

28-30 October 2015 - CCIB - Barcelona

Smurfit Kappa Corrugated Division Germany SAFETY HANDBOOK FEFCO SPECIAL EDITION

Who is Smurfit Kappa?

Smurfit Kappa worldwide

Smurfit Kappa is one of the leading providers of paper-based packaging solutions in the world, with around 43,000 employees in approximately 350 production sites across 33 countries and with revenue of € 8.1 billion in 2014

Smurfit Kappa in Germany

We are the market leader in the development and production of corrugated cardboard, solid board, and carton packaging.

In Germany, Smurfit Kappa employs over 5000 personnel at over thirty locations and is therefore the country's largest manufacturer of corrugated cardboard, solid board, and carton packaging and corrugating media.

An integrated company

We run five recycling companies in Germany that collect and process waste paper. We therefore cover the entire production cycle. Our advantage: Each production step is reliable and traceable. We safeguard the best possible quality and supply reliability in every production stage.

Sustainability

Our company policy is geared towards protecting the environment, reducing air pollutant levels, and minimising the consumption of water, energy, and raw materials for the protection of resources. Efficient packaging solutions afford a key contribution to the environmental compatibility of the entire production stream. All of our plants in Germany are FSC or PEFC certified. Both certificates confirm that the owner operates a sustainable management of raw materials and products from the trees to the consumer

Global knowledge for customers on site

The ideal basis for sharing best practices and innovations is presented by our size and structure. Our customers can then benefit from incredible possibilities and solutions.



Goal

This manual describes how we at Smurfit Kappa live health and safety at work and the systems we use for this.

We are convinced that by implementing the codes of conduct described in this manual we will achieve our goal of zero accidents.

We expect from all of our executives and employees at all departments that they act in accordance with this manual and set an example to others.

Boris Maschmann CEO Germany

Stefan Buchner Senior Manager HS & E



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Part 1: Our safety requirements



Why is safety at work so important?

From our values and guiding principles

- By implementing suitable organisational and technical measures, we create safe and healthy working conditions.
- We adhere to safety regulations, and our code of conduct and initiatives protect us and our colleagues from harm.
- It is our responsibility to report unsafe and health hazardous working conditions.
- We document and analyse all risks, incidents, and accidents for the purpose of improving safety at work on a continuous basis.

"The protection of our health, our lives, and other persons has top priority!"

G. Eberding Osnabrück

"Safety at work is so important because I value full physical, mental, and social capabilities!"

C. Kling Sarstedt "Each and every one of our employees has the right to return home from work as unharmed as he came. It is the entrepreneur's duty and obligation to safeguard this accordingly. All this serves to preserve the capacity for work, without which performance cannot be delivered. To sum up: Safety at work equals safeguarding of jobs for employees. Health and safety at work should not be considered an unnecessary burden, bringing new rules and regulations with it, but as an opportunity to improve working conditions".

H. Bungartz-Vallcorba + A. Niessen work council, SK Rheinwelle

Safety First!

" I find safety at work important because I want to return home to my family every day in one piece. Not only that, I want to enjoy my retirement in forty years' time without disabilities."

C.Böhlke Sarstedt

People, Environment, Production

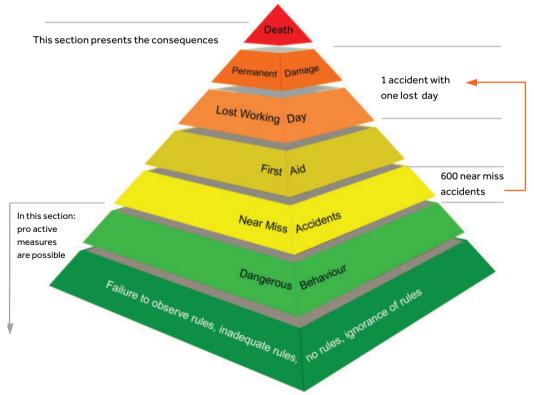
Safety at work and good management are the We can reduce the number of injured in future same sides of the coin. Conditions giving rise to safety risks are also the causes of damage to the environment and equipment.

by reducing the number of hazardous activities and by improving, examining, and observing our rules.

On the path to zero accidents: fighting the causes

Every accident with lost working days is accompanied by:

- 50 accidents involving slight injuries
- 600 near accidents
- 5000 instances of dangerous behaviour



Performance begins with safety at work

"It is our common goal to manufacture high quality products to the satisfaction of our customers. We can do this only with your motivated commitment. However, motivation is possible only in a working environment where you feel safe from harm at all times. Safety at work begins in your head and is your personal success for you yourself as well as for your colleagues. Your safe work provides the basis of our outstanding performance as a manufacturer of innovative packaging".

