

Document Health & Safety	Published 02/08/2023	Valid for Escanaba Mill
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Right To Act Policy

SCOPE and RESPONSIBILITY

Each employee is expected to assess each work situation and if believed unsafe/unhealthy, or in violation of a safety or health policy or known safety and/or health standard, resolve the issue themselves or with the help of their co-workers. If unable to do so, engage their supervisor and safety department representative by sharing the concern for their safety/health, and/or the safety/health of others, if the specific job or task were to be performed. The employee(s) shall communicate that they are not willing to perform the required job or task because of identified safety and/or health risks that could result in injury or illness to themselves, other employees, the community or result in property damage.

Upon notification of the concern to their supervisor and safety department representative, it is the responsibility of the supervisor to assess the situation and if needed consult with the Area Manager, or his/her designate, to review the situation. If appropriate, the Area Manager, (or his/her designate), will engage the Operations Manager and/or Safety Manager (or their designate), and/or Union Central Safety Committee Representative (if possible) in determining if the employee(s) concerns are warranted and decide if the task or situation confirms that the risks as identified do or do not exist.

If the safety and/or health concern(s) are not resolved by those involved, the process will continue by engaging representatives from the Safety Leadership Committee in assessing the situation. If upon concluding an assessment of the situation/task, it is determined to be unsafe and/or unhealthy, the employee(s) shall be directed by management to not perform the assigned task (or anyone else) until it is safe to do so.

Each of these types of situations must be entered into the mill's electronic safety incident reporting system per the Immediate Reporting Policy and a job hazard analysis (JHA) completed on the task/job by the employee(s) and Supervision. The JHA should be reviewed by all employees that may be performing the job/task in the future.

The Right-To-Act is not just about refusing or stopping a job/task that is unsafe/unhealthy, it's also about identifying hazards and at-risk behaviors, and how to eliminate/control each of them – short and long term. If you see something that is unsafe and/or unhealthy, you have a responsibility to say and do something. This can be accomplished by using the process outlined above.

All employees must be trained on the Right-To-Act process and instructed on how important it is to prevent fatalities, injuries, and adverse events, as well as, how critical it is to maintain and respect the process going forward. Under no circumstances shall employees be discriminated or retaliated against for using this process.