



**Craig Technologies, Inc.
&
Craig Ball Sales, Inc.**

Safety & Risk Control Program

Table of Contents

	<u>Page</u>
Section 1: Safety Policy	3
Section 2: New Employee Safety	5
Section 3: General Safety Rules	5
Section 4: Emergency Procedures	9
Section 5: Accident Management	12
Section 6: Regulatory Compliance (OSHA)	15
Section 6A: Written Hazard Communication Program	20
Section 6B: Confined Space Procedure	21
Section 7: Substance Abuse, Prevention and Control	22
Section 8: Ergonomics / Manual Material Handling Safety	30
Section 9: Fleet Safety Program	32
Section 10: Contractual Controls & Contractor Safety	35
Section 11: Fall Protection Procedure	36

<u>Attachments</u>	<u>Title</u>	<u>No. of Pages</u>
AD-0300, Att. #1	Health & Safety Policy Statement	1
AD-0300, Att. #2	Employee's Safety Suggestion	1
AD-0300, Att. #3	New Employee Safety Checklist	1
AD-0300, Att. #4	General Self Inspection Checklist	2
AD-0300, Att. #5	Safety Observation/Hazard Assessment	1
AD-0300, Att. #6	Supervisor's Accident Investigation Report	2
AD-0300, Att. #7	Supplemental Info for Accident Investigation Report	2
AD-0300, Att. #8	Log of First Aid Injuries	1
AD-0300, Att. #9	OSHA Investigation Checklist	2
AD-0300, Att. #10	Lock-Out/Tag-Out Annual Procd. Insp. Cert. Form	1
AD-0300, Att. #10A	Lock-Out/Tag-Out Periodic Inspection Form Insp.	1
AD-0300, Att. #11	Lock-Out/Tag-Out Procedure Checklist Energy Source	2
AD-0300, Att. #11A	Lock-Out/Tag-Out Form	1
AD-0300, Att. #12	Job Safety Analysis Form	2
AD-0300, Att. #13	Safety Violation Notice	1
AD-0300, Att. #14	Work Related Injury Flow Chart (During Normal Work Hours) ...	1
AD-0300, Att. #15	Work Related Injury Flow Chart (AFTER Normal Work Hours) ...	1
AD-0300, Att. #16	Consent to Pre-Employment Drug Screening	1
AD-0300, Att. #17	Emergency Exits & Meeting Points Map	1
AD-0300, Att. #18	Truck Operators Checklist, Truck Sign-In / Out Log	3
AD-0300, Att. #19	Van Operators Checklist, Van Sign-In / Out Log	3
AD-0300, Att. #20	SDS Sheets, Chemicals - Craig Technologies	1
AD-0300, Att. #21	SDS Sheets, Resins - Craig Technologies	1
AD-0300, Att. #22	SDS Sheets, Colorants - Craig Technologies	1
AD-0300, Att. #23	SDS Sheets, Chemicals - Linus Tooling	1
AD-0300, Att. #24	Required PPE Chart	1
AD-0300, Att. #25	Injury Report Totals	1
AD-0300, Att. #26	ADDENDUM – Coronavirus (COVID-19) Policy.....	4

<u>Attachments</u>	<u>Title</u>	<u>No. of Pages</u>
AD-0300, Att. #27	Confined Space Procedure	6
AD-0300, Att. #28	Confined Space Permit	2

Section 1: Safety Policy

A. Company Policy

Craig Technologies, Inc. & Craig Ball Sales, Inc. are dedicated to providing a safe and healthy work environment for all of our employees and customers. We shall follow operating practices that will safeguard employees, the public and Company operations. **We believe all accidents are preventable.** Therefore, we will make every effort to prevent accidents and comply with all established safety and health laws and regulations. See **AD-0300, Att. #1.**

B. Management Commitment to Safety

Management is concerned about employee safety. Accidents, unsafe working conditions, and unsafe acts that jeopardize both employees and Company resources will be tracked and acted on in a timely fashion. Accordingly, Management will provide sufficient staffing, time, and equipment so that employees can work safely and efficiently.

C. Safety Goals and Objectives

GOALS

The main goal of our Safety and Loss Prevention Program is to prevent accidents. This means that safety and health will be a vital part of our business values and our daily work routine. To achieve this, we have the following goals:

- To have all staff help design, practice, and maintain our Safety and Loss Prevention Program.
- To create a Safety Committee that includes managers and workers.
- To develop programs and procedures to meet our safety and health needs.
- To implement an ongoing safety and health training program for all staff.
- To inform all staff of their safety and health responsibilities.
- To conduct a baseline safety and health review of our facility - **See AD-0300, Att. #4 & 5.**

OBJECTIVES

The following objectives will help us achieve our health and safety goals:

- We will form a Safety Committee that includes both managers and staff.
- The Safety Coordinator will complete a full safety and health survey each month of the workplace to determine if we comply with Federal and State safety and health regulations for review by the Safety Committee.
- The Safety Committee will maintain our written Safety and Loss Prevention Program.
- All management and staff will have access to the written Safety and Loss Prevention Program.
- The Plant Manager along with the Safety Coordinator will determine if a Job Safety Analysis (See **AD-0300, Att. #12**) should be conducted for any reportable/recordable injuries and near misses.
- The committee will review the Safety and Loss Prevention Program yearly.
- The committee’s review will make sure that the Program works and will see if we have reached our goals and objectives. The committee will change the program as needed, with approval from management.

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- Staff will know and accept their safety and health responsibilities.
- We will train staff members to conduct regular in-house inspections. Staff will get into the habit of checking for possible workplace hazards.
- The Plant Manager along with the Safety Coordinator will train supervisors to conduct prompt accident/incident investigations.
- The Plant Manager along with the Safety Coordinator will complete initial training for all staff.

D. Assignment of Responsibilities

Safety is everyone's responsibility. Everyone should have a safe attitude and practice safe behavior at all times. To best administer and monitor our safety policies, the following responsibilities are delegated. This list should not be construed as all-inclusive and is subject to change as needed.

1. Management (will)
 - a. Provide sufficient staffing, funds, time, and equipment so that employees can work safely and efficiently
 - b. Hold every employee accountable for safety and evaluate performance accordingly.
 - c. Periodically review the Safety Program effectiveness and results.
2. Supervisors - Each employee who is in charge of a specific work area, supervises the work of others, or to whom an employee is assigned for a specific task or project, is responsible and accountable for their safety. Supervisors will:
 - a. Establish and maintain safe working conditions, practices, and processes through:
 - b. Observe work activities to detect and correct unsafe actions.
 - c. Ensure that all injuries are reported promptly and cared for properly. Make available first aid treatment.
 - d. Investigate all accidents promptly. Complete an accident report and provide it to the Plant Manager the same day the accident occurs. Review all accidents with the Plant Manager and employees and correct the causes
 - e. Consistently enforce safety rules/regulations, programs, and protective measures (i.e. use of personal protective equipment, machine guarding, proper clothing, etc.)
3. Employees - Each employee is responsible for his/her own safety. No task should be completed unless it can be completed safely. Employees will:
 - a. Comply with all company safety programs, rules, regulations, procedures, and instructions that are applicable to his/her own actions and conduct.
 - b. Refrain from any unsafe act that might endanger them or fellow workers.
 - c. Use all safety devices and personal protective equipment provided for their protection.
 - d. Report all hazards, incidents, and near-miss occurrences to their immediate supervisor or Plant Manager regardless of whether or not injury or property damaged was involved.

C. Employee Suggestions

Safety suggestions from employees are welcomed and encouraged. To make a safety suggestion, complete the Employee's Safety Suggestion form (see **AD-0300, Att. #2**) and provide it to the Plant Manager. The suggestion will be reviewed by Management. Responses to suggestions will be discussed with the individual who presented it.

D. Safety Observation / Hazard Assessment Form (AD-0300, Att. #5)

If during a Safety Inspection, a specific safety observation or hazard is discovered, complete a Safety Observation / Hazard Assessment form and forward it to the Safety Coordinator for action to be taken.

Section 2: New Employee Safety

The Plant Manager or designate should provide safety training to all newly hired employees. Each new employee will be given a copy of the Safety Manual.

General safety orientation containing information common to all employees should be reviewed, **before beginning their regular job duties**. Recommendations include (at a minimum):

- Review the Safety Manual, with extra time spent on: Accident & Hazard reporting procedures, emergency procedures, first aid, personal protective equipment, and special emphasis programs (Drug-Free Workplace Policy, Return-to-Work Policy, Incentive Programs, etc.)
- Encourage & motivate employee involvement in safety.
- Make each employee accountable for their safety and the safety of their coworkers.
- Review any known workplace hazards.

Continual training should be provided to new hires. Each new hire should be assigned to work with an experienced worker for at least 6 months.

The Safety Coordinator should complete the New Employee Safety Checklist for each new employee 60 days after beginning work. See **AD-0300, Att. #3**.

Section 3: General Safety Rules

All employees are responsible for safety. The following applies to all employees:

A. Rules

1. Comply with all established safety rules, regulations, procedures, and instructions which are applicable to your own actions and conduct.
2. Promptly report all accidents, hazards, incidents, and near-miss occurrences to your immediate supervisor, regardless of whether or not injury or property damage was involved.
3. Do not visit, talk to, or distract another employee who is operating a machine, or who is engaged in a work activity where the possibility of injury exists.
4. Do not participate in horseplay, scuffling, pushing, fighting, throwing things, or practical jokes.
5. Observe all no-smoking signs and regulations.
6. Do not run on Company premises.
7. Use handrails on steps, elevated platforms, scaffolds, or other elevations.
8. Assist others and ask for assistance in lifting and carrying heavy or awkward objects.
9. Firearms, ammunition, and explosives are prohibited on Company premises.
10. Alcohol and drug use and possession on Company property is prohibited.

B. Housekeeping

1. Practice good housekeeping by keeping the work area, aisles, walkways, stairways, roads, or other points of egress clean and clear of all hazards.
2. Place trash and scrap in proper waste containers.
3. Keep work area floors clean, dry, and free of oils, grease and liquids. Remove all spills immediately.

C. Tools, Machinery, & Equipment

1. Power saws, grinders, and other power tools must have proper guards in place at all times.

2. Cords and hoses must be kept out of the walkways and off stairs and ladders. They must be placed so as not to create a tripping hazard or damaged from equipment or materials.
3. Electrically powered tools and equipment should be double-insulated or grounded at all times when in use.
4. Hand tools should be used for their intended purposes only. The design capacity of hand tools should not be exceeded by the use of unauthorized attachments.
5. Do not stand, walk, or work under suspended loads or loads being moved by overhead equipment.

