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1.0 SCOPE:

1.1 This program applies to all Graham Packaging Company owned and leased locations worldwide.

2.0 PURPOSE:

2.1 Graham Packaging Company’s EH&S values state that it’s everyone’s responsibility to act in a way that creates and maintains the highest standards for safety in the workplace. The purpose of this document is to provide additional details for implementing Graham Packaging Company’s EH&S value, policy and principles.


3.0 POLICY:

3.1 General

- A. All locations must comply with Graham Packaging Company’s Corporate EH&S standards that have been developed in support of Graham Packaging Company’s EH&S Policy.
- B. Locations that cannot comply with the requirements of a standard, temporarily or permanently, are required to develop a business case, impact analysis and risk assessment and obtain approval from Corporate EH&S and operations.

3.2 EH&S Communication


- A. Plant Management must communicate Graham Packaging Company’s EH&S policy to all personnel who enter the location.
 - 1. The EH&S policy (EHS1.01-01) must be posted in a common area of the plant (lobby, hallway, breakroom, etc.). The most current version of the policy must be posted. The Corporate EH&S Department will communicate any changes to the policy.
 - 2. Personnel must be introduced to this policy during their new-hire orientation and the policy must be reviewed with all personnel annually thereafter.
- B. Effective communication of EH&S metrics, data and information is key to keeping all location personnel informed about current EH&S performance and trends. Each location must maintain an EH&S communication board for this purpose. The EH&S communication board must be located in a common area of the plan and may be electronic.
 - 1. The EH&S communication board must be updated by the 8th working day of each month to include the following location specific information:
 - a. Year-to-date plant incident summary
 - b. Year-to-date Total Recordable Rate (TRR)
 - c. Year-to-date STOP Card metrics and corrective action tracking sheet

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- d. Location safety committee notes
 - e. Results of safety walkthrough inspections and corrective action list
 - f. EH&S Alerts and other EH&S related communications
2. The Corporate EH&S Department will provide monthly reports to all verticals tracking vertical EH&S performance. Data for individual locations can be found using the EH&S Dashboard.

3.3 Visitor Safety

- A. All visitors, including vendors and contractors, are required to sign in when they enter plant and sign out when they exit. Visitors must be met and escorted by Graham Packaging Company personnel unless their work assignment is established and the visitor has conducted such work in the past (servicing vending machines, extended contractor work, etc.)
- B. All visitors who enter the production, maintenance or warehouse areas of the plant are required to view the Visitor Safety Video and Cardinal Rule Video. Each visitor must be issued a wallet card valid for 1-year. Repeat visitors can show their valid wallet card to waive the visitor safety video requirement. Wallet cards are good at all Graham Packaging Company locations. If the wallet card is expired, the visitor will have to watch the visitor safety video again and be issued another wallet card.
 - 1. Visitors who will remain in the office during the course of their visit are not required to view the Visitor Safety Video or Cardinal Rule Video. Visitors must still be informed on evacuation protocol for the office area.
 - 2. A standard wallet card template has been developed by the Corporate EH&S Department. The template is found on GrahamConnect and is form number EHS1.01-6.
- C. Each location must maintain equipment suitable for showing the visitor safety video to all visitors. (laptop, TV, DVD player, etc.)
- D. The most current version of the videos must be shown. The most current version of the videos are available on the EH&S GrahamConnect page and can be downloaded in different languages.
- E. Visitors are required to use standard personal protective equipment while visiting production, maintenance and warehouse areas of the plant. Tasks specific PPE may be required. Generally, contractors are required to provide their own PPE. Detailed PPE requirements can be found in Graham Packaging Company's Personal Protective Program (EHS9.01). Graham will provide PPE to the visitor at no cost to the visitor.

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- F. Visitors are subject to all Graham Packaging Company EH&S rules and procedures. Visitors who violate these rules will be subject to immediate removal from Graham Packaging Company.

3.4 Plant Safety Inspections (Walkthroughs)

- A. At least once a quarter, Location Management must ensure all areas of the facility including production, warehouse, maintenance, offices and outdoor/perimeter areas are inspected for EH&S hazards and/or unsafe conditions.
- B. Hazards or unsafe conditions discovered must be documented and corrective actions developed and implemented to address the issue. This can take the form of a 30/60/90-day planner.
- C. The Corporate EH&S Department has developed the “Plant Safety Inspection” audit form (EHS1.01-4) to serve as guide for individuals conducting the EH&S Inspection. The form may be modified to fit the individual location.
- D. Location Management are encouraged to use the help of the plant’s safety committee or other interested and engaged personnel to conduct these inspections.

3.5 Safety Committees

- A. Each location is required to maintain a safety committee made up of hourly and salary personnel. The breakdown between hourly and salary personnel must be 75% hourly and 25% salary.
- B. The safety committee must be formalized with a written charter (EHS8.01-1) and meet at least once a month with documented meeting minutes and action item list.
- C. At a minimum safety committee topics must include the following:
 1. Review of high risk incidents
 2. Plant STOP card performance
 3. Job Safety Analysis reviews
 4. Safety inspection results
- D. All personnel must have the opportunity to join and participate in the safety committee and membership should rotate on a basis determined by the location.


