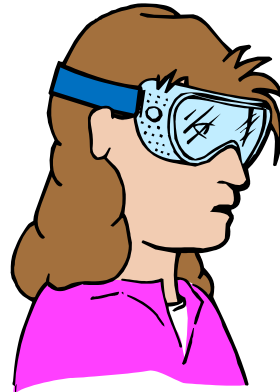
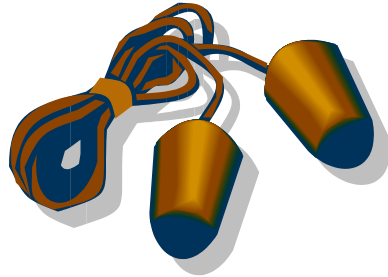


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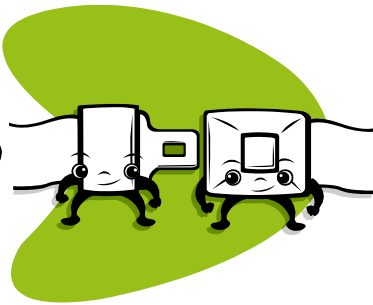
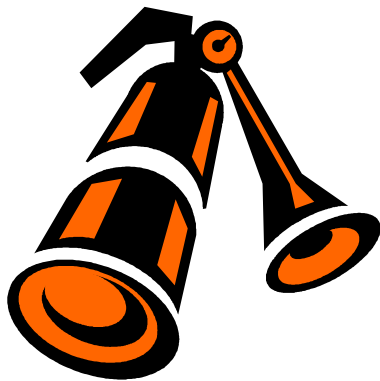
HEALTH & SAFETY Manual

SPECTRUM PLASTICS GROUP (SPG)

2500 Northwinds Parkway

Suite 472

Alpharetta, GA 30009



SPECTRUM PLASTICS GROUP **insert site name here** Site Authorization:

Plant Manager:*Date:*

Site Safety Mng. Rep:.....*Date:*

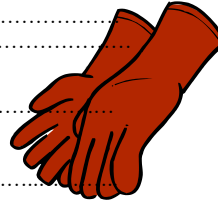
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**Plant Manager – SPECTRUM PLASTICS GROUP (insert site name here & SPR# _____)
Safety Message**

Date: _____

A Message from the Plant Manager:

Plant Manager should refer to CPR91 for typical example of a safety message.

Plant EHS Mng.Rep to place the site SPR version of the Plant Manager's Message,
in place of this page, when creating a hard copy version of this document.

Name: _____
Plant Manager

SPECTRUM PLASTICS GROUP SAFETY ABSOLUTES - CPR97

Purpose:

One of the key elements in achieving an accident free environment involves the elimination of unsafe acts from our workplace. All employees must understand "working safely is condition of employment", and performing unsafe acts will subject them to disciplinary action. In an effort to help clarify appropriate actions related to unsafe acts within our workplaces and the appropriate consequences in the form of disciplinary action related to that behavior, the following will be in effect.

Safety Absolutes:

The potential severity of the unsafe act will dictate the degree of discipline imposed. In all cases we must be consistent and fair in the administration of discipline. The potential of some unsafe acts is so serious that normal progressive disciplinary steps may be bypassed. In these cases, referred to as **SAFETY ABSOLUTES**, the action will result in immediate termination unless extraordinary circumstances exist. This list of **SAFETY ABSOLUTES** is not meant to be all inclusive. Flagrant disregard of safety rules, work practices or other egregious acts will be dealt with by the same manner and degree.

While plants may establish additional **SAFETY ABSOLUTES** for their facility, the following safety absolutes will be in place at all SPG. Facilities:

- **Lockout / Tagout (LOTO) violation.**
- **Intentionally bypassing, removing or disabling a safety device.**
- **Reaching into moving equipment in violation of established safe operating procedures.**
- **Operating a powered industrial vehicle in a reckless or threatening manner.**
- **Placing yourself or another employee in serious danger.**

Steps required to ensure the proper foundation is in place:

The following things should be in place to provide a proper foundation for the introduction of these safety absolutes.

- The Safety Absolutes must be effectively communicated to all employees including formal documentation of the communication on an annual basis and with all new hires.
- All employees, before being assigned to a job, must receive safety training specific to that assignment. Including appropriate job hazard analysis (JHA), LOTO, and Safe Operating procedures.
- Appropriate machine guarding must be in place and in use at all times.
- Appropriate safety signage must be maintained throughout the plant.
- Good housekeeping standards, that are conducive to a safe work place, must be in place and maintained.
- Appropriate personal protective equipment (PPE) will be provided and must be worn as required.

Proper guidelines, effective communication, and the proper foundation are critical to achieve our desired results, the elimination of unsafe acts leading to the creation of an accident free environment

Print Name: _____

Date: _____

Signature: _____

Section 2 - Health & Safety Organization & Responsibilities.

Introduction

SPECTRUM PLASTICS GROUP Health & Safety Policy is presented in **CPR1** and **CPR48** in accordance with SPG's statutory obligations under Rules and Regulations established by Federal, State and Local Government Agencies and following International Standards AS/ISO and OHSAS requirements. **CPR31**

Health & Safety Policy Statement

SPECTRUM PLASTICS GROUP Health & Safety policy "Statement" sets out the Health and Safety Organization and responsibilities for the management of Health and Safety at work for all employees and other persons affected by SPG's operations.

SPECTRUM PLASTICS GROUP Commitment, Safety, Culture and Climate

Within SPG actions will be taken to ensure the maintenance of a safe and healthy working environment, the health, safety and welfare of all employees and non-company personnel while on the site of SPG, and to prevent damage to Company property by actively promoting safety awareness including legal and personal responsibilities.

Our workforce is our most valuable and perishable resource.

For that reason, attention to safety must be part of everything we do.