D. Office Safety

1. Practice good housekeeping throughout the office area. Report or correct any obvious hazards as soon as they are discovered.
2. Close files and desk drawers. Arrange contents in file cabinets to prevent tipping when draws are open. Store heavier materials in the lower drawers. Do not open more than one draw at a time when tipping may occur. Secure cabinets to each other as necessary.
3. Do not leave paper cutters with the blade in the open or upright position.
4. Take precautions to prevent materials from falling from the top of file cabinets or desks.
5. Clean up spills on floors immediately.

E. Clothing

1. **Clothing:** Wear safe and practical working apparel. Be sure that any clothing you wear is not highly flammable. Neckties and loose, torn or ragged clothing should not be worn while operating lathes, drill presses, reamers and other machines with revolving spindles or cutting tools.
2. **Shoes:** Low-heeled, closed-toe shoes or approved safety shoes must be worn in designated areas. The company will reimburse up to **\$75.00/year** for safety shoes per employee.
3. **Jewelry:** Do not wear rings or any form of jewelry or ornamentation when working around machinery or exposed electrical equipment.

F. Electrical

1. The Plant Manager is responsible for complying with the National Electrical Code and all Federal, State, and local codes. Only knowledgeable, certified electricians are to perform electrical work.
2. Prior to performing any work, electricians must "lockout and tagout" the equipment or machinery. (See Section 6 paragraph D).
3. Electrical cords and trailing cables should be covered, elevated or otherwise protected from damage.
4. Working spaces, walkways, and similar locations must be kept clear of cords.
5. Electrical tools and equipment must be appropriately protected when used in wet or damp areas.

D. Fire Prevention

1. General Rules
 - a. Good housekeeping is the first rule of fire prevention. Oily rags, paper shavings, trim, etc. should be cleaned up and placed in trash receptacles.
 - b. All flammable liquids should be stored in an approved manner and dispensed in approved safety containers.
 - c. Combustible materials or equipment in combustible containers should be stored properly. Fire extinguishers should be kept within close proximity to any combustible container.
 - d. Fire extinguishers should be recharged and inspected regularly. A tag indicating the date of recharging should be affixed to each extinguisher.
 - e. Access to fire hydrants should be maintained at all times. Fire hydrants should never be blocked or obstructed in any way.

- f. All combustible waste materials, rubbish, and debris should be disposed of daily.
 - g. Smoking is prohibited inside the building. Smoking is allowed only in designated areas outside the building.
 - h. Gas cylinders should be transported and stored in an upright position. When stored for extended periods of time, they must be kept at least twenty five feet from oxygen cylinders.
 - i. No material should be stored within three feet of an electrical panel, outlet, or fire suppression equipment.
2. Fire Prevention Program
- a. A daily check of each exit will be made to determine that doors are not improperly locked in any manner. No obstructions will be permitted in corridors or aisle spaces. Necessary exit signs and lights shall be lighted and in good condition.
 - b. All employees shall be educated as to the location and operation of fire extinguishers initially and annually (refresher training) thereafter.
 - c. Maintenance will be responsible for making periodic checks (at least once a month) of all fire extinguishers to insure accessibility, proper condition and pressurization. Such checks will be recorded on the extinguisher tag.
 - d. Maintenance is responsible to ascertain that the sprinkler system main control valve is in the fully open position and the sprinkler system is operational.
3. Fire Extinguishers
- a. Fire Extinguisher Types:
 - Water: Contain water and compressed gas and should only be used on Class A (ordinary combustibles) fires.
 - Dry Chemical: Are usually rated for multiple purpose use. They contain an extinguishing agent and use a compressed, non-flammable gas as a propellant. Dry chemical extinguishers come in a variety of types and are suitable for a combination of class A, B and C fires.
 - BC - This is the regular type of dry chemical extinguisher. It is filled with sodium bicarbonate or potassium bicarbonate. The BC variety leaves a mildly corrosive residue which must be cleaned immediately to prevent any damage to materials.
 - ABC - This is the multipurpose dry chemical extinguisher. The ABC type is filled with monoammonium phosphate, a yellow powder that leaves a sticky residue that may be damaging to electrical appliances such as a computer
 - Carbon Dioxide (CO₂): Contain carbon dioxide gas and are most effective on Class B and C (liquids and electrical) fires.
 - Kitchen (K rated extinguisher): Contain potassium bicarbonate and are sometimes selected in lieu of regular dry chemical extinguishers due to their greater fire extinguishing capabilities. Purple K extinguishers are also effective on Class B & C fires.
 - Multi- Class: Many extinguishers available today can be used on different types of fires and will be labeled with more than one designator, e.g. A-B, B-C, or A-B-C.
 - Halon: Due to Clean Air Act, Halon production was ceased in the U.S. in 1994, but Halon extinguishers may still be available and are still legal to use. CO₂ extinguishers are typically used in lieu of Halon extinguishers.
 - b. Using a Fire Extinguisher:
 - Employees, who have been designated to use fire extinguishers as part of the emergency action plan, must be trained on how to use the fire extinguishers appropriately in the workplace. This training is a specialized form of education that focuses on developing or improving skills and it must be provided annually and when employees are first assigned these duties.

Most fire extinguishers operate using the following **P.A.S.S.** technique:

1. **PULL:** Pull the pin. This will also break the tamper seal.
2. **AIM:** Aim low, pointing the extinguisher nozzle (or its horn or hose) at the base of the fire. **Note:** Do not touch the plastic discharge horn on CO2 extinguishers, it gets very cold and may damage skin.
3. **SQUEEZE:** Squeeze the handle to release the extinguishing agent.
4. **SWEEP:** Sweep from side to side at the base of the fire until it appears to be out. Watch the area. If the fire re-ignites, repeat steps **2 - 4**.

Important: If you have the slightest doubt about your ability to fight a fire....EVACUATE IMMEDIATELY!

E. Smoking Policy

1. **Policy:** Smoking is prohibited unless clearly posted as "Smoking Permitted" area, which includes all company vehicles.
2. **Discipline:** All employees share in the responsibility for adhering to and enforcing the policy. In all cases, the right of the non-smoker to protect his/her health and comfort will take precedence over an employee's desire to smoke. Employees who violate this policy may receive a written safety violation notice and may be disciplined, up to and including termination of employee, based on the severity of the violation.

F. Machine Guarding

1. It is the responsibility of the Supervisor to see that guards are installed on machines where needed.
2. Employees should report any malfunctions of the guards to their Supervisor.
3. The Plant Manager should determine if the machine should be locked and tagged-out until the guard can be fixed or replaced.
4. The guards increase safety on the machine. Machinery with the guards removed shall not be used by any employee.

G. Ladders

1. Inspect all ladders before use. Do not use any ladders with missing safety feet, missing or broken rungs, etc. Defective ladders will be taken out of service and replaced immediately.
2. All ladders placed up against a stationary object must be tied off at the top to a secure point.
3. Ladders must extend at least three feet beyond the step off point.
4. Do not place a ladder close to live electrical wiring or against piping. Beware of overhead wires when moving an extended ladder. Do not use metal ladders near electrical power lines.

H. Safety Glasses

1. Safety glasses must be worn when operating any machines or tools that create chips, fragments, or other possible airborne debris or objects.

I. Hearing Protection

2. Hearing protection (company provided) must be worn when working in the Glebar or Lapping areas.
3. Hearing protection must be worn whenever the work activity produces excessive noise. See **Section 6** Regulatory Compliance (OSHA) for specifics.

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Section 4: Emergency Procedures

A. Introduction

The following contain the policies adopted by Craig Technologies, Inc. & Craig Ball Sales, Inc. to aid in properly responding to disasters or emergencies.

After the initial emergency response action has been implemented, it is imperative that the appropriate management notifications take place.

These policies and procedures may not contain all of the information needed with respect to every emergency situation; therefore you must exercise good judgment and common sense when dealing with any emergency.

Main Office Phone: **Ext. #1229**

Emergency Contact Number(s): Maintenance Manager **Ext. #1232**

B. Fire

Initial response to a fire is very critical. The initial response must be immediate and organized.

Thoroughly review your Emergency Evacuation and Fire Safety Standard and implement all key elements of it to assure for swift and efficient evacuation when necessary. In addition, follow these suggested procedures:

1. Call the fire department immediately. Give them your name, the address and the location of the fire.
2. Evacuate the customers and employees in an orderly manner per the Emergency Evacuation and Fire Safety Standard plan.
3. If the fire is small, and proper training has been received, attempt to put the fire out with an extinguisher. Be sure to use the proper type of extinguisher for the type of fire.
4. If the fire is electrical in nature, cut the power to the fire by using the circuit breaker if possible.
5. Do not close the sprinkler riser until told to do so by the fire department.
6. Arrange for refilling and servicing any used fire extinguishers. Maintenance will contact the fire extinguisher service company to refill/replace fire extinguishers.
7. Make a detailed report of damages and product loss for insurance purposes.

C. Power Failure

The initial response to a power failure is critical in terms of minimizing product loss and customer and/or employee panic. Planning for a power failure in advance will assure a well-organized and immediate response. Follow these suggested procedures:

1. As soon as the power failure occurs, Maintenance will contact the public utility to determine the anticipated duration of the power loss. If the power loss is the result of an internal problem, notify the Maintenance Manager.
2. If the utility can provide a firm idea of the duration of the power loss, and the duration is expected to exceed one hour, determine the need to evacuate customers and close the facility.
 - a. Make a detailed report of damages and product loss for insurance purposes.

D. Armed Robbery

Preparing to deal with an armed robbery could save lives. Implement all procedures in the Armed Robbery Standard, being especially sure to provide the proper training.

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The following is a summary of the critical points in the Armed Robbery Standard:

1. Do not resist the instruction given by the participants in the robbery. Failure to follow the instructions could result in bodily harm.
2. As soon as possible, notify the police and secure and protect the crime scene.
3. Make a detailed report of damages and material / equipment loss for insurance purposes

E. Bomb Threats

When a bomb threat is received via the phone:

1. Remain calm.
2. Listen carefully to anything the caller has to say. Take notes if you have a pen and pad handy.
3. Note any identifying characteristics such as:
 - a. Accent
 - b. Male or Female
 - c. Low pitched voice or High pitched voice
 - d. Excitable
 - e. Adult or young adult
 - f. Speech impediments
4. Notify the police immediately at the conclusion of the call.
5. Notify the appropriate members of management.
6. Determine with the direction of the police:
 - a. Whether or not the facility is to be evacuated.
 - b. Whether participation is requested to perform a search of the facility.

F. Natural Gas Leak - Maintenance will:

- a. Call the gas company immediately. Follow any instructions they provide.
- b. Turn off the main gas line if possible. Make sure key employees know where the main valve is. If this is not possible, turn off the nearest valve to the item or line that is leaking.
- c. Determine the need for evacuation of customers and employees.
- d. Make a detailed report of damages and product loss for insurance purposes

G. Poison Control

1. If a poisoning situation occurs an immediately contact to the poison control center must be made.
2. The national toll-free number for poison control centers: **1-800-222-1222**.

