

 PHILIP MORRIS INTERNATIONAL	ENVIRONMENT, HEALTH, SAFETY & SECURITY GUIDELINES FOR PMI CH SERVICE PROVIDERS		Effective date: 01/01/2014
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OBJECTIVE

This document aims to provide PMI Service Providers with guidance on the minimum EHS&S requirements and standard rules to be applied in all PMI premises in Switzerland.

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INTRODUCTION

PMI is committed to provide a SAFE AND SECURE WORK ENVIRONMENT for all its Employees, Service Providers & Visitors.

These Guidelines set Environment, Health, Safety & Security guidelines and rules for all PMI Service Providers in Switzerland.

Their main objectives are to:

- Reinforce the importance of Environment, Health, Safety and Security.
- Make sure that all Service Providers:
 - Know the key PMI EHS&S rules and how to apply them.
 - Recognize, Understand and Respect EHS and Fire prevention signs.
 - Know how to adequately react to Emergency situations.
 - Know how to report any EHS&S related issue.

These Guidelines cannot cover every situation and they are not intended to do so. Each service provided presents hazards and risks that require special alertness, awareness and good judgment on everyone's part. In addition, the requirements established by the particular site where the work is being performed must be complied with.

In all cases, the EHS&S risks present shall be reviewed and, when required by PMI, additional practices established as needed to minimize those risks.

It is everyone's duty to work safely and to correct unsafe acts, practices and conditions for the protection of one's self and others. It is extremely important that each person understands how to accomplish each task safely and if not known or understood, stop and ask before the work begins.

If, while working, something changes on the job that was not planned for, stop and ask before continuing.

The Service Provider's personnel and sub-Service Providers must comply with any reasonable and legitimate instruction given by the Client and must not put themselves at risk, or through their action / inaction, put at risk the health and safety of any person, or cause damage to materials, services, plant, equipment, or affect the Clients' production or the environment.

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UNDERTAKING OF COMPLIANCE *(If the Service Provider has a contract with the PMI entity, verify that the contract includes a condition that requires the Service Provider to comply with PMI's EHS Guidelines. If the contract does not include such a condition, or if there is no contract at all, then ensure that the Service Provider signs this undertaking of compliance.)*

The Service Provider undertakes to, in performing work under its engagement, comply with the requirements of Swiss law concerning Environment, Health, Safety & Security, and with PMI's Environment, Health, Safety & Security Guidelines for PMI CH Service Providers.

(This page must be returned signed to the Service Provider's PMI Coordinator).

Name of Service Provider: _____

Name of Service Provider representative: _____

Date: _____

Signature: _____

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DEFINITIONS

Audit:

Systematic approach to evaluate the work area and identify workplace behaviors in order to determine whether the Service Providers' activities conform to EHS&S Rules and whether these rules are implemented effectively and are suitable for achieving the PMI EHS&S objectives.

Client:

Philip Morris International Management SA or Philip Morris Products S.A. (PMP S.A.) or PMI Engineering S.A. as appropriate.

Contract:

A legally binding agreement between the Service Provider and the Client.

EHS&S:

Environment, Health, Safety and Security Department in charge of Environmental protection, Occupational health, Safety and Security at work.

Emergency:

Any condition which poses a hazard to the environment, life, company or community property. This may include fire, explosion, contamination with hazardous materials, spills, leaks, emissions, product related issues, bomb threats, serious medical cases, etc.

Incident:

An unplanned and uncontrolled work-related event, or series of events, that results or could result in environmental damage, injury or illness to people, property loss, or business interruption. When an incident occurs, it is important to report the occurrence so actions such as an investigation can be taken to make sure that a similar or more serious incident does not happen again.

Key Performance Indicator (KPI):

Set of quantifiable measures and business metrics which are used to evaluate performance factors critical to the success of an organization. It helps to achieve organizational goals through the definition and measurement of progress.

Personnel protective equipment (PPE's):

All equipment used to reduce employees exposure to hazards when technical and organizational controls are not feasible or effective to reduce these risks to acceptable levels. The personnel protective equipment (PPE's) refers to protective clothing, helmets, safety glasses or other garments or equipment designed to protect the wearer's body from injury.

PMI Coordinator:

PMI employee or on-site Service Provider nominated to implement and/or coordinate the Service Provider's activities and contract.

On-site Service Provider:

A Service Provider for which at least one employee works 100% in PMI CH premises.

Other Service Provider:

Any Service Provider for which the employees work less than 100% in PMI CH premises.

Random check:

Any unplanned control performed by the PMI Coordinator or the EHS&S Team to ensure that EHS&S rules and requirements are applied by the Service Provider's personnel.

Service Provider:

Any person, firm, company, vendor, supplier (including any of their employees, servants or agents), that enters into a contract with the Client to provide services to the Client (or to another member of the PMI group). This term corresponds to the term "Supplier" that is often used in PMI contracts.

Service Provider's Coordinator (S.P.C.):

Service Provider's representative responsible for supervising and directing the on-site activities of the Service Provider's personnel.

Sub-Service Provider:

Any person, firm, company, vendor, supplier (including any of their employees, servants or agents), that enters into a contract with the Service Provider under which that person provides services that are received by a member of the PMI group.

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ROLES & RESPONSIBILITIES

PMP S.A. EHS Teams in Neuchâtel:

- Establish, maintain, monitor and improve the Service Provider's management processes in PMP S.A. premises (including in the premises called the "Industrial Development Centre" ("IDC") which are occupied by PMP S.A.) according to EHS requirements.
- Provide support and expertise to the PMI Coordinators on any EHS&S concerns.

General Services EHS&S Team in Switzerland:

- Ensure compliance with EHS&S related laws and legislation in all PMI premises under GS CH scope of responsibility and all PMI business and functions under GS EHS&S CH scope of responsibility.
- Establish, maintain, monitor and improve the Service Provider's management processes according to Security and Fire prevention requirements in PMI Switzerland and to EHS requirements in PMI Switzerland (excluding PMP S.A. premises in Neuchâtel).
- Provide support and expertise to the PMI Coordinator on any EHS&S related subjects or concerns that may arise.

PMI Coordinator:

- Ensure that the Service Provider is informed of all PMI EHS&S rules (both general and job specific) and potential hazards.
- Verify that the Service Provider has trained its employees in accordance to the requirements of the service to be delivered (for more details see [Annex I](#)).
- In specific cases "e.g. acrobatic cleaning", verify that employees have the adequate work certifications.
- Verify that the Service Provider has provided appropriate equipment including Personnel Protective Equipment (PPE) required by the specific task to be performed to its employees (for more details see [Annex II](#)).
- Ensure that the Service Provider's activities are performed in line with Swiss legal (local) and PMI EHS&S requirements.
- Conduct random checks of the Service Provider's activities.

Service Provider Coordinator (SPC) and Sub-Service Provider:

- Become familiar with PMI's requirements and expectations in terms of Environment, Health, Safety, Security and Fire prevention.
- Read and follow the contents of this guideline and consult with the PMI Coordinator or the EHS&S team (GS or PMP S.A.) for any questions about its contents.
- Ensure that the Service Provider's employees know, understand and respect the PMI EHS&S Compliance Requirements.
- Ensure that all Service Provider's personnel have the necessary skills and training for executing the expected work safely and without risks including suitable site induction training and information on the site rules and procedures, H&S risks and environmental impact.
- Conduct a risk analysis of the activities to be delivered, through its own methodology or through the PMI EHS&S methodology, and communicate the results to its employees.
- Take relevant measures to reduce the risks and impacts identified during the risk/impact assessments.
- Report any incident to the PMI Coordinator or the EHS&S team (GS or PMP S.A.).

Service Provider personnel and Sub-Service Provider personnel:

- Comply with the Swiss (Local) and PMI requirements in respect of the Environment, Health, Safety & Security and the implications thereof for the execution of the work under the contract.
- Report any incident to the PMI Coordinator or the EHS&S team (GS or PMP S.A.).

