SPECTRUM PLASTICS GROUP BUSINESS

CONTINUITY

PLAN

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Circulation List

Name	Title	
	CEO/CFO	
	VP of Finance	
	Divisional SVP	
	СТО	
	QEHS Director	
	Director Global Quality	
	Plant Manager	
	Human Resources Manager	
	Engineering Manager	
	Finance	
	Operations Manager	
	Quality Manager	
	EHS Coordinator	

1 Introduction

This Business Continuity Plan ("the Plan") has been compiled with the objective of creating a plan for Spectrum **Plastics Group** (SPG), to follow in the event of a major incident, which seriously affects the ability of the company to service its customers.

The nature of any incident and the severity of the restrictions it places on the Company's operation cannot be known in advance. However, the relevant parts of this plan should be used whether the incident either:

- a) Closes the whole facility
- b) Closes part of the facility
- c) Prevents a major supplier from supplying the facility

Rapid assessment of the situation and the taking of appropriate contingency action are vital to limit disruption in the interests of both the Company and its customers.

2 Initial Response to an Incident

An Incident Team will be formed to coordinate the response to any incident. The Team will be made up of (as required).

Divisional SVP (Team Leader)
СТО
Director Global Quality
Plant Manager
Human Resources Manager
Engineering Manager
Finance
Operations Manager
Quality Manager
EHS Coordinator

If the incident occurs during a workday, the Incident Team shall assemble in the Conference Room or, if this is unsafe, at a safe alternative place determined by the team. Team members who are absent should be contacted, if necessary. Phone numbers of team members are listed in Appendix I. If the incident occurs outside normal business hours, the team **may** convene in the Conference Room. If the building is deemed unsafe, the team will convene outside the main office area and determine where to meet further, if necessary.

If the incident occurs at night, [] the plant manager or operations manager should be contacted at the first instance, followed by the Human Resource Manager.

The initial role of the Incident Team shall be as follows:

- In the case of danger to personnel, ensure the safety of employees and point of contact with the emergency services as the main priority.
- Determine the extent of the disruption.
- Assess the expected time lapse prior to restoring the ability of the Company to do business (completely or partially).
- Activate the IT Disaster Recovery procedure if necessary (see Appendix II).
- Determine the best means of communication (cell phones, faxes, etc.).
- Contact the CEO, CFO or Divisional VP (in Atlanta, GA) to advise that the Contingency Plan may become activated.
- Launch an investigation into the cause of the incident.
- Contact CFO to alert the insurers.

On the basis of the above action and information, the Incident Team can start to assess the impact of the disruption and to start a plan of action to meet customer needs.

3 The Assessment Process

As each potential incident is different, not all items listed below will be relevant to each incident. However, the Incident Team should use the following guidelines to assist in its decision-making process:

Use of the premises:

- > Are they safe? Can they be made safe?
- > Are utilities available? If not, when will they be restored?
- > Is access affected? If so, how soon will it be free?
- Is any production/operation possible?
- > How soon will they be restored to partial/full use?
- > What third-party approvals are necessary to restore/start re-using premises?
- Would the situation be improved by the utilization of temporary facilities (e.g., local warehouse, etc.)? If so, contact third parties.
- > Are extra, site-security measures necessary? If so, contact third parties.

(Useful information on third parties and their contact numbers is listed in Appendix III)

3.1 Machinery:

- > Which machines have been rendered unusable?
- Which machines could be used if relocated?
- > What other equipment is available/lacking (e.g., forklift trucks, etc.)?
- > What is the availability on site of change parts, spares, tapes and knives, etc.?

(Useful information on third parties and their contact numbers is set out in Appendix IV)

3.2 Stock:

- > What raw materials and/or packaging has been destroyed/rendered unusable?
- > What finished goods inventory has been destroyed/rendered unusable?
- > Are materials damaged by smoke or water?
- > How soon can replacement raw materials and packaging be obtained?

(Useful information on major suppliers and alternative sources is set out in Appendix V)

3.3 Customer Requirements:

- > What is the workload necessary to meet customer requirements?
- > How much of this can be shipped from other plants within the group?

