

American Packaging Corporation Health, Safety and Environmental Vision, Intent, Guiding Policy and Commitment

VISION

The American Packaging Corporation Health, Safety and Environmental Committee has a vision of a workplace free of all injuries and illnesses and losses resulting from accidents, fire, theft, environmental incident, and/or related activities. We maintain that all loss incidents can be avoided through the elimination of the conditions and behaviors that lead to these losses. We believe all APC employees share the responsibility for loss control and through awareness, continuous improvement and teamwork, we can achieve our vision. We believe in sharing experiences and best practices from our divisions as well as from outside the corporation to help ensure the safety of all of our employees and minimize impacts to the environment. Our relationships between divisions are open, positive and supportive as we strive to help each other eliminate all loss incidents.

INTENT

The HSE Committee intends to provide the support and direction to our divisions to ensure the safety and health of our employees, neighboring communities, and the protection of the environment. This will be accomplished through the assignment and communication of HSE responsibilities and granting of authority to managers, supervisors, committees and individuals. The HSE Committee will hold those in authority accountable for continuously improving our practices, policies, facilities and loss control initiatives.

GUIDING POLICY

Employment: Working safely and the prevention of environmental pollution are corporate values and are conditions of employment at APC.

Performance: All APC employees will perform their job duties in a manner that prevents loss producing incidents in our facilities; at work, at home, on the road and in our communities.

Responsibility: Loss control is a primary responsibility of line management, however, all APC employees have accountability and control in preventing loss incidents. All APC employees will comply with applicable legal requirements and with other requirements to which the organization subscribes.

Facilities: Our plants will be designed, operated and maintained to prevent all forms of loss and business interruptions. We will strive to efficiently use resources and be a good neighbor to our local communities.

Knowledge: The key to effective loss control is a knowledgeable workforce which will be developed through effective, regular and timely training, freely sharing information and open communications between facilities and employees.

Assessment: We will regularly assess our health, safety and environmental programs through audits and inspections from internal and external organizations and we will promptly investigate incidents to determine root causes.

Correction: Loss producing conditions and behaviors will be identified and promptly corrected.

Continual Improvement: We will continue to improve upon the health, safety and environmental programs. We will work to ensure the efficient utilization and preservation of natural resources.

COMMITMENT

The HSE Committee is committed to drive the loss control efforts throughout the organization and to the vision, intent and guiding policy outlined above.