

PERSONNEL PRACTICES & PROCEDURES

SUBJECT: DISSEMINATION OF TOXICITY INFORMATION

APPROVED:

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GENERAL: The Company will not knowingly expose any employee to an unreasonable health risk associated with the manufacture, use, or transport of our materials. It is Company policy to disseminate toxicological test results to those employees who have potential exposure to a test chemical/compound.

PROCEDURE

I. Nature of Information to be Communicated

Information which could be communicated to employees includes:

- A. Test results from Celanese sponsored studies.
- B. Industry studies of which Celanese is a participant.
- C. Test results which Celanese may obtain through industry and government contacts.

II. Specific Information to be Communicated

The Corporate Department of Environmental and Health Affairs will interpret toxicity data and write a memo explaining, in lay terms, the test results, their implication, recommend exposure contact procedures and future actions. The Department will also prepare sample questions and answers to accompany the memo. This information will be cleared with the Legal Department and forwarded to the CPSC Manager, Regulatory Services.

III. Determination to Disseminate

Upon receipt of toxicity information pertinent to CPSC employees, shippers and customers, the Manager, Regulatory Services, will call a meeting of the Chemical Alert Committee. This committee shall be chaired by the Manager, Regulatory Services and shall consist of a designated representative of each profit center, the Manager, Safety & Security and the Manager, Personnel Administration.

The committee will review toxicity information provided by the Department of Environmental and Health Affairs and arrive at a decision with respect to whether or not the specific information should be communicated to employees and, if so, to which employees. This decision will be forwarded to the appropriate profit center(s) management via the profit center committee representative for effective and timely communication to employees where the decision is to disseminate the toxicity information in question. The means of dissemination are left to the discretion of profit center/facility management but should adhere to the following guidelines: The Chemical Alert Committee may offer specific recommendations with respect to dissemination depending upon the seriousness of a particular test result, level of exposure or situation.

IV. Methods of Dissemination

Responsibility for effective and timely dissemination of toxicity information rests with each profit center and its respective facilities. The following means of dissemination are available and should be followed. Specific means of dissemination will be governed by the circumstances surrounding each particular situation.

- A. Safety Meetings - Routine safety meetings are recognized as the most effective means of communication. They provide personal contact, an opportunity to answer questions and minimize concerns and to keep a particular situation in perspective. The "routine" nature of such meetings will help to reduce the anxiety that would be associated with formal and infrequent announcements regarding toxicity information. Attendance should be taken to ensure that all employees who should receive toxicity information do, in fact, receive such information either at the meeting or at a later time.
- B. Postings - The Corporate Department of Environmental and Health Affairs will provide postings which clearly convey test results and their implications. Postings provide a written confirmation of what has been conveyed verbally in Safety Meetings and also, since they would be posted for a period of time, represent a more permanent form of communication. It is recommended that such postings remain for seven (7) calendar days.
- While there are a variety of dissemination options available, methods A (Safety Meetings) and B (Postings) will, in most situations, be effective and meet our communications objectives if used in combination with one another. The Chemical Alert Committee recommends joint utilization of these methods (A and B) for most dissemination situations.
- C. Registered Letters - There may be situations where the need to disseminate toxicity information is of such importance that we elect to guarantee and record dissemination via registered letters. Once again, this method may be used in combination with others to ensure effective dissemination. Utilization of this approach must receive prior approval of the Chemical Alert Committee.
- D. Payroll Stuffers - While this method does not provide a specific means of recording those to whom information is disseminated, it does allow for wide distribution of written information. Utilization of this approach must also receive prior approval of the Chemical Alerts Committee.

The use of registered letters and payroll stuffers allow for wide dissemination of written toxicity information. In the case of registered letters, a record of employees to whom information is disseminated is also provided. However, neither of these methods is viewed as being as effective as a combination of Safety Meetings and Postings. Registered letters and payroll stuffers do not provide the opportunity to answer questions and address concerns. Also, as written communications, they may receive distribution which is wider than anticipated or desired which could lead to adverse publicity or misunderstandings. It is for these reasons that Safety Meetings and Postings are recommended and why the use of registered letters and payroll stuffers must receive prior approval of the Chemical Alert Committee.

V. Communications to Unions

Depending upon the labor relations climate at a specific facility and the seriousness of toxicity information, it may be desirable to inform location union officials of the information to be disseminated. This will be left to the discretion of the respective profit center employee relations manager. It is recommended that the Vice President, Employee and Public Relations be advised of such intentions in advance.

VI. Coordination of Dissemination Activities

Upon receipt of the Chemical Alert Committee's recommendation, profit center(s) management will elect a method(s) of disseminating the information in question and the time period during which it will be disseminated. This information must be forwarded to the Manager, Regulatory Services prior to dissemination. He/She will inform the Corporate Department of Environment and Health Affairs of the proposed action. This enables this Department to coordinate action, where necessary, between divisions. Once the Department has been appropriately notified, the Manager, Regulatory Services will authorize dissemination of toxicity information within the respective profit center(s) by contacting the profit center's committee representative.