

## Allergan Environmental Health and Safety Achievement Program

The Environmental Health and Safety Achievement Program (EHS Achievement Program) is Allergan's EHS Management System. The program incorporates elements of ISO 14001 and OSHAS 18001. Our EHS Achievement program is a road map for Allergan managers to follow for developing, implementing, maintaining, and improving their EHS systems and performance. The EHS Achievement Program identifies specific requirements that are oriented at three separate levels of achievement: compliance, prevention and leadership. The EHS Achievement Program also provides the following:

- Establish minimum EHS practices that must be implemented across all Allergan R&D and manufacturing locations.
- Assures compliance with EHS Requirements.
- Reduce EHS risks.
- Alignment with the EHS Policy
- Anticipate and identify potential sources of EHS risks
- A tool for goals-setting purposes
- Checklists to identify progress
- Appendices and glossaries for detailed understanding
- Orients managers to our EHS responsibilities.
- Communicate EHS achievements and opportunities
- Measure critical indices of performance
- Continuously improve EHS performance

The compliance level contains the basic EHS requirements that will ensure regulatory compliance and basic EHS systems implementation including the following titles:

Management Systems	Hearing Conservation
Biohazardous Materials Management	Incident Reporting
Confined Space Safety	Lock Out/Tag Out
Contingency and Emergency Response	Personal Protective Equipment
EHS Documents and Records Management	Powered Industrial Truck Management
EHS Risk Assessment	Regulatory Compliance Management
Electrical Safety	Respiratory Protection
Hazard Communication	Waste Management
Hazardous Materials Management	

The second level is the prevention level. This level contains the EHS requirements that will improve basic EHS systems and take them from a reactive mode to a preventive mode and includes the following titles:

Management Systems	Environmental Sampling
Analytical Laboratory Management	Ergonomic Program
Contractor Management	Medical Surveillance
EHS Change Management	Process Safety
EHS Event Reporting	Safety Committee

## Waste Minimization

## Wastewater Discharge Management

The third level is the leadership level. This level contains the EHS requirements that will improve EHS systems and take them from a preventive mode to a leadership mode and includes the following titles:

Management Systems  
Energy Management  
Water Conservation

Supplier Management  
Indoor Air Quality Management  
Financial Liability Management

The EHS Achievement Program is required to be fully implemented at all R&D and manufacturing facilities. The EHS Achievement Program is progressed through for any new Allergan facility over a five year period. The first two years are used to implement the compliance level. Confirmation is achieved through a formal audit. The next two years are used to implement the prevention level of the Program. Confirmation of achievement again is measured by formal audit. The leadership level will be implemented during the fifth year and is followed by a comprehensive audit of all systems in the sixth year. Each facility will be audited every two years thereafter.

For office and distribution centers an abbreviated EHS Achievement Program has been created and implemented. The elements of this abbreviated program include emergency response, EHS training, EHS agency inspections, fleet vehicle reporting, EHS data reporting, injury and illness management, EHS internal auditing, and EHS asset retirement obligations. There is only one level of EHS program achievement.