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GENERAL REQUIREMENTS

The Service Provider personnel must comply with the following Swiss requirements (amongst others):

- Code of obligations (CO)
- LTr (Swiss Labor Law)
- LAA (Accident Prevention Law)
- LSIT (Technical Safety Installation Law)
- LSPro (Equipment safety Law)
- LPE (Environmental Protection Law)
- OPA (Accident Prevention Ordinance) N°3 and N°4 and the related comments
- OSIT (Technical Safety Installation Ordinance)
- MSST Directive 6508 (Directive concerning the use of company doctors and other Health & Safety specialists)
- OTConst (Construction project Ordinance)
- OTD, OPAir (Waste treatment and air protection Ordinances)
- Any other rules and statements such as Suva documentation, SIA (Swiss Association of Engineers and architects) Directives, etc.

The Service Provider must comply with the following PMI Principles and Practices: (see the documents in [Annex IV](#))

- PMI EHS&S Principle and Practices so called "PMI08-C"
- PMIM011 - Building Access and Use of Parking
- PMIM001 - Clean desk and information protection
- GS 11 - Random & specific checks of personal belongings in Neuchâtel PMPSA
- Any other PMI Standard Rules referred to in this document

If the Client considers it necessary, it may issue specific work procedures or permits not referenced in this document.

If the applicable EHS&S rules are not complied with, the Client reserves the right to remove the relevant employees from the PMI premises.

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ACCESS TO PMI CH PREMISES

On-site Service Providers:

- A smartcard is received during the integration meeting with the General Services Relocation team
- Or a green access card is received at the relevant entry point (reception, delivery quay or security centers)
- When performing extra activities (not listed in the contract specification), the process for “Other Service Providers” must be followed (see paragraph below).

Other Service Providers:

- The Service Provider’s employees must be announced at least 48 hours in advance to the relevant Security center by the PMI Coordinator through the EHS&S Authorization procedure. The SPC must provide the arrival date, time, personnel’s first name and name and the phone number.
- A kick-off meeting with the Client must be organized to ensure that all EHS&S topics have been covered. This meeting can take place before the issue of the offer by the Service Provider in order to integrate in the offer potential EHS&S costs.
- Green access cards are issued at their arrival by the relevant entry point (reception, delivery quay or security centers) in exchange for an official ID document (Passport, identity card, driving licence). The access card must be returned each day to the delivery quay or the reception and the ID document will be returned to the Service Provider.

Access rules on site, please be aware of:

- Building access card is personnel and not transferable.
- Never let unknown or unauthorized people enter the building.
- Access card holders should carry and always display their access card within PMI premises, except in the production area.
- Security checks could be performed by the security brigade at any time in order to ensure Service Providers’ personnel safety and security.
- Service Providers’ personnel can only access areas in relationship to the services to be provided. If another area needs to be accessed, the Service Providers’ personnel must request specific access from the PMI Coordinator.
- Access to restricted areas must be requested from the PMI Coordinator and approved by the area owner.
- Visitors can be invited by Service Providers’ personnel only after authorization from the PMI Coordinator. Visitors must be escorted at all times by their host.
- Keys for specific areas are available at the relevant entry point (reception or delivery quay) and are provided to the SPC with the approval of the PMI Coordinator, and in exchange for a personal key.
- Any lost badge is to be immediately reported to the local Security Center.
- The presence of the Service Provider’s personnel will be recorded for the purposes of security and, to the extent presence on site is relevant to the business relationship between the Service Provider and the Client (or one of its affiliates), for the purposes of administering relevant elements of the business relationship with the Service Provider.
- Access procedures may include verifying the identity of the Service Provider’s personnel through biometric data. To the extent this is required under applicable legislation, the Service Provider will ensure that it obtains the consent of its personnel to such processing. The Client will process those recordings for the purposes described in the preceding paragraph, and in accordance with its security procedures.

Specific rules in PMP S.A. premises in Neuchâtel:

Service Providers can park in a PMP S.A. parking space only when authorized by the PMP S.A. Reception. The number of the space is communicated to the Service Provider by PMP S.A. Reception. Only one vehicle per Service Provider is authorized to park in PMP S.A. car park.

Specific rules in data centers in Renens and Bonvillars:

All access must be requested 48 hours in advance to the PMI Coordinator who will request access to the data center Manager.

When authorized:

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- On-site Service Provider can access the data center without the presence of the PMI Coordinator or the delegate
- Other Service Provider can access the data centers only in the presence of the PMI Coordinator or the delegate

The PMI supervisor is responsible for informing the Service Providers about specific access rules in data centers.

CCTV cameras

CCTV cameras operate, and make recordings, in certain areas of PMI sites. Typically this occurs in data centre processing rooms in order to ensure the security of data processing and for general security purposes; areas for access/exit (both ordinary access/exit and emergency access/exit) for building security; loading docks and storage areas for general security purposes, for business process controls and for administering the business relationship with suppliers; meeting rooms for remote assistance with use of equipment; and parking areas and external areas of sites for security. Insofar as the Service Provider's personnel are in such areas, their activities will be recorded by such cameras for the purposes given above. The Client will process those recordings in accordance with its security procedures.

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EHS&S RULES ON SITE

The Service Provider shall take all reasonable precautions while on PMI premises to ensure the health and safety of persons including: PMI employees, other Service Providers, the Service Provider's employees, Sub-Service Providers and visitors.

The following rules, as well as any other rules given by the PMI Coordinator, must be applied at any time in all PMI Switzerland premises.

ALWAYS behave in a way that:

- PROTECTS YOUR HEALTH, SAFETY and SECURITY and that of your colleagues and others with whom you interact in the course of business.
- SAFEGUARDS PMI's ASSETS, REPUTATION and the ENVIRONMENT.
- Understand and ADHERE TO APPLICABLE REGULATIONS and the Company's EHS Principles and Practices, Standards and Guidelines and seek improvements where appropriate.

Environment, Health & Safety:

- SAFETY is a condition of employment.
- Always FOLLOW THE RULES & SIGNS.
- DO NOT RUN in the premises.
- Sort your WASTE in the right places.
- Use only tools, equipment and adapted multi-sockets and electrical equipment that are appropriately maintained.
- Smoking is allowed only in designated areas.
- Within PMI premises, Swiss road rules are applicable. The maximum speed is 20 km/h in all PMI car parks and circulation areas and 40km/hours in the PMI CH Warehouse located in Onnens.
- No drugs or alcohol can be brought to PMI premises. Persons under the influence of alcohol or drugs won't be permitted access to the premises.
- Housekeeping rules:
Service Provider's personnel must apply the following rules to ensure that personnel, material and equipment are safe from unexpected movement such as falling, slipping, rolling, tripping, or any other uncontrolled motion:
 - Keep all floors clean.
 - Clean up spillages immediately. If the floor is wet, use appropriate signs to indicate that extra care is required or that people are directed to use another route.
 - Use fall protection (e.g. barriers) to prevent any falls and, when working at height, secure tools and equipment against falling.
 - Avoid loose cables crossing pedestrian routes. Use cable guards to cover cables.
 - Ensure that floor mats are securely fixed and that edges do not present a tripping hazard.
 - Install warning signs to indicate potential obstacles. Temporary risks and/or restricted areas should be segregated by the use of yellow tape, etc.

Fire protection and Emergency preparedness:

- Corridors, exit routes, emergency exits and access to safety material (fire extinguisher, safety showers,...) must be kept clear of obstructions.
- Service Provider's personnel must know the location of the nearest emergency exits, fire extinguisher, assembly point and emergency layout.

