

Location:	Corporate	Document #:	089-9426
Department:	EHS - Safety	Revision #:	4
Category:	Procedure	Date of Last Review/Revision:	7/20/2026
Doc Owner:	EHS Manager	Date of Next Review:	7/20//2027
Doc Approver:	Director of EHS	Training Frequency:	Annually / Upon Revision

1. PURPOSE

To establish minimum requirements for selecting, using, and providing oversight for Contractors, Contracted Employees and Service Personnel.

2. DEFINITIONS

2.1 Competent Person

One who is capable of identifying existing and predictable hazards in the surroundings or working conditions, which are unsanitary, hazardous or dangerous to employees, and has the authority to take appropriate corrective measures to eliminate them.

2.2 Contracted Employees

For the purpose of this procedure, a Contracted Employee is an individual or group of individuals for whom ANCHOR GLASS provides direct supervision in their day-to-day activities and direction as to how an activity is to be performed.

2.3 Contractor

For the purpose of this procedure, a Contractor is an individual or group of individuals who are retained to perform work by ANCHOR GLASS but are not directly supervised by ANCHOR GLASS employees. As used in this procedure, Contractor also means sub-contractor.

2.4 Job Hazard Analysis

A documented evaluation of the hazards associated with an area, process, and/or equipment conducted by person(s) knowledgeable of safety and health hazards.

2.5 Service Personnel

Those Contractors whose work does not affect process safety. This includes Contractors working on non-manufacturing equipment such as vending machines and office equipment, or those who provide janitorial or laundry services.

3. SCOPE

This procedure applies to Anchor Glass Container LLC utilizing Contractors, Contract Employees and Service Personnel.

4. PROCEDURE

4.1 General Requirements

4.1.1 Written Selection System

Each ANCHOR GLASS location shall develop a written system for selection and oversight of Contractors, Contract Employees and Service Personnel that includes the following:

- Methods for selection
- Means to orient
- Means to monitor and evaluate performance
- Means to document required training
- Participation in incident investigation

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- Participation in other health and safety activities, including drills
- Means to advise ANCHOR GLASS of chemicals they will bring on site
- Means to provide ANCHOR GLASS with information, and
- Means to assure Contractors, Subcontractors and service personnel are qualified for the job.

4.1.2 Job Hazard Assessment

A job hazard assessment may be used to determine the requirements for specific work. The requirements depend upon the extent to which the work

- May affect the safety of the manufacturing processes,
- Involve or introduce safety or health hazards to the work area.

For example, selecting and overseeing Service Personnel may require less detailed procedures than for construction work.

4.1.3 Documentation

Documentation of the Contractor selection process is required. The documentation must include evidence of Contractor programs and safety performance/accident statistics.

4.1.4 System Review

Each plant must review the plant-specific Contractor requirements at least every three years. The review must be documented.

4.2 Contractor Pre-Qualification

4.2.1 Process

The pre-qualification process shall include a means to evaluate the Contractor's safety and health processes including but not limited to

- Past experience at the plant
- Contractor's written safe work procedures
- Employee training and documentation, and
- Accident/incident statistics.

4.2.2 Documentation

The plant shall retain the pre-qualification documentation for three years. A sample pre-qualification form is provided in Attachment 1.

4.3 Contractor Selection - General

Contractors for work that affects or has the potential to affect the safety of the manufacturing processes, or work introducing safety and health hazards into the work area shall be selected for the plant's list of pre-qualified Contractors.

4.3.2 Information to be provided to Contractors

A. General

- Minimum safety and health requirements for each job shall be given to the Contractor as part of the bid package.

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- Specific requirements may be determined by a job hazard assessment conducted prior to issuance of bid package.
- For work performed through ANCHOR GLASS purchasing or ANCHOR GLASS engineering those functions will provide health and safety requirements to the Contractor, including all plant-specific requirements.