Health & Safety must be of equal importance to and is naturally interrelated with quality and productivity.

Co-operation of All

*SPECTRUM PLASTICS GROUP's Policy as presented in **CPR1** and **CPR48** and this statement are fully supported by the Board of Directors, who encourage and support consultations and co-operation between Workforce and Management and all those who endeavor to carry out the Policy.*

Responsibilities

Safety is a matter of individual responsibility. All employees will take this responsibility for themselves, be alert for possible unsafe actions or situations, and ensure, so far as is reasonably practicable, that they are eliminated. SPG believes that accidents are preventable (that means all accidents) if safety is given the priority it deserves. In turn, all employees are expected to display the same commitment to safety by following all Company safety rules and supporting and participating in all the programs outlined in this manual. It is the responsibility of every employee at SPG to conduct themselves with due regard for their own safety as well as the safety of his/her fellow employees.

Review

An annual review of this Policy will take place in order to take advantage of new business practices, technology and to ensure compliance with new laws as a minimum requirement, which should also be reviewed to determine its continued relevance, appropriateness, and effectiveness.

Safety Meetings

Employee Commitment, Involvement & Views: Safety meetings will be (in accordance with section 2.3) open to all, to ensure formal recording of Employee and Management commitment and involvement.

Audits

SPG will undertake independent Health & Safety Audits at least annually.

Organization & Responsibilities

2.1 Organization

2.1.1 General

The CEO has overall responsibility for implementing and ensuring the Safety Policy is adhered to in all circumstances.

All members of Management are responsible for ensuring that the Policy, relevant legislation and safe working practices are complied with. CPR31

All Operatives are responsible for carrying out work operations safely and within Policy requirements.

All Employees are required to respond to incorrect or impractical circumstances by bringing any breaches of Company Policy regarding Health and Safety to the attention of their immediate Supervisor and subsequently the Health and Safety Manager.

2.1.2 Appointment of a 'Competent Person'

SPG has appointed the Health & Safety Management Representative (EHS-Mng.Rep.) as their site 'Competent Person' as required by the Management of Health & Safety at Work Regulations.

2.1.3 Objectives and Targets will be set annually. CPR32

2.1.4 SPECTRUM PLASTICS GROUP Absolutes CPR97 and Progressive Discipline have been established.

2.2 Health & Safety Responsibilities

2.2.1 CEO

The CEO has overall responsibility on behalf of SPECTRUM PLASTICS GROUP and the Board of Directors for the implementation and effectiveness of SPG's Health & Safety Policy. CPR1

The CEO will initiate the H&S Policy review and ensure any amendments necessary are made to take account of current and/or future developments. (Refer Management Review meeting requirements and meeting CPR5).

The CEO has delegated the following responsibilities to the Plant Managers to:

- a. Ensure that Site Safety Committees (SSCs) are formed and are implementing their responsibilities as listed in 2.2.7.2 of this program.
- b. Ensure that adequate resources in terms of human resources, funds for safety equipment and training, and program commitment from management are available to implement the safety program.
- c. Evaluate supervisors annually to ensure that they are implementing their responsibilities as defined in this program.
- d. Ensure that accidents are fully investigated and corrective action taken to prevent recurrence of the hazardous conditions or behaviors.
- e. Ensure that a record of injuries and illnesses is maintained and posted as described in this program.
- f. Set a good example for employees by following established safety rules and attending required training.
- g. Report any unsafe practices or conditions observed to the supervisor of the area where the hazard was observed.
- h. Competent Persons are appointed, empowered and trained to assist in ensuring compliance with the requirements imposed by relevant statutory provisions.
- i. The Health & Safety Policy is implemented, it's effectiveness monitored and health & safety at work is actively encouraged and promoted.
- j. All Management & Supervisory Staff understand their duties and responsibilities about the Health & Safety Policy.
- k. Relevant safety training and job instruction for all levels of employees is:
 - i. Planned and promoted on a continuing basis.
 - ii. Given to all employees.
- l. SPG's obligations for the Health & Safety of persons other than its own employees are observed.

- m. Plant, equipment and materials procured meet with all legislative requirements and relevant appropriate safety standards and are free from risk in use and are maintained in an efficient state, efficient working order and in good repair.

2.2.2 Plant Manager - Health & Safety Responsibilities

The Plant Manager is responsible for ensuring that SPG's Health & Safety Policy is implemented within all the departments of the facility and that all requirements necessary for effective compliance with the policy provided, so far as is reasonably practicable.

The Plant Managers shall in areas under their control:

- a. Ensure that plant wide all the above CEO designated responsibilities listed are implemented and enforced. This will be achieved through the site safety committee (SSC) formed to implement its responsibilities as listed in 2.2.7.2 of this program.
- b. Ensure that each **employee (full-time or temporary)** supervised by SPG and/or by temporary service(s) has:
 - i. Received SPG initial orientation training, to assist in identifying OSHA requirements refer to OSHA SPG CPR 3012 OSHA - General Industrial Standards - Annual Self-Assessment.
 - ii. Received training on specific equipment and/or tasks before starting work
 - iii. Demonstrated they are competent to safely work near any hazard, and/or operate specific equipment/tools before beginning work an assigned project or equipment.
 - iv. Received and signed off on the **orientation and all other appropriate training check list/form, and that these documents are date and signed off by the trainer.**
- c. Ensure that each employee has been issued required personal protective equipment (PPE) before starting work on a project requiring PPE and can use PPE correctly.
- d. Ensures that department managers/supervisors complete periodical inspections and audits their departments through:
 - i. Daily walk-around safety check of the work area, and report hazards discovered promptly and takes or initiate a formal corrective action in **SOMS** for any hazards discovered.
 - ii. Periodically observe work performance of department employees for compliance with safety rules, contained in or referenced by this document.
 - iii. Provide training and take corrective action as necessary using the **SOMS** CAPA and Tasks.
 - iv. Document employee H&S evaluations.
 - v. Set a good example for employees, by following established safety rules and attending required training and Safety meetings.
 - vi. Complete a preliminary investigation of all accidents and report findings to management.
 - vii. Ensure that peers, department supervisors, employees, contractors and visitors fulfill their responsibilities, as defined in this H&S manual and other referenced documents.
- e. Ensures that:
 - i. No chemicals or hazardous substances are brought onto site unless the proposed method of storage, transportation, use and disposal has been approved by the EHS-Mng.Rep and that a material safety data sheet has been provided.
 - ii. All employees are informed of the risks to their Health and Safety, as identified by any risk assessment relevant to their work, and the preventative and protective measures adopted to minimize the risk.
 - iii. All employees are informed of any emergency procedures including **LOTO and handling of stored energy affecting their place of work.**
 - iv. All employees and other persons who may be affected are informed of any prohibited practices or restricted tasks. Refer to Risk Assessment (Equipment/JHA/Work Areas/Haz-Sub).
 - v. Arrangements are made to correct any defects, faults and unsafe practices brought to the department's attention.
 - vi. Use **SOMS** Incident reporting to track incidents, any near-miss and accidents.
 - vii. Inspection and monitoring procedures are established to ascertain that all activities within their department are undertaken in a controlled safe manner with due regard to statutory obligations, approved codes of practice and Company safety procedures.

- viii. Actions proposed by the Health and Safety Committee or any departmental safety representative, affecting their area are processed in a timely fashion and monitored through SOMS.
- ix. Safety responsibilities are properly delegated and accepted at all levels.
- x. That a personal commitment to the Health and Safety Policy is demonstrated by good example, and by reacting promptly and effectively to unsafe situations affecting their staff.

2.2.2.1 Human Resources (HR) - Health and Safety Responsibilities

In addition to the Departmental Manager responsibilities set out in 2.2.3 below, the HR shall ensure SPG has:

- a. Appropriate insurance coverage for accidents and ill health resulting from its activities.
- b. Adequate funding is provided to support this policy.
- c. Appropriately qualified Management Representative(s) (Mng.Rep.) and Competent Person(s) are in place at each facility.
- d. Following up on post incident/accident check list CPR154

2.2.3 Departmental Managers

All Production/Quality /Materials/Engineering Departmental Managers shall ensure, so far as is reasonably practicable, that in areas under their control:

- a. They seek to be aware of duties under the H&S Policy and in respect of statutory requirements relating to their department's tasks.
- b. Persons operating are conversant with current Health and Safety legislation, codes of practice, Company Health and Safety Policy, procedures and guidelines, which relate to their work operations and that they work in a safe manner and maintain safe situations.
- c. That operators and workers give due H&S consideration to others in their area of operation.
- d. That the Health & Safety Mng.Rep has appropriate involvement in the planning, commissioning and use of all equipment and process changes.
- e. Safety training requirements are identified and proper training provided and where appropriate, assists in the design and delivery of Health and Safety training programs.
- f. Safe working practices are developed by instruction and supervision, particularly in the case of new and young employees, thus ensuring a high level of safety awareness of all personnel.
- g. That all safety related aspects as detailed in the departmental induction programs are explained and understood by all new employees and employees transferring from other areas.
- h. Monitoring is carried out to ensure that safe working methods and practices are implemented. Monitoring may include audits, workplace inspections, shift checks, etc.
- i. Protective clothing and equipment, (PPE), as specified by the Health & Safety Mng.Rep is available and is used as required.
- j. Risk assessments are scheduled as necessary and carried out by competent persons. This can be the Department Manager or a responsible Supervisor.
- k. Operator care assessments are carried out as necessary.
- l. All employees are aware of the potential hazards as established by risk assessments relating to their places of work and operations being carried out in their area by other persons.
- m. All plant and machinery complies with Company specifications and is installed, used and maintained in good, safe working condition.
- n. Good housekeeping standards are maintained and that safe access and exit is provided to all work areas and that traffic routes, both pedestrian and vehicular, are suitable for the purpose used.
- o. Health & Safety Committee Member are appointed to represent their respective departments.
- p. Matters arising from the Health and Safety Committee are acted on and completed without undue delay.
- q. The Health & Safety Mng.Rep is consulted in respect of Health and Safety problems or concerns. At a minimum of once per year, each department manager will meet with the Health & Safety Mng.Rep to discuss safety concerns within their respective department.
- r. Reasonable access and assistance is provided when requested by Health and Safety personnel for the maintenance of any safety requirement to fixed or portable equipment.

- s. Employees with work related medical problems are referred to SPG's Occupational Health service provider.
- t. All accidents, near misses, or incidents of ill health relating to work place activities are reported in writing to the Human Resource Manager in line with Company procedures and guidelines.
- u. A detailed report on any incident causing a work-related injury or ill health to an employee, which results in lost time of one full shift or more is sent to the Health & Safety Mng.Rep within three working days of being aware of the incident.
- v. A personal example is set.
- w. All necessary personal protective equipment is provided as specified and that all employees are instructed on its correct use, maintenance and replacement.
- x. Risk assessments and operator care assessments are scheduled and undertaken by competent persons and their recommendations will be put into action, where applicable.

2.2.3.1 Department Health and Safety Responsibilities are to assist the Departmental Managers:

- a. Ensure that buildings, facilities, plant and equipment is maintained and safe.
- b. Ensure that buildings, facilities, plant and equipment purchase orders specify that they comply with all, Health and Safety OSHA and all other relevant statutory legislation in addition to Company standards.
- c. Set up procedures to ensure that no article is procured unless it's potential regarding risks (Using SPG SOMS Risk Assessment modules) in respect of the health, safety and welfare of employees and other persons, is assessed by a competent person and that data sheets giving all assessed information are supplied to SPG Safety and Health Department.
- d. Set up procedures to ensure that no Plant or Equipment requiring statutory tests or inspections is procured unless certification, confirming conformity is obtained from the supplier.
- e. All employees are provided with all necessary information, instruction and training on the correct use of work equipment, materials and system of work to enable them to carry out their tasks in a competent manner.
- f. All accidents and dangerous occurrences are fully investigated and remedial measures taken to prevent their re-occurrence.