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Security:

- *Clean desk and Information protection policy:*
 - All documents, devices or information, such as badges, access codes and keys, cannot be taken and/or used during PMI employees' absence.
 - Keys and badges are not left unattended at desks or in unlocked cabinets.
 - Passwords and access codes are not written down.
 - Documents or storage devices used in the conference room, used paper on flipcharts and drawings on white boards must be erased / removed.
 - Computers are password protected when not in use, secured at all time, and switched off at the end of the day.
 - All documents, devices or information left behind must returned to the appropriate Security center.
 - In case of lost or stolen badges, the employee, consultant, contracted staff, or external supplier must inform the Security Centre immediately.
- *Random checks of personal belongings:*
 - With the aim of avoiding any pilferage and theft of PMI property (finished goods, other PMI goods) random checks of personal belongings and personal cars are performed in Serrières South or Onnens.
 - Such random checks may be performed in all PMI buildings in Switzerland, where a risk exists.

Specific rules in Factory premises and Industrial Development Center in Neuchâtel:

On-site Service Providers' personnel must wear distinctive clothing provided by their company. Service Providers with no distinctive clothes must permanently wear a fluorescent safe jacket.

In the interests of personnel health and in order that emergency situations can be quickly/safely dealt with, we advise that the PMP S.A. EHS should be informed of any person working in the Facility who is required to take regular medication to control a specific health condition. Note: All such cases must be dealt with in the strictest confidence.

Specific rules in Laboratories:

Service Providers' personnel must be aware of all EHS&S rules to be observed in laboratories, communicated to them by the PMI Coordinator. Access to laboratories is granted only by the person in charge of laboratories.

RISK ANALYSIS

On-site Service Providers:

To ensure that the EHS&S risks related to the services provided are reduced to a minimum level, the Service Provider must follow a risk assessment process before commencing work at PMI premises. This must include:

- the identification of hazardous situation and assessment of risks in order to define risk levels
- the implementation of preventive actions with the intention of reducing these risks levels
- the communication of the risks and related preventive actions to its personnel

The Service Provider shall use its own methodology or can request the PMI CH methodology from the PMI Coordinator.

The Service Provider must review the risk analysis no less frequently than once per year. Should the service to be provided be modified significantly, or should an event (incident, accident, near miss) occur, the Service Provider must perform a new risk analysis.

The Client will review, and approve or reject the risk assessment. The Client reserves the right to modify (or add to) the preventive actions proposed by the Service Provider.

Other Service Providers:

To ensure that the EHS&S risks related to the services are reduced to a minimum, the Service Provider must support the PMI Coordinator in completing in the EHS&S Authorization Form before commencing work.

This includes:

- the identification of hazards linked to the Service Provider activities on site
- the definition and implementation of preventive measures to prevent the occurrence of an accident (or at least to reduce the consequences in case of an accident)
- The communication of the EHS&S Authorization Form to all Service Provider personnel.

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EHS&S TRAINING

On-site Service Providers:

All Service Providers' personnel working at PMI Switzerland facilities must attend the "EHS&S Induction training" provided by PMI EHS&S teams. This training will take place in Lausanne or Neuchâtel facilities. They must attend refresh training every 2 years.

The Client reserves the right to:

- Invite Service Providers' personnel to specific PMI EHS&S training sessions related to the activities to be performed.
- Request the SPC to provide it with employees' qualification certificates or permits related to the activities to be performed.

Attendees' sheets are recorded in the Client's Systems.

Other Service Providers:

The SPC must communicate to all its employees the PMI EHS&S rules by using the EHS&S Authorization Form. The SPC and all Service Providers' employees must accept the EHS&S Authorization Form.

The EHS&S Form Authorization must be displayed at the working area or the SPC must keep the document. The EHS&S Authorization Form must be available for the PMI Coordinator, PMI EHS&S, PMI's Security team and all PMI employees for the purposes of Client review.

The Client reserves the right to:

- Invite Service Providers' personnel to specific PMI EHS&S trainings when required by the activities to be performed.
- Request the SPC to provide it with employees' qualification certificates or permits related to the activities to be performed.

Specific rules in Factory and Industrial Development Center premises in Neuchâtel:

On-site Service Providers working in PMP S.A. must attend the specific "EHS&S in factory" induction training session provided by PMP S.A. EHS. Attendees' sheets are recorded in the PMP S.A. system. Refresh training must be performed no less frequently than every 3 years.

Other Service Providers must attend the EHS&S training provided at the PMP S.A. Security center. Refresh training must be performed every year. For more details, please contact your PMI Coordinator.

Specific rules in Laboratories:

All Service Providers must be informed by their PMI Coordinators about specific EHS&S rules applicable in laboratories during their activities.

When relevant, the PMI Coordinator could request GS EHS&S to enroll Service Provider's employees in the "EHS Laboratory training". This training is relevant to laboratory employees, laboratory supervisor/manager and any Service Provider's employee that must access the laboratories during the course of his/her job. Refresh training occurs every 2 years. Attendees' sheets are recorded in the GS EHS&S System.

PERSONNEL PROTECTIVE EQUIPMENT

Unless agreed otherwise, the SPC must provide appropriate PPE to its personnel and ensure their compliance with PMI and Swiss legal requirements in this area (e.g. safety shoes, safety glasses, hearing protection, etc.).

The Client reserves the right to remove employees or visitors from the Facility if the appropriate PPE is not used or is not used properly.

INCIDENT REPORTING

When an incident occurs, it is important to report the occurrence so actions can be taken to ensure that a similar or more serious incident does not happen again.

The Service Providers' personnel must report immediately to the PMI Coordinator any accident or incident (including fires) resulting directly from their work or services and that could have resulted / has resulted in injury or damage to people, property or the environment.

If the PMI Coordinator is not available, the event must be reported to the relevant service:

- the GS Helpdesk Lausanne at 058.242.50.00 or GeneralServicesHelpDeskLausanne@pmi.com
- the GS Helpdesk Neuchatel at 058.242.81.99 or GeneralServicesHelpDeskNeuchatel@pmi.com

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- The Neuchatel Security Center at 058.242.28.00 or SecurityNeuchatel.PMI@pmi.com
- The Lausanne Security Center at 058.242.59.59 or pmi.securitycenter@pmi.com

The Service Providers' personnel must remain available to the EHS&S team for investigations purpose. The investigations will be treated as confidential and the concerned persons will remain anonymous.

AUDITS AND KEY PERFORMANCE INDICATORS (KPIs)

Audit:

To ensure that Service Providers' personnel apply the EHS&S rules presented in this document, the following processes must be implemented:

- **Random checks:**
 - The SPC must perform random checks. The frequency is defined by the type of activities and the risks related to them.
 - If one or more rules are not applied, these activities have to be stopped until EHS&S rules are applied and that corrective measures are implemented. The PMI Coordinator must be immediately notified of the non-conformity.
 - Results of random checks are reported to the PMI Coordinator.
- **Planned EHS&S Audit:**
 - For on-site Service Providers, periodical audits are conducted by the SPC.
 - The PMI coordinator can conduct separate EHS&S audits or can attend the Service Provider's audits with the support of the PMI EHS&S team.
 - Audits are planned in advance and based on the EHS&S rules applicable to the activities. The frequency shall be defined by both the PMI Coordinator and the SPC based on the types of activities and the risks related to them.
 - The results of the audits, as well as any action plans, are communicated to the Service Provider's personnel and the PMI Coordinator.
 - The Service Provider personnel shall implement corrective actions and the SPC shall regularly communicate progress in status reports to the PMI Coordinator.

KPIs:

To assess the EHS&S performance of on-site Service Providers, the PMI Coordinator rates the EHS&S performance based on [Annex III](#).

The score is defined as follows:

- Score =3 if the percentage is between 100% and 90%
- Score =2 if the percentage is between 89% and 80%
- Score =1 if the percentage is below 80%

This score is periodically given to the SPC by the PMI Coordinator.