Stephan Kunze
HR & Legal Director



Safety at work and productivity



"Outstanding performance in safety at work is a sure sign that productivity, quality, cost control, and environmental protection are implemented and lived in equal degree. Over the years, we could see on many occasions that the two are linked. Safety at work and good production results are inseparable".

Eric Claes
Operational Director

Part 2: How we proceed



A systematic procedure

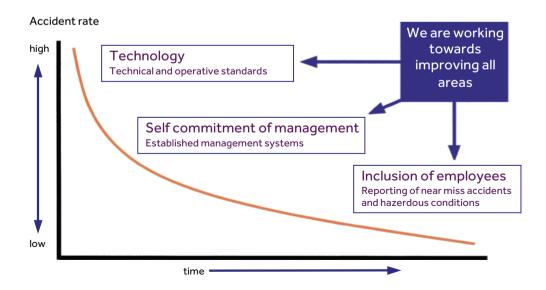
The keys to outstanding results in safety at work are:

- strict adherence to the technical and operative standards and the defined procedures,
- the entire management's undivided support for safety at work and the corresponding conduct during everyday work, and
- the willingness to learn from accidents and near accidents, and a joint, enhanced awareness for safety at work during all activities.

The continuous implementation and application of these three points over the whole of our organisation is elementary if we are to continue improving safety levels for all of us at our places of work.

Boris Maschmann
CEO Corrugated Division Germany

Steps towards achieving the goal of zero accidents



Safety-Management-Systeme

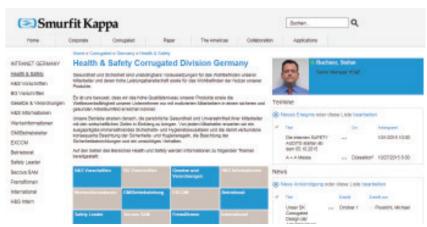


The Smurfit Kappa health and safety rules can be found on its German intranet under "Health & Safety:

There you will also find the most important legislation, ordinances, guidelines, and regulations issued by the professional association. Furthermore, monthly reports, the Health & Safety newsletter, and other health and safety information.

The regulations describe how you can perform activities and work processes safely. An extract from the most important H&S regulations can be found in this safety manual. For further details, please turn to the local safety leader.

Screenshot of health & safety website



Our safety principles

- All of our plants maintain the highest possible level of cleanliness and tidiness.
- All plants must draw up an annual H & S schedule with objectives and plans of action (What? Who? When?)
- All plants must have a work safety committee that meets regularly.
- All employees must attend regular safety instruction courses.
- A risk assessment must be drawn up for all activities involving a potential risk.
 The employees must be instructed on the basis of this risk assessment.
- There must be an emergency response plan for foreseeable events. This must be tested in an annual exercise and revised every two years.
- Executives are urged to conduct regular safety tours.

- Activities requiring personal protective equipment (PPE) must be described. This also applies to visitors and subcontractors.
- **Preventive maintenance** must be performed.
- A work permit procedure must be introduced.
- Changes to operating resources must be made in accordance with a specified procedure.
- A subcontractor safety management system must be introduced.
- All accidents and incidents must be reported and analysed in accordance with the specifications. Measures must be derived to prevent their recurrence.

The successful implementation of the safety principles described here requires the **undivided support of plant management**.

Plan - implement - check - intervene

"The key to our success is the continuous improvement of our activities in all areas. The basis of improvements is the identification of deficiencies in our work processes, their assessment, and the consistent elimination of the causes".

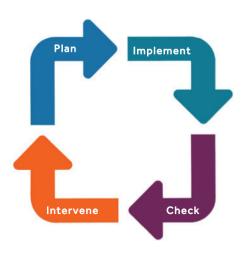
This means that we must constantly:

- PLAN
- IMPLEMENT
- CHECK
- INTERVENE

Wolfgang Pixner



Safety plan of action



PLAN

to achieve the expected improvements.

IMPLEMENT

what you have planned.

CHECK

that the measures have brought about the expected improvement.

INTERVENE

when adjustments or corrections are needed.

Safety plan of action

All plants are obliged to set themselves safety targets in compliance with the legal and the Smurfit Kappa provisions and to implement these actively.

PI AN

- Definition of targets. Dividing of targets into subtargets, when this is necessary.
- Development of plans of action, specifying responsibilities, and defining schedules.

IMPLEMENT

 The management should use all information channels employees in the planned targets and actions. Provide training and further training programmes for achieving the targets.

CHECK

 Every month, senior staff check whether the steps needed to achieve the targets have been taken.

INTFRVFNF

 when adjustments or corrections are needed.

Responsibility of the works councils

Works councils are elected representatives of the workforce who together with management are responsible for improving safety at work.

It is the responsibility of the works councils:

- to represent the interests of the workforce.
- to monitor adherence to the safety regulations.
- to support the management in all safety issues.