H. Severe Weather / Hurricane

1. When severe weather threatens, special preparatory notices from the Plant Manager/designate will be sent to all supervisors with guidance and instructions. These instructions may be in the form of e-mail, texts, and/or written instructions.
2. Inspect the facility for the following items:
 - a. Properly functioning sump pumps
 - b. Roof clear of debris
 - c. Gutters and downspouts clear of obstructions, debris
 - d. Storm drains clear in parking lots and receiving areas
 - e. Emergency generator is functional and tested recently
 - f. Alarm systems are functional
 - g. Clear the exterior of extra pallets, bales, etc.
 - h. Secure items outside of the facility such as garbage cans, benches, etc.
 - i. Emergency lighting is operational
3. As the severe weather approaches, do the following:

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- a. Establish communications with local first responders. Follow any instructions you are given.
- b. Keep a supply of batteries and flashlights ready for use by employees
4. If the weather causes damage, make a detailed report of property damages for insurance purposes.

I. Water Emergency – No Water

1. Water is a critical component to the operation. Should the water supply become interrupted for any reason, a swift and complete response is required. Use the following guidelines:
2. As soon as an interruption in the water supply is apparent, contact the Water Company and/or fire department to determine the expected duration of the outage.
3. Close sprinkler systems to keep water in the lines. No water means that the system will not operate as intended. Accordingly, conduct periodic walk through “fire watch” tours and make sure all fire extinguishers are charged and accessible.
4. Place “out of order” signs on all public rest room doors. Consider providing “porta johns” if the water outage will last for **12** hours or longer, or use bottled water to flush toilets in the employee rest rooms.
5. Make a detailed report of damages and product loss for insurance purposes.

J. Inspections

1. Periodic inspections will be conducted to identify hazardous conditions and unsafe behavior. Management will conduct inspections, along with insurance companies and OSHA, and may request employees or supervisors to participate. The inspector should look for unsafe practices and conditions that can cause an accident and take corrective action immediately.
2. Every month, the following inspection form should be completed and provided to the Plant Manager/designate. Management will review the report, take any corrective action needed, and maintain a file of inspections.
3. Periodically, supervisors, or designated employees will complete inspections on a safety-sensitive or non-routine job to ensure compliance with safety procedures.

K. Emergency Preparedness Plan

1. Emergency exit routes are identified and designated meeting points for each work area is defined on an Emergency Exits & Meeting Points Map (See **AD-0300, Att. #17**).
2. Primary and secondary exits routes are identified on the Emergency Exit & Meeting Points Map.
3. Practice drills are conducted annually and a head count is taken at gathering points.
4. Practice drills will be reviewed with any employee who was absent on the day of the drill. The Practice drill will be recorded on the Employee training Record when attended or when reviewed if absent on the day the drill was conducted.

L. Bloodborne Pathogen Kit

1. A Bloodborne Pathogen kit is located in the main hallway leading from the Front Office area into the main production/manufacturing area (See **AD-0300, Att. #17**).

Section 5: Accident Management

Purpose:

Craig Technologies is dedicated to the protection of its employees from on-the-job injuries and illnesses. However, when injuries or illnesses do occur, we are prepared to immediately respond to the needs of the injured or ill.

This written First Aid Program is intended to ensure that Craig Technologies & CBS, Inc. meets the requirements of **29 CFR 1910.151**, Medical Services and First Aid.

Administrative Duties

The Plant Manager is responsible for establishing and implementing the written First Aid Program. This person has full authority to make necessary decisions to ensure the success of this program.

First Aid Personnel

The Plant Manager is readily available for advice and consultation on matters of workplace health.

The *National EMS Education and Practice Blueprint* lists the following first aid designations:

- **First aid provider:** Occupationally required to be trained in first aid even though they may not be specifically obligated by law to perform first aid. Responds as a "Good Samaritan." Uses a limited amount of equipment to perform initial assessment and provide immediate life support and care while awaiting arrival of emergency medical services (EMS).
- **First responder:** Uses a limited amount of equipment to perform initial assessment and intervention and is trained to assist other EMS.
- **Emergency Medical Technician (EMT)-Basic:** The **2nd** level of professional emergency medical care provider. Qualified to function as the minimum staff for an ambulance.
- **EMT-Intermediate:** The **3rd** level of professional emergency medical care provider. Can perform essential advanced techniques and administer a limited number of medications.
- **Paramedic:** The **4th** level of professional emergency medical care provider. Can administer additional interventions and medications.

The following person(s) are trained to render first aid & CPR:

<u>Name:</u>	<u>Title</u>	<u>Course Name</u>
Claude Whittaker	Plant Manager	First Aid; CPR

First Aid Supplies and Equipment

It is important that our first aid supplies and equipment meet the specific needs of our workplace.

Training

Training is the heart of our First Aid Program. Employees should NOT attempt to rescue or treat an injured or ill employee unless they are qualified to do so. Instead, they should contact someone who is qualified.

Employees who are qualified to render first aid have completed our first aid training program. Nanticoke Memorial Hospital will be the site conducting training.

First Aid training is done annually. We include Basic 1st aid and CPR training.

A. Accident & Near Miss (Close Call) Reporting Procedures

If you have a near-miss situation while working, notify your supervisor immediately. The situation will be investigated and corrective action implemented to prevent future injury. Employees and witnesses must fully cooperate in the investigation.

If you are injured on the job:

1. Contact your supervisor, or the nearest coworker (who should notify a supervisor) if you are unable to contact your supervisor due to the severity of your injury.
2. The designated employee who is trained in first-aid and/or CPR should be immediately notified to assist in the situation.
3. First aid kit, located by the break room, is available and medical supplies are refilled by the Front Office.
4. If needed, the supervisor or his designee should transport the injured worker to the company's designated medical facility to receive appropriate medical attention. A post-accident drug and/or alcohol test will be conducted in accordance with the company's Drug-Free Workplace Policy. **See AD-0300, Att. #14 & 15 for Work Related Injury Flow Charts for Normal & After Hours reporting.**
5. If rescue personnel are summoned, the supervisor should delegate an individual to wait for the rescue team and escort them to the injured employee.
6. All witnesses to the accident should be available to provide their account of the incident and must cooperate in all accident investigations.
7. The Front Office will notify the insurance company of the accident and file a workers' compensation claim.

Every accident or near-miss situation should be reported immediately. Injured employees and witnesses to the accident will assist the supervisor in completing an accident investigation. Injured employees must comply with the medical treatment provided by the treating physician, cooperate with the insurance company and its designees, and abide by the company's return-to-work policy.

B. Accident Investigation Review and Analysis

The supervisor must investigate every accident to determine the cause and to initiate corrective action to assure that similar type accidents will not recur from the same causes. NOTE: Supervisors have the authority to immediately implement and monitor corrective actions.

Supervisors should complete the following accident investigation form (**See AD-0300, Att. #6 & 7**) immediately or no later than within **1 day** after the accident/incident occurred and they must submit a copy to the Plant manager and the Safety Coordinator for review. Injuries are logged on the Log of First Aid Injuries - **See AD-0300, Att. #8.**

All Accident Reports are reviewed and initialized by management within **3 days** of the Report being filed/written. Incomplete or weak investigations are sent back to the Supervisor for more detail and information. Corrective Actions of Accident Reports are followed up on by the Safety Coordinator and results are communicated to employees in meetings and/or postings on the Safety Board.

Corrective Actions will have follow-up dates assigned for completion and review by the Safety Coordinator. (See **SOP-0400** for time frames for corrective actions to be completed).

Implemented Corrective Actions will be reviewed and evaluated for effectiveness and when refresher training is needed it will be conducted in Safety meetings conducted by the Safety Coordinator along with the affected area's Supervisor.

Tips on accident investigations:

1. Every accident is caused. Carelessness is not a cause, but the result of some deficiency. Telling employees to be more careful will not eliminate the real accident cause.
2. An accident investigation is not a trial to find fault or to place blame. Its purpose is to find accident causes so that corrective measures may be taken to prevent future accidents.
3. Most accidents result from a combination of human error (unsafe behavior) and a physical hazard (unsafe condition). Do not overlook the possibility of multiple errors and hazards.
4. Don't stop at the obvious answer. For instance, a missing machine guard does not cause an accident. The accident happened because the operator entered the point of operation. Determine why the operator did this and why the guard was off the machine. Only by correcting both problems can you prevent future accidents.
5. The accident investigation should be conducted as soon after the accident as possible. Facts should be gathered while the accident is fresh in the minds of those involved. If possible, question every employee who was involved, or witnessed, the incident. Delay interviewing injured employees until after medical treatment has been received.
6. Other employees who did not witness the accident but work in the area may contribute information regarding the injured workers' activities prior to the accident and conditions at the time of the accident.
7. The accuracy and completeness of the information received from the injured worker(s) and witnesses depends on how well the interview is conducted. Supervisors should:
 - a. Put employees at ease.
 - b. Ask what happened and how it happened.
 - c. Permit employees to answer without interruptions.
 - d. Show concern.
 - e. Remember, nothing is gained with criticism or ridicule.
 - f. Ask why questions only to clarify the story.
 - g. Repeat the story as you understand it.
 - h. Give the employee the chance to correct any misunderstandings that you have.
 - i. Photographs of the conditions as they exist immediately following the accident, including photos of the damaged equipment, are very helpful.
 - j. Damaged equipment should be removed or secured for future testing and use as evidence.
 - k. Take immediate action to correct any obvious unsafe conditions. Determine the basic accident causes and correct or recommend action to prevent reoccurrence.
 - l. See **AD-0300, Att. #6** for additional information.
8. Department Supervisors will complete **AD-0300, Att. #25**, Injury Report Totals each month.
9. Safety Violations:

- a. In the event an employee is found in violation of company safety rules they are to be written up using the Safety Violation Notice (**AD-0300, Att. #13**).
- b. The notice will be maintained in their personnel file.
- c. Excessive violations will result in disciplinary action.

Section 6: Regulatory Compliance (OSHA)

A. OSHA (Records) Requirements

Copies of required accident investigations and certification of employee safety training shall be maintained by the Safety Coordinator. A written report will be maintained on each accident, injury or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on OSHA Log and Summary of Occupational Injuries **Form 300** according to its instructions. Supplemental records of each injury are maintained on **OSHA Form 301**. Every year, a summary of all reported injuries or illnesses is posted no later than **February 1, until April 30**, on **OSHA Form 300A**. These records are maintained for five (5) years from the date of preparation.

B. OSHA Checklist

To avoid safety violations and remain in compliance with OSHA standards, the Maintenance Manager should complete the following OSHA Investigation Checklist, **AD-0300, Att. #9**, on a monthly basis and forward it to the Safety Coordinator when done. Deficiencies should be immediately corrected. If problems persist, the Safety Coordinator should contact our Loss Prevention consultant at our workers' compensation carrier to conduct a comprehensive OSHA inspection.