2.2.4 Supervisors and Others with Supervisory Responsibilities

All such persons shall ensure, so far as is practicable that:

- a. They seek to be aware of their Manager and the Health & Safety Mng.Rep 's responsibilities under this Policy and provide them with their full support.
- b. Risk to Health and Safety of persons in their control, whether employed by SPG or not, are assessed and information on that assessment passed to the persons exposed.
- c. Any systems set up to support this policy are acted on and completed within their area of control.
- d. When entrusting tasks to employees they take into account their capabilities with regard to Health and Safety.
- e. Actively support the Health & Safety Mng.Rep in fulfilling the requirements of this Policy.
- f. Monitor the Health and Safety performance of areas under their control.
- g. Set personal example.

2.2.5 Plant & Office Employees - Health and Safety Responsibilities

All plant and office employees have a legal responsibility to take reasonable care of the Health and Safety of themselves and others who may be affected by their acts or omissions while at work.

Employees shall:

- a. Familiarize them self with, and conform to SPG's Health and Safety Policy.
- b. Co-operate with Management to enable compliance with statutory duties imposed on SPG.
- c. Not intentionally or recklessly interfere with or misuse anything provided for Health and Safety purposes.
- d. Use any machinery, equipment, dangerous substance, transport, and means of production or safety device provided by SPG in accordance with any training or instruction provided to him.
- e. Not undertake any work or any operation for which they have not been trained or instructed.
- f. Inform SPG of any work situation that represents a serious and immediate danger to Health and Safety.
- g. Comply with safety advice given in SPG's Health and Safety at Work booklet.

- h. Observe all safety rules, procedures, instructions and signs.
- i. Wear appropriate protective clothing; non-skid, closed, leather, flat footwear (no high heels); or equipment as may be specified by the Health & Safety Mng.Rep in the plant or warehouse areas.
- j. Use safety devices provided for their protection, the way they were designed to be used, and in line with the employee's training.
- k. Keep their workplace tidy and, where practicable, free from slip, trip and fall hazards.
- l. Report any accidents or damage to Company property or plant to their supervisor whether anyone is injured or not, including near misses or no damage incidents.
- m. Report all safety hazards to their supervisor and make suggestions that might improve the safety of the work environment for themselves or for others.

2.2.6 Health & Safety Management Representative (EHS-Mng.Rep)

Under Section 2.1.2 of SPG's Health and Safety Policy the Health & Safety Mng. Rep is appointed as the 'Competent Person'.

The role and responsibilities of the Health & Safety Mng.Rep is to:

- a. Advise Senior Management on the actions necessary to comply with statutory requirements.
- b. Assist the engineering department in the purchasing, testing, installation and commissioning of Plant and Equipment.
- c. Assist all other departments in their compliance with SPG Health and Safety Policy.
- d. Prepare and review Health and Safety Policy, Procedures, Guidelines and Safe Systems of Work in line with Company Procedure.
- e. Where necessary, employ external assistance to ensure compliance with this Policy.
- f. Plan for the reporting, investigation and recording of accidents, ill health and near miss incidents.
- g. Provide the Health and Safety Executive with all statutory returns following reportable accidents and other events that are required to notify to a statutory authority.
- h. Provide statistics in respect of SPG's accident/ injury performance.
- i. Provide for maintenance and testing of fire and/or security systems to ensure their continued functioning within design criteria.
- j. Provide for statutory testing and inspection of Plant and Equipment.
- k. Instigate risk assessments to Company guidelines and ensure significant findings are recorded.
- l. To advise and assist the development and provision of Health and Safety training.
- m. Liaise and co-ordinate discussion with External Interested Parties and ensure good communication in relation to Health, Safety, Fire and Environmental issues.
- n. Ensure that a competent medical service is provided and that appropriate health initiatives, including pre-employment medical and health surveillance, are instigated.
- o. Audit Company performance in relation to Health and Safety.
- p. Inductions are carried out for all contractors working for any department and that continued monitoring of their performance regarding Health and Safety is undertaken.

2.2.7 Health and Safety Committee

The committee is made up of Safety Mng.Rep, Plant Manager, HR manager and Company designated employee representatives, one employee elected representative, and a representative from the office, Production Floor (including all shifts), Shipping, Fabrication, Maintenance, Engineering/Tooling, and QA/QC Departments.

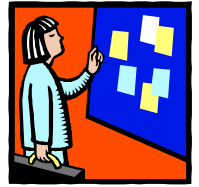
2.2.7.1 Mission Statement:

To form a safety committee to provide a method for employees and management to work together in identifying safety issues, develop solutions to safety problems, review accident reports, and evaluate the effectiveness of our overall safety program.

2.2.7.2 H&S Committee Roles and Responsibilities Structure

The Plant Health and Safety Committee will comprise of:

- A. Chairman - The Site Health & Safety Management Representative (H&S Mng.Rep)
Responsible for:
 - a. Running the safety committee meeting for the month
 - b. Ensure meetings start on time



- c. Maintain meeting focus
- d. Collecting the monthly safety check lists from each member
- e. Post meeting minutes on the employee notice board and distribute via **SOMS**
- f. Maintain a list of all action items and decisions reached for each meeting.
- g. Distribute monthly safety meeting reminders
- h. A copy will be posted on the employee bulletin board after each meeting.
- i. The Site Health and Safety Mng.Rep will attach the minutes to the respective Site meeting minutes in **SOMS** and these will be maintained in **SOMS** to meet State or Federal requirements.