- to refer management to potential dangers.
- to support actively all approved safety activities and to promote their introduction.



Responsibility of the executives and the workforce

Responsibility of the executives

- Executives are responsible for implementing the H&S standards.
- This applies equally to third parties who perform activities under supervision.
- Divisional and plant managers must set up an organisation for implementing the H&S standards in their areas.
- promote the personal and technical skills of their employees so that they can develop a good safety awareness.

It is the responsibility of all executives to:

- apply the Smurfit Kappa standards.
- inform and include all employees for the fulfilment of H&S standards.
- monitor, audit, and revise safety systems (technical and organisational) serving to prevent accidents.
- maintain the health and safety of employees at all times during all work.

Responsibility of the workforce

It is the responsibility of each and every employee during work:

- to maintain his own safety and the safety of third parties who may be in danger from his activities or his failure to perform them.
- to observe the legal and the Smurfit Kappa specifications.
- to use or apply the machines, tools, hazardous substances, conveyances, equipment, and work processes as described in the operating instructions or as they were instructed in the training programmes.

- to wear personal protective equipment (PPE) and to use the protective equipment for its intended purpose.
- to report near accidents and hazardous conditions promptly so that preventive measures can be taken.
- All accidents must be reported immediately, irrespectively of their effects.

Prevention is better than cure.....



It is the responsibility and legal obligation of executives to promote the knowledge and skills of their employees, to set down rules, and to steer the processes in such a manner that the above situations are prevented from coming about.

Employees are obliged to follow the regulations and operating instructions in order to prevent situations with a potential of injury.

Health & safety audits

Inspection tours and audits are important tools that help us to progress in our endeavours towards the highest possible level of safety at work. They serve to identify deficiencies, share good examples and solutions with other plants, and verify adherence to the legal and Smurfit Kappa standards.

Inhouse inspection tours

 are organised and conducted by the plant management on their own responsibility.

B audits

- are initiated and conducted by the H&S department.
- · are one-day audits without rating.

A audits

- are initiated and conducted by the H&S department.
- are three-day audits with final report and assessment of the audited areas.
- lead to a plan of action for remedying the deficiencies.

External H&S audits

 are conducted when needed and by order of the external bodies. Inhouse inspection tours or audits

B audits by the H&S department

A audits by the H&S department

External H&S audits
Authorities
Professional association
ISO 18001

Part 3: Safe working practices



Safety tours by executives, behavioural work safety



Give feedback to the watched employee.

- Encouraging feedback on safe behaviour
- Following a frank talk on the dangers to the employee caused by how he performs his activities

the potential consequences

the understanding to work more safely in order to prevent an accident

On their tours, executives should:

watch the employees at work and focus on:

- how the Smurfit Kappa rules are being applied
- behaviour
- potential dangers posed by the manner of performing an activity

This is expected as such from all executives with personnel responsabilities



Program "SAIFE" : Safety feedback checklist

Behavioural work safety



The behaviour of each and every employee affects safety at work either negatively or positively.

It has been the case that we fail to observe the safety rules as a result of ignorance, inattention, or other reasons. In such cases, every employee is urged to address the colleague acting dangerously and to point out to him how to perform the work safely.

Risk assessment

"All accidents are avoidable"

This is often heard, above all after the accident has happened. In actual fact, though, the only avoidable accidents are foreseeable ones.

Risk assessments are needed for:

- all regular activities with a certain risk potential.
- nonregular activities with a certain risk potential or particular risks. These are assessed in the form of a hazardous work permit (GGA).

Risk assessments should be drawn up prior to a new activity and with the persons later performing this activity. The risk assessment must be drawn up systematically according to the specified Smurfit Kappa standards. The findings of the risk assessment must be communicated to all persons who will be executing the activities affected by the risk assessment.

Areas and activities requiring risk assessments:

(this does not claim to be complete)

- Working at heights
- Manual work
- Lifting work
- Tight spaces
- No-go zones
- Plant traffic / forklift-person junction
- Noise
- Handling hazardous substances
- Asbestos
- Hot work
- Solitary work places
- Cutting risks
- Pinch sites
- Persons at particular risk (e.g. young persons, apprentices, pregnant women)

Senior staff with personnel responsibilities are also responsible for organising the risk assessment and adherence to the measures.

Risk classification

1-4	Minimal
5-9	Low
10-16	Medium
17-25	High



Ascending order of occurrence probability

Accident / incident reporting

All accidents, near accidents, and hazardous conditions must be reported at Smurfit Kappa.

Depending on their severity or potential, these are then reported inhouse or to the Smurfit Kappa Group accident database.