C. OSHA Inspection: What you can expect during an OSHA inspection

1. **Arrival of the Compliance Officer (OSHA Inspector)**

- a. Request to see credentials.
- b. Record his name, identification number, the name of his/her supervisor, and office location.
- c. Notify the Maintenance Manager. If the Maintenance Manager is not available, ask the Officer to wait until the Maintenance Manager arrives. If he/she cannot wait or the Maintenance Manager will not be available, a member of management should accompany the Officer.
- d. Do not volunteer any information, only answer questions.

2. **Opening Conference**

- a. The scope of the inspection will be discussed.
- b. The Officer will explain the reason for the inspection (i.e. employee complaint, scheduled inspection, etc.)
- c. If the reason for the inspection is an employee complaint, request a copy of the complaint.
- d. Take comprehensive notes and request to record the meeting and walk-around.

3. **The Walk-Around (inspection)**

- a. The Company representative should accompany the Compliance Officer throughout the inspection.
- b. The Officer may ask to interview employees. Employees should cooperate. The Company representative should attempt to participate in the interview.
- c. The Company representative should be prepared to show the Officer: 1) the Safety Manual, 2) Hazard Communication Program, 3) **OSHA poster**, 4) **OSHA 200 Log**.

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- d. If at all possible, correct any violations immediately that the Officer points out.
- e. Take photographs of the same items or areas that are photographed by the Compliance Officer.
- f. Take notes. Write down every possible violation, standards cited, corrective action needed, and a deadline date.

2. Closing Conference

- a. The Compliance Officer will review any violations discovered during the inspection. Compare these to the notes you took during the inspection. Point out any discrepancies and areas already corrected.
- b. Be polite. Do not argue or get defensive with the Compliance Officer.
- c. If you are not clear on something, ask questions.
- d. This is a good opportunity to produce records of compliance efforts and other safety practices.

3. Citations & Penalties

- a. Our goal is to provide a safe and healthy work environment. If the company is cited for OSHA violations, corrective action will be completed before the deadline provided by OSHA and as quickly as possible. It will be management's decision to appeal any citations.

D. Lock-Out/Tag-Out - (See AD-0300, Att. #10 & 10A, 11 & 11A)

Purpose

To establish a procedure to protect and prevent personnel from injury by 1) accidental activation of any powered or damaged equipment, and 2) the uncontrolled release of electrical energy. A secondary purpose is to remain in compliance with OSHA regulations, **29 CFR 1910.147**.

Responsibility

The Maintenance Manager is responsible for compliance. The Maintenance Manager shall train supervisors on proper lock-out/tag-out procedures, audit and/or oversee the application of the procedures, ensure corrective actions are taken when problems arise, and conduct an annual inspection/evaluation. Supervisors are responsible for training effected and authorized employees on the purpose and use of these procedures. The Maintenance Manager should periodically monitor training activities and assist as required to ensure compliance with OSHA regulations and company goals. All effected and authorized employees involved in lock-out/tag-out procedures must receive annual training. A list of authorized, trained individuals will be maintained by the Maintenance Manager (see page 18 for a list of trained individuals). The Lock-out/tag-out procedures are assessed annually **AD-0300, Att. #10** and are certified during a periodic inspection see **AD-0300, Att. #10A**. **AD-0300, Att. #11A** forms are retained by the Maintenance Manager.

Scope

This procedure applies to all Company personnel and contract employees. It will be enforced during installation, cleaning, servicing, maintenance, or inspection work is performed on any powered equipment and/or processes in which the activation of such could injure an employee or cause property damage. This procedure does not apply to adjustment or other activities which require the equipment be operating at the time of service, provided other protective measures are employed.

Definitions

Lock-out:

The application of a lock, chains, or other appropriate apparatus, and a danger identification tag to de-energize electrical equipment and/or process system to ensure that the equipment or system cannot be

activated. Note: OSHA regulations require that locks be used to secure equipment whenever possible. Chains can be wrapped around valve handles and then locked in such a way that the valve cannot be operated. Tags alone can be used when it is not possible to use a lock.

Tag-Out:

The application of a danger identification tag when a physical lockout or de-energizing is not feasible or a lock has already been applied. Tags should bear the name of the employee applying the tag, the date of application, and a brief description of the work needed.

Energy Source:

The switch or valve through which energy is controlled to the unit (e.g. motor control center (disconnect) switches, (circuit) breaker panel switches, valves, locking pins, etc.). This energy may come be: **1)** electric power, **2)** mechanical power, **3)** hydraulic power, **4)** pneumatic energy, **5)** chemical system, or **6)** thermal energy.

Authorized Employees:

A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment.

Effected Employees:

An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed. An effected employee becomes an authorized employee when the effected employees' duties include servicing or maintenance.

Lock-Out/Tag-Out Procedures

1. Each piece of equipment or system must be evaluated to identify all energy sources to be locked or tagged out. The evaluation should be done periodically by a supervisor or an authorized employee with familiarity with the equipment/system, using the attached Energy Source Determination Checklist. **See AD-0300, Att. #11.**
2. If the machine is determined by OSHA that formal **Lock-out/tag-out** procedures are required, this should be done by an authorized employee and **recorded on the AD-0300, Att. #11A, Lock-out/Tag-out Form.** These procedures should then be followed. If no specific procedures are required, or provided by the equipment manufacturer, complete the following tasks.
3. Deactivate (turn off) and secure the equipment/system at the energy source. Relieve pressure, release stored energy from all systems, and restrain or block them. (Operators must tag the appropriate switches or controls inside the control room as part of this step).
4. Attach a lock to each isolation device and a tag to the lock. Sign and date the tag, along with providing pertinent information.
5. Check to ensure that no personnel are exposed to the equipment/system, then attempt to activate the normal operating controls to ensure proper lockout/tagout. (A voltmeter can check the switch) **CAUTION: Always return the operating control to the "neutral" or "off" position after completing this test.**
6. The equipment/system is now locked and tagged out.

Lock-Out/Tag-Out Removal Procedures

1. After installation, servicing, maintenance, inspection, or cleaning is complete, verify that all tools have been removed, all guards have been reinstalled, the area is clean and orderly, and the equipment is safe to operate.

2. Ensure that employees are not exposed to the equipment and all employees are aware of the removal of the lock and tag.
3. The locks and tags should be removed only by the employee who applied them, the supervisor or the Maintenance Manager. The supervisor or Maintenance Manager should only remove the locks and tags after a reasonable effort is made to contact the employee and notify him of the removal. The tags should be signed and dated and submitted to the Maintenance Manager.
4. Activate energy source as required.

Procedures involving more than one person

If more than one individual is required to lockout or tagout equipment, each shall use his/her own assigned lock-out/tag-out device on the energy source. When the energy source cannot accept multiple locks or tags, a multiple lock-out/tag-out device (hasp) should be used. A single key should be used to lockout the equipment/system, with the key being placed in a lock-out box or cabinet. This cabinet or lock-out box must allow multiple locks to secure it. Each employee will then use his/her own lock to secure the box or cabinet. As each person no longer needs to maintain the lock-out protection, that person will remove his/her lock from the cabinet. Proper removal procedures should be followed.

List of Authorized Lockout/Tagout Individuals

Name	Mechanical (yes/no)	Electrical (yes/no)
Maintenance Manager	Y	Y
Maintenance Technician	Y	Y

E. Hearing Conservation

Purpose

Provide adequate safeguards for the hearing of our employees and to ensure compliance with regulatory requirements.

Responsibility

The Safety Coordinator is responsible for compliance. The Safety Coordinator shall train supervisors and employees on the proper wearing of hearing protective equipment, participate in sound level surveys and analysis, assist in efforts to reduce noise levels, purchase needed hearing protection, refer employees to the company physician, as needed, and monitor the program and retain records as required by law. Employees will receive training on hearing conservation on an annual basis.

Supervisors. Supervisors shall ensure that employees receive hearing examinations as scheduled and wear their hearing protective equipment as required, participate in training, and maintain a work environment that ensures maximum employee safety and health. Supervisors should also ensure visitors abide by the hearing conservation program.

Employees. Employees must comply with this program and report any changes in conditions which create high noise problems to their supervisors.

Scope

This program stipulates that protection against the effects of occupational noise exposure shall be provided to any affected employees when sound levels are in excess of an 85 dB time-weighted average.

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Procedures

1. Employees will be notified in writing **24** hours in advance of a hearing examination. Employees must avoid high noise areas both on and off the job for **24** hours prior to their examination. If this is not possible, hearing protection must be worn from the start of the employees' shift until the time of testing.
2. Testing will be in accordance with OSHA regulations.
3. A base line audiogram will be established for each employee working in a high noise area. A job and future audiogram will be compared with the baseline to determine if a significant threshold shift has occurred.
4. An employee who has a significant threshold shift will be:
 - a. Informed in writing within **21** days of the determination of the existence of a significant threshold shift
 - b. Refitted with hearing protectors and retrained in their use
 - c. Referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is required or if medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.
5. The Human Resources will notify employees of their need for an examination if a medical pathology of the ear is suspected which is unrelated to the use of hearing protectors.
6. Employees exposed to noise that equals or exceeds an **8** hour, time-weighted average of **85 dB** will receive an annual evaluation.
7. As required by OSHA, an audiologist or qualified physician shall review the audiogram. The Company will provide the following information to the physician:
 - a. A copy of the OSHA requirements for Hearing Conservation
 - b. A copy of the baseline audiogram and most recent audiogram of each employee to be evaluated.
 - c. Measurements of background sound pressure levels in the audiometric test room and booth.
8. The following preparation to the audiometer and examination room will be done prior to the employee testing. A record of results will be maintained.
 - a. Functional audiometer check
 - b. Biological audiometer check
 - c. Measure background sound pressure levels in audiometric test room and booth
9. Audiograms are mandatory for the following categories of personnel:
 - a. New hires: Within **50** days after hire, all new employees required to work in jobs designated as 'high noise'.
 - b. Termination: Employees working in 'high noise' jobs who leave any department for any reason and have not had a company audiogram within **90** days of their departure date
 - c. Recalls: Former employees called back to work in 'high noise' jobs who have not had a company audiogram within the past **6** months.

Section 6A: Written Hazard Communication Program

General

The following hazard communication program has been established for Craig Technologies, Machine Shop and Craig Ball Sales.

This program will be available for review by all employees.

Hazard Determination

Craig Tech, Machine Shop and Craig Ball Sales will rely on Safety Data Sheets obtained from product suppliers to meet hazard determination requirements.

Labeling

- A. Receiving will be responsible for seeing that all containers entering the workplace are properly labeled.
- B. All labels shall be checked for:
 - 1. Identity of the material.
 - 2. Appropriate hazard warning for the material.
 - 3. Name and address of the responsible party. (Only if the container is received from the manufacturer, distributor, or importer.)
- C. The Maintenance Manager shall be responsible for ensuring that all portable containers used in their work area are labeled with the appropriate identity and hazard warning.