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3.6 Behavior Observation Program

- A. Graham Packaging Company employs the DuPont STOP Card Program as our company’s behavior observation program. All locations must utilize this program. All personnel must participate in the STOP card program.
- B. The standard DuPont STOP card must be used. Location specific cards are not permitted. STOP cards can be sourced directly from DuPont.
- C. On a monthly basis, Location Management must track STOP card metrics to include the following data points:
 - 1. Total number of STOP cards submitted
 - 2. Percent participation rate
 - 3. Percent behavior-based observations
- D. STOP Card participation expectations must be communicated to all location personnel.
- E. Location Management must track unsafe conditions and behaviors identified from STOP cards. Follow up action items required to correct the unsafe condition or behaviors must be tracked to closure. Tracking sheet must be updated monthly and included on the location’s EH&S communication board.
- F. Location Management must upload the location’s STOP card performance metrics to Incident Investigation Client database by the fifth working day of each month.

3.7 Incident Investigations

- A. When an incident occurs, Location Management is responsible for conducting an incident investigation and developing corrective actions to prevent a repeat incident.
- B. Details and further guidance on conducting an incident investigation can be found in Graham Packaging Company’s Incident Investigation program (EHS4.01).
- C. All incidents including near-miss and injury free events must be added to Graham Packaging Company’s Incident Investigation Client within 24-hours.
- D. Corrective action plans must be developed for all “recordable”, “high risk” and “fire” events.

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3.8 EH&S Cardinal Rule Program

- A. Graham Packaging Company maintains a Cardinal Rule program which focuses on high level EH&S requirements implemented to reduce the risk of fatalities and serious injuries. Violating a Cardinal Rule is a very serious offense and Plant Management must manage the incident in a strict fashion regardless of injury outcome.
- B. Graham Packaging Company Cardinal Rule policy (EHS1.01-1) must be posted in a common area of the plant (lobby, hallway, breakroom, etc.) the most current version of the policy must be posted. The Corporate EH&S Department will communicate any changes to the policy.
- C. Personnel must be introduced to the Cardinal Rule policy during new-hire orientation and the policy must be reviewed with all personnel annually thereafter. All personnel must be issued a Cardinal Rule “pocket card” during their initial introduction.
- D. When an actual or potential Cardinal Rule violation occurs, Plant Management must:
 - 1. Contact the EH&S Department following Graham Packaging Company’s Adverse Event Reporting program (EHS3.01).
 - 2. If a Cardinal Rule violation is determined to have actually occurred, the involved employee or employees must provide a written statement and then be suspended for the remainder of the investigation.
 - 3. Conduct a detailed investigation of the incident to include a review of personnel training records, personnel performance documentation and the Cardinal Rule Violation checklist (EHS2.01-3).
 - 4. Prepare a Cardinal Rule Violation Investigation packet as required by Graham Packaging Company’s Incident Investigation program (EHS4.01).
 - 5. Review the completed investigation packet with required plant, operation and corporate leaders.
- E. Based off the details of the investigation, the location will make a recommendation for the disciplinary outcome of the employee(s) involved. Discipline may include documented coaching up to termination of employment.
- F. Refer to Graham Packaging Company’s Cardinal Rule written program (EHS 2.01) for more details on the EH&S Cardinal Rule Program.

3.9 EH&S Training

- A. All new-hire personnel including temporary workers, must receive new-hire orientation that covers basic safe working requirements and awareness trainings prior to being permitted to work on the plant floor. Orientation training must include the following EH&S topics:
1. Lockout/Tagout
 2. Machine Guarding
 3. Mobile Equipment
 4. Fall Prevention and Protection
 5. Ergonomics
 6. Hazard Communication
 7. Electrical Safety
 8. Personal Protective Equipment
 9. Hearing Conservation
 10. Environmental Awareness and Spill Response
 11. Bloodborne pathogens
- B. Training material to support new-hire orientation training will be provided by the Corporate EH&S Department. Training materials can be modified by the location to provide more detail around location specific hazards. Example include adding location specific mobile equipment heat map to EH&S provided Mobile Equipment Awareness training.
- C. All personnel must receive safety training based off the monthly safety training schedule provided by the Corporate EH&S Department. Monthly training can be delivered as a computer-based training using Graham Packaging Company's Learning Management System or in instructor lead, classroom style training.
1. Location Management must aim to have 90% of the plant population trained on the monthly safety topic by the end of each month.
- D. Training records must be retained for auditing. Attendance sheets must include the date the training was provided, the instructor's name and training topic.
- E. Where provided, personnel must pass all post training quizzes, tests and check for understanding documents with an 80% or better to be considered properly trained. Personnel who do not achieve an 80% or better must be retrained.

- F. EH&S training is general awareness training and does not replace dedicated on-the-job training and observation required for personnel to become proficient in their assigned job tasks. Personnel must demonstrate competency in their assigned work before being permitted to perform such work solo.
 - 1. On-the-job, task specific training must be outlined in a training matrix.
 - 2. The training matrix must be broken down by job classification and include all detailed EH&S and on-the-job training programs required for personnel in each job classification to be considered trained.