Accidents

- LTA: an accident that causes such serious injury to an employee that he is issued a certificate of incapacity for work by the accident insurance consultant.
- RWC: Smurfit Kappa employees only.
 Any accident at work with the consequence that the employee is or can be no longer assigned his usual tasks, but can still carry out an activity.
- MTC: an accident after which the casualty has to be examined or treated by a medic or doctor.
- FAC: an accident requiring first aid or first aid material. As well as all accidents entered in the first aid book.



Near Miss Accident Reporting Checklist

Near miss accidents

are all accidents that have not caused injury, but had the potential to do so. For example: A machine traps an employee's fingers, but he can free them without injury.

Dangerous conditions

are all conditions affecting operating resources, work processes, or the working environment that can cause an accident. For example: a foot trap, sharp edges, a defect on a machine or safety equipment.

All near accidents and hazardous conditions must be reported. To this end, each plant has set up a reporting procedure.

Screenshot Accident & Incident Recording Tool



Accident analysys

All incidents relevant to safety must be investigated as a means to identify the causes and introduce safety measures. All plants must have procedures regulating how incidents are investigated and the findings communicated to the employees.

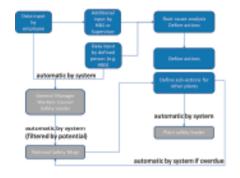
Accident investigation levels:

Lowest level: The senior employee or a member of plant management performs a simple accident analysis (e.g. the five whys). This serves to identify the simple causes and introduce corrective measures.

Medium level: a more precise, written accident analysis that requires consultation with the safety leader and, if necessary, the works council.

Highest level: a team based, deep reaching, written accident analysis with the plant management, senior staff, safety leader, works council, and H&S manager.



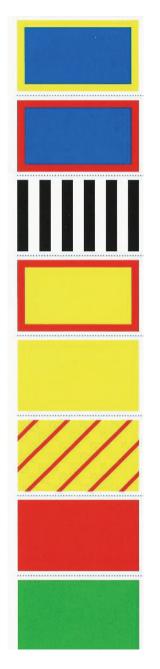


The investigation process requires the following:

- 1. Preparation and planning.
- 2. Compilation of the information.
- Analysis, assessment, and sorting of the information. This must apply the Smurfit Kappa standards on accident investigations.
- 4. Generation of an investigation report with findings and plans of action.
- The affected persons are informed, and the implementation of the measures organised.
- 6. The gained knowledge is shared with the organisation.

All accidents must be followed by corrective measures. Accidents may not recur.

Smurfit Kappa colour codes



Safe pedestrian ways that may not be used by powered vehicles and do not lie close to powered vehicle traffic!

Safe pedestrian ways that may not be used by powered vehicles, but lie close to powered vehicle traffic. Care must be taken!

Zebra crossings, pedestrian crossings in areas used by vehicles (e.g. transfer cars, forklifts).

Transfer car ways. Caution: Transfer cars crossing!

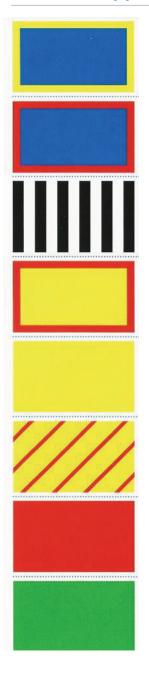
General danger areas, safety grilles, steps, motion ranges for machines.

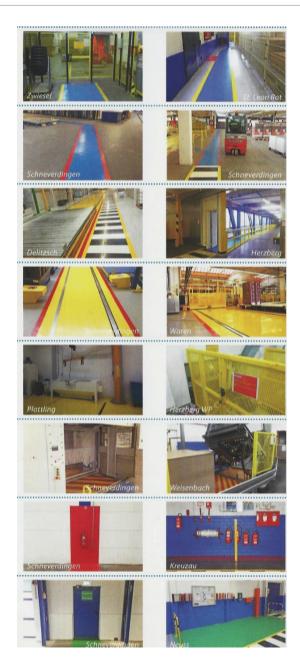
Danger areas where machine parts can drop suddenly. These areas may not be entered until it has been ensured that no machine part can drop on the assigned employee. This can be prevented e.g. with safety chains, supports, or locking pins.

Fire protection equipment: This area must be kept clear at all times!

Emergency exits, first aid equipment: This area must be kept clear at all times!

Smurfit Kappa colour codes





Emergencies, contractors

All plants must provide plans that list:

- the expected emergencies
- the emergency personnel and their functions
- the emergency procedure
- the location of escape and emergency services routes
- the location of emergency facilities in the plant
- the announcement and implementation of plant evacuation
- the persons and authorities that must be notified – including phone numbers

Each plant must perform a full evacuation drill once a year and document this. Persons with special emergency assignments must receive instruction at regular intervals.