B. Plant Manager

- a. Supporting open communications and the committee.
- b. Providing direction in respect of corporate Policy, Strategy and resources.

C. Department & Employee Safety Committee representative are to support open communications from each department and/or employee group they represent and to carry back Safety Committee decisions to employees in the department/group they represented in the meeting.

- a. The term for elected department and employee group Safety Committee representatives is for **one year**.
- b. The previous year's department or employee Safety Committee representative will act as the back-up member.

D. Management Safety Committee representative: In addition to the department/employee elected representatives, management will designate no more than three Safety representatives, but a minimum of one, who will serve until replaced by management.

E. Safety committee members

In addition to the above roles and responsibilities, the committee members are responsible for:

- a. Performing monthly self-inspections for the Shift or Department that they represent.
- b. Members are responsible for their area but additional items should be included throughout the plant when identified.
- c. Assist in accident and incident investigations as necessary.
- d. Review all accident reports to uncover trends and provide appropriate corrective action measures.
- e. Communicate with the employees regarding all safety issues.
- f. Promote, encourage and publicize safe work practices among co-workers.
- g. Monitor company safety program effectiveness.
- h. Set personal example.

2.2.7.3 Objectives

- a. Promote Health and Safety awareness throughout the plant
- b. Provide a driving force for Health and Safety related issues
- c. Provide a forum where plant wide Health and Safety issues may be discussed and central Policy agreed
- d. Provide guidelines and objectives for Departmental Health and Safety Representatives
- e. Monitor Health and Safety audits and reports generated internally and externally (eg: SPG, OSHA, Insurers, etc.)
- f. Monitor accident statistics
- g. Review Health and Safety related Company procedures
- h. Work safely them self – set the example in the plant
- i. Attend and actively participate in safety committee meetings when on day or night shift
- j. Work with your supervisor(s) to eliminate hazardous conditions and unsafe working practices in the department.

A. Meeting Scope/Agenda refer to **CPR99** for standard layout

The Committee shall discuss the following aspects at each meeting:

- a. Minutes of previous meeting
 - b. Accident Statistics
 - c. Departmental reports and referrals
 - d. Training information for members
 - e. Any other business
- B. Frequency
- a. The Committee shall meet monthly at minimum, with a minimum of 12 meetings per year
 - b. Meetings may only be cancelled in extreme circumstances
- C. Administration
- a. The H&S Committee meeting schedule will be produced and circulated to all members.
 - b. At least one of the SPECTRUM PLASTICS GROUP Executive members and the SPG EHS-Mng.Rep will attend each of the site H&S committee meetings, via video conference.
 - c. The meetings scheduled are to be planned in conjunction with the Group Professional Assistant based in Atlanta. Meetings should therefore not overlap with other location site H&S committee meetings.
 - d. The site EHS-Mng.Rep will ensure that minutes are entered Spectrum Operations Management System (SOMS) and issued/posted no later than **one week** after the meeting date.
 - e. Members should take note of the meeting dates and attend
 - f. Apologies for non-attendance should be passed to the EHS-Mng.Rep, in writing prior to the meeting.

Section 3 – Communications and Training

3.1 Communications

The Safety Policy will be communicated via:

- a) Engagement procedure
- b) Induction training
- c) On the job training/off the job training
- d) Documentation/Procedure issue
- e) Personal contact by Supervisor
- f) Personal contact by Management
- g) Personal contact by Health & Safety Mng.Rep
- h) Health & Safety Committee Meetings
- i) Posting of safety notices on notice boards
- j) Annual Review at the “Crew and Office” Meetings



Failure to follow Company Health and Safety Procedures will result in disciplinary action up to and including termination.

SPG recognizes that there may be occasions when specialist advice is necessary. In these circumstances the services of competent, external advisors will be obtained.

3.1.1 First Aid & CPR

SPG will maintain suitable numbers of trained personnel to deal with minor accidents and emergencies at the workplace. These personnel will have sufficient training and qualifications in accordance with statutory requirements. Identities of first aid providers will be displayed throughout the workplace. **CPR152**

3.1.2 Safety Training

SPG is committed to all aspects of training and actively plans and encourages employees’ training to enable them to carry out their duties within the Law. Training is conducted on an annual basis. A copy of the training plan is documented under the Training Schedule. **CPR8**

3.1.3 Safety Inspection and Assessments

- A. SPG is committed to aggressively identifying hazardous conditions and practices, which are likely to result in injury or illness to employees and management will take prompt action to eliminate those hazardous conditions. In addition to reviewing injury records and investigating accidents for their causes, management and the safety committee have implemented several methods of identifying hazardous conditions before they result in injury to workers.

Safety inspections provide a detailed survey of the level of implementation and effectiveness of the safety program as it applies to a specific department or operation.

Safety inspections are a “walking tour” of distinct areas of company operations designed to locate safety problems or violations of safety program protocols.

Inspections will focus on general working conditions, housekeeping, facility and equipment maintenance, emergency preparedness, compliance with applicable State and Federal (OSHA) regulations, and work practices.

To be most efficient and effective, the safety inspections will be performed following standardized, pre-printed checklists **CPR96**

- B. **Annual Site Survey & CAPAs** - Once a year an inspection team made up of members of the safety committee will do a wall-to-wall walk through inspection of the entire work-site. They will note any safety hazards or potential hazards during their walk through. The results of this inspection will be used to



eliminate or control obvious hazards, target specific work areas for more intensive investigation, assist in revising the checklists used during regular monthly safety inspections, and as part of the annual review of the effectiveness of our accident prevention program. **CPR25 & CPR26** - Use **SOMS EHS Audit Check sheet** for this purpose

- C. Monthly Safety Inspection - Each month, before the regularly scheduled safety committee meeting, safety committee representatives will inspect their area for hazards using the standard safety inspection checklist and will interview their co-workers regarding safety concerns. The committee member shall:
- Report findings and recommendations resulting from inspections directly to the Safety Committee prior to the monthly Safety Committee Meetings.
 - Report any hazards documented or concerns expressed to the whole committee for consideration.
 - Check the racks for damage on their walk-through.