Safety Data Sheets (SDSs)

- A. The Safety Coordinator /Designate will be responsible for compiling and maintaining the master MSDS file. The file will be kept in the Lunch Room.
- B. SDSs will be available for review to all employees during each work shift. Copies will be available upon request to the Safety Coordinator or /Designate or Quality Supervisor.
- C. If a required SDS is not on file, Safety Coordinator/Designate shall contact the supplier, to request the SDS.

Employee Information and Training

- A. Safety Coordinator /Designate shall coordinate and maintain records of employee hazard communication training.
- B. Each new employee will attend a hazard communication training class. The class will provide the following information and training:

Information:

- ☐ All operations in their work area where hazardous chemicals are present
- ☐ Location and availability of the written hazard communication program, the list of hazardous chemicals, and the SDS.

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Training:

- ☐ Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area
- ☐ Physical and health hazards of the hazardous chemicals
- ☐ Measures the employees should take to protect from these hazards
- ☐ Details of the hazard communication program--including explanation of labeling system and SDSs and how employees can obtain and use hazard information

C. The employee shall be informed that:

1. The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.

D. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training class.

List of Hazardous Chemicals, Resins and Colorants

Attachments of the hazardous chemicals, resins, and colorants used by Craig Technologies, Linus and Craig Ball Sales are attached to this document (See attachments **AD-0300, Att. #20, 21, 22, & 23**). Further information regarding any of these chemicals can be obtained by reviewing its respective SDS.

Materials which can be purchased by the ordinary household consumer, and which are used in the same fashion and amount as by the ordinary household consumer, are not required to be included in this list.

For Coronavirus Response/Information, See **AD-0300, Att. #26 ADDENDUM -- Coronavirus (COVID-19) POLICY**

Section 6B: Confined Space Procedure

For Confined Space Procedure and Confined Space Permit, see the following Attachments:

- AD-0300, Att. #27 Confined Space Procedure
- AD-0300, Att. #28 Confined Space Permit

Section 7: Substance Abuse, Prevention and Control

1.0 POLICY PURPOSE

1.1 Craig Technologies, Inc. & Craig Ball Sales, Inc. value its employees, its reputation and are concerned with accident prevention and loss control. It recognizes that employee substance abuse negatively impacts employee health and jeopardizes the Company's resources. Additionally, substance abuse undermines the Company's ability to operate effectively and efficiently. As part of its commitment to protect the safety, health and well-being of its employees, to protect the Company's assets, to satisfy insurer risk management recommendations, and to deter the illegal use of drugs and alcohol misuse, the Company has established a Drug-Free Workplace Policy".

2.0 SCOPE AND APPLICABILITY

2.1 Employees. Compliance with this Policy is a continuous condition of employment and it shall apply to all full-time, part-time and temporary employees of the Company (hereinafter all are referred to as "Employees"). Temporary Employees are required to comply with **Sections 2, 3 and 4** of this Policy. If a temporary Employee violates this Policy, he/she shall be advised that his/her assignment has ended with the Company.

2.2 Contract Disclaimer. This Policy does not create an express or implied employment contract or alter any existing agreements or collective bargaining agreements, if any. This Policy does not affect or alter an Employee's status as an "employee-at-will."

2.3 When Applicable. The Company's Policy is intended to apply whenever an Employee is on-duty and, in some instances, while off-duty. For purposes of this Policy, the term "on-duty" shall include the following Employee conduct:

- (a). while on-call/paid standby;
- (b). while on work premises (whether on or off-duty);
- (c). during all working hours (regardless of location);
- (d). during lunch and other breaks (whether paid or unpaid);
- (e). while operating a motor vehicle for business purposes;
- (f). while operating a Company-owned vehicle at any time;
- (g). while attending Company-sponsored events; or
- (h). while conducting business on behalf of or representing the Company.
- (i). Business related entertainment with company and/or non-company personnel, and
- (j). While traveling on company business.

2.4 Policy Modification. This Policy supersedes any other Company policy or practice on the subject of Employee drug and alcohol use, abuse, and testing. At any time, the Company, with or without notice, may amend, supplement, modify or change any part of this Policy. This Policy shall automatically incorporate any changes to satisfy federal or state laws without notice to Employees. Any failure to implement the Policy or any part thereof, any variation, addition, or omission to the procedures set forth in the Policy shall not confer any contractual or other rights or claims in favor of the Employee not otherwise conferred by law.

2.5 Designated Employer Representative. The Human Resources Specialist shall be the Designated Employer Representative (DER). Questions regarding this Policy, should be directed to the DER who is coordinating the drug-free workplace program for the Company. The Administrative Coordinator shall be

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the secondary point of contact, in the event that the primary DER is unavailable. This Policy shall be effective 11/23/2015.

3.0 EMPLOYEE RESPONSIBILITIES AND DUTIES

3.1 Employee Duties. This Policy imposes the following Employee duties for when failure to comply is a Policy violation separate from **Section 3**:

- (a). Report to work at all times in a fit-for-duty capacity which includes free of alcohol or other drugs which pose a direct threat to workplace safety.
- (b). Review and understand the Policy, the negative effects of drugs and alcohol misuse, the Company's Policy on testing, and voluntarily seek help with drug and alcohol problems prior to problems arising at work.
- (c). An Employee who is convicted of a drug law violation must notify the Company's DER no later than five (5) calendar days after the conviction or the plea of nolo contendere (which means "no contest").
- (d). Whenever an Employee is legally prescribed drugs or directed to take over-the-counter medication, the Employee shall ask his/her prescribing physician whether the medication, if taken as directed, is likely to pose a direct threat to workplace safety and if so, obtain a note from the prescribing physician indicating the same and provide it to the Company.
- (e). An Employee shall notify his/her supervisor and the DER of prescription or over-the-counter medication use that may pose a direct threat to workplace safety or significantly impair the Employee's fitness-for-duty prior to beginning work. When required to notify, an Employee is not required or asked to report his/her medical condition or the drugs used; the Employee should merely report that he/she is using medication that may pose a direct threat to workplace safety. The Employee shall provide a copy of the physician's job instructions to the Company prior to performing job duties.
- (f). If an Employee is legally using a prescription or over-the-counter drug that poses a direct threat to workplace safety, then the Company shall determine whether the Employee may continue to work during the course of treatment. The Company may seek a second opinion from a medical professional of its choice and may require the Employee to undergo an examination by the Company's chosen medical professional. The Company may rely on the second opinion rather than that of the Employee's prescribing physician.
- (g). Participate in and support Company-sponsored drug and alcohol education programs if instituted.
- (h). Cooperate in any investigation and support the Company's efforts to eliminate alcohol and other drug abuse among Employees where it exists.
- (i). All Employee medications must be kept in their original containers while on-duty.

4.0 DRUG AND ALCOHOL PROHIBITED CONDUCT

4.1 Illegal Drugs. It is a violation of Company Policy for an Employee to sell, manufacture, distribute, dispense, use, possess, purchase, obtain, transfer, convey, be under the influence or test positive for controlled substances deemed illegal by federal or state law (or to attempt any of the foregoing acts).

When testing is performed, the specimen will be analyzed for the following controlled substances. Some of the common drug names are included in parentheses:

- Cannabinoids (Marijuana)
- Cocaine
- Opiates (Heroin, Morphine, Codeine)
- Amphetamines (Stimulants like Benzedrine and Didrex)

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- Phencyclidine (PCP)
- Barbiturates (Depressants like Phenobarital and Secobarbital)
- Benzodiazepines (Depressants like Valium and Xanax)
- Propoxyphene (Narcotics like Darvon and Darvocet)
- Methaqualone
- Methadone

4.2 Prescription Drugs. Prescription medication usage on-duty is not prohibited when taken in standard dosage and/or under a physician's written prescription, provided, however, that the prescribed drug would not pose a threat to workplace safety or render the Employee unfit-for-duty. Abuse of prescription drugs is strictly prohibited including, but not limited to, exceeding the prescribed dosage, using a prescription medication for a purpose not intended or using a prescribed medicine which was prescribed to another individual.

4.3 Over-the-Counter Drugs. Over-the-counter medication usage is not prohibited when taken in the standard dosage, provided, however, if taken as directed, it does not render an Employee unfit to perform job duties or otherwise negatively impact workplace safety. The Company prohibits Employees while on-duty from being under the influence of mood-altering over-the-counter drugs used contrary to the product's labeling (i.e. misuse of over-the-counter drugs).

4.4 Alcohol. The Company prohibits Employees from illegally using, possessing, selling, buying, distributing or illegally attempting to distribute, manufacture, or being involved in illegal alcohol-related conduct, including, but not limited to, driving under the influence and underage drinking violations, while on-duty. The Company reserves the right to take adverse employment action if an Employee's driver's license suspension (which occurs because of off-duty behavior) will negatively impact the Employee's ability to fulfill his/her job duties. For purpose of this Policy, the term alcohol includes any intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols and includes any medication or food containing alcohol. Furthermore, the Company prohibits its Employees from the alcohol related conduct while on-duty listed below.

- (a). Possessing opened containers of alcohol;
- (b). Using, consuming, distributing, manufacturing, dispensing, or being under the influence of alcohol;
- (c). Operating a motor vehicle for business purposes;
- (d). Using or consuming alcohol four (4) hours before reporting for duty; or
- (e). Consuming alcohol within eight (8) hours following an accident or before a post accident alcohol test is performed (whichever comes first) if the accident would require a post-accident test as specified in this Policy.

4.5 Drug Paraphernalia. Employees are prohibited from bringing paraphernalia related to the illegal use of drugs onto Company property at any time.

5.0 EMPLOYEE DRUG AND ALCOHOL TESTING

5.1 Testing a Condition of Employment. The Company may require its Employees to be tested for illegal use of drugs in the circumstances listed below. In order to carry out such testing, an Employee may be asked to submit a saliva, urine, blood or breath sample for testing. Employee acceptance of testing when requested is a mandatory condition of employment. **See AD-0300, Att. #16.**

- (a). **Pre-Employment.** The Company shall require a pre-employment (post offer) drug and/or alcohol test to be administered to any applicant who has received a conditional offer of employment. Any applicant who is given a conditional offer of employment must receive a

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verified negative drug and/or alcohol test result prior to performing job duties. Additionally, any applicant who tests positive, refuses to submit to a pre-employment drug and/or alcohol test, or attempts to tamper with a test or the testing procedures shall be treated as withdrawing his/her application and this Company shall revoke its offer of employment. New hires will be retested on an unannounced random basis during their first six (6) months of employment.