The Client reserves the right to adapt these KPIs to any specific EHS&S topics related to the services to be provided or to any serious event related to the services provided/to be provided.

EMERGENCY RESPONSE

The SPC shall ensure that its employees are trained on how to react in case of an emergency such as fire, chemical spillage, evacuation and other emergencies related to their job.

If an emergency occurs, the Service Provider's personnel must GIVE THE ALERT by using the emergency numbers (displayed on PMI IP phones, on emergency layouts and in specific areas when relevant). When possible without endangering themselves and people:

- Ensure that any injured personnel are attended to;
- Ensure that the concerned area is cleared of all non-essential personnel; and
- Take actions to make the area safe (include isolating power, turning off compressed air, clearing the way for emergency personnel,...).

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If there is an evacuation:

- Follow the EVACUATION MESSAGE;
- Do not put yourself in danger;
- DO NOT USE THE ELEVATOR; and
- GO TO THE ASSEMBLY POINT.

Service Providers' personnel must remain available to EHS&S teams for the purposes of investigation.

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ANNEX I: NON EXHAUSTIVE LIST OF EHS&S RELATED TRAININGS

<div> <div>EHS&S Training sessions¹</div> <div>Services to be provided¹</div> </div>	All Service Providers									On-site Service Providers								Other Service Providers	
	Biosafety	Radiation protection training and certification	Chemical training: general or specific (hydrofluoric acid,...)	Working at height machine (e.g. Nacelle permit)	IRATA certification or similar	Working at height in PMI (Induction based on the EHS&S Authorization Form)	Confined space training	Hazardous goods transport certification (ADR)	Atex training	EHS&S Induction	EHS&S in Serrières south	EHS&S in laboratories	Lausanne: Working at height in PMI	Hot work PMI certification	PMI Fire safety and evacuation procedures	EHS&S Authorization Form training	Lausanne: Compacting waste	EHS&S Induction (Based on the EHS&S Authorization Form)	Basic EHS&S rules in Serrières south
Service to be provided within Serrières south Boundaries										X	X							X	X
Service to be provided in a laboratory										X		X ²						X	
Working with radioactive source		X								X								X	
Handling of hazardous material (e.g. toxic, flammable, corrosive,...) or highly toxic chemicals (e.g. Carbon monoxide, hydrofluoric acid,...)			X							X								X	
Working with a mobile plate-form, nacelle,...				X						X								X	
Working at height or suspended work					X	X				X			X					X	
Working in confined spaces (pit, silo,...)							X			X								X	
Working with pathogenic agents (class 2) or Genetically Modified Organism (GMO)	X									X		X						X	
Transporting hazardous goods by road								X		X								X	
Supervising other Service Providers										X						X ³		4	
Realizing hot work permit for other Service Providers										X				X ³				4	
Supervision of fire prevention installation										X					X			4	
Use of the compacting waste machines (Lausanne)										X							X	X	
Working in explosive areas									X	X								X	

1: Non exhaustive list.

2: Only for Service Providers working as laboratories employees

3: Only if this task as been delegate to an on-site Service Provider

4: Services forbidden for Other Service Providers

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ANNEX II: MATRIX OF PERSONNEL PROTECTIVE EQUIPMENT

Activity	Personal Protective Equipment	FEET PROTECTION Safety shoes	EYES AND FACE PROTECTION DES Safety glasses and visor	HEARING PROTECTION Various protection	RESPIRATORY PROTECTION Mask	HAND / ARM PROTECTION Various safety gloves	HEAD PROTECTION Safety helmet	KNEES PROTECTION Knee guards	BODY PROTECTION Protective clothes (pans, lab coat,...)	ANTI-FALLING PROTECTION Harnesses, ropes,...
1	Any person working in a production area or a technical room.	X							X	
2	Any person entering or working in a laboratory.	X (Close shoes)	X ¹		X ¹	X ¹			X (lab coat)	
3	Handling of heavy goods by hand or with an equipment (forklift, hoist,...).	X				X ²				
4	Work on a construction site.	X					X			
5	Use of compressed air guns, pressurized water guns or fire hose	X	X	X (for Air gun with no safety system)		X			X	
6	Handling of hazardous material (e.g. toxic, flammable, corrosive,...)	X	X ¹		X ¹	X ¹			X	
7	Working with mechanical equipment. Risk of projection of particles,...	X	X	X ²	X ²				X	
8	Working with noisy machine or in a noisy environment.				X					
9	Working in a dusty environment	X ²	X ²		X					
10	Handling of sharp equipment (cutter machine, knife,...)					X ²				
11	Working in a low-ceiling environment (risk of hitting the head)						X			
12	Working with a mobile plate-form, nacelle,...	X					X			X ²
13	Working with the knees on the floor	X ²						X		
14	Welding with a risk of projection of particles and ultra-violet rays.	X	X (UV-proof glasses)			X			X	
15	Controlling and handling batteries	X	X			X			X	
16	Working at height or suspended work	X					X		X	X
17	Working in confined spaces (pit, silo,...)	X	X		X ²	X	X		X	X ²
18	Working with radioactive source (x-rays machine, radionuclide source...),				X ²	X			X	
19	Working with pathogenic agents (class 2) or Genetically Modified Organism (GMO)				X ²	X			X ²	

1: According to the chemicals hazard and the Material safety data sheet (MSDS)

2: According to the activity and the tool/equipment used

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ANNEX III: RATING DETAILS FOR EHS&S KPI