Periodically, committee representatives may mutually agree to inspect each other's area rather than their own departments or work areas to provide a more objective inspection. **CPR96**

- D. Monthly Rack Inspection - This process is to ensure racks are installed properly and inspected for damage on a routine basis. This ensures the safety of employees and meets company standards for rack integrity. **CPR188**
- E. Daily & Shift Safety Inspection - Each Day Department Supervisors, Safety Committee Members, and Operator/Technicians have the following responsibilities to implement this procedure:
- Department Supervisors (Managers, Shift Managers, and Lead Operators)
 - Report any hazardous conditions or work practices in your supervised operations judged to be due to inadequate or insufficient safety guidance.
 - Coordinate and cooperate with the Safety Committee during the performance of the required safety inspections.
 - Implement the recommendations of the Safety Committee, when appropriate.
 - Packers/material Handlers/Operators/Technicians:
 - Consult with your Lead or Department Supervisor when you encounter any questionable safety condition.
 - Report any observed unsafe condition or act in a timely manner.
 - Any equipment or machinery deemed unsafe may be reported directly to Maintenance. You may do this in person, with a written work order (**WO - CPR187**) or by using the site Maintenance module where one exists, i.e.: COGZ software program.

- F. Work Activity Risk Assessment - When tasks or workstations are identified as particularly or potentially hazardous a Job Hazard Analysis will be conducted. If deemed necessary, after a review, the job will be modified as needed to eliminate or control the hazard. Employees will be trained in the revised operation. The results will be reported to the safety committee. **CPR9 & CPR14**

Safety is your First Priority

3.2 Regulations

3.2.1 General

SPG operates within a framework of Engineering Safety Procedures that are enforceable within the Organization and Responsibilities (*Section 2*) of this Policy.

- This section (*Section 3 - Arrangements*) utilizes these established procedures and extends to additional requirements detailed as follows.
- SPG recognizes that there is a need to re-assess processes, equipment and material and encourages improvements to enhance procedures and improve general safety.

- c. Any such improvements should be submitted by employees through the Health & Safety Committee for discussion and further submission to Management for implementation. Individuals will be recognized for such improvements.
- d. Loitering on company property is strictly prohibited. Employees are to leave the premises immediately after the completion of the work shift.
- e. All visitors, including contractors, must enter the plant by the front office, sign in, and be issued a visitor badge. Upon leaving they are to return the badge and sign out. **CPR190**

3.2.2 Eliminating Workplace Hazards: **CPR9 & 14**

- a. SPG is committed to eliminating or controlling workplace hazards.
- b. SPG will meet or exceed the requirements of Federal, State and Corporate safety standards where they have specific rules about a hazard or potential hazard in our workplace.
- c. Whenever possible, SPG will modify or design our facilities and equipment to eliminate employee exposure to hazards. Where these engineering controls are not possible, SPG will institute work practice controls that effectively prevent employee exposure to the hazard.
- d. When the above methods of control are not possible or not fully effective SPG will be require the use of personal protective equipment (PPE) such as safety glasses, hearing protection, gloves, and other designated protection.

3.2.3 Noise at Work Regulations **CPR163**

- a. Although every effort is made to ensure noise is reduced to levels within the legal guidelines, certain areas have been designated hearing protection zones.
- b. Employers are required to provide suitable hearing protection at 85 dB (A) and employees must wear protection at 90 dB (A) and above.
- c. Suitable ear protection is available throughout all areas and the Policy enforced.
- d. SPG aims to reduce noise levels in all areas to below the second action levels 90 dB (A) as long as reasonably practicable.
- e. Employees are required to wear protection as indicated above and are encouraged to reduce noise levels by reporting machine faults, air leaks, replacing machine guards and covers etc.



3.2.4 Stored Energy, LOTO and Electricity at Work Regulations **CPR166 & CPR167**

A suitable competent person will undertake all LOTO in respect of stored energy and electrical as well as testing of equipment.

Devises, tools and equipment used to restrain stored energy and to address LOTO procedure are to be inspected and audited using Periodic Inspection and/Audit form CPR166.

Refer to Equipment and Other work hazard risk assessments for specific LOTO and stored energy controls.

- a. All electrical equipment shall be maintained, repaired and used in such a manner as to prevent danger.
- b. All electrical equipment on site shall be suitably protected from various elements such as: mechanical damage, adverse weather, water etc.
- c. Ensure all electrical equipment is used for the purpose and in the environment, it was intended for.
- d. Where electrical equipment is to be used in areas of possible build up of vapors and gases the equipment will be intrinsically safe.
- e. Low voltage equipment is preferred where reasonably practicable.
- f. All equipment shall be installed in a manner that allows single operation isolation for each respective type energy source (Air/oil/hydraulic/gravity/chemical/water/electrical/gas.etc) and/or stored energy source.
- g. All cable connections shall be made with proprietary male/female insulated units and under no account should be taped or open joint splices made.
- h. Before using any portable electric equipment all connections, cables, casings etc. should be visually inspected before connections are made, and these inspections should be repeated during operation.