B. Minimum Information in Bid Package

Information to be submitted to the Contractor in the bid package or purchase order shall include at the minimum

- Plant-specific safety rules, including entrance and exit from the plant and emergency plans and/or work authorization procedures permit.
- Contractor safety standard/procedures established by the plant
- A description of any special or unusual hazards for the work to be performed and any ANCHOR GLASS or plant procedures that affect the work (from the job hazard assessment), and
- A statement that Contractor's work area will be periodically evaluated, and that the Contractor will be terminated or removed from the plant at ANCHOR GLASS's discretion based on safety performance or work practices.

C. ANCHOR GLASS Contact

- An ANCHOR GLASS contact shall be named for each contract job.
- This individual will be responsible for assuring all requirements are met before the Contractor begins work.
- The contact shall also ensure that Contractor performance is periodically evaluated during the course of the job.
- The contact shall also coordinate reporting Contractor accidents/incidents to plant safety personnel.

4.4 Pre-Job Activity

4.4.1 Safety and Health Orientation

Before work begins, the contractor shall ensure that each of its employees has received plant, and if necessary, department specific safety and health orientation. The Contractor must provide documentation of the training to ANCHOR GLASS.

All Contractor orientation shall include:

- Means for Contractors to provide the ANCHOR GLASS Plant with information about hazards the Contractors activity may generate
- Means to ensure that Contractors and subcontractors are included in any incident investigations that involve them or their work
- Means to ensure that the Contractor informs ANCHOR GLASS of any chemicals it brings on the plant site
- Emergency plans, alarm and evacuation procedure
- Plant specific requirements and rules, such as work authorization procedures, and

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- Known potential fire, explosion, or toxic release hazards related to the Contractor's work or work area.

4.4.2 Work Safety Briefing

A documented work safety briefing to finalize and communicate the safety and health requirements for the job shall be conducted for each job. The ANCHOR GLASS contact shall assure that the briefing is conducted and documented. A sample is shown in Attachment 2, Sample Contractor Briefing Form.

4.5 Monitoring and Evaluation Contractor Performance – Work in Progress

4.5.1 Contractor Evaluation

All inspections, job site reviews, formal safety and health evaluation procedures, evaluation procedures of the Contractor, and the Contractor's work shall include:

- Means to verify Contractor's compliance with ANCHOR GLASS Plant and other requirements. The method used will be determined by each Plant to fit the plant's safety process and the type of hazards associated with the work. An example form is shown in Attachment 3, Sample Contractor Safety and Health Performance Evaluation Form.
- Procedure to dismiss or remove the Contractor from the Plant premises if and when necessary.
- Means to maintain an ANCHOR GLASS summary of injuries and illnesses of Contractors. The ANCHOR GLASS Contractor statistics form may be used for this summary. See Attachment 3.

4.5.2 Communication to Competent Person

The Contractor's "Competent Person" and/or on-site supervision shall be identified and apprised of the means ANCHOR GLASS may use in monitoring the Contractor's performance on-site.

4.5.3 Annual Review

The Contractor's safety and work performance shall be formally reviewed at least annually. The review shall be documented.

4.6 Contractor Responsibilities

4.6.1 Training/Orientation

- A. The Contractor is responsible for ensuring its employees and subcontractors have the necessary training in both job skills and safety and health training to perform their specific job tasks. Documentation of the training and the means used to verify the training was understood is required.
- B. The Contractor is responsible for ensuring that all of their employees receive plant-specific safety and health orientation and that employees follow all safety and health requirements on-site.

4.6.2 Safety Equipment

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The Contractor is responsible for providing all safety equipment that is required for each job. Work must not begin until all such equipment is in place and ready for use.

4.6.3 Requirements

The Contractors must abide by all local, state, federal laws and ANCHOR GLASS requirements.

4.6.4 Contractor Accidents/Incidents

The Contractor shall immediately inform ANCHOR GLASS of accidents/incidents involving the Contractors' employees or any equipment. The Contractor and its employees and subcontractors shall conduct documented investigation of all near misses, incident and accidents. Documentation of these investigations shall be forwarded to the ANCHOR GLASS contact for the Contractor. Contractors, their employees, and subcontractors shall also participate in ANCHOR GLASS-sponsored investigations.

