

Corporate Health and Safety Policy Statement

Sears cares about the health and safety of our associates, customers, visitors and contractors; this is a vital component of the Sears culture. It is through this strong commitment to workplace health and safety, the prevention of occupational injury and illness and the Early and Safe Return to work program, that the Company will realize its objective to improve health and safety performance. This goal is achieved by the establishment and maintenance of health and safety programs that meet or exceed applicable legal and other requirements. The Company is dedicated to the continuous improvement of its health and safety performance and commits to ensuring that adequate funding and sufficient resources are available to support the programs.

A safe and healthy workplace is the responsibility of everyone. It is through the active participation and cooperation of all Associates that Sears goals will be achieved.

Management is responsible for establishing and maintaining health and safety programs and ensuring that sufficient resources are available to support the programs. Management is also responsible for ensuring compliance with this policy, health and safety programs, and applicable health and safety legislation and other requirements. Management is accountable for the support of follow up and where necessary takes the appropriate corrective action in regards to non-compliance by Leaders and / or Associates.

Leaders are responsible for ensuring that Associates carry out their duties and responsibilities in compliance with established safe work practices and procedures. Leaders are also responsible for ensuring that safe and healthy work conditions are maintained in the workplace. Leaders are accountable for follow up and closure of any non-compliance issues.

Associates are responsible for working safely in compliance with applicable health and safety legislation, and according to established safety procedures, practices, and requirements. Associates are accountable for completing all required training for their specific tasks.

Sears supports the activities of the Joint Health & Safety Committees/H&S Representatives and requires everyone to cooperate with and support the execution of their duties.

Commitment and daily vigilance to a safe and healthy working environment is not only an essential component of the company; it is in the best interest of everyone. All parties will continue to work together to ensure a safe and healthy workplace, and the successful implementation of this policy.

Chief Executive Officer



Calvin McDonald
President and CEO

June 23, 2011

Date