(b). Reasonable Suspicion. The Company shall require an Employee to submit to reasonable suspicion drug and/or alcohol testing when, in the sole judgment of management and based on information known at the time the decision to test is made, the Employee is unfit for duty or there is a reasonable suspicion to believe that an Employee is using drugs or alcohol in violation of the Company's Policy or exhibits the physical signs and symptoms of substance abuse. The evidence will be drawn from specific, objective facts and reasonable inferences. Such facts and inferences may be based on, but are not limited to, any of the following:

- (i). Observable behavior, such as direct observation of drug or alcohol abuse, possession or distribution, or the physical symptoms of being under the influence of drugs or alcohol such as, but not limited to slurred speech, dilated pupils, odor of alcohol or marijuana, dynamic mood swings, etc. Observation may include indications of the chronic and withdrawal effects of the illegal use of drugs;
- (ii). A pattern of abnormal conduct, violent or erratic behavior or deteriorating work performance which appears to be related to substance abuse or misuse;
- (iii). The identification of an Employee as the focus of a criminal investigation into unauthorized drug possession, use or trafficking;
- (iv). The admission by the Employee that he/she is involved in the illegal use of drugs or misuse of alcohol;
- (v). Repeated violations of the Company's safety or work rules that pose a substantial risk of physical injury or property damage and that appear to be related to substance abuse or misuse that may violate the Company's Policy;
- (vi). A report of drug or alcohol use provided by reliable and credible sources and which has been independently corroborated; or
- (vii). Evidence that an individual has tampered with a drug or alcohol test.

(c). Post-Accident. The Company shall require an Employee involved in a job related accident or incident to submit to drug and/or alcohol testing following the accident. The Company may also test any individual whose performance created a "near miss or unsafe condition" or was a contributing factor to a job-related accident. This determination shall be based on the best information available at the time of the accident. The post-accident test will be administered as soon as possible. In no way is this post-accident test requirement intended to delay the necessary medical treatment for an injured person(s) following an accident or to prohibit an Employee from leaving the scene of an accident to obtain medical assistance for others or for personal medical assistance. For purposes of this Policy, a job-related accident is defined as an unplanned, unexpected or unintended event that occurs during the conduct of the Company's business, on the Company's property or involves the Company-supplied motor vehicles or motor vehicles used in conducting the Company's business and results in any of the following:

- (i). a serious violation of a safety rule or standard;
- (ii). a fatality of anyone involved in the accident;
- (iii). a serious bodily injury requiring medical treatment or if the injury sustained is a reportable injury to OSHA or workers' compensation purposes; or
- (iv). other serious property, vehicular or equipment damage occurs.

(d). Return to Duty. The Company shall require an Employee who has violated this Policy and desires to return to work or who has been on leave of absence for more than six (6) months, to test negative on a return-to-duty drug test before returning to work. Additionally, the Company may require a return-to-duty alcohol test if the prohibited conduct involved alcohol or a

treatment provider recommends an alcohol test. Inclusion of this paragraph, in no way obligates the Company to make an offer to return-to-work to an Employee.

(e). Follow-up. Following a determination that an Employee is in need of assistance in resolving problems associated with alcohol misuse and/or the illegal use of drugs, the Employee may be subject to unannounced follow-up drug and/or alcohol testing as directed by a treatment professional. The number and frequency of such follow-up testing shall be as directed by the treatment professional. The Employee may be required to undergo follow-up testing for both alcohol and drugs, if the treatment professional determines that follow-up testing for both are necessary for that particular Employee. Follow-up testing shall not exceed sixty (60) months from the date of the Employee's return-to-duty. Inclusion of this paragraph in no way obligates the Company to reinstate the Employee or conduct follow-up testing.

5.2 Testing Procedures for Drugs. Testing for illegal use of drugs normally will be conducted through urine specimens collected at a collection site. The collection site will take the necessary steps to assure that the specimen is not adulterated or tampered with and that a strict chain-of-custody is maintained. Normally, the specimen will then be transported to a U.S. Department of Health and Human Services certified laboratory for screening and confirmation testing for the drugs listed under **Section 4.1** on pages 21 & 22.

5.3 Testing Procedures for Alcohol. The initial testing for alcohol normally will be conducted through either a saliva or breath specimen. If the Breath Alcohol Content (BAC) is less than **0.02**, the test is considered negative. If the screening test results show an alcohol concentration level of **0.02** or greater, a confirmation test will be conducted. The confirmation test shall be performed by using breath specimen conducted on an Evidentiary Breath Testing (EBT) device approved for use in the United States Department of Transportation's Drug and Alcohol Misuse Prevention Program. If the confirmation test reads positive, **0.02** or greater, the test results shall be considered positive and the Employee will be subject to disciplinary action as specified in this Policy.

5.4 Screen and Confirmation Testing. All urine samples will undergo an initial test. If the specimen tests above the screening cut-off levels set by the U.S. Department of Health and Human Services Mandatory Guidelines for Federal Workplace Drug Testing Programs, then the screen test shall be considered positive. The sample shall then undergo a confirmation test. Test results indicating the illegal use of drugs at levels below the confirmation cut-off limits shall be considered negative and those above the confirmation cut-off levels shall be considered positive.

5.5 Review of Test Results by Medical Review Officer. All positive drug test results will be reviewed and interpreted by a Medical Review Officer (MRO) before the test results are reported to the Company. A MRO is a person who is a licensed physician and who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results. The MRO review of a positive test result may include conducting a medical review of the tested Employee's medical history, or review of any other relevant biomedical factors. If the MRO determines that a legitimate medical explanation exists for the test results, then the MRO will report to the Company that the test result is negative. If after making all reasonable efforts and documenting them, the MRO is unable to reach a tested Employee directly, the MRO shall contact the DER, who will direct the tested Employee to contact MRO as soon as possible. In such circumstances, the Company will, to the maximum extent possible, ensure that the requirement on a tested Employee to contact the MRO is held in confidence. If the tested Employee does not contact the MRO within three (3) days after being instructed to do so, the MRO will report the test as being positive.

5.6 Validity Testing. Additionally, validity testing of an Employee's urine specimen may also occur. Validity tests are the evaluation of the specimen to determine if it is consistent with normal human urine and

include tests for creatinine concentration, specific gravity, pH, and substances that may be used to adulterate a specimen.

5.7 Direct Observation/Monitoring. The Company reserves the right to have its collection site agent conduct a direct observation or monitoring of the urine specimen collection if the collection site personnel indicates an attempt to tamper, the specimen's temperature is out of range, the specimen appears to have been tampered with, if the laboratory reports an invalid test and the MRO states no medical reason, the result is positive, adulterated or substituted, cancelled, and for return-to-duty or follow-up testing.

5.8 Dilute Specimens. If the MRO informs the Company that a drug test was positive dilute, the Company will treat the test as a verified positive test. The Company shall not direct the Employee to take another test based on the fact that it was dilute. For negative-dilute test results, the Company shall require an Employee to take another test immediately, but it shall not be collected under direct observation unless there is another basis for use of direct observation. If the Company directs another test, then the result of the second test, not the original test, becomes the controlling test result.

5.9 Re-collections. When the Company directs the Employee to take another test, the Employee shall be given the minimum possible advance notice that he or she must go to the collection site. The result of the second test, not the original test, is the test of record. Any Employee required to take another test, which is also negative and dilute, will not be permitted to take a third test. Provided, however, that if the MRO directs the Company to conduct a recollection under direct observation, the Company must immediately do so. If the Company directs the Employee to take a second test and the Employee refuses, the test will be treated as a positive result.

5.10 Verification Testing. For urine drug testing, one portion of the specimen will be preserved for a very limited period of time after the Employee is told the test results. If the portion is originally analyzed (the primary sample) is positive, the Employee shall have the right to specify a laboratory certified by the U.S. Department of Health and Human Services to which the preserved portion will be sent for independent analysis. The verification test cost is the responsibility of the Employee. The verification test result shall be controlling.

5.11 Refusal to Test and Test Tampering. Any Employee who refuses to submit to testing, tampers, manipulates or attempts to tamper with the testing will be treated as having a verified positive test result and violating this Policy. A refusal to submit to testing shall include, but not be limited to, the following:

- (a). Fails to appear for any test within a reasonable time, to be determined by the Company, after being directed to do so by the Company;
- (b). Fails to remain at the collection site until the testing process is complete;
- (c). Fails to provide urine specimen when required for a drug test or a saliva or breath specimen for an alcohol test;
- (d). In the case of directly observed or monitored collection in a drug test, fails to permit directly observed or monitored collection;
- (e). Fails to provide a sufficient amount of urine, saliva or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure;
- (f). Fails or declines to take a second test as directed;
- (g). Fails to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process;
- (h). Fails to cooperate with any part of the testing process;
- (i). Fails to immediately report a job-related accident for the purpose of avoiding testing; or

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(j). Is reported by the MRO as having a verified adulterated or substituted test result.

6.0 DISCIPLINE FOR POLICY VIOLATIONS

6.1 Employee Discipline. Any Employee who is reasonably believed to have violated this Policy shall be subject to adverse employment action. For a first violation, the employee will be suspended without pay and the Company shall require the employee, at their own expense, to undergo an evaluation by a treatment professional, comply with an appropriate treatment program recommended by the treatment professional, undergo drug testing, execute a confidentiality release so treatment success may be monitored and sign a “last chance” agreement. In the event that an Employee violates the Policy a second time, the Company shall immediately terminate said Employee. The Company encourages its Employees who are chemically dependent to voluntarily obtain assistance/treatment for substance abuse problems before they cause problems in the workplace. An Employee’s decision to voluntarily seek assistance for such problems will not be used as the basis for disciplinary action. Employees may not avoid imposition of discipline by first requesting such treatment or a leave of absence after being selected for testing or violating the Company’s Policy.

6.2 Referral to Law Enforcement. In addition to imposing discipline, the Company may refer information about serious criminal activities and transfer any suspected illegal drugs or illegal drug paraphernalia to appropriate law enforcement.

6.3 Other Discipline Not Precluded. Nothing in this Policy prohibits an Employee from being disciplined or discharged for other violations and/or performance problems.

6.4 Automatic Suspension. In the event that an Employee is ordered to submit to a post accident or reasonable suspicion test the Employee shall be suspended or placed on administrative leave without pay until the MRO verified test result is received. If the verified result is positive, then the Employee is subject to discipline as described in herein. If the Employee’s post-accident or reasonable suspicion drug test result is negative, cancelled, invalid, or rejected for testing because of a fatal flaw, then the Company shall award back pay for the lost hours during the Employee’s suspension.

6.5 Last/Chance Rehabilitation Agreement. If an employee who completed a rehabilitation program is found to have reoffended, under this policy and in conjunction with state law, may be disciplined or discharged based on a positive test result.

7.0 SEARCHES

7.1 Company Property Searches. The Company may provide lockers, storage areas, equipment, briefcases, computers, vehicles, desks or workstations for use by employees in order to perform the duties of their positions. All such items and the data or materials generated using Company property remains Company property. The Company reserves the right to search any Company property, at any time, with or without notice or cause. No Employee shall maintain any expectation of privacy in Company-owned property. The Company also reserves the right to use other investigative methods when reasonable suspicion exists to indicate drug-free workplace Policy violations. Refusal to cooperate in the conducting of a search shall be considered a Policy violation.