4.6.5 Competent Person Requirements

The Contractor must have a "Competent Person" in the work area when required by OSHA and ANCHOR GLASS.

4.6.6 Unique Hazards

The Contractor must advise ANCHOR GLASS of any unique hazards presented by the Contractor's work and of any hazards identified during the course of work.

4.7 General Requirements for Contracted Employees

4.7.1 OSHA Log

Each ANCHOR GLASS plant must maintain an OSHA log of recordable injuries and illnesses for Contracted Employees. These incidents shall be entered on the plant ANCHOR GLASS OSHA log. The log may be subdivided to show separate listings for Contracted Employees, but the log must be considered as one log for compliance purposes; i.e., annual posting of the log

4.7.2 Orientation and Training

Requirements for orientation and training of Contracted Employees are the same as for newly hired ANCHOR GLASS employees. This orientation and training is the responsibility of ANCHOR GLASS and shall include the means to

- Orientate Contracted Employees
- Document their ANCHOR GLASS training, and
- Include Contracted Employees in accident/incident investigations and drills.

5. RESPONSIBILITIES

5.1 Plant Manager

The Plant Manager has the primary responsibility for implementing this procedure.

5.2 Director, Environmental, Health and Safety



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The Director, Environmental, Health and Safety has the primary responsibility for initiating, revising and interpreting this procedure.

6. RELATED DOCUMENTS

Attachment 1 - Contractor Pre-Qualification Form

Attachment 2 - Contractor Pre-Job Hazard Assessment Form

Attachment 3 - Contractor Safety and Health Evaluation Form

7. Review/Revision History

Date	Rev #	By	Comments
05/13/2009	1	Stephen Misuraca	Created
1/16/2018	2		Updated
3/3/2026	3	Ryan Johnson	Updated to new format
7/20/2026	4	Ryan Johnson	Updated contractor attachments

Attachment 1

ANCHOR GLASS Contractor Pre-Qualification Form



CONTRACTOR INFORMATION

Contractor Name:

Subsidiary / Division of: _____

Corporate Address:

City: _____ State: _____ Zip Code: _____

Local Office Address:

City: _____ State: _____ Zip Code: _____



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Local Office Phone Number:

Emergency Contact: _____ Title: _____ Phone No. _____

Years Under Present Name:

Other Names Operated Under in past 3 years:

Standard Industrial Classification (SIC) Code: _____

or

North American Industry Classification System Code (NAICS):

Anchor Glass jobs that Contractor has worked on in the past 3 years:

SAFETY & HEALTH INFORMATION

1. Workers Compensation Experience Modification Rate (EMR) Data

a. EMR for three last years: _____ Previous Year - 1
 _____ Previous Year
 _____ Current Year

2. Is your firm self-insured for workers compensation claims? YES ☐ NO ☐

3. Using the information from your OSHA 300 log please provide injury and/or illness data for the last three years.

	PY -1	PY	CY
Total Hours Worked			
Avg. # of Employees			
Number of Recordable Cases			
Recordable Incident Rate			
Number of Restricted Workday Cases			
Restricted Day Incident Rate			
Number of Lost Workday Cases			
Lost Workday Incident Rate			
Number of Fatalities			



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NOTE: The following formula should be used when calculating the incidence rates:

$$\frac{\# \text{ of Cases} \times 200,000}{\# \text{ of hours worked}}$$

4. Some firms are not required to complete an OSHA 300 log because they have too few employees or are exempted by virtue of the service they perform. If you don't complete an OSHA 300 log is it because:

Your firm has too few employees:

YES ☐ NO ☐

Or, because your firm performs a service which is exempted from completing an OSHA 300 log?