4 The Contingency Plan

If the assessment of the incident reveals that the Company cannot meet the requirements of their respective customers, the following action should be considered by the Incident Team:

- In discussion with the CEO/SVP of Spectrum (SPG) determine which items can be manufactured/shipped from other plants within the group;
- Prepare drafts for discussions with affected customers which could include:
 - > explanation of situation
 - > understanding of key requirements, i.e., "must-have" items
 - > understanding of latest delivery date acceptable
 - > authorization to manufacture at alternative location
 - > authorization to manufacture using alternative materials
- Contact suppliers to discuss raw material availability
- Contact customers to discuss alternative arrangements
- · Prioritize customer orders and inform customers of any revision to delivery date
- Send details to any other Spectrum (SPG) location selected to produce on contingency with orders, tooling, equipment and specifications:
- Determine whether manufacturing/quality personnel should be sent to another site to assist with production/quality control
- Keep customers informed of progress
- Keep employees informed of events and, if they are sent home for a period due to lack of work, check that contact numbers are available and current

(Details of manufacturing facilities are indicated in Appendix VI)

5 The Restoration Plan

The Incident Team should also begin work as soon as possible toward organizing the restoration of the facility to full operational status. Action which might be necessary, depending on the incident, includes:

- Assist the emergency services in rendering the facility safe:
 - > identify the location of gas, electricity and water supplies
 - identify the location of hazardous substances
- Provide guidance for plans of action and precautions to be taken during the salvage operation
- Obtain necessary approvals to effect restoration of building (local authority, SPG)
- Rectification of site services and plant
- Obtain necessary approvals for ordering replacement machinery from SPG
- Order replacement IT hardware and software in preparation for termination of IT disaster recovery service (as outlined in Appendix II)

(Details of useful third-party contacts are listed in Appendix VII)

6 Other Issues

6.1 Continual Review of Situation

It is vital that the Incident Team be kept informed of all developments. Employees involved in both the Contingency and Restoration Plans must have full knowledge of all developments when they are asked to carry out any tasks. The Incident Team should meet at least once a day (timing to be agreed upon) to ensure that all members are informed of the latest developments and actions.

6.2 Communications to the Media

Should communication with the media be desired by the Company or sought by the media, only the CCO, after co-ordination with the CEO of Spectrum Plastics Group (SPG) is authorized to talk to them. Employees should be instructed not to reveal any information.

6.3 Insurance

Details of all costs and losses incurred because of the incident should be recorded and forwarded to the CFO of Spectrum Plastics Group (SPG).

6.4 Neighboring Facilities

Management personnel at other facilities in the immediate vicinity should be kept informed of any potential danger to their facilities. If an incident at a neighbouring facility threatens to disrupt production at the Company facility, contact information of an Incident Team member should be made available to the neighbour to keep the Company informed of developments.

APPENDIX I

Local Incident Team – Contact Numbers

Name	Home Telephone Number	Cell Telephone Number

APPENDIX II

IT Disaster Recovery Procedure

- The Spectrum (SPG) Atlanta IT Department provides coverage 24 hours all business days.
- Emergency contact numbers for all IT personnel:

Name	Telephone Number

- The local IT Systems Administrator will have a local back-up drive. The back-up drives are switched weekly and the removed drive is stored in a fireproof safe at the facility. This rotation ensures the recent data is stored locally for immediate recovery.
- IT personnel will:
 - > Establish an NT environment and network
 - > Install software on sufficient PC's
 - Load information from back-up tapes
 - > Establish a line for e-mail
 - Once the emergency IT coverage is in place, work can begin on restoring the IT system within the Company's facility
- Useful contact numbers for technical support:

For	Contact	Telephone No. Email (if applicable)
Telephone System		
Telephones/PBX		
IFS Software		
Internet Provision		
T-1 Lines		
Computers (New PC's)		
PC Supplies		
PC/Servers		
Payroll Software		

APPENDIX III

Site - Third-party Information

Utility	Company	Emergency Tel No
Gas		
Water		
Electrician		
Plumber		
Chemical Spills/ Emergency Clean up		
Waste Disposal		
Telephone Service		
Electricity (Distribution)		

APPENDIX IV

Site: Third-party Information – Machinery

Item	Supplier	Telephone No
Forklifts		
Crane Hire		
Extruder Equipment		
Electrical		
Electrical Components		
Cooling Systems (process)		
Air Compressors		
HVAC		
Gearboxes/Motors New and Repair		
Health & Safety Consumables		
Hand Tools		

APPENDIX V

(The following information has been deleted from uncontrolled external copies for confidential reasons.)

Site: Third-Party Information - Raw Materials and Freight Carriers

Company	Product	Contact	Telephone No	Fax No

Note: Approved List Controlled by Materials Department.

APPENDIX VI

Details of Spectrum (SPG), LLC Facilities

Facility	Telephone No	Fax No

APPENDIX VII

Site - Third-party Information - Restoration [See also Appendix III]

Service	Name/Company	Telephone No
Fire Alarm		
Sprinkler System		
Fire Extinguishers		
General Contractor		
Janitorial		
Snow Removal		