Contractors

Every employer of a subcontractor performing skilled work on the Smurfit Kappa grounds or wishing to enter the production site must:

- be instructed in the particular dangers and operating conditions (at least once a year)
- be instructed, whenever necessary, in the hygiene guidelines (at least once a year)
- report carried hazardous substances

 be accompanied or have received adequate instruction so that he can be instructed in or is familiar with the code of conduct in the event of an emergency

Skilled work by subcontractors on the company grounds always requires a work permit.

Subcontractors must comply with the Smurfit Kappa standard before they can be commissioned.

Work permit (GGA)

A hazardous work permit (GGA) is required for all activities that involve particular dangers and have not been subjected to risk assessments.

The GGA is to verify that the potential dangers have been identified and the required protective measures implemented before the work commences. After this work has ended, it must be verified that the working area has been returned to its safe and proper state.



The following activities may not be performed without a work permit:

- Opening access ways into tight spaces.
- Hot work (angle grinding, welding)
- Bypassing or deactivating safety equipment
- Manual earthwork deeper than 30 cm, and all machine earthwork excluding scrapers
- Pressure test (based on operating pressure) on pipes or operating resources / plant parts
- Work on or with material containing asbestos
- Repairs or tests on pipes or equipment containing unconventional parts or requiring special monitoring
- Skilled work by subcontractors without Smurfit Kappa qualification

The following activities require a work permit when they do not come with a risk assessment and operating or work instructions derived from this:

- Work at heights (1.8 metres or higher above the ground)
- Work on areas or pipes containing hazardous substances or posing particular dangers (e.g. toxic, irritant, flammable, pressure, temperature)
- Crane/hoist work, use of cranes and hoisting gear, maintenance work on cranes and trolleys

Tight spaces, confinend areas

Tight spaces are areas with a very high le-vel of risk potential. These areas may be en-tered only with an access permit valid on the day.

Tight spaces may, for example, be: boil-ers, vessels, machine or plant parts, or sewer manholes.

 Conduct a risk assessment based on the access permit before entering. If you intend to perform dangerous activities in the confined space as well, you will need in addition a hazardous work permit (GGA).

- Enter the tight space only when all power sources have been switched OFF and secured in place (LOTO) and there is no danger.
- Enter a tight space only when a second person monitors your movements.



Confined areas

Confined areas are areas that pose particular dangers. These areas may be accessed only by personnel who have been trained to enter nogo zones and entered on a list of authorised persons. The list is approved by the plant management.

Confined areas can be e.g. condensate pits, shredder chambers, underfloor conveyors, baling press compartments, etc.

- Enter a confined area only when you are authorised to do so.
- Keep to the code of conduct specified in the operating instructions.

Perform only those activities described in the operating instructions. Other activities require a hazardous work permit (GGA).



Lock Out - Tag Out (LOTO)

The supply from various energy sources must be locked down if work on the machine is not to be at risk from the release of (residual) energy at any time.

All involved in the work protect themselves by attaching their own padlock.



Example sources of danger:

- Electricity
- Hydraulics
- Pneumatics/air
- Mechanisms
- Liquids
- Steam
- Chemicals
- Gases

There are three LOTO levels at Smurfit Kappa:

Level 1: Complete machine shutdown and lockdown.

Level 2: Complete shutdown and lockdown of a machine part (e.g. sheet feeder).

Level 3: Shutdown of a separate area of a machine part without the need for a padlock when certain conditions are fulfilled.

Changes/management of change (MOC)

MOC is a structured procedure for changes to machines, process flows, and other operating facilities.

The objective of MOC is:

 to maintain documentation, revision history (e.g. machine conversions/attachments).

- to eliminate potential dangers caused by uncontrolled changes.
- to safeguard expected results and the fulfilment of all technical, safety, and official requirements.

An exact description of the procedure can be found in the Smurfit Kappa H&S standards.

Personal protective equipment (PPE)

Many activities at Smurfit Kappa require the wearing of personal protective equipment (PPE). Wherever PPE is prescribed, this must be worn.

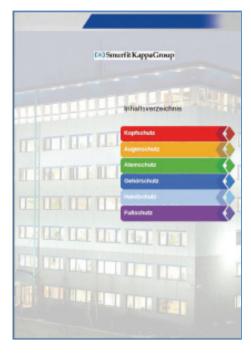
The necessity of PPA is determined and prescribed by means of a risk assessment.

Each employee receives the personal protective equipment he needs for his activities.

Every employee is responsible for his personal protective equipment. He himself is responsible for cleaning and caring for his PPE and replacing any damaged items.

Executives must make sure that the worn prescribed personal protective equipment complies with the requirements.

The PPE specified for the usual activities can be found on the H&S intranet under /H & S-Informationen/allgemeine Informationen. Each standard PPE comes with three different models to choose from.



If none of the standard PPE models are suitable for you, please contact the local safety leader. Together with you, he will find a suitable alternative.