- i. Specific points to note should be damaged plugs, loose parts or screws, visual evidence of overheating, loose connections, cracked or broken insulated shrouds; broken, kinked or chafed cable, damaged environmental protection.
 - j. Any areas of concern should be brought to the attention of Management for repair/rectification before the item is used.
- A. Qualified, experienced electricians only will undertake all electrical work. **CPR189**
- a. All electrical systems will have appropriate voltage regulators, circuit breakers, and emergency isolation switches.
 - b. All work will be carried out within the guidelines of SPG Engineering Safety Procedures. **CPR14**
 - c. Special Requirements Relating to the Safety Testing of Portable Appliances and Equipment.
 - d. All portable equipment requires periodic testing. This encompasses any equipment brought onto Company premises by employees.
 - e. Tests will be carried out on an appropriate time scale relating to the use frequency of the equipment.
 - f. Tests will include an initial visual inspection for physical defects.
 - g. A further test utilizing a portable appliance tester (PAT) will be made.
 - h. Should any piece of equipment fail the prescribed tests then it shall be withdrawn from service and if appropriate, repaired or removed from service permanently.
 - i. All test results; repairs and withdrawals from service shall be recorded on the appropriate Portable Appliance Test Record Sheet.
- B. Permits to Work procedures **CPR170-174** are in operation, and for work **on energized and** electrical equipment **CPR186** and separately for **live electrical work** **CPR189**
- j. Lockout/Tagout Procedure (**CPR167**)
 - i. **Safe work practices** and procedures are a critical element when working safely with electrical equipment **and TO ADDRESS STORED ENERGY.**
 - ii. The maintenance specific Lockout/Tagout Procedure shall be followed when performing service or maintenance on any machine or equipment in which accidental start-up could cause injury to an employee or employees.
 - iii. *All maintenance personnel are trained and authorized for specific lockout/tagout LOTO procedures* that include procedures for equipment that has **multiple energy sources and isolating devices**. Failure to use this procedure or use of this procedure by unauthorized employees will result in disciplinary action as described in the Accident Prevention Plan.
 - iv. As an employee, it is your responsibility to be aware of the company lockout/tagout procedure and you must not attempt to use equipment that has been locked out.
 - v. The following safety tips are provided to ensure a safe working environment and assist you in avoiding electrical and other **multiple energy sources** hazards:
 - **Do Not** work on any electrical equipment other **multiple energy sources** if you are not qualified to do so, or if you are not sure of what you are doing.
 - Do not use equipment that appears defective in any way.
 - Unplug defective electrical and other **multiple energy sources** equipment and have it repaired as soon as possible.
 - Keep electric cables, cords and plugs and other **multiple energy sources** component and connections clean and free from kinks, cuts fraying, tears and damage.
 - Carry equipment by its base, never by its cord or other **multiple energy sources** connections.
 - Use extension cords only temporarily.
 - Ensure the correct directional flow connections are in place for electrical and other **multiple energy sources** plugs and connections
 - Do not overload electrical outlets by using extension devices to increase number of outlets.
 - Keep cords and pipes and hoses out of aisles or walkways.
 - Replace defective equipment or inform your supervisor or safety representative of damaged or defective equipment. Use the standard work order form and procedure in place at the site.

3.2.5 Basic Safety Rules:

The following basic safety rules have been established to help make our company an efficient safe place to work. These rules are in addition to specific safety rules established for jobs (which are listed elsewhere in this program).

Failure to comply with these rules will result in progressive disciplinary action (refer to [Employee Hand book](#)) up to and including termination refer to [Safety Absolutes CPR97](#)

- a. You shall not perform activities, which are unsafe to get the job done.
- b. If a necessary activity is unsafe, report it to your supervisor/Shift Manager or safety committee representative so it can be evaluated and alternate methods developed.
- c. Mechanical guards must be kept in place always when machinery is being operated. Do not remove or disable any safety device!
- d. No person may operate a piece of equipment unless they have been trained and are authorized.
- e. Use your personal protective equipment whenever it is required.
- f. Obey all safety warning signs
- g. Working under the influence of alcohol or illegal drugs is prohibited.
- h. Firearms and other weapons are not permitted on company property.
- i. Smoke in permitted areas only.
- j. Horseplay, running, and fighting are prohibited.
- k. Good housekeeping is an essential part of accident prevention. [CPR183](#)
 - i. Clean up spills immediately.
 - ii. Replace all tools and supplies after use.
 - iii. Do not allow scraps to accumulate where they will become a hazard.
 - iv. Monitor all areas for dust accumulation and take steps to ensure that it does not become a combustible or fire hazard.
- l. There is sufficient evidence established that worker exposure to noise of enough intensity and duration can result in hearing damage. ([CPR163](#)) Noise induced hearing loss can happen unnoticed over a period of years. Hearing protection in the form of **earplugs** or muffs is **required** when on the shop floor. The shop floor includes Fabrication, the Warehouse, production floor, tooling and Maintenance.
- m. Personal Stereos, Walkman Radios, Tapes or CD Players and Ear wear.
 - i. [The use of radios or similar equipment is not allowed on the Shop Floor](#), where hearing protection is required.
 - ii. The use of personal stereo equipment blocks the effectiveness of ear protection and is in violation of the OSHA Noise Standard.
- n. Audiometric testing will be conducted annually on site. A mobile audiometric testing service will be contracted for this testing and employee records will be maintained through Human Resources.

3.2.6 Manual Handling Operations Regulations and Ergonomics

- a. Where manual lifting is an unavoidable element of SPG operations, SPG will undertake an assessment to evaluate minimizing the risk.
 - b. All employees must make use of the lifting equipment provided by SPG and under no circumstances, undertake manual lifting where a forklift or similar equipment is available.
 - c. Where manual lifting is unavoidable, the risk factor must be reduced by the ‘doubling-up’ of personnel if appropriate.
 - d. The correct stance and angle of lift should also be considered before undertaking manual lifting operations.
 - e. The lifting operation must be carried out with minimum exertion and efficient stance and movement taking appreciation of the way in which a lifting operation is performed.
- A. Safe Lifting Practices - General Rules
- a. If the load is too heavy - don't lift it.
 - b. Always lift with the load close to the body.
 - c. Never twist through a lift, always turn with feet movement.