EHS&S TOPICS		Rating details			
	Rating	0	1	2	3
Security					
The Service provider comply with the general Security rules: -minor non-compliance: presentation of an invalid identity card, access card not carried, extend access without a business justification or unannounced, non compliant with the air park rules -major non-compliance: give access with its own access card to an other person, lost access card not announced, theft, non immediate announcement of an employee termination, use of a PMI equipment/device without a business justification or without a authorization (phone,...), picture taken, violent behavior		One major non-compliance or 3 or more minor non-compliance	2 minor non-compliance	1 minor non-compliance	The Service provider comply with the general Security rules
Environment, Health, Safety					
RISK ANALYSIS					
The risk assessment was provided before the commencement of works to the PMI Coordinator and was communicated to the employees		No risk assessment provided	Risk assessment realized but not provided before the commencement of work to the PMI Coordinator and not communicated to the employees	Risk assessment communicated to the employees but not provided to the PMI Coordinator before the commencement of work	Risk assessment provided before the commencement of work to the PMI Coordinator and communicated to the employees
In case of major modification of activities, the risk assessment was updated and communicated to employees and to the PMI Coordinator		No risk assessment provided	The risk assessment was updated but not communicated to employees and to the PMI Coordinator	The risk assessment was updated and communicated to the employees but not to the PMI Coordinator	The risk assessment was updated and communicated to both the employees and the PMI Coordinator
EHS&S TRAINING					
Service Provider has the appropriate EHS&S Trainings, they train their employees according to the training plan and they keep training records		EHS&S Trainings did not exist	EHS&S Trainings exist and employees are trained but no training plan is in place and training records are not kept	EHS&S Trainings exist, employees are trained and training records are kept but no training plan is in place	Service Provider has the appropriate EHS&S Trainings, they train their employees according to the training plan and they keep training records
ACCESS TO PMI CH PREMISES					
When performing extra activities, the Service Providers informed the PMI Coordinator. A kick-off meeting is set up and specific preventives measures are defined and implemented before the commencement of work		The Service Provider did not inform the PMI Coordinator. No specific preventives measures are defined and implemented before the commencement of work	The Service Provider informed the PMI Coordinator. No kick-off meeting is set up and no specific preventives measures are defined and implemented before the commencement of work	The Service Provider informed the PMI Coordinator and specific preventives measures are defined without organizing a kick-off meeting.	The Service Provider did inform the PMI Coordinator. A kick-off meeting is set up and specific preventives measures are defined and implemented before the commencement of work
Commitment to EHS&S RULES AND REQUIREMENTS					
Service Provider complied with Swiss legal requirements and PMI EHS&S rules		Non compliance to the EHS&S rules which resulted in an incident/accident	Non compliance to the Swiss and PMI EHS&S Rules identified through random checks and audits without incident/ accident	Immediate actions are implemented when non conformities are identified through random checks and audits	Compliance to the Swiss and PMI EHS&S Rules based on random checks and audits
Sub-supplier complied with Swiss legal requirements and PMI EHS&S rules		Non compliance to the EHS&S rules which resulted in an incident/accident	Non compliance to the Swiss and PMI EHS&S Rules identified through random checks and audits without incident/ accident	Immediate actions are implemented when non conformities are identified through random checks and audits	Compliance to the Swiss and PMI EHS&S Rules based on random checks and audits
PERSONAL PROTECTIVE EQUIPMENT (PPE)					
Service Provider provided PPE according to the Swiss legal requirements and the risk assessment		No PPE were provided or PPE are not appropriate or déficient	PPE were provided but employees not trained in their use	PPE were provided and employees trained in their use.	PPE were provided and employees trained in their use. They are maintained according to suppliers requirements.
INCIDENT REPORTING					
Service Provider reported incidents/accidents to PMI		The Service Provider did not record incidents/accidents	Incidents were recorded but not investigated and not reported to the PMI Coordinator.	Incidents were investigated, recorded and but not reported to the PMI Coordinator.	Incidents were investigated, recorded and reported to the PMI Coordinator.
AUDIT AND KEY PERFORMANCE INDICATORS (KPIs)					
Service Provider performed EHS&S Audits based on an audit plan. Preventives and correctives actions are implemented on time.		Service Provider did not perform EHS Audits	Service Provider performed EHS&S Audits. No plan is in place and preventives and correctives actions are not implemented on time.	Service Provider performed EHS&S Audits based on a plan. Preventives and correctives actions are not implemented on time.	Service Provider performed EHS&S Audits based on an audit plan. Preventives and correctives actions are implemented on time.
Service Provider provided the documentation requested by PMI in a timely manner.		Service Provider did not provide the documentation requested by PMI.	Service Provider did provide the less than 80% of the requested documentation with delay.	Service Provider did provide all the requested documentation with delay.	Service Provider provided the requested documentation in a timely manner.
EHS raw Score		#DIV/0!			
Compilation of EHS&S criteria	Wheight	Wheighte d score	Score EHS&S Final		
Security	30%	0			
Environment, Health, Safety	70%	#DIV/0!			

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ANNEX IV: PMI PROCEDURES

OUR PRINCIPLES & PRACTICES	 PHILIP MORRIS INTERNATIONAL
PMI 08-C	Environment, Health, Safety and Security
Issued:	01.09.2010
Effective:	01.04.2013
Next review:	01.04.2015
Owner:	Vice President Environment, Health, Safety & Security, PMI
Approved by:	Chief Executive Officer, PMI

Key Points to Remember

- Always behave in a way that:
 - protects your health, safety and security and that of your colleagues and others with whom you interact in the course of business; and
 - safeguards PMI's assets, reputation and the environment.
- Understand and adhere to applicable regulations and the Company's EHS&S Principles and Practices, Standards and Guidelines and seek improvements where appropriate.
- Promptly report any violations, deficiencies or concerns, as described within this document.

Principles

The Company is committed to:

- Responsibility - being a responsible corporate citizen and continuously improving EHS&S performance.
- Compliance - meeting or exceeding applicable regulatory and company requirements.
- Health, Safety and Security - providing a safe and secure work environment for all employees, contractors, visitors and others with whom we interact in the course of business.
- Assuring our business – keeping our people and assets safe and secure and providing assurance that EHS&S risks to our business are continually assessed and minimized.
- Environment - reducing our risks and impact on the environment, and promoting the sustainable use of natural resources.

Why it is Important for PMI

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**PMI 08-C Environment, Health, Safety and Security**

These principles and practices are important to protect the health, safety and security of our people and assets and to reduce our impact on the environment and the communities in which we work.

Violations of health, safety, security and environmental practices can endanger people's lives, cause damage to assets and the environment, create significant liability and reputational risk, and result in significant business disruption.

Who Must Follow these Principles & Practices

These principles and practices must be followed by all Company employees in all work settings, from leaf agronomy to manufacturing and sales, covering all PMI's business.

Employees who engage third parties (e.g. business partners, contractors) that carry out tasks on Company premises or on behalf of the Company must make these third parties aware of, and hold them accountable for, compliance with relevant Company EHS&S standards.

Definitions

Company or PMI - Philip Morris International Inc. and its direct and indirect subsidiaries.

EHS&S - Environment, Health, Safety and Security.

EHS&S Function - PMI's organizational structure responsible for directing, managing and advising upon EHS&S matters. The EHS&S Function is headed by the Vice President EHS&S and represented in the regions and affiliates by assigned personnel.

PMI Mandatory Practices

When performing our day-to-day work, it is important that we act responsibly and minimize health, safety and security risks to ourselves and those around us. We need to actively consider risks in our work to prevent incidents and minimize our impact on the environment across the whole of our business.

Management for each function, market and affiliate must lead by example and ensure that the following steps are taken to enable compliance with applicable legal requirements and to minimize EHS&S risks. This should include setting and regularly reviewing the strategies and concrete action plans for EHS&S management and continuous improvement within their area, in line with these Principles and Practices:

- assign suitably qualified and trained persons to implement, manage and coordinate EHS&S activities, initiatives and management systems; including coverage of third parties and contractors;
- identify, assess and manage compliance with all applicable regulations and Company requirements;
- undertake risk assessments to identify and assess EHS&S risks and impacts and implement appropriate measures to control, reduce or mitigate those risks.
- train employees and communicate with them on relevant work related EHS&S matters, risks and applicable legal and Company requirements;

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PMI 08-C Environment, Health, Safety and Security

- provide the resources and promote a culture where EHS&S considerations form an inherent part of PMI's business and are recognized as an integral management responsibility;
- report up and investigate incidents and take appropriate corrective, preventive and improvement actions; and
- monitor and report on EHS&S performance.

Company employees must:

- understand the EHS&S risks and impacts associated with their business activities and follow all applicable EHS&S regulations and Company requirements established for their facility and communicated to them;
- take an active role in improving EHS&S performance, including supporting and participating in risk identification, assessment and mitigation activities; and
- report all EHS&S concerns, risks, incidents and non-conformities to their manager, Affiliate's EHS&S Function, and / or management. For Compliance related issues see "Reporting Violations and Deficiencies" below.

Exception Handling

The Company does not allow exceptions to *PMI 08-C Environment Health, Safety and Safety*.

Learn More

Guidance and examples of how we expect management and employees to contribute to improving our EHS&S performance are provided in our Implementation Experience. Functional Standards also provide additional information in specific areas, such as Fleet Safety.

Implementation Experience.

More information about EHS&S, including Functional Standards, is available on the [EHS&S intranet site](#) and [EHS Documents](#).

Ask Questions and Give Feedback

If you have any questions regarding the content or the interpretation of *PMI 08-C Environment Health, Safety and Security*, please contact the Vice President EHS&S, PMI.

Employees must take individual responsibility for enabling the Company to achieve our EHS&S commitments and in seeking sustainable improvement in our EHS&S and wider business performance. Do not engage in or tolerate practices that are not in line with these Principles and Practices, speak up if you observe such practices.

Reporting Violations and Deficiencies

If you violate these principles and practices, you may be subject to disciplinary action, up to

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and including termination of your employment.

All good faith reports of suspected violations of these principles and practices are taken seriously and will be investigated as appropriate.