SK signal work uniform, SK anti twist safety shoe



This is the way how a Smurfit Kappa employee has to look like

Instructions (Trainings)

The risks associated with an activity are not always immediately apparent or clear. For this reason, the safe procedures and codes of conduct must be repeatedly learned and refreshed in the form of instruction.

This instruction can be provided at any time in unvarying quality to all employees when training software is used for most of the courses.

- Every employee must have access to the Smurfit Kappa training software.
- The direct disciplinary superior is responsible for the selection, assignment, and implementation of training courses.

- The training courses that must at least be performed are listed in a training matrix.
- The held training courses should be distributed over the year. It is impractical to hold as many training courses as possible over a short period of time.
- All instruction courses, e.g. group instruction or external training, must be documented in the training software.
- Employees without their own computer must be provided with a training computer in a training room.

Screenshot E-learning software "SAM"



Cleanliness and tidiness

This constitutes the foundation of a safe working environment and productivity.

Cleanliness and tidiness must be maintained at all times

- All corridors, escape routes, and emergency exits must be kept clear at all times.
- Waste and secondary resources must be disposed of in the containers provided for this purpose.

 Whenever possible, all spilled auxiliaries (e.g. oil, paint, etc.) must be removed immediately if they are not to prove a safety hazard. If this is not possible, the spillage must be reported and the danger zone secured.

Do not forget: The work is first finished when the work place or work area is clean and tidy.

















- Tools and auxiliaries must be stored at the provided locations when not in use.
- Hoses, extension cables, etc. must be coiled or wound on a drum if they are not to pose a tripping hazard. When used, these must be routed for the greatest possible safety.
- During work, the work place or area must be neat and tidy whenever possible if they are not to pose a risk of tripping or falling.



Pull in hazards, safety equipment

Our machines transport paper or power mechanical systems. The machine, however, cannot differentiate between persons and material. Anything getting caught in them will be pulled in, resulting in potential grievous injury.

Especially the conveyor and waste belts, chains, and rollers/cylinders in the printing presses, corrugating machines, shredders, and baling presses pose a high risk!

In the past, trapping injuries started e.g. with cleaning cloths being pulled into the rollers, followed by the hand, arm, and whole person. People tend to act on reflex, keeping hold of the cleaning cloth while it is being pulled in.

The rule: Never reach into running machinery, use jog mode during setup work, and apply the LOTO procedure for all maintenance, repair, and cleaning work!



Safety equipment

Safety equipment extends to all facilities and devices that are designed to protect against dangers.

Examples of safety equipment:

- Light barriers
- Emergency stop
- Safety curtain
- Safety switch
- Firefighting water supply
- Sprinkler system
- · Fire extinguisher
- First aid facilities
- Barriers

- Railings
- Safety grilles
- Emergency pull cords
- Blue spot (e.g. on the forklift)

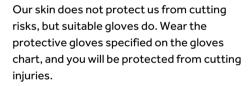
No part of safety equipment may be rendered inoperable or otherwise compromised. It may not be removed or bypassed. If it must be removed or bypassed for operative reasons (e.g. repairs), this first requires a hazardous work permit (GGA).

Damage incurred as a result of manipulations on safety equipment may entail legal consequences.

Cutting risks

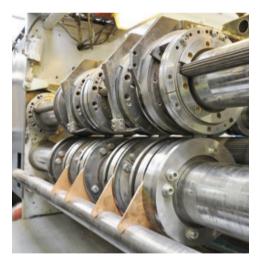
Our industry poses many cutting risks that can seriously injure employees:

- The largest accident potential lies in the cleaning/handling of the doctor blades on the printing presses. The doctor blades are razor sharp and cut to the bone.
- The same applies to the cross and furrow cutting blades on the corrugating system.
- Employees are exposed to other cutting risks e.g. when they handle punch blades, cutters, bundled strips, and corrugated sheets.



A cut may look like a small matter. But if it becomes inflamed, you cause lose a finger or even your whole hand.





Transfer cars

The rules and instructions on how to install and handle transfer cars correctly are found under the section "Health & safety / transfer cars" in the operating standards.

Here the most important rules:

- Please drive the transfer car only when you have been issued written authorisation by the plant management and have been instructed in its use.
- Before using the transfer car, first read the operating instructions and inspect the safety equipment (e.g. emergency stop, brake, warning light, siren, safety bumper, laser scanner).
- Irregularities/defects on the car or the safety equipment must be reported immediately to senior staff.
- If there are safety risks, the transfer car must be put out of operation.
- Safety equipment may not be rendered inoperable or bypassed (e.g. lower siren volume).
- Do not dwell on the yellow transfer car ways, but use them only to cross from one side to the other. Cross over these ways only at the provided sites.

- Never rely fully on the technology, e.g. the laser scanners that stop the car when they detect obstacles or persons. Also technology fails!
- For this reason, please cross only at an adequate safety distance from the car.



