



HEALTH & SAFETY POLICY

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201. HEALTH AND SAFETY POLICY

1.0 Purpose

- 1.1 To ensure that Health and Safety programs at Vantiva are managed in a manner consistent with the commitments established within the Vantiva Charter for Health, Safety, and the Environment.
- 1.2 To ensure that Health and Safety Programs at Vantiva are managed in compliance with applicable legal requirements in an effort to protect the health and safety of workers, contractors, and visitors to Vantiva facilities.
- 1.3 To define the components, responsibilities, and organization of Vantiva Health and Safety Program that will help:
 - 1.3.1 Ensure a safe and healthy work environment;
 - 1.3.2 Minimize the potential for accidents, fires, injuries and similar unwanted occurrences; and
 - 1.3.3 Minimize the risk associated with unwanted occurrences.

2.0 Responsibilities

- 2.1 Corporate HSE is responsible for establishing corporate direction and strategies and ensuring implementation of corporate health and safety policies and guidelines which meet or exceed applicable regulatory standards for compliance.
- 2.2 **Senior Management** (General Managers and above) have the ultimate responsibility for all health and safety issues within their operations.
- 2.3 **Plant/Site Manager** - has the ultimate responsibilities for all plant/location health and safety issues including establishment and submittal of annual goals to Corporate HSE. Each Vantiva site must designate an individual qualified by means of training, education, or experience to be the Site Health & Safety Coordinator.
- 2.4 **Health and safety coordinator**, is responsible for:
 - 2.4.1 Directing, developing, implementing, and maintaining the site Health and Safety Programs to meet the criteria established within this policy,
 - 2.4.2 Modifying of Corporate Guidelines to meet more restrictive local demands if any,
 - 2.4.3 Managing day-to-day activities,

2.4.4 Notifying appropriate agencies when circumstances require communication and informing Corporate HSE of such communications for all non-compliance citations or site remedial action.

2.5 **HSE Committees** shall be formed to regularly assess the environmental, health and safety programs and the causes of unwanted occurrences within each site. These committees must consist of a representative cross-section of personnel from the different work areas.

2.6 **Supervision and Management** - at all levels, have the responsibility to lead, by example, in demonstrating a commitment and involvement in Health and Safety activities and for enforcing provisions of the site's health and safety policies programs, procedures and specifications. In addition to identifying and correcting potentially unsafe situations, Supervision and Management shall recognize safe work practices, behaviors, industrial hygiene, and safety suggestions.

2.7 **Vantiva Workers** - are responsible for understanding and following the designated health and safety policies, programs, procedures, and specifications relevant to their jobs, and for immediately notifying their supervisor of any unsafe conditions encountered, or any procedure or rule that does not adequately address health and safety program requirements and for making proposals to further improve health and safety.

3.0 Accountability

All workers are to be held accountable for following established health and safety policies, procedures, and work practices. Proper disciplinary actions, commensurate to the violation, are to be taken when unsafe work is observed.

4.0 Program Components

The components of the Site Health and Safety Programs are described in the following paragraphs. The guiding principle of each component is the minimization of workplace injury, illness, and other losses.

4.1 **Injury & Illness Prevention and Management** (see Injury and Illness Prevention Guideline). Sites must develop and implement programs to prevent work-related injury and illness and to ensure proper medical management once injury or illness occurs. Work practices and procedures must be developed to ensure that workers can perform their jobs safely, without injuries and without occupational illness. Workers must be educated on the hazards associated with their job, the control measures already taken by Vantiva, and measures they need to take, to prevent accidents and injury, and on the established process to follow if injured as a result of a work-related event.

All accidents which involve an injury to a Vantiva worker, or contractor working at a Vantiva site, shall be analyzed and a formal report submitted to the Health and Safety Coordinator within two (2) business days of the incident.

The purpose of the analysis is to discover the unsafe circumstances surrounding the incident and determine what corrective measures can be taken to avoid future recurrence. Such incidents, their root cause, and their mitigation, shall also be discussed by the *HSE Committee*.