The Company will not tolerate retaliation or threats of retaliation in any form against any employee who, in good faith, reports a suspected violation of these principles and practices or who has cooperated in a Company investigation of a suspected violation. See *PMI 16-C Reporting Suspected Compliance Violations*, regarding the Company's stance on retaliation and prohibition of efforts to interfere with investigations of suspected compliance violations.

Any concerns about violations of, or deficiencies in these principles and practices must be reported without delay to any of the following:

- your people manager;
- your manager's manager;
- your department head;
- the Human Resources Department;
- the Law Department;
- the Compliance Department; or
- the Chief Compliance Officer.

Face-to-face discussions are often best, but there may be times when you do not feel comfortable talking to someone in person or you may prefer to remain anonymous. That is why the Company maintains both a dedicated Outlook email: PMI.Compliance@pmi.com, as well as an independently operated and confidential Compliance HelpLine, which operates as both a phone line and a web line.

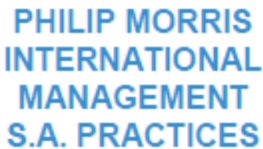

The phone line can be reached by collect call to +1-704-752-0621 or by a local toll free line. [The local numbers are available on the Compliance intranet site or from your local management.](#) The web line address is www.pmiintegrity-webline.com.

Revision History

April 2013: Amended to include Security, clarification of scope and mandatory practices.

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PMIM 11	Building Access and Use of Parking
Issued:	01.07.2011
Effective:	01.07.2013
Next review:	01.07.2015
Owner:	Director General Services Switzerland
Approved by:	Approval Committee

Why Do We Need these Practices

This Affiliate Practice formalizes the requirements and guiding principles to access all Philip Morris facilities and parking in Switzerland.

The objectives are to:

- Create a secure business environment
- Minimize economic losses and business disruption
- Safeguard PMI integrity, assets, information and reputation.

Who Must Follow these Practices

This Affiliate Practice applies to permanent and fixed term employees of *Philip Morris International Management S.A. and other Swiss entities*, consultants, contracted staff, external suppliers, external visitors and outsourced services providers.

Philip Morris International Management S.A. Mandatory Practices

The procedure below outlines and explains the access control measures for all PMI buildings in Switzerland. To facilitate access and ensure security, different types of accesses are granted according to the employment category or business relationship. It also provides guidance to the use of car park spaces within and around PMI facilities in Switzerland.

1. ACCESS CARDS AND INDIVIDUALS ACCESS LEVELS

1. Company Employees

Company employees are provided with an electronic access Smartcard showing his / her picture to be used at all sites. The access control is coupled with a biometric facial recognition system. The card provided is personal and not transferable. The access card is delivered

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PMIM 11 Building Access and Use of Parking

during the integration meeting organized by General Services.

For safety purposes, badging in and out are mandatory for every employee entering and exiting PMI facilities, by foot or by car.

Swiss based employees are granted access to all Lausanne and Neuchâtel buildings 24 hours, 7 days a week, except for Restricted Areas - *Please refer to Attachment 2 – Restricted Areas Access Authorizations under section Forms and Attachments.*

During new employees Integration Process, an "Integration" badge with a grey stripe is issued at the Reception, for the first two working days. The "Integration" badge only remains valid for 48 hours. (07:30 a.m. – 06:30 p.m.)

Overnight work from 11:00 p.m. to 06:00 a.m. and Sunday work from Saturday 11:00 p.m. to Monday 06:00 a.m. are prohibited by Swiss law unless a prior authorization has been granted by the Canton Labor Office. *Please refer to Practice: PM Switzerland 404 – Annual Working Time – Section 11.*

Any employee's badge unused during a period of one month is suspended in the Access Control System. A warning message is sent to the badge holder and his / her supervisor. Upon return to work, the badge will be reactivated after proper identification process.

2. Contracted Staff and Consultants

Contracted staff and consultants are provided with an electronic access Smartcard showing his / her picture and a capital "C". The access control is coupled with a biometric facial recognition system. The card provided is personal and not transferable. The access card is delivered during the integration meeting organized by General Services.

During new employees Integration Process, an "Integration" badge with a grey stripe is issued at the Reception, for the first two working days. The "Integration" badge only remains valid for 48 hours.

For safety purposes, badging in and out are mandatory for every contracted staff and consultants entering and exiting PMI facilities, by foot or by car.

Contracted staff and consultant have access to Philip Morris facilities only where they are based, from Monday to Friday, from 06:00 a.m. to 10:00 p.m..

Overnight work from 11:00 p.m. to 06:00 a.m. and Sunday work from Saturday 11:00 p.m. to Monday 06:00 a.m. are prohibited by Swiss law unless a prior authorization has been granted by the Canton Labor Office. *Please refer to Practice: PM Switzerland 404 – Annual Working Time – Section 11.*

Any contracted staff unused badge during a period of one month is suspended in the Access Control System. A warning message is sent to the badge holder and his / her PMI supervisor. Upon return to work, the badge will be reactivated after proper identification process.

Extended Access for Contracted Staff and Consultants

In case a contracted employee requires an extended access to the building, a written business justification with the duration of the exception, for a maximum period of three months, must be prepared by the PMI supervisor, validated by the PMI Head of Function (Director or above) and provided to the local Security Centre.

Only two extended access categories are attributed:

- Extended Category 1: from Monday to Saturday, from 06:00 a.m. to 11:00 p.m.
- Extended Category 2: permanent, 24 hours / 7 days

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Access for contracted staff and consultants might be adapted to specific business needs at the factory, IDC, warehouses and data centers.

On a quarterly basis, all extended accesses have to be re-validated by the PMI Head of Function (Director or above).

3. External Visitors / Retirees / Family members

Visitors, retirees and family members are provided, at the receptions, with an electronic access card showing a red stripe, in exchange of an official ID document (passport, identity card, driving license).

Only IMDL registered PMI employees, contracted staff and consultants are allowed to invite visitors.

Access is only granted from Monday to Friday, from 07:30 a.m. to 06:30 p.m., or during the opening hours of receptions. External visitors must be escorted at all times by their host. Visitor's access card must be worn visibly and must indicate Name, First Name, Company, PMI Sponsor and the validity of the badge. The same procedure must be followed on a daily basis.

Extraordinary stay after reception hours due to business reasons, have to be announced to the Local Security Centre.

Pre-registration of visitors is highly recommended and should be addressed to the local reception.

4. Philip Morris Field Visitors (from affiliates or representative offices)

There are two categories of Field Visitors:

Category 1: visitors staying one to five working days

Category 2: visitors staying more than five working days

Field visitors staying for one to five working days are provided, at the reception, with an electronic access card showing a black stripe. The access is granted from Monday to Friday from 07:30 a.m. to 06:30 p.m. for entering the building and from 07:30 a.m. to 10:00 p.m. for exiting the building.

In case an extension of a short-term field visitor's badge is required, an e-mail request including business justification must be sent by the Welcoming Manager to the reception, also notifying GS Relocation Services: WorkPermitsSwitzerland.PMI@pmi.com.

Field visitors staying more than five working days, receive an electronic access card showing a yellow stripe and valid from Monday to Friday, from 07:30 a.m. to 10:00 p.m. The card is issued by the GS Relocation Services during an integration process.

As per Swiss Labor Law, any person on a business trip and spending more than 8 working days during a calendar year in Switzerland should verify whether a work permit is required.

Field visitors should be announced by their PMI hosts, 48 hours in advance, by following the procedure available on the GS intranet page: [Integration Services - Work authorization for Field Visitors](#).

5. Suppliers

There are three categories of Suppliers access cards, which will be delivered depending on the frequency of the visits:

Category 1: generic supplier cards

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Category 2: supplier company's cards with mention of the company name

Category 3: nominative supplier cards with mention of the company name

Suppliers' access cards are provided by the Security or a reception, showing a green stripe, in exchange of an official ID document (passport, identity card, driving license). Suppliers of category 1 or 2 have to be met and escorted by their on-site sponsor.