YES ☐ NO ☐

5. If you do not complete an OSHA 300 log and you answered "No" to the above question, please explain:

_____.

6. Have you received any OSHA citation(s) for the three most recent years?

Please describe: _____

_____ 2015

_____ 2016

_____ 2017

7. Does your firm have a written substance abuse program?

YES ☐ NO ☐

8. Does it include the following:

☐ Pre-employment Testing

☐ Testing for Cause

☐ Random Testing

☐ DOT Testing



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SAFETY AND HEALTH PROGRAM ELEMENTS

1. Do you have a new employee orientation program? YES ☐ NO ☐
 If yes, does it include instructions on the following?

	YES	NO		YES	NO
Company Safety Policy			Personal Protective Equipment		
Company Safety Rules			Respiratory Protection		
Safety Meeting Attendance			Fall Protection		
Company Safety Record			Scaffolding		
Hazard Recognition			Hazard Communication		
Hazard Reporting			Barricades		
Injury Reporting			Housekeeping		
Safety Audits			Fire Protection		
OSHA Regulations			Emergency Procedures		
Medical Treatment			Trenching / Excavation		
Drug / Alcohol Use			Rigging & Lifting		
Vehicle Safety / PIV (Powered Industrial Vehicles)			Confined Space		
Hearing Protection			Electrical Safety / Lockout/Tagout		
Eye Protection			Welding / Cutting		
Spill Prevention			Waste Disposal		

2. Do you hold periodic safety meetings for your employees?
 Weekly YES ☐ NO ☐
 Bi-Weekly YES ☐ NO ☐
 Monthly YES ☐ NO ☐
 Less often, as needed YES ☐ NO ☐

3. Do you conduct field inspections of work in progress? YES ☐ NO ☐
 If yes, who conducts the inspection?
 How often? _____ Are corrections / corrective actions documented? YES ☐ NO ☐

4. Is safety a criteria in evaluating the performance of:
 Foreman YES ☐ NO ☐
 Supervisors YES ☐ NO ☐
 Management YES ☐ NO ☐

5. Describe who will provide your first aid and other medical services for your employees while on site.

6. Do you have personnel trained to perform first aid and CPR? YES ☐ NO ☐



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NOTE: When submitting this questionnaire, please submit copies of:

- A. OSHA Citations for the last three years.
- B. Letter from your insurance agent, insurance carrier or state fund (on their letterhead) verifying the EMR data listed in this questionnaire.
- C. Written safety, health & environmental policy / program.
- D. OSHA 300 Log for the last three years (if any OSHA recordables are listed, please include type of injury).

CONTRACTOR REPRESENTATIVE

SIGNATURE

PRINT NAME

DATE



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GUIDELINES FOR COMPLETING THE ANCHOR GLASS CONTRACTOR SAFETY & HEALTH QUESTIONNAIRE

Do not leave any items unanswered. Mark N/A (Non-Applicable) where appropriate.

Definitions:

North American Industry
Classification System Code (NAICS)

Or Standard Industrial Code (SIC): A system that categorizes all U.S. economic activity into groups with existing structure of American industry. (i.e. SIC # 15 = Construction - General Building Contractors)

The NAICS or SIC Code may be obtained through your insurance carrier.

Experience Modification Rate: A computation (often used in workers compensation (EMR) insurance) which adjusts or modifies the premium charged for insurance, increasing or decreasing depending on the loss experience of the policyholder.

The EMR can be a valid measure of a company's success or failure of preventing worker injuries.

The EMR can be obtained from your insurance carrier.

OSHA 300 Log: A log required by the Occupational Safety and Health Act that is used to classify recordable occupational injuries and illnesses and for noting the extent and outcome of each case.

Certain employers may be exempt from following the OSHA Requirements. Please discuss your requirements with your insurance carrier.



