

CONTRACTOR SAFETY PROGRAM

PURPOSE

This program is designed to ensure that all Contractors and Subcontractors (herein referred to as “Contractors”) performing work for Silgan Containers Corporation together with its parent, subsidiary and affiliated companies referred to herein as “Silgan” comply with applicable Occupational Safety and Health regulations as well as specific company safety policies.

SCOPE

This program outlines Contractor safety requirements that must be verified by the Plant Manager or designee prior to any Contractor performing work for Silgan. This program also outlines safety policies that Contractors must comply with while working for Silgan.

CONTRACTOR SAFETY

It is Silgan’s policy to adhere to local, state, and federal regulations regarding occupational safety and health. Safety is a joint responsibility to be shared by Silgan and any Contractor Silgan may employ. Silgan is committed to providing safe working conditions for its employees. Silgan expects its Contractors to provide safe working conditions for their employees and adhere to all applicable safety and health regulations.

Written Safety Program

Before a Contractor is permitted to perform work at a Silgan facility, the Plant Manager shall review a copy of the Contractors written safety program. The program should at a minimum include:

- A Policy Statement
- Names and titles of persons responsible for maintaining the safety program
- OSHA required programs (Hazard Communication, Energy Control, Confined Space, etc.)
- Employee safety training documentation

If a single Contractor is used several times throughout the year, that Contractor’s safety program need only be reviewed on an annual basis.

Job Safety Analysis

The Contractor shall prepare a Job Safety Analysis (JSA) to identify potential hazards associated with the project. The JSA shall identify procedures and equipment to be used to control all identified hazards. The JSA shall be documented using the same type format as the JSA form in the Silgan Corporate Safety Manual.

Pre-Job Meeting

A pre-job meeting shall be held with the Contractor(s), the Project Engineer or Plant Manager and the Plant Safety Coordinator. The purpose of the meeting will be to; (1) review the scope of the project, (2) review the JSA for accuracy, and (3) schedule a time to hold a safety briefing for all contract personnel that will be working on the project.

Safety Briefing

All contract personnel working at a Silgan facility must attend a safety briefing prior to the start of a project. It is the responsibility of the Plant Manager to ensure that the safety briefing is completed and that the following safety items are covered:

Incident Reporting

- Immediate notification to Silgan of any incident resulting in injuries or damage to Silgan property
- Written Incident Report completed by Foreman / Lead Man and copies to provided to plant management

Hazard Communication

- Disclosure of hazardous materials and their locations within the facility
- Disclosure of hazardous materials contractor will bring into facility
- Location of both contractor and Silgan Material Safety Data Sheets

Energy Control / Lockout

- Provide overview of Silgan's Energy Control program

Emergency Procedures

- Evacuation alarms and procedures
- How to report a fire
- How to summon medical assistance, directions to local medical clinic

Confined Space

- Permit-required confined spaces within the facility
- Confined Space permit requirements

Fire Prevention

- Storage of flammable & combustible materials
- Hot work permit requirements
- Smoking Areas

Personal Protective Equipment (PPE)

- Types of PPE required
- Work areas that require PPE

Forklifts

- Permitted for certified drivers only
- Silgan forklifts are not to be used by Contractor personnel

Housekeeping

- Staging area for materials
- Housekeeping requirements in the facility

General Facility Safety Rules

- All plant safety rules
- Contractor parking
- Job trailers and equipment staging
- Sign-in / Sign-out procedures

The safety briefing must be documented using the Employee Safety Meeting/Training form located in the Corporate Safety Manual. The plant shall retain a copy for the file.

Toolbox Safety Meetings

It is the responsibility of the contractor(s) to make sure their work crews review the hazards and control measures outlined in the Job Safety Analysis before the start of all work shifts. The Foreman or lead man should convey to his work crew how the control measures relate to the days planned activities. If the duration of the project exceeds more than one week, the contractor shall hold weekly, documented, Toolbox Safety Meetings for its work crews. The subject(s) covered in each meeting should be directly related to work being done on the project. A copy of the meeting documentation shall be submitted to the plant safety coordinator.

Inspections

The contractor is responsible for insuring that the Foreman or Lead Man on the project conducts informal daily inspections of the project site. The intent of these inspections is to (1) recognize and remove potential safety hazards, and (2) insure that the work crew is following accepted safety practices. Depending on the size and scope of the project, these inspections may need to be documented. Determining the need for documentation of the inspections will be left to the Project Engineer, Plant Manager, or the Plant Safety Coordinator.

Contractor Responsibilities

The contractor is responsible for providing a safe workplace for its employees and those of subcontractors of any tier who may be performing work on the premises. In furtherance of this commitment, it is expected that all personnel performing work to be in the proper physical condition to perform their duties. Contractor agrees and will advise its employees that:

- It is Silgan's policy to prohibit the use, possession, sale and distribution of alcohol, drugs or other controlled substances at the workplace and to prohibit the presence of an individual with such substances in their body unless prescribed by a physician.
- Entry onto Silgan property constitutes consent to an inspection of the worker or contractor's vehicle and personal effects when entering, while on, or upon leaving the property.
- Any worker who is found in violation of the policy or who refuses to permit inspection will be removed and barred from the property.



