

ENVIRONMENT HEALTH AND SAFETY POLICY

TOWARDS A SUSTAINABLE FUTURE – OUR EXPECTATIONS





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Expectations

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ENVIRONMENT, HEALTH AND SAFETY (EHS) EXCELLENCE – OUR COMMITMENT

Rexam's goal is to ensure a safe and healthy working environment that benefits employees, the environment, customers, shareholders and the communities around us in every country in which we operate.

We believe good management practices not only protect stakeholders and the environment, but also make a positive contribution to the success of our business. We will openly report our performance, consult with and listen to our employees and other stakeholders. We will work with others to raise standards and recognise those who have contributed to superior EHS performance.

Our EHS programmes are mature and embedded in our operations. However, achieving excellence in EHS management is a dynamic process and we continually strive to improve our performance. The cornerstones of our programmes are recognition, understanding and managing of EHS

responsibilities at all levels. Part of this process is to develop measurable safety and eco efficiency targets which we are committed to meet.

This document provides additional details which support the policy expectations for all Rexam employees and which will take us towards our goal.

The management team and I see ourselves as catalysts for the changes needed to continue to build Rexam as we move from being a good company to a great one. Our role is to promote sustainable development, ownership of issues, proper behaviour, and innovative technology, all of which foster eco efficiency and a safe working environment. We are firmly committed to the pursuit of EHS excellence - not just for today but for the future.

Lars Emilson, Chief Executive

EXPECTATION 1 – LEADERSHIP AND RESPONSIBILITY – WORKING TOGETHER TO IMPROVE EHS PERFORMANCE

Everyone within Rexam is responsible for achieving our goal of a safe and healthy working environment. Managers must demonstrate positive EHS behaviour by:

- Having updated and relevant EHS policies
- Clearly defining roles and responsibilities at every level
- Providing the necessary resources and create EHS awareness throughout the organisation
- Encouraging significant workforce participation in EHS issues
- Setting clear, measurable goals for continuous EHS improvement
- Collecting, recording and reviewing Key Performance Statistics
- Ensuring opportunity for open communication on EHS issues at all levels
- Providing regular focused feedback about ongoing EHS performance
- Measuring, reviewing and reporting on EHS management arrangements on a regular basis

- Demonstrating, visible ongoing support for managers and front line supervision.

Rexam employees should:

- Work together with management towards the goal of achieving EHS excellence through continuous improvement
- Act in such a manner as to protect their own health and safety and the health and safety of others
- Identify and report risks associated with our activity and ensure the issues are raised at the appropriate level within the organisation.

Working together as a team and sharing best practice is an important part of the Rexam Way. In 2002 we established an Inter Company Working Group (ICWG) with representatives from all Sectors, to ensure that our Group environment, health and safety programmes are relevant to the issues we face. The ICWG meets quarterly and Rexam operations are encouraged

to put forward to their Sector co-ordinators any issues and topics they wish to be addressed. Sectors need to ensure they actively participate in these meetings and that Sector Directors are informed of any significant outcomes or decisions.

Rexam businesses are required to demonstrate progress on environmental, safety and resource management and are expected to share this information within the Group. Sharing of experience, both good and bad, is vital for improved performance as well as the reduction of risk to our employees or damage to the environment.





EXPECTATION 2 – RISK ASSESSMENT AND CONTROL

Identification and removal of risk is a continuous process and essential to the success of our EHS programme.

Everyone has a responsibility to:

- Identify risk associated with our existing activity and ensure the issues are raised at the appropriate level within the organisation for action
- Make certain risk assessments are regularly reviewed and appropriate action is taken to reduce and manage the risk in light of new technologies
- Ensure the risks are understood and managed and that information is communicated to all concerned prior to the introduction of any new process or procedure.

EXPECTATION 3 – REXAM RISK ASSESSMENT SYSTEM (RAS)

Rexam's intranet based Risk Assessment System (RAS) gives our businesses a structured framework in which they can measure EHS systems and their effectiveness. Its main aim is to help our employees develop an understanding of the implications of their actions and then guide them to take appropriate reduction and control measures. The system also contains readily accessible examples of best practice. The educational section contains a knowledge library, a live Question and Answer forum and an interactive training programme to help our people develop a better understanding of the technical aspects of EHS issues which, in turn, leads to better and more informed decision making.

All Rexam employees with responsibility for coordinating EHS issues are expected to have access to the RAS system and to keep this up to date.

The screenshot displays the REXAM KNOWLEDGE BASE interface. At the top, it shows 'REXAM KNOWLEDGE BASE' and 'HELP MODULE'. Below this is a 'KNOWLEDGE SEARCH' header. A sidebar on the left contains 'Visitors - 6554 Version 1.06', a 'Screen options' menu with 'Help screen' and 'Change password', and an 'EXIT SYSTEM' button. The main content area is titled 'KNOWLEDGE LIST' and features a table of documents. Each row includes an information icon, a search icon, a play icon, and the document title. Below the table, there are filters for 'Filter the list by:' with 'Key word' and 'Type' dropdown menus.

KNOWLEDGE LIST file			
Title			
			Hazard - Combustion
			Hazard - Arson
			Accident Investigation
			RAS Manual
			Air Pollution
			Groundwater
			Risk Assessment F
			Rexam plc Environ
			Rexam plc Health a
			eRAS User Guide

Filter the list by:

Key word

Type



EXPECTATION 4 – PEOPLE AND SAFE BEHAVIOUR

In general, the majority of workplace accidents are triggered by unsafe behaviour. Many agree that reducing accidents and improving safety performance can be achieved by systematically focusing upon those unsafe behaviours in the workplace.