7.2 Personal Property Searches. The Company reserves the right to conduct a search of an Employee’s personal property if a violation of this Policy is suspected. A search may include all personal property

located in or brought onto Company property such as wallets, purses, bags, briefcases, toolboxes, lunch bags, or vehicles. Entry onto Company property and continued employment constitute consent to search. The search shall be conducted in the presence of two company representatives and the Employee.

8.0 CONFIDENTIALITY

8.1 Test Results. The Company shall take reasonable efforts to insure that all aspects of the testing process are as private and confidential as reasonably practical. Actual test results will be provided to: a) the MRO and his staff; b) supervisor(s) who have a need to know such information; c) the Employee tested upon request; d) any person(s) permitted or required by law or regulation to receive such information; e) any individual(s) with an Employee's written authorization; f) to law enforcement; g) the decision maker(s) in a legal action initiated by or on behalf of the Employee or placed at issue by the Employee in any legal, administrative or other proceeding; or h) to any governmental agency(ies) as required by federal or state law. Nonspecific statistical information may be provided upon request to a corporation, which requires its vendors or subcontractors to maintain drug and alcohol testing programs in accordance with a contract, or to a governmental agency in accordance with law.

8.2 Separate Files. Testing results will be maintained in a locking file cabinet or a secured file separate and apart from Employee personnel files.

Section 8: Ergonomics / Manual Material Handling Safety

A. General Policy

Our goal is to prevent the occurrence of work-related musculoskeletal disorders (**MSD**) by controlling or eliminating the risk factors which cause them. This program ensures that all affected employees are aware of job-related risk factors and provides information and solutions to elevate them. We promote continuous improvement for the efficiency, comfort, and well-being of all employees through a team effort of management and employee involvement.

If, after reading this program, you find that improvements can be made, please contact our Safety Coordinator or the Plant Manager. We encourage all suggestions because we are committed to the success of our Ergonomics Program. We strive for clear understanding, safe and efficient work practices, and involvement in the program from every level of the company.

B. Outline of Ergonomic Improvement Process

The basic steps of our ergonomic improvement program is as follows:

1. Review of the job safety analysis and standard operating procedures for jobs.
2. Link ergonomic risk factors to steps:
 - Forceful exertions
 - Awkward and static postures
 - Repetitive motions
 - Contact stress
 - Environmental (vibration, cold temperatures, lighting)
3. Describe the risk and root cause
4. Brainstorm alternatives to apply a principle of ergonomics to eliminate or reduce the ergonomic risk. Examples:
 - Consider size & weight during the selection of raw materials and products.
 - Neutral postures
 - Reduce force
 - Keep objects within an easy reach
 - Keep objects at elbow height or within knees to shoulders
 - Reduce repetitive motions
 - Avoid static postures
 - Avoid pressure points
 - Provide adequate clearance
 - Reduce vibration
 - Control the temperature and lighting

C. The Safety Committee will act as the Ergonomics Team

The Safety Coordinator, Plant Manager and the Maintenance Manager are responsible for our Ergonomics Program. They are responsible to implement ergonomic improvements within our company and define the methods for identifying and resolving any problem areas.

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The Team members have been trained to recognize problem jobs, identify risk factors, and develop solutions to reduce those factors. Elements of this training include the identification of workplace risk factors; job analysis methods, implementation and evaluation of control measures, and teamwork skills.

D. Injury/Medical Management

We encourage all employees to immediately report any symptoms of discomfort that may be associated with their job duties. In most cases, employees are to report to their immediate supervisor.

Supervisors record and file written reports from the first observation of illness or injury through all subsequent follow-up activities. They are also responsible to forward information about the worker injury or illness for recording on the Log of Work-Related Injuries and Illnesses. The supervisor may recommend that the job receive a review from the Safety Committee (Ergonomics Team).

E. Identifying Problem Jobs

The Safety Committee (Ergonomics Team) reviews and periodically monitors injury and illness records such as the Log of Work-Related Injuries and Illnesses and workers' compensation data to identify patterns of ergonomic-related injuries and illnesses.

The Safety Committee (Ergonomics Team) members participate in evaluating new equipment and processes for potential risk factors. They also evaluate hand tools to determine if the designs are ergonomically suitable for the intended use and appropriate for the workers who use them.

F. Solutions

When a job, process, or equipment has been evaluated the Team completes a risk factor checklist (See Job Safety Analysis Form, **AD-0300, Att. #12**). Through this checklist, problems are identified for correction and supervisors and employees in the affected areas are notified. The Ergonomics Team, in conjunction with those affected employees, will develop possible solutions, choose the most appropriate, implement the changes, and follow up to determine the effectiveness.

For each problem job which has been changed, we maintain an electronic file (pdf or Word file) of the improvements and changes completed. The file contains documentation of the ergonomic-related illnesses or injuries, the actual changes made, and any similar incidents which occurred after the changes were implemented. These files are maintained on our electronic data server.

G. Employee Training

We train each employee who works at a job with exposure to specific risk factors and each employee in a job where a work-related musculoskeletal disorder has been recorded.

H. Enforcement

Constant awareness of and respect for ergonomic hazards, and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the HR Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program. Please refer to the Employee Handbook to review the Disciplinary Policy.

Section 9: Fleet Safety Program

A. MOTOR VEHICLE OVERVIEW

The following policy is in regards to the operation of CTI owned or leased vehicles and/or rented vehicles used for company business.

CTI considers the safety and health of our employees to be of primary importance. We recognize and accept our responsibility to employ professional, qualified drivers and provide safe well maintained vehicles.

While most drivers will be safe and responsible, there is a chance some will not. Because motor vehicle accidents are an unnecessary waste of our resources, we are implementing a proactive safety program aimed at reducing, preventing or eliminating motor vehicle accidents and injuries. Management is morally committed to providing safe working conditions, complying with all safety and traffic laws and ordinances.

The cooperation of all employees is expected as it pertains to training, supervision of drivers, following safe practices and rules, and following all safety and traffic laws and ordinances. Only through everyone's cooperative efforts can a loss control program be effective.

General Rules and Guidelines:

1. Regardless of any other considerations, do not take chances.
2. Drinking of alcoholic beverages while on duty or within four hours of starting work is prohibited.
3. Employees are required to inspect their assigned vehicle before driving to ensure that it is in proper driving condition. The attached vehicle inspection report specific to the vehicle be driven should be used.
4. When refueling or parking, engines are to be turned off, and ignition keys or key bobs removed from the vehicle.
5. Vehicles must be locked when unattended to avoid criminal misconduct.
6. Personal use of trucks is not permitted unless authorized by management.
7. Operate vehicles according to laws and regulations of the city, county and state you're driving through. Abide by posted speed limits, weight limitations, bridge clearances, truck lanes, etc., while driving.
8. Drive Defensively. Defensive driving is driving to prevent accidents in spite of the incorrect actions of others and adverse conditions.
9. Use of seat belts is mandatory.
10. Keep to the right on divided highways and one-way streets except when overtaking slow moving vehicles or when getting into position to make a turn.
11. Use signals when changing lanes or turning.
12. Do not tailgate.
13. Use of cell phones while driving is only permissible if you have blue tooth connections in your car. Any other use of a cell phone, texting or emailing or use of any other electronic instruments such as navigation systems are only permissible when you are at a full stop and parked. Texting or emailing while driving is absolutely prohibited and dangerous. If caught

you will lose your driving privileges of a company vehicle. We recommend that you pull over and stop whenever possible to use your phone.

14. Accidents:

Stop immediately

Take precautions to prevent further accidents.

Render reasonable assistance to any injured persons.

Exchange names, addresses and license information.

Complete a driver accident form.

Report the accident to your supervisor immediately.

If possible, take photos of the accident with your cell phone for insurance purposes.

Include surrounding area and both vehicles in case questions arise as to who is at fault.

B. DRIVER SELECTION

CTI believes that our employees are our most valuable assets. Because of this belief, the personnel selections of the company are extremely important as we select personnel for driving privileges. To help carry out this commitment, CTI has implemented the following qualifications for drivers.

1. CTI requires that any person approved for driving a company vehicle must be a minimum of age **21**, have a valid Delaware driver's license and have no major offenses listed on their license from the Dept. of Motor Vehicles.
2. Our hiring standards require that personnel chosen to drive a company vehicle have no chargeable or preventable motor vehicle accidents within the past year, and that they have no more than 5 points on their drivers motor vehicle report when approved for operating a company vehicle. The Human Resource department will request your written permission to request this report from DELDOT. This information will be used and retained in the strictest of confidence. Once received and reviewed by the Director of personnel, if the criteria noted has been met, then approval will be granted for driving privileges at CTI.
3. Annually the Human Resource department will request updates from DELDOT to review driving records for all active drivers. Any major offenses as noted in this section may cause you to lose your driving privilege or you may be put on notice that you are in danger of losing your driving privilege.
4. No person will be approved for driving a company vehicle if they have been convicted of any offense in the past **5** years involving the operation of a motor vehicle while impaired by alcohol or drugs.
5. No person will be approved for driving a company vehicle who has been convicted of any careless or reckless driving in the past **5** years involving the operation of a motor vehicle.
6. No person will be approved for driving a company vehicle who has been convicted of a criminal offense or felony in the past **5** years involving a commercial vehicle.
7. Personnel assigned to drive the company trucks must first be trained by authorized personnel for proper operation of the vehicles. Training will include operating the vehicle, how to properly secure cargo, driving a vehicle while loaded verses unloaded, and proper safety rules to follow by. Once properly trained this record will become part of the employees personnel file and will be monitored annually for updates to training if required.
8. CTI requires all drivers for company trucks to successfully complete a road test examination conducted by the Maintenance Manager. The road test shall be performed in the type of vehicle the driver will operate for the company. The company's road test will cover the following areas:
 - A complete pre-trip inspection
 - Placing the vehicle in operation

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- Using the vehicle's controls and emergency equipment
 - Driving in traffic and passing other vehicles
 - Turning
 - Braking, and slowing by means other than braking
 - Backing and parking
 - Proper technique for securing cargo
 - Proper operation of lift gate
9. The original copy of the road test examination signed by the company official conducting the test and showing approval for driving privileges shall be submitted to the Human Resource Specialist, for retention in the drivers personnel file. A copy of the examination shall be provided to the employee if requested.
 10. Annually as part of the employees review process, any employee assigned for driving company trucks shall be reviewed by the Maintenance Mgr., on their driving performance in an effort to provide constructive feedback. This helps our drivers to continually improve their driving performance so that any deficiencies can be worked on to prevent any future problems. A written report on what is discussed, along with new improvement goals established, shall be submitted to Human Resources and included with the annual employee review form which then determines any future pay adjustments by their immediate supervisor. A copy of all reviews shall be provided to the employee.
 11. Any employee identified as a high risk driver will not be authorized to drive any motor vehicle at any time on company business.