Handling hazardous substances

Many of the substances we handle have a certain risk potential. Yet it is possible to work safely with these substances when the safety rules are followed.

- Use the information contained in the operating instructions or safety data sheets.
- Potentially hazardous substances must be rated in a risk assessment, and the corresponding protective measures taken.
- Make sure that no quantities are released that may pollute the air or otherwise pose a danger.
- Always wear the required personal protective equipment when working with hazardous substances or opening containers or piping with hazardous materials inside.





- Make sure that your personal protective equipment is suitable for the hazardous substance you are working with.
- Use a hazardous work permit (GGA) if there are no operating instructions for your work with the hazardous substance.
- When transferring flammable liquids or gases, make sure that the containers are earthed.
- Use only suitable containers for hazardous substances, and never any that could be confused with food containers.
- All containers and pipes must be labelled according to their contents.

Working at heights

Working at heights includes all activities greater than 1.8 metres above the ground where persons can fall and injure themselves.

Working at heights requires a hazardous work permit (GGA) when there are no operating instructions for this activity. This does not apply to permanently installed ladders in the building.

Working at heights also applies to activities on moving ladders greater than 1.8 metres high.

What's to be done?

- Make sure that the equipment you use is suitable, reaches an adequate height, and provides a stable support for the planned activity.
- Make sure that the equipment you use to reach the height is in perfect working order and provides a stable support. If necessary, secure this against falling over.
- Use an antifall device if this is necessary.
- Make sure that the equipment used to reach the height is installed at a site that cannot collide with forklifts, transfer cars, doors, or other objects.
- Always observe the three-point-contact principle on ladders. In other words, never lift more than one hand OR one foot off the ladder, keeping the others firmly on the rungs.



- Always first check the equipment used to reach the height and the antifall devices before using them.
- If there are no operating instructions for working at heights, first conduct a risk assessment based on the hazardous work permit (GGA) before commencing work.



Pedestrian v forklift / warehouse safety

In our industry, accidents involving forklifts are among those with the most serious consequences. Before a forklift driver can react to an imminent collision with a person, it is often too late.

For this reason, we at Smurfit Kappa ensure the strict separation of forklifts and people wherever possible. These endeavours have also given rise to the warehouse safety regulations (paper and finished goods stores).

It is strictly forbidden at all times for persons to enter stores when they do not work there (persons working there are e.g. forklift drivers). If you must enter the stores for official reasons, observe the following:

- Notify the forklift drivers before entering. You may enter only after these have parked their forklifts and approved access.
- Forklifts may not be operated while there are persons in the stores.
- A warning vest must be worn by all persons in the stores.





The following conditions must be observed if "pedestrians" in the stores are to be protected to the maximum possible extent from falling loads:

- Paper rolls less than 80 cm in diameter may not be stacked on other paper rolls.
- No more than four paper rolls may be stacked on top of each other.
- No more than three paper bales may be stacked on top of each other.
- The height and narrow side of stacks may not exceed the ratio 6:1.

Forklift trucks

- Use a forklift suitable for the activity.
- Examine the forklift according to the specifications before use.
- Forklifts may be operated only by persons who have been instructed in and assigned to the use of the forklift and its attachments.
- Use the forklift only when this does not involve any risks, e.g. pedestrians nearby.
- Seatbelts must be worn. Safety bars or doors do not serve in lieu of seatbelts.
- Move only in the direction of travel and only when you have a clear view. Use the rear view camera.
- Heed the NO ZONE.
- Never drive under the influence of alcohol or drugs.

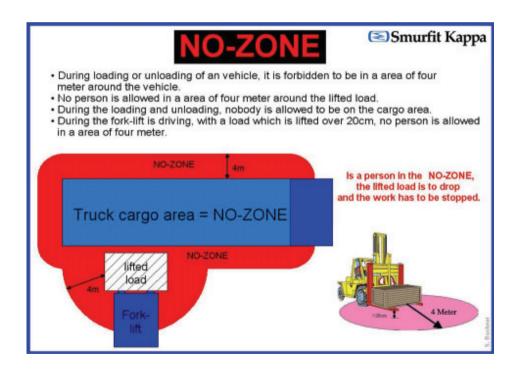


- Take special care on uneven or inclined floors.
- Always drive at a sensible speed, above all on sites obstructing vision.
- Do not lift more than the forklift's design load.



Loading and unloading

- Raised loads are always at risk of falling off. Protect yourself by keeping at an adequate distance.
- Falling paper rolls can continue moving for several metres. In this case, keep at a distance greater than that for normal loads.
- Never try to stop a falling load. Step to one side.
- Loading and unloading trucks must always be secured against rolling away.
- When loading and unloading, always keep in safe areas. If provided, in those marked especially for this purpose.