In Rexam we have been actively managing safety for many years. All our operations have procedures, safe systems of work and external audits. We have now started to determine if our procedures affect people's behaviour. Control of these behaviours is everyone's responsibility - both operators' and managers'.

Managers are expected to provide training, equipment and consistently reinforce the most appropriate behaviours. Employees must act competently and safely and let Managers/Supervisors know when operating procedures are no longer satisfactory and need updating. Managers/Supervisors must respond in a proactive manner to these communications so that co-operation and mutual respect may grow.

EXPECTATION 5 – TRAINING

Providing our employees with the opportunity for ongoing training and development works in both their interests and the interests of the company in achieving a safe working environment.

Everyone has responsibility for EHS issues and is expected to have the appropriate qualifications and training in line with their job expectations. As a minimum, those responsible for the co-ordination of safety should achieve a level of qualification that is recognised by national organisations in the countries in which they operate. EHS aspects should be built into all on site training materials. Managers must ensure training is given in a timely manner and employees should not take on a task before they have been given appropriate training. Training is an evolving process and the scope and quality of training arrangements should be continually reviewed in order to ensure they remain relevant and effective.





EXPECTATION 6 – ASSESSMENTS AND ASSURANCE

The Risk Management Inter Company Working Group determines the scope, content and format of our Groupwide EHS audits to ensure that they remain relevant to our processes and issues. External third party specialist verification of performance is expected to be carried out periodically. Operations are expected to develop timely action plans to improve performance. This is reviewed by each Sector management team and reported annually through the Rexam PLC Audit Risk Committee Process.

All Rexam operations will be expected to self assess their EHS performance at least once a year using the Rexam audit protocols and provide assurance that the processes are working effectively.

EXPECTATION 7 – INCIDENT REPORTING, ANALYSIS AND PREVENTION

All Environmental, Health, Safety and Property Protection incidents which are considered abnormal occurrences (an event which causes harm or damage to people, property or the environment), will be investigated, reported via the Rexam Reporting System and analysed to improve performance and prevent recurrence. Investigations will focus on root cause and/or system failure along with preventive actions. Corrective actions and preventive measures will be shared across the Group to reduce similar future incidents.

Sectors are expected to review quarterly their incident report data and report on trends to Rexam PLC and the ICWG.

Health and Safety Incidents

All health and safety incidents are required to be reported in the RAS system. Rexam defines such incidents as any injury to an employee or contractor, including bumps, knock, twists, etc., even if no medical treatment is given. The definition does not include band-aid incidents. Any incident that requires band-aid and plasters should be recorded in a consistent method on site and reviewed periodically.

Every site is expected to develop a range of measurement systems, which facilitate in depth accident trend and cause analysis in order to develop prevention programmes. As a minimum sites are expected to be able to report: lost time or restricted days, medical, first aid, national reportable and near miss cases.



EXPECTATION 8 – KEY PERFORMANCE INDICATORS – ECO-EFFICIENCY

We expect our operations to continue to strive to limit the environmental and health impact of our operations by reducing waste, emissions and discharges and by using energy efficiently.

All operations are required to collect and report relevant and accurate quarterly data on their Key Environmental Performance Indicators (KPI) selected by the ICWG. They are also required to calculate relevant eco efficiency rates and to set challenging reduction targets. Progress towards achieving the targets is to be reported annually. The performance data submitted by individual reporting units will be aggregated for the Group Environmental and Social report and published externally.

EXPECTATION 9 – EHS MANAGEMENT SYSTEMS

Environmental

ISO 14001 is an international standard that defines the overall structure and requirements of an environmental management system. Rexam considers it valid and applicable worldwide. One of its key requirements is a commitment to continual improvement in performance, and the prevention of pollution. We believe the management system approach helps the company ensure that local environmental impacts are being addressed.

We are encouraging all our major operating sites around the world to strive for independent certification to the ISO 14001 standard by the end of 2006. Where independent certification is not appropriate we expect operations to adopt environmental management systems which would stand up to internal verification against the key elements of the ISO 14001 standard.

Safety

OHSAS 18001 is rapidly becoming recognised as a management standard in the area of health and safety. The Rexam Health and Safety audit protocol is based on OHSAS 18001 and achieving a score in the best practice will take our businesses a long way to meeting the standard.

Rexam businesses that have achieved best practice status in their audits are encouraged to take the next step and progress towards accreditation to OHSAS 18001.



EXPECTATION 10 – SITE OPERATING STANDARDS – MEETING REGULATORY REQUIREMENTS

Sites will ensure they operate in a safe and environmentally sound manner at all times. As a minimum, our operations are expected to meet local regulatory legal requirements at all times. In countries where regulatory requirements are not well developed or clearly defined, operations will be expected to achieve standards in line with similar operations in their Sector.

RECOGNITION – THE REXAM RISK MANAGEMENT AWARD –

This document sets out our behavioural expectations with regard to Risk Management.

The Rexam Risk Management Award has been created in order to recognise Rexam facilities that have achieved excellence in this important area.

Each winner is presented with 'The Spirit of Gaia' sculpture.





Access to the RAS Suite

<http://ras.rexam.com>

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