3.10 Work Guidance

- A. Providing proper guidance and instructions for work tasks is an administrative hazard control that has proven to reduce the risk of injury and incident while improving quality and productivity.
- B. Graham Packaging Company requires a documented Job Safety Analysis for all routine work activities. Routine activities are any tasks that is performed more than once every 6-months.
- C. Examples of routine work include:
 - 1. Setting up machines and equipment
 - 2. Minor servicing tasks such as clearing jams, clearing flow heads and making routine adjustments.
 - 3. Starting up and shutting down machines and equipment
 - 4. Quality tasks
 - 5. Routine maintenance and housekeeping activities
- D. Documented Job Safety Analysis must include required personal protective equipment as well as take ergonomics (force, posture and repetition) into account.
- E. Personnel must receive documented training on applicable Job Safety Analysis for the work they will be performing. Training must occur and the employee must be deemed competent prior to being permitted to perform work solo.
- F. If non-routine work is performed and a documented Job Safety Analysis has not been created for the work, the personnel involved in the non-routine work must complete a Non-Routine Work Hazard Assessment form (EHS7.01-02). This form will be used to review and plan the work. When completing the Non-Routine Work Hazard Assessment form personnel must consider:


1. Physical and health hazards of the work
 2. Personal protective equipment requirements including additional PPE beyond standard requirements.
 3. Body position and posture of all involved personnel
 4. How effective communication will be maintained
 5. Individual steps required to complete the work successfully
- G. The completed assessment form must be reviewed by the Supervisor prior to work beginning.

3.11 Return to Work Program

- A. Distractions are a leading cause of workplace incidents and injuries. Personnel who are away from the workplace for extended periods of time are more likely to be distracted by non-work thoughts during the first shift upon their return to work. To assist with re-focusing personnel on work and reduce the risk of incident and injuries, Graham Packaging Company has developed a return to work program for personnel who return to work after a leave of absence that extends greater than five consecutive days.
- B. When returning to work, Location Management must review the “Back to Work – Back to Safety” tool box communication (EHS7.01-3) along with the attached check for understanding with the returning employee. Additional topics of discussion include:
1. Any significant EH&S events or near-misses that have occurred during the employee’s time away from work.
 2. Changes, updates or additions to work guidance documentation
 3. Changes to PPE requirements
 4. Safety training sessions that were missed during the employee’s time away from work.

3.12 EH&S Promotional Events

- A. Graham Packaging Company supports the health and safety of personnel both on and off the job. To help support this dedication to personnel, all locations are required to plan and conduct safety promotional programs at least three times a year.
- B. Promotional events can include:

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1. Focus on a specific EH&S risk or hazard (fire safety, below-the-wrist injury prevention, etc.)
 2. Focus on seasonal risk (heat stress awareness, winter walking/driving, pool safety, etc.)
 3. EH&S related guest or promotional speakers
- C. Locations are encouraged to engage the location’s Safety Committee to assist with planning and executing required EH&S promotional events.

3.13 Environmental Compliance


- A. Graham Packaging Company will ensure all of its facilities are good stewards to their local community and environment through the documentation and implementation of several key environmental programs including:
1. Storm Water Management
 2. Waste Management
 3. Spill Prevention Control and Countermeasures (SPCC)
 4. Ozone Depleting Substances (ODS)
 5. Air Management
 6. Emergency Planning Community Right-To-Know Act (EPCRA) Tier II
- B. Graham Packaging Company is committed to the ISO 14001 Principles for Environmental Management and will look to certify our plants on the objectives of ISO14001.

4.0 RESPONSIBILITIES

4.1 Location Management

- A. Location Management is responsible for implementing all requirements outline by this program. If individual requirement cannot be implemented, Location Management is responsible for obtaining the required variance from Corporate EH&S and Operations. Where required by this document, Location Management must ensure all required training is completed for all personnel.

4.2 Corporate Environmental, Health and Safety Department

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- A. The Corporate EH&S Department is responsible for updating and maintaining this document along with all EH&S guidance/standards used to support Graham’s EH&S policy. The EH&S Department with communicate any changes to guidance documentation and ensure guidance meets applicable federal laws and industry best practices.

4.3 All Graham Packaging Company employees

- A. All Graham Packaging Company employees are responsible for working in a manner that respects their personal health and safety as well as the health and safety of their co-workers and protection of the environment.

5.0 **REVISION HISTORY:**

Revision Date	Revision Description
08/16/2021	Initial Publication on SharePoint (must match date in the header)
11/29/2021	Updated section 3.3 to include reference to visitor safety wallet card template.
10/12/2022	Added Section 3.13: Environmental Compliance
01/05/2024	Updated section 3.3 to include Cardinal Rule Video. Updated section 3.8 to reference written cardinal rule program. Revised general formatting.

6.0 **APPROVED BY:**

01/05/2024	Corporate Environmental, Health and Safety Department