and all site specific training is included in the Gensuite system for each location. Annual management training addresses corporate environmental requirements as well as site specific programs. Pactiv Evergreen has multiple programs in place to identify and respond to emergency situations. These plans are reviewed at a minimum on an annual basis and managed as part of the Pactiv Evergreen Gensuite Management System. These plans/programs include:

- Emergency Response
- Risk Management
- Business Continuity
- Emergency Notification System
- Site Emergency Contact List
- Local Fire Department Tours
- Evacuation Drills



- Table Top Exercises
- Spill Prevention Control and Countermeasures
- Storm Water Pollution Prevention

In addition, Pactiv Evergreen ensures that all employees who have responsibility for EHS activities have the appropriate education and training. A matrix of requirements and training is maintained for each job function. Each facility maintains training files as part of our overall training management program. Pactiv Evergreen also provides Environmental, Health and Safety Management training to members of management at all facilities on an annual basis and is included in the Gensuite system for each location.

As noted above, in addition to each facility having a budget for the management and improvement of EHS risks, the company has established an approval system for all capital projects that ensures regulatory concerns are addressed at the planning level of any capital improvement project.

## **V. COMMUNICATION**

Pactiv Evergreen utilizes Gensuite Environmental Management System for all relevant internal communications. All EMS compliance notifications are generated via email for all compliance tasks. In addition, a monthly summary report is automatically generated and distributed via email to all levels of management within Pactiv Evergreen. Pactiv Evergreen's Vice President of EHS&S maintains the Pactiv Evergreen EHS Commitment and EMS. To foster communication, Pactiv Evergreen maintains an internal intranet site (SharePoint) where information is shared with employees as needed.

## **VI. DOCUMENTATION**

Pactiv Evergreen utilizes a formal documentation system, including our data management system (Gensuite). The documentation system covers both compliance and system related documentation. Also, each location has an electronic and manual environmental health and safety filing system to ensure all regulatory documentation is retained as needed.

## **VII. OPERATIONS**

Operational controls and procedures are the measures that enable a business to function. They are also the means by which an EMS can manage environmental impacts. Controls have been put in place to prevent any potential significant incidents such chemical or air releases. Pactiv Evergreen utilizes a number of listening devices and control charting tools to ensure its operations function within regulatory compliance limits.

## **VIII. PERFORMANCE EVALUATIONS**

Pactiv Evergreen has well established mechanisms in place to monitor and measure environmental performance. Gensuite provides monthly compliance reports which allow all levels of management access to the current state of environmental performance. The expectation each month is 100% completion of all environmental objectives. The Regional Managers also perform at a minimum annual site visits for all locations within Pactiv Evergreen. The more complex the site environmental programs, the more frequent the visits. During those visits the Regional Managers use Leader Standard Work practices to ensure compliance with all corporate and site



environmental programs. The Pactiv Evergreen Environmental Health Safety and Security Team meets monthly to review sustainability data, program compliance reporting, corporate and site initiatives, regulatory changes and program change implementation strategies. In addition, we review our EHS Strategic Priority Plan to ensure that we are still on target for our performance metrics and targets. Site specific meetings are scheduled on an as needed basis between the Regional Managers, Business Unit EHS leads and the functional directors.

In addition, as part of our ongoing continuous improvement, Pactiv Evergreen assesses its EHS management system as part of the PEPS assessment process. The goal is for each facility to have a yearly onsite assessment (by an internal assessment team) while also conducting several self-assessments throughout the year which are entered into a tracking database.

## **IX. IMPROVEMENT**

All corrective actions related to the environment are managed in Gensuite. Gensuite is used to generate near-miss reports and inspection reports. The action tracking system in Gensuite also provides a means for dealing with one time corrective actions. More complex issues and corrective actions are presented by the Vice President of EHS&S to the executive team. The approved corrective action and incident summary are then communicated to site management teams to provide an opportunity to learn from the incident.

## **X. BUSINESS CONTINUITY**

Pactiv Evergreen has implemented a multi-disciplined business continuity plan (BCP) to ensure continued operation during critical events. These events include but are not limited to: severe weather, civil unrest, work stoppages, cyber-attacks, and criminal activity. Pactiv Evergreen's BCP is led by the Director of Environmental Compliance and includes members from supply chain, procurement, finance, operations, IT and human resources. Our EMS includes business continuity elements that each facility must implement to ensure that control measures are in place and that table top exercises are performed.