C. MISCELLANEOUS VEHICLE INFORMATION See attachments **AD-0300, Att. #18 & 19**

1. All vehicles require periodic maintenance. Our Trucks have a service contract for maintenance. The Maintenance Manager will coordinate with production as to when time can be allocated for the vehicles to be taken in for service. Those driving company owned automobiles these vehicles have maintenance programs that advise you as to when your vehicle requires service. Service is to be scheduled by you with the auto dealership in which your car was purchased or leased when maintenance is required. All maintenance is paid for by the company. Follow the recommended maintenance schedules provided by the auto dealership. All drivers who are assigned vehicles are held responsible for the proper upkeep and care of your vehicle. Anyone not following proper care or maintenance of your vehicle can lose their driving privilege with our company.
2. In case of any breakdown of your vehicle, contact either the Maintenance Mgr., or Don Hollenbeck who will instruct you on how to proceed with dealing with your breakdown. It is preferred that if you notice something not operating correctly with your vehicle that you call the auto dealership immediately to arrange for the earliest possible service date so as to prevent a breakdown on the road.
3. Each year the accounting department will provide you with an updated certificate of insurance card. This card is to be placed in your glove compartment so in case of an accident or traffic violation you have the necessary insurance information. If an accident has occurred, the necessary forms can be obtained from the Accounting Department Mgr. Please contact the Accounting Dept. Mgr., as soon as possible to report the accident so our insurance company can be notified.
4. During each year the company participates in webinars that refresh drivers on safety and technique. It is required that at least once a year each driver participate in one seminar so as to stay abreast of good driving skills. Once you have attended a webinar, please have your supervisor advise the Human Relations department of your participation so that your records

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can be updated. A schedule will be posted as to when the webinars will take place. Those who do not participate may lose their driving privileges with the company.

5. On company cars, spouses are permitted to drive the vehicles, but children or friends are not permitted. Exception is if they are company employees and need to drive for company business.

Section 10: Contractual Controls

As a Policy of Craig Technologies, all outside contractors are required to submit a certificate of insurance before being allowed to perform any work on or around our company facilities. The certificate of insurance will be reviewed by the Plant Manager who will qualify the contractor, check references if necessary, as well as review that adequate insurance coverage is provided as it pertains to the type of work the contractor has been hired for. Once satisfied, the Plant Manager will pass the certificate of insurance onto the accounting department noting approval, and they will then retain this document on file.

The Maintenance Manager is responsible for obtaining quotations for work to be performed so it can be authorized by the Plant Manager, or upper management. Once work is authorized and proper insurance documents are in place, the Maintenance Manager may proceed with the work. It is the responsibility of the Maintenance Manager that all outside contractors are made aware of appropriate safety guidelines in regards to manufacturing areas, or facility work.

Contractual language between the Company and other contractors can help transfer exposures generated by having subcontractors perform work for us.

These include:

1. Hold Harmless Agreement- This is an agreement that is part of the overall contract. It is signed by the subcontractor to hold the Company harmless for certain acts of omission and degrees of negligence caused by subcontractor employees. It helps maintain a degree of protection for the contractor should an incident occur.
2. Certificate of Insurance- A copy of each subcontractors current Workers' Compensation and General Liability insurance policies are required to be shown before any work is to be performed on each job site. Liability limits of General Liability coverage should not be less than **\$1,000,000**.
3. Additional Named Insured- If possible, the Company should be named as an Additional Named Insured on each subcontractor's insurance policy. This gives the Company additional protection by making available the subcontractor's insurance policy as primary with additional limits before our company's policy becomes involved for accidents involving subcontractor employees.
4. All Contractors prior to performing any work on site will be informed and receive training on CTI Safety Policies/procedures and will be required to obey all Safety rules and procedures and be required to wear the proper protective equipment when performing work.
5. All contractors will be informed of all hazardous materials that they may encounter when performing work and they must adhere to all SDS requirements when handling or working near any hazardous materials.

6. The Maintenance Manger will review the Lockout/tagout procedures (**Section 6 paragraph D**) with all outside contractors who will be performing work on site prior to work being initiated.
7. **Anytime you observe a sub-contractor performing work in an unsafe manner, please report that person or persons directly to the Safety Coordinator and/or Plant Manager.**

Section 11: FALL PROTECTION PROCEDURE

1. STATEMENT OF COMPANY POLICY

Craig Technologies, Inc. is dedicated to the protection of its maintenance Employees (workers) and outside contractors from on the job injuries. All workers and contractors of Craig Technologies along with its affiliates; RLDP Holdings, Inc., & Nesbitt Partners, LLC, have the responsibility to work safely on the job. The purpose of this procedure is: (a) To supplement our standard safety policy by providing safety standards specifically designed to cover fall protection from the roof areas and/or sides of the buildings for our manufacturing and warehousing facilities; (b) to ensure that each worker is trained and made aware of the safety provisions which are to be implemented by this procedure prior to the start of any work; (c) that any outside work requested by leasing parties where ground or roof access is required, and d) that they are properly informed of this procedure. (*Note: Training Records of Craig Technologies workers will reflect training to this procedure*).

This Fall Protection Procedure addresses the use of other than conventional fall protection for a number of areas, as well as identifying specific activities that require non-conventional means of fall protection. These areas include but are not limited to:

- a. Connecting activity (point of erection for ladders, scaffolding).
- b. Leading edge work flashing, gutter work, side panels.
- c. Unprotected sides or edge of roof area.
- d. Laying of roofing materials, floor sheathing, etc.
- e. Installation of any equipment on top of roof; air-conditioning, tower systems, etc.

This procedure is designed to enable Craig Technologies and its workers or sub-contractors to recognize the fall hazards on any job and to establish the procedures that are to be followed in order to prevent falls to lower levels or through holes and openings in walking/working surfaces. Each worker will be trained in these procedures and strictly adhere to them except when doing so would expose the worker to a greater hazard. If, in the worker's opinion, this is the case, the worker is to notify his/her supervisor of the concern and have the concern addressed before proceeding.

Safety policy and procedure on any one project cannot be administered, implemented, monitored and enforced by any one individual. The total objective of a safe, accident free work environment can only be accomplished by a dedicated, concerted effort by each individual involved with the project from management down to the actual worker performing the job. Each individual must understand their value to the companies; the costs of accidents both monetarily as well as physically and emotionally; the objective of the safety policy and procedures; and what their individual role is in administering, implementing, monitoring, and their role in complying to our safety policy and procedures. This allows for a more personal approach to compliance through planning, training, understanding and cooperative effort, rather than by strict enforcement. If for any reason an unsafe act persists, strict enforcement will be implemented.

It is the responsibility of the Maintenance Manager to implement this Fall Protection Procedure. The Maintenance Manager is responsible for continual observational safety checks of their work operations and to enforce the safety policy and procedures. Likewise, the Jobsite Leader is also responsible to correct any unsafe acts or conditions immediately. It is the responsibility of the worker doing the work to understand and adhere to this procedure and to follow the instructions of the Jobsite Leader. It is also the responsibility of the worker to bring to management's attention any unsafe or hazardous conditions or acts that may cause injury to either themselves or any other person. Any changes to this Fall Protection Procedure must be approved by the Management Representative.

2. FALL PROTECTION SYSTEMS TO BE USED

Where conventional fall protection is infeasible or creates a greater hazard at the leading edge and during initial connecting activity, one should procedure to do this work using a Safety Monitoring System so as to expose only a minimum number of people for the time necessary to actually accomplish the job. A Safety Monitoring designate will be assigned and is allowed to monitor up to a maximum of (6) six workers. The workers, after review of procedures for raising ladders or scaffolding are then permitted to proceed with their work without the use of conventional fall protection. Only individuals with the appropriate experience, skills, and training will be authorized to perform this work. Under the Safety Monitoring System the workers shall have been trained and instructed in the following areas:

- a. Recognition of the fall hazards in the work area (at the leading edge and when making initial connections-point of erection).
- b. Avoidance of fall hazards using established work practices which have been made known to the employees.
- c. Recognition of unsafe practices or working conditions that could lead to a fall, such as windy conditions.
- d. The function, use, and operation of guardrail systems, body belt/harness systems, control zones and other protection to be used.
- e. The correct procedure for erecting, maintaining, disassembling and inspecting the system(s) to be used.
- f. Knowledge of construction sequence or the erection procedure.

A Safety Monitoring System means a fall protection system in which a competent person is responsible for recognizing and warning workers of fall hazards. These duties include:

- a. Warn by voice when approaching the open edge in an unsafe manner.
- b. Warn by voice if near any open, or damaged roof areas to be repaired.
- c. Warn by voice if there is a dangerous situation developing which cannot be seen by another person involved with product placement.
- d. Make the designated erectors aware they are in a dangerous area.
- e. Be competent in recognizing fall hazards.
- f. Warn workers when they appear to be unaware of a fall hazard or are acting in an unsafe manner.
- g. Be on the same walking/working surface as the workers and within visual sighting distance.
- h. Be close enough to communicate orally with the workers.
- i. Do not allow other distractions, i.e. cell phones, hold conversations or wander away from the designated work area while work is underway.

3. ENFORCEMENT

Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment or contractual obligations. The Craig Jobsite Leader, as well as individuals responsible for Safety, reserves the right to issue disciplinary warnings to workers, up to and including termination, for failure to follow the guidelines of this procedure. For contractors not following these guidelines, we reserve the right to cancel our contract should these safety rules not be adhered to.

4. RISK EVALUATION

All of our buildings are considered low risks due to build structure and to building heights and no access can be made without the use of special ladders or motorized basket lifts. Because of this no special security concerns exist for unlawful access to our roof area. Access to any roof area is on a need to access only for maintenance purposes and must be approved and permitted by the Maintenance Manager/Designate. If outside contractors are required one will be chosen that has the skill set required to properly access and service our roofing needs. For all other needs our maintenance department will utilize our motorized basket lift to service any equipment that may be located on top of our buildings. All parties will follow the guidelines set forth in this procedure.

Change History Record:

<i>Revision:</i>	<i>E.O.</i>	<i>Changes:</i>	<i>Date:</i>
H	N/A	Minor updates to pages 12, 18 & 20.	03/04/2019
I	N/A	Updated Lock-out/tag-out procedure; added Att.'s 11A & 26. Added COVID-19 ADDENDUM.	04/15/2020
J	N/A	Update lock-Out / Tag-Out procedure	10/22/2020
K	N/A	Added Confined Space procedure And Att.'s #27 & 28.	11/03/2020

Authorizations & Approvals:

	<i>Date:</i>
Authorized By: D. C. Hollenbeck/s/ - President	11/03/2020
Approved By: Claude Whittaker/s/ - Plant Manager	11/03/2020
Approved By: T. R. Liroy/s/ - Quality Manager	11/03/2020