Access to suppliers is limited from Monday to Friday, from 06:30 a.m. to 06:30 p.m. or during receptions or delivery quays opening hours.

Access to suppliers may be adapted to specific business needs at the factory, IDC, warehouses and data centers. Suppliers' performing an intervention in an emergency context are supervised either by the Security or on-call services.

Selected categories of suppliers (i.e. cleaning, guard force) may require an extended access due to the nature of their tasks, which must be requested with a written business justification.

All works in the building must be supervised, not necessarily accompanied during all the time, by an on-site sponsor or a Security Guard.

On a quarterly basis, all access cards of suppliers must be re-validated by the PMI Supervisor.

II. SECURITY CHECKS INSIDE THE BUILDINGS

Philip Morris Security personnel may perform identification checks at any time. In such a case, employees should bear in mind that these checks are performed for their personal safety and security.

All employees are expected to fully collaborate with the security personnel and strictly follow their advice or requests.

III. GENERAL RULES

- Building access card is personal and not transferable.
- PIN code is strictly confidential and must not be kept with the access card, if applicable.
- Never let unknown people enter the building.
- Access card holders should carry and display their card within PMI premises.
- Visitor and supplier access cards must be returned daily to receptions or delivery quays.
- Any non-returned card will be deactivated.

IV. USE OF CAR PARKS

The company has a limited number of non-allocated parking spaces that are available for employees only on a "first come, first serve" basis.

General Services defines individual parking authorizations on each site for benefit cars and may modify existing rules and authorizations as needed.

Employees must strictly follow traffic signs & rules inside the car parks.

1. Use of Car Parks

- Parking is only permitted in authorized zones. Parking in any other areas is not permitted, even in the absence of any signs to that effect.

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PMIM 11 Building Access and Use of Parking

- For optimum use of the parking facilities, employees with an allocated car park who will be absent for one or more days must allow colleagues to use their space.
- Motorcycles and bikes may only be left in the designated areas and must not be parked in spaces reserved for cars.
- All drivers must give priority to pedestrians.

PMI car park facilities can only be used for business purposes. Employees may not leave their car overnight in any "first come, first serve" parking and underground parking facilities.

Parking during business trips is to be provided to the local Security Centre, and only allowed if authorized by the PMI Head of Function (Director or above), with copy to the Local Security Manager.

2. Traffic

The authorized speed limit in the underground car parks is 20 km/h.

Steps to Follow

Employees and Contracted staff - forgotten access cards:

A temporary access card, valid for up to 48 hours, will be issued by the receptionists. The functionalities of the Smartcard will be transferred automatically to the temporary card (access, e-cash, printing, etc.). This card must be returned to the reception.

Lost / stolen access card:

The employee must immediately notify the Security Centre of any lost or stolen access card. A new access card will be issued and the missing card deactivated. The functionalities of the lost / stolen Smartcard will be transferred automatically to the new card (access, e-cash, printing, etc.).

Revocation and / or cancellation of access:

All access will be automatically revoked if the access card is not returned on the last day of validity or cancelled refused if the access card is used outside authorized access hours, or the access card is not returned on the last day of validity.

Exception Handling

Requests for exceptions to *PMIM 11 Building Access and Use of Parking Facilities* must be submitted in writing, by the PMI Head of Function (Director or above) to the Manager General Services Security. Exceptions are approved by the Director General Services Switzerland.

Learn More

For additional information, please refer to the General Services intranet pages:

[Building Access - Lausanne sites](#)

[Building Access - Neuchatel sites](#)

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[Data Centers Access - IT Service Center \(ITSC\) WorkPoint](#)

[General Services Visitors Module](#)

[PMI Parking Facilities](#)

[General Services Parking Module](#)

Ask Questions and Give Feedback

If you have any questions regarding the content or the interpretation of *PMIM 11 Building Access and Use of Parking Facilities*, please contact the General Services Help Desk.

Forms and Attachments

[Attachment 1: Access Procedure by site](#)

[Attachment 2: Restricted Areas Access Authorizations](#)

[Attachment 3: Access to the Childcares](#)

[Attachment 4: Parking Procedure by site](#)

Revision History

June 2013:

- Updated list of the buildings.
- Added details on how to manage exceptions.
- Limited access to Rhodanie Parking to residents and benefit cars users.

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PHILIP MORRIS INTERNATIONAL MANAGEMENT S.A. PRACTICES	 PHILIP MORRIS INTERNATIONAL
PMIM 01	Clean Desk and Information Protection
Issued:	01.01.2011
Effective:	01.01.2013
Next review:	01.01.2015
Owner:	Director General Services Switzerland
Approved by:	Approval Committee

Why Do We Need these Practices

This Affiliate Practice is derived from *PMI 01-C Managing Company Information* and formalizes the general principles and requirements to protect information and assets against theft, unauthorized use, or disclosure.

Who Must Follow these Practices

This Affiliate Practice applies to permanent and fixed term employees of *Philip Morris International Management S.A.* and other Swiss Entities (please refer to section *Forms and Attachments*), consultants, contracted staff, external suppliers, and General Services outsourced services.

Philip Morris International Management S.A. Mandatory Practices

Supervisors must advise their subordinates and contractors to observe the provisions of this Affiliate Practice and ensure that proper safeguards are available to the employees for the protection of Company information.

In order to avoid the risks of unauthorized access, misuse, disclosure of company information or assets (such as documents, USB keys, CD's, flipcharts, etc.) the employees, consultants, contracted staff, and external suppliers must always ensure that:

- All documents, devices or information, such as badges, access codes and keys (which can grant access to PMI facilities, systems, or storage rooms) cannot be taken and / or used during absence;
- Keys and badges are not left unattended at desks or in unlocked cabinets;
- Passwords and access codes are not written down;
- Documents or storage devices used in the conference room, used paper on flipcharts and drawings on white boards must be erased / removed;
- Computers are password protected when not in use, secured at all time, and switched

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PMIM 01 Clean Desk and Information Protection

off at the end of the day, unless instructed otherwise by the IT staff for software maintenance purposes;

- For meetings lasting several days, a request must be made to Security to have the room locked upon departure of the last participant. In this case, the cleaning of the room will be supervised by Security.

The Security Services regularly inspect the offices and the conference centre and report non-compliance cases to the General Services Local Security Manager. Repetitive non-compliance cases will be addressed by the Local Security Manager to the Head of the relevant Department.

Documents left behind will be collected by Security, securely stored for a maximum of 24 hours and shredded, if unclaimed.

In case of lost or stolen badges, the employee, consultant, contracted staff, or external supplier must inform the Security Centre immediately.

Exception Handling

Philip Morris International Management S.A. does not allow exceptions to PMIM 01 Clean Desk and Information Protection.

Learn More

Please refer to [AWARENESS Program](#)

Ask Questions and Give Feedback

If you have any questions regarding the content or the interpretation of *PMIM 01 Clean Desk and Information Protection*, please contact the Manager General Services Security Switzerland.

Forms and Attachments

[Swiss Entities Affiliate List](#)

[Clean Desk Check List](#)

Printed documents are not controlled. Our Principles & Practices Platform is the authoritative source, which is available on your intranet.

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Doc. Type: Associated document	Owner : PMI CH	Version N° : 1.0	Page

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Revision History

January 2013: As required by the P&P Framework the P&P was reviewed by the Process Owner and re-approved. Currently, there are no changes to the process.

Printed documents are not controlled. Our Principles & Practices Platform is the authoritative source, which is available on your Intranet.



HR-GS Procedure



HR - GS 11

RANDOM & SPECIFIC CONTROL CHECKS OF PERSONAL BELONGINGS IN NEUCHÂTEL PMPSA

Issued: 01.06.2010

Effective: 01.06.2010

Next review: 01.06.2012

Owner: Manager GS Security Switzerland

Approved by: Director General Services Switzerland

Why Do We Need this Procedure

This HR-GS Procedure formalizes the measures taken to protect PMI assets against theft at Philip Morris Products S.A. (PMPSA) production facilities in Switzerland.

