Greif Inc. Global EHS Administrative Policies Effective Date: October 1, 2012 Revision 00



Subject: Contractor Safety

Purpose:

The purpose of a Contractor Safety Policy is to ensure contractor work is performed in a safe manner and meets Greif's minimum safety standards. Contractor Safety policies are not intended for contract labor (i.e. temporary labor) unless an agreement for services with the provider / agency is not available.

Policy Requirements:

All facilities shall develop, administer and maintain a program to properly review and engage contractors. The policy shall contain the Program Elements outlined below and shall also contain any additional elements that are required by the regional legislation. In the case of conflicting requirements, factories shall meet the more stringent requirement(s).

Application:

This policy applies to all Company facilities. Each Strategic Business Unit shall develop, implement, monitor and administer and effective program that meets the requirements of this policy.

Program Elements:

Each facility must develop a written Contractor Safety Policy containing the following:

- 1. Statement of purpose of the program.
- 2. Scope of contracts covered by this program.
- 3. Statement of responsibilities.
- 4. Provisions for retaining documentation pertaining to this policy.
- A requirement for documentation to include: a code of safety practice (Greif's safety rules), liability insurance(s), contract for services including an indemnification clause adhering to Greif's safety standards.
- 6. Provisions for conducting a pre-job orientation and safety review relating to the scope of work.
- 7. Procedures for advising the contractor of procedures to follow in case of an emergency. This should include information and on evacuation, fire, severe weather, natural disasters, rescue procedures, location of alarms, and other site-specific emergency information as necessary
- 8. A requirement to document all violations of safety rules and communicate them directly and immediately to the contractor, and ensure all are addressed.
- 9. A provision that, if a contractor uses Greif equipment, they only should do so after obtaining management approval, ensuring the contractor is adequately trained in the proper and safe operation of the equipment, and that the equipment is in safe working order with all necessary safeguards installed.

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