- 4.2 **Hazard Recognition Evaluation and Control.** All facilities and equipment must be designed, constructed, maintained, and operated in a manner which is safe to the health of the workers, community, and environment. All equipment purchased for use within Vantiva facilities, which present potential hazards to workers and or environment, must follow health and safety laws and regulations and are to be reviewed and approved prior to production use by the appropriate site safety, environment, and facilities personnel.

New equipment/process must be approved by the *HSE coordinator* prior to any usage/implementation (Form 11 or similar)

Facility and equipment inspections must be conducted whenever modifications are made which could have an impact on worker health and safety, and on an on-going basis. Areas of concern include but are not limited to: housekeeping; hazardous material handling, disposal, and storage; personal protective equipment use; electrical safety; machine guarding; fire safety and adherence to safe work procedures. A complete facility inspection to identify and correct potential safety hazards and noncompliance must be conducted no less than annually. All inspections are to be documented and include written follow-up detailing actions taken or planned.

Appropriate control measures are to be provided to the extent feasible to ensure that employee exposure to harmful chemical stresses and physical agents are minimized, and do not exceed established exposure limits. Examples of control methods include, but are not limited to, plant layout and design, equipment design, substitution of a less hazardous agent or method, isolating the hazard from the operator, reduction of the hazard at its source, and ventilation.

Industrial hygiene sampling and analysis must be conducted in all areas where chemical, physical or biological agents or stresses exist to determine if control measures are adequately protecting workers and minimizing their exposure. Such sampling includes: dusts, fumes, gases, mists and vapors; ionizing and non-ionizing radiation; noise; heat; and ventilation. All sampling and analysis must be documented, communicated to workers and when applicable, corrective actions noted.

Personal protective equipment must be used when engineering controls are not sufficient to achieve acceptable levels of exposure to the identified hazard. Protective equipment includes as example eye, face, hand and foot protection, hearing protection, protective clothing, respiratory protection, and protective creams and lotions.

- 4.3 **Health and Safety Training.** (see Training Policy) A most important aspect of the program is comprehensive health and safety training for all workers. Health and Safety training begins at the time of employment, before the employee actually starts work. Safety training is required for:

- 4.3.1 New workers,
- 4.3.2 When new hazards, equipment or processes are introduced,
- 4.3.3 When procedures have been revised or updated,
- 4.3.4 When new information must be made available,
- 4.3.5 When employee performance needs to be improved,
- 4.3.6 Compliance with new applicable Governmental or Company regulations and guidelines, and
- 4.3.7 On a periodic basis to refresh the material.

Training rosters must be completed for each training session and are to be maintained by the Site HSE Coordinator as described in the record retention policy, typically for a minimum of 5 years.

- 4.4 **Emergency Planning and Preparedness:** Written emergency plans must be developed, communicated, and practiced addressing potential emergency situations which may occur at each location (fire, explosion, chemical spill or release, earthquake, tornado, flood etc.)

Evacuation drills or exercises must be conducted annually. When evacuation drills or exercises are deemed not feasible, documented annual training shall be provided to each employee. This training must include what the evacuation signal is and how it will be given and specific procedures to follow when the evacuation signal is given.

Emergency plans must ensure that the facility and community is prepared to address, contain, and control the situation; that proper actions are taken in the event of an emergency situation, allowing for the safe evacuation of all personnel from the area of concern, accountability of said personnel, access to the area for purposes of fire extinguishment, chemical spill clean-up and disaster control; and proper company personnel and outside authorities are contacted.

- 4.5 **Fire Protection and Prevention:** Fire protection and prevention techniques must be incorporated into all facilities. Each location must have formal programs which include: plan checking; fire protection equipment/system impairment procedures, fire protection prevention and suppression equipment and system inspection, maintenance, and testing; hot works procedures; and material storage.

- 4.6 **Hazardous Materials Management:** An analysis of hazardous materials used and/or stored on our sites must be conducted and measures taken to ensure proper construction of chemical storage areas, the safe delivery, handling, storage, use and transportation of hazardous materials and that all workers who work with or around hazardous materials receive training on the associated hazards, methods of protection and emergency procedures. New chemicals must be approved by the **HSE safety coordinator** prior to any process usage.