CORPORATE SAFETY MANUAL

CONTRACTOR INSURANCE & SAFETY CHECKLIST

Plant / Location _____ Job # _____

Contractor _____ P.O. # _____

Reviewed By _____ Title _____

Date Reviewed _____

- 1. Received Certificate of Insurance _____
- 2. Certificate of Insurance lists acceptable types of insurance coverage _____
- 3. Certificate of Insurance lists acceptable minimum insurance coverage limits _____
- 4. Contract includes required indemnification language _____
- 5. Contractor safety program reviewed for minimum acceptable elements _____
- 6. Verified Contractor's Experience Modification for past 3 years _____
- 7. Job Safety Analysis prepared by contractor _____
- 8. Pre-Job meeting held between Silgan and contractor _____
- 9. Job Safety Analysis reviewed by Silgan and contractor _____
- 10. Contractor safety briefing held _____
 Items covered:
 - Hazard Communication _____
 - Lockout / Tagout _____
 - Emergency Procedures _____
 - Fire Prevention _____
 - Personal Protective Equipment _____
 - Housekeeping _____
 - Facility Safety Rules _____
- 11. Contractor safety briefing documented _____
- 12. Tool Box safety meetings will be required _____
- 13. Contractor provided name and title of on-site person responsible for safety _____



CORPORATE SAFETY MANUAL

This Hold Harmless Agreement must be signed by all Contractor personnel before entering Silgan property.

CONDITIONS FOR ENTRANCE

The undersigned, _____, as a condition of entrance, and in consideration of the opportunity to provide goods and/or services (including freight pick-ups and deliveries) to or at Silgan, hereby agrees that Silgan is not the employer or principal of the undersigned. The undersigned instead is either an independent contractor or an employee of an entity not affiliated with Silgan. The undersigned hereby acknowledges and agrees that Silgan is not responsible for directing or supervising the manner in which the undersigned provides the goods and/or services, or determining the skills necessary to provide the goods and/or service. The undersigned instead agrees that he or she (or the employer) is solely responsible, and agrees and acknowledges that he or she will not seek to hold Silgan, its employees or officers liable, by claim, lawsuit or otherwise, for any loss, liability, claim, injury, damage or expense which arises out of or relates to the undersigned's activities on or about the premises of Silgan, and hereby releases Silgan from any such liability. The undersigned also acknowledges and agrees that if a claim or lawsuit arises out of or relates to the provision of good and/or services to or at Silgan, the undersigned (and his employer) shall indemnify Silgan for any and all related direct or indirect losses, liabilities, claims, damages or expenses (including, but not limited to, reasonable fees and expenses for hiring attorneys, expert witnesses, or consultants for such a claim or lawsuit), specifically excluding the negligent or willful action or inaction of Silgan, its employees and officers.

Unless specified below in writing by the undersigned, the undersigned further acknowledges and agrees that assistance by Silgan and its employees is unnecessary and agrees never to assert to the contrary in any claim or lawsuit.

Date: _____

Company Name

Print Name

Sign Name

Employee Title

Job	JSA Identification Number	Facility	
	Type (General or Specific)	Department	
Job Titles of Involved Employees			
Required and/or Recommended Protective Equipment			
BASIC JOB STEPS			
Break the job down into its basic steps. Describe & record the job steps in their normal order of occurrence. For example, the job of "using a fire extinguisher" may be broken down as follows. 1. Remove fire extinguisher from hanger. 2. Carry to fire in an upright position. 3. Remove seal and pin. 4. Hold extinguisher in one hand, hose in other. 5. Return extinguisher to empty rack.	HAZARDS (UNSAFE ACTS/CONDITIONS) What are the hazards for each job step listed? You can get your answers by (1) discussing with employee (2) observing the job steps (3) reviewing past accidents & injuries or (4) a combination of all. Record the hazard by using the letter for the type of accident & by the description of the unsafe act or condition. Caught in (CI) Caught on (CO) Struck against (SA) Struck by (SB) Contacted by (CB) Contact with (CW) Fall (F) Overexertion (O) Exposure (E) Caught between (CBE)	CONTROL MEASURES How should the employee do the job to avoid the potential hazard? Review each job step & hazard you have listed. Discuss the hazards with the employee. List each precaution that the employee is to take to avoid the hazard you have shown. Number each separate recommendation with the same number given to the hazard. Answers must be specific & concrete if procedures are to be effective. General precautions – "be careful", "use caution", or "be alert" – should not be used. Answers should state precisely what to do & how to do it safely.	
Prepared by	Other Approvals	Safety Approval	Date Revised
		Date Originated	