Who Must Follow this Procedure

This HR-GS Procedure applies to all PMPSA employees and all other persons accessing PMPSA premises in Serrières Sud and Onnens.

Definitions

Positive controls: The person(s) are in possession of materials that are not in line with policy GE-008 or are not covered by an authorization to leave the premises.

Negative controls: The person(s) are fully compliant with PMPSA policies.

PMPSA Premises: Serrières Sud, Neuchâtel and Onnens, Vaud.

Random controls: Controls performed at random dates, times and exit points.

Specific controls: Controls performed with specific objectives.

Security Agent: Member of the Security Force in charge of carrying out a Random or Specific Control.

Security Force: Professional security agents contracted through a third party supplier.



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Security Manager Neuchatel: Head of the Security Force in charge of protecting PMI employees and assets.

Swiss Security Manager: Head of the PMI Swiss Security Department in charge of protecting PMI employees and assets.

General Services Mandatory Procedure

All PMPSA employees and other persons who access PMPSA premises, including the Security Agents, are subject to the Procedure and are requested to comply with the present Procedure and may become subject to the procedures described herein. Prior to accessing PMPSA premises they are made aware by the responsible person (such as employees, direct supervisor, HR Business Partner or Security Agent) that they may be subject to random or specific controls of personal belongings upon departure. The controls are conducted by PMPSA Security Forces.

Responsibilities

Employees:	Conform to the Procedure and ensure that visitors and external suppliers are aware of the Procedure and its implications.
Management:	Conform to the Procedure and ensure that all direct reports conform as well.
Security Force:	Carry out the controls as fairly as possible, in compliance with this Procedure ensuring a random selection of people.
Security Manager:	Ensure that the controls are organized and carried out according to this Procedure
Temporary Employees:	Are made aware of the Procedure by the hiring company; are required to conform to the Procedure.

Random control checks

At PMPSA Onnens: The controls are carried out for all departing persons and vehicles. The scheduling is prepared by the Security Force on a random basis.

AT PMPSA Serrières Sud: The Security Force makes monthly plans for the controls in a random manner at the 3 principal exit points of Serrières Sud: i.e. the main gate, the one-by-one gate and at the "L" building, and such other places where a specific risk of theft exists (e.g. IDC building).

Random controls at Serrières Sud may include personal vehicles exiting PMP S.A. premises. This is to ensure an equal application of the Procedure as not all employees walk in and out of the site.



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Controls of personal vehicles may include the trunk and a visual control of the interior. The Security Agent may request the driver and/or occupants to open specific items, when reasonably necessary for the purpose of the control (e.g. preventing theft).

The Security Agent on duty will randomly select people and politely request them to open their bags, brief cases, luggage etc.

Specific control checks

It may occur that a person or group of people falls under suspicion of theft (or some other felony). A specific control of the said person or group of people may be organized by the Security Manager and carried out by the Security Force upon reasonable doubt or suspicion has been brought forth.

Whenever appropriate, in particular when a person under suspicion of theft is refusing to be controlled or is trying to avoid such control, the Security Manager (or his/her deputy) may call the police for assistance.

Consequences, general provisions

All controls must respect the controlled person's privacy and dignity. In particular, all information related to the control must remain confidential and may only be used and shared with other parties within PMPSA and third parties (e.g. the police) when reasonably necessary and suitable to pursue the rights and legitimate interests of PMPSA or other parties affected.

All controls must be made in a proportionate manner in view of circumstances. In particular, the Security Forces must never use force when controlling a person. Body searches are authorized in case of suspicions. If someone refuses to undergo the control or refuses to cooperate, the name of the person, the date and time of the attempted control are reported to the Security Manager who will take appropriate actions. In case of a clear and obvious suspicion of theft by a person who refuses the clarification of such suspicion or otherwise is unwilling to reasonably cooperate, the Security Manager may call the police for assistance and – in an appropriate manner – prevent the person under suspicion from leaving the premises until the police has arrived; however, the Security Manager shall warn the person beforehand of such step (permitting his/her cooperation) and shall, whenever feasible, not act without a witness and/or documenting the event (e.g. by use of a camera). Any such situation shall be documented and reported to the Swiss Security Manager.

If the control is negative, the person is advised of this fact and may continue his/her route. No personal data shall be collected or recorded concerning such person, except if the circumstances warrant so (e.g. in case of problems or complaints).

If the control is positive, the Security Agent, with the assistance of the Security, HR Business Partner and/or the direct supervisor (only if necessary or requested by the person), will (1): obtain evidence of the identity of the person (and if possible a copy of a document proving his/her identity), the date and time of the control, (2): document the suspicious items found, (3): document the place and circumstances of the control, (4): offer the person to comment on the items found and the control and record such comments (including any complaints), (5): ask the person to confirm the correctness of the information documented by signing the form (the person shall be given a copy of such document), and (6): inform the Security Manager, and (in case of an employee), the HR Business Partner and the superior, or (in case of non-employees), the point of contact responsible for such person. The direct



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supervisor/responsible person, the HR Business Partner and the Security Manager will handle the case from this point in time.

Should it not be possible to immediately clarify the situation concerning suspicious items and whenever reasonably necessary to protect the interests of PMPSA (e.g. to protect confidential business information), the person with the suspicious items shall only be allowed to leave without the items at issue. In unclear cases, the Security Agent shall inform the Security Manager who will make the most appropriate decision and action (which may include calling the police). Any items retained by a Security Agent shall be stored safely, securely, and separately and shall be documented (which document shall be signed by the person at issue), with a copy of such document to be handed out to the person at issue.

The refusal to undergo the control and cooperate with the Security Forces and any other person executing this Procedure is considered a violation of this Procedure and a non-compliance with instructions given by PMPSA. Such non-compliance may lead to disciplinary sanctions and other legal action, such as but not limited to a warning, refusal of access to PMPSA premises, penalty, contract termination, and/or official police complaint.

PMPSA reserves all rights, including the right to (1): at any time involve the police and other public authorities in case of suspected or proven theft or any other illegal action. (2): exercise its contractual and other legal rights in case of other non-compliance with PMI's policies, other breaches of contract or breaches of law that may be uncovered in connection with a control (even if only revealed by coincidence).

The above applies to all materials and cigarettes not covered by the *HR-GS 04 Cigarettes distribution Procedure* and the *Special authorization for the carrying of cigarettes samples for business purposes only form*. (Please refer to section Supporting documentation).

Compliance

All suspected theft must be reported according to PMI Policy C-16. In case of discrepancy between this Procedure and C-16, the terms of C-16 will take precedence.

All thefts have to be documented and reported within 48 hours to:

1. The Security Manager
2. The Compliance Department

Any complaints concerning this Procedure shall be reported to the Security Manager Neuchâtel and / or the Swiss Security Manager.



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Supporting documentation

- [PMI Code of Conduct](#)
- [PMI 16-CG1: Reporting Suspected Compliance Violations](#)
- [HR-GS 04 Procedure: Cigarettes Distribution](#)
- [Special authorization for the carrying of cigarettes samples for business purposes only](#)

Exception Handling

General Services Switzerland does not allow exceptions to the HR-GS RANDOM & SPECIFIC CONTROL CHECKS OF PERSONAL BELONGINGS IN NEUCHÂTEL PMPSA.

Ask Questions and Give Feedback

If you have any questions regarding the content or the interpretation of the HR-GS RANDOM & SPECIFIC CONTROL CHECKS OF PERSONAL BELONGINGS IN NEUCHÂTEL PMPSA Procedure, please contact the Manager GS Security Switzerland or the GS Help Desk.