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Attachment 2

ANCHOR GLASS Contractor Pre-Job Hazard Review

Date: _____ Location: _____

Purchase Order Number: _____

Contractor: _____ Supervisor: _____

Project Description: _____

-
- | | |
|--|---|
| ☐ Personal Protective Equipment | ☐ Lock, Tag and Try |
| ☐ Plant Entry | ☐ Hot Work |
| ☐ Location of MSDS | ☐ Ladders/Mobile Platforms/Scaffolds |
| ☐ Vehicle rules | ☐ PIV (Powered Industrial Vehicles) |
| ☐ Line Breaking | ☐ Contractor Employee Conduct |

☐ Incident Reporting to: _____

☐ Evacuation muster point: _____

Number of employees in crew: _____

Work areas: _____

Lay down areas: _____

Utilities available: ☐ 110V ☐ Electric ☐ Water ☐ Air (60 psi) ☐ Other _____

Other safety precautions pertinent to work: _____

Available break/smoke areas: _____

Condition of work area upon arrival: _____

Basic Safety Rules:



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- Work hours for this job are: _____ AM to _____ PM
- Each day, we must be given permission to begin working via a permit issued by the plant representative.
- Smoking is not permitted in the plant except in locations so designated.
- The use of, or being under the influence of alcoholic beverages or other intoxicating materials is strictly forbidden on Company property – including parking lots.
- All personnel must wear appropriate personal protective equipment while on site. Hard hats, safety glasses with side shields, hearing protection, leather or other appropriate work gloves, Steel Toe or Composite Work Boots with Puncture Resistant Insoles, slacks and shirts with sleeves unless specifically exempted by the plant safety representative are the minimum requirement.
- Safety equipment is the responsibility of the contractor and will not be supplied by ANCHOR GLASS.
- All equipment, safety equipment and tools such as ladders, electric hand tools, etc. must meet applicable OSHA 1910 and 1926 standards.
- Any work involving floor openings must be properly barricaded.
- The use of open flames, welders, grinders, electronic equipment or other spark producing equipment requires special daily permits.
- No tanks, vessels, machinery, pipelines or electrical conduit can be worked on until it has been verified safe by the proper Rexam personnel.
- The contractor supervisor must inspect the job-site at the end of each day and correct any unsafe conditions or housekeeping problems before leaving the site.
- Contractor employees are restricted from entering any area of the plant other than the approved work and laydown areas.
- Upon completion of the job all machine guarding has been placed back in a manner to meet the OSHA 1910.217 requirements.

ANCHOR GLASS Representative (Print)

ANCHOR GLASS Representative (Sign)

Date

I have read and discussed the above with the ANCHOR GLASS representative and understand that it is my responsibility to inform and control personnel under my supervision and insure compliance with ANCHOR GLASS safety and security procedures while on ANCHOR GLASS property. Should my workers or sub-contractors be on site without me, a substitute supervisor will review and sign this sheet prior to the start or continuance of work. Violations of these rules may result in ejection from the plant.

Contractor (Print)

Contractor (Sign)

Date

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Copies: ANCHOR GLASS representative, Contractor, HR Manager, Plant Controller

Attachment 3

ANCHOR GLASS Contractor Evaluation

Date: _____

Rating:

Contractor: _____

5= Excellent

ANCHOR GLASS Representative: _____

4= Above Average

Project: _____

3= Average

Date Started: _____

2= Below Average

Date Completed: _____

1= Unacceptable

CATEGORY

A.	SAFETY	RATING	COMMENTS
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Compliance with ANCHOR GLASS safety standards

Housekeeping in job site and facilities

Supervisor's involvement and communication

B. QUALITY

Workmanship

C. PROJECT MANAGEMENT

Planning and scheduling



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Field supervisor's knowledge of project and specifications

Paperwork submitted in a timely manner

Proper staffing of project

D. OVERALL

ANCHOR GLASS representative spent an acceptable amount of time assuring contractor's performance.

ANCHOR GLASS overall satisfaction with the job.

RATING SUMMARY

Total Possible Score:

Contractor Total Score:

Average Performance Rating:

Performance	=	Average Rating
Excellent	=	4.50 to 5.00
Above Average	=	3.50 to 4.49
Average	=	2.50 to 3.49
Below Average	=	1.50 to 2.49
Unacceptable	=	0.00 to 1.49

ANCHOR GLASS Representative _____ Date _____

Contractor Name _____

Contractor Representative _____ Date _____

Contractor Representative Comments:



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