Hot work



- Make sure that suitable extinguishing agents have been provided for all hot work.
- Suitable personal protective equipment must be worn (e.g. welding apron, welding goggles).
- High dust levels can cause a fire or explosion, so these must be removed before hot work in these areas.

Hot work like e.g. welding, angle grinding, soldering. The main danger lies in fire and explosion. The following measures help to minimise the danger of fire and explosion:

- A hot work permit is always required for all hot work outside of the locations provided for this.
- Remove all fire loads like e.g. flammable liquids, cardboard, paper, wood, paint, chemicals, etc.



Hand tools / portable machines

- Use tools that are suitable for your work.
- Make sure that the tools are in perfect working order and that all safety equipment operates properly.
- Check for any damage on the supply lines to pneumatic and power tools. Make sure that the supply lines do not hinder or otherwise endanger you while you are working.
- Use only approved handheld power tools.
 This can be recognised e.g. by the inspection label.



 Make sure that the supply lines have an adequate length. If necessary, use extensions.



- Protect your eyes and your hands. Long hair should be tied up, and clothes tight fitting.
- Clean the tools after use. Report any defects on tools, and mark them as defect. If it is in perfect working condition, place it back in its usual place.



Workshop machines



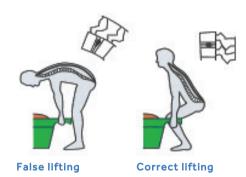
- Only instructed persons may operate machines.
- All safety equipment must be examined before use. Defects must be reported without delay and remedied before use.
- Material for drilling must be secured firmly in place.
- Familiarise yourself with the emergency stop system so that you can protect yourself and your colleagues at any time.
- Keep your work place clean and tidy.

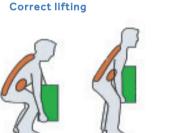
- Protect your eyes and your hands. Long hair should be tied up, and clothes tight fitting.
- Concentrate on your work. Never interrupt anybody while he is working with a machine.
- Always switch OFF the machine immediately after use.
- Disconnect the power supply before setting up or servicing the machine.
- It is forbidden to wear gloves at turning machines.



Lifting and carrying

- Bear in mind the correct procedure before lifting or carrying loads.
- Keep the load close to your body.
- Make sure you are standing on a stable surface.
- Lift and carry only when you can hold the load safely.
- Do not sway your back when lifting or carrying.
- Lift and carry only loads that are not too heavy for you.
- Avoid twisting your back.
- Move with the load only when you can see where you are going.
- Lift and carry bulky and heavy loads with a second person, or use aids.
- Keep your back straight when lifting.







Work safety in the office

- Keep the floor and above all the aisles free of cables, cartons, and other foot traps.
- Always open drawers one at a time. You will then prevent the cabinet from tipping over.
- Close drawers directly after use. You will then prevent others from tripping over or hurting themselves on the drawer.
- Place articles in, and not on, the cabinets.
 Place heavy articles as far as possible towards the bottom.
- Watch for foot traps or slippery areas, and report these.
- Spilled drinks or water from umbrellas can pose a risk of slipping. Remove these immediately.
- Do not walk with loads that block your view.
- Do not read when walking. You are not saving any time, but putting yourself and others in danger.
- Please walk, and do not run.
- Use a ladder or a step stool, and do not climb on office furniture or similar.



- Use the handrails on stairs.
- Use aids when you have to carry heavy loads, or ask for help.
- Our offices and buildings are no-smoking areas. Smoke only outside of the building or in specially designated smoking areas.
- Do not overfill tables, partitioning walls, shelves, or similar.
- Note the advice on setting up a video workstation.
- Note defect equipment like e.g. switches, sockets, cables, burnt-out lamps, foot traps, detached floorings, etc. Please report these to your senior staff.

Road traffic safety

Smurfit Kappa recommends the following "established procedures" concerning road traffic safety.

- Employees whose assignments require frequent driving should take a driving safety course every three years.
- Always check whether there are alternative travel options (e.g. train, plane).
- Whenever possible, the driver should make no telephone calls in the moving car.
- When driving, the driver may use only the handsfree option on his phone. If the company vehicle is not fitted with a handsfree option, phone calls may be made only with the engine switched OFF.
- Keep at an adequate distance from the vehicle in front.
- Take a break when you are tired. You are better sleeping over at a hotel, than driving at night or when you are overtired.



- Driving under the influence of alcohol or drugs is a criminal offence.
- Never drive under the influence of medication when this restricts your fitness to drive.
 - Take a taxi, or engage a professional driver.
- For security reasons, you should take prolonged breaks only on attended carparks at night.
- Engage a professional driver in countries whose driving culture or traffic regulations are a problem to you.

Editorial

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Editorial:

Stefan Buchner

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Michael Poustchi

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