- d. If a load needs to be lifted and then carried over a distance to be set down - utilize a hand truck or similar equipment to cover the carry distance.
- e. Always lift with steady movements, never jerks and hurry lifts.
- f. When feasible, utilize 'Team Handling' approaches to handling operations that may be beyond the capability of one person.
- g. Do NOT lift on slippery surfaces
- h. Test the load before going the lift
- i. Get help if the load is too heavy or awkward to lift alone
- j. Break the load down into smaller components if possible to provide for a comfortable lift.
- k. Do NOT over exert!
- l. Make sure you have a good handhold on the load
- m. Do not jerk the load or speed up. Lift the load in a smooth and controlled manner.
- n. Do not lift while twisting (especially with a heavy load). Turn and take a step
- o. Keep the load close to the body. Walk as close as possible to the load, pull load towards you before lifting if necessary.
- p. Avoid long forward reaches to lift over an obstruction
- q. Avoid bending your back backward to lift or place items above your shoulder. Use a step stool or platform.
- r. Do not lift while in an awkward position
- s. Use a mechanical device such as a forklift, hoist, hand truck or elevated table whenever possible to do the lift or assist in placement of the load between the knees and waist before the lift.
- t. Use 'Team Handling' particularly where bulk items are to be lifted which impede stance as the operative is unable to place the feet either side of the load.
- u. Before attempting a lift consider the balance of the item, as an off center, center of gravity, will create more difficulty in handling the item effectively.
- v. If a load is difficult to hold e.g.: smooth, greasy, sharp edges, and consider placing it in a box or on a tray to improve the lifting sequence.
- w. Particularly when lifting loads from the ground, adapt a method of lifting utilizing the leg muscles rather than the back.
- x. Always remove obstacles that restrict closeness to the load and then ensure the feet are placed beneath or adjacent to the load.
- y. Stop and Think
- z. Plan the lift.
 - i. Where is the load going to be placed?
 - ii. Use appropriate handling aids if possible.
 - iii. Do you need help with the load?
 - iv. Remove obstructions such as discarded wrapping materials.
 - v. For a long lift - such as floor to shoulder height - consider resting the load mid-way on a table or bench to change grip.

**Back injury claims are painful for the worker
and expensive for SPECTRUM PLASTICS
GROUP. Lift safely!**

- B. Ergonomics (Also refer to 'Sentry' Ergonomics Risk Assessment form)
- a) Place the feet: Keep feet apart, giving a balanced and stable base for lifting (tight skirts and unsuitable footwear make this difficult). Leading leg should be as far forward as is comfortable.
 - b) Adopt a good posture:

- i. Bend the knees so that the hands when grasping the load are as nearly level with the waist as possible, but do not kneel or over flex the knees.
- ii. Keep the back straight (tucking in the chin helps).
- iii. Lean forward a little over the load if necessary to get a good grip.
- iv. Keep shoulders level and facing in the same direction as the hips.
- c) Get a firm grip:
 - i. Try to keep the arms within the boundary formed by the legs.
 - ii. The optimum position and nature of the grip depends on the circumstances and individual preference, but it must be secure.
 - iii. A hook grip is less fatiguing than keeping the fingers straight. If it is necessary to vary the grip as the lift proceeds, do this as smoothly as possible.
- d) Don't jerk: Carry out the lifting movement smoothly, keeping control of the load.
- e) Move the feet: Don't twist the trunk when turning to the side.
- f) Keep close to the load:
 - i. Keep the load close to the trunk for if possible.
 - ii. Keep the heaviest side of the load next to the trunk.
 - iii. If a close approach is not possible, try slinging it towards you before attempting to lift it.
- g) Put down, and then adjust: If precise positioning of the load is necessary, put it down first, and then slide it into the desired position.

3.2.7 Hazardous Materials (currently CPR175 is a blank best practice place holder)

Each individual SPG site is responsible for and is to control:

- a. Hazardous materials used in Company operations, and to meet the requirements of the regulations, uses a system of control. This includes legionella pneumophila, which has been known to cause Pontiac Fever and Legionnaires Disease.
- b. Manufacturers safety data sheets are obtained and SDS assessments undertaken to assess any possible hazardous components, with a view to substituting materials for less harmful items or making appropriate arrangements for the use of specialized personal protective equipment.
- c. Hazard Communication Training will be conducted on an annual basis and DOT requirements will be covered every 3 -years.

3.2.8 Personal Protective Equipment (PPE)

Safety Policy:

- a. **Eye protection:** Refer to CPR45.

Safety Glasses: The use of Personal Protective Equipment (PPE) for the eyes is **required** for all employees and visitors when working on, or passing though the shop floor, which includes: Tooling, Fabrication, Production and Maintenance areas.

- i. Due to the hazard of flying objects, the eye protection will include side protection. Those individuals who wear prescription lenses shall wear eye protection that incorporates the prescription in its design or shall wear eye protection that can be worn over the prescription lenses.
- ii. Over 90% of occupational eye injuries occur because employees are not wearing the proper eye protection. The SPG plant has an employee assistance program that will cover a portion of the costs associated with Prescription Safety Glasses. The program includes:
 - iii. Co-payment plan and employee costs
 - iv. Safety Eyewear Ordering Procedures
 - v. Frame Styles and Prescription lens options
 - vi. Company recognized Prescription Eyewear Dispensers and Locations.

An application for prescription eye ware is available through the HR Manager.

- b. **Hearing Protection:** Refer to CPR163.

Required when working or passing through the factory area, to Include: Tooling, Shipping, Fabrication, Production areas and Maintenance.

c. **Foot Protection Safety Shoes:**

Refer to **CPR53**. Required when on the **factory floor**, which includes **Tooling, Shipping, Fabrication and Maintenance**.

Designated walkways - You are required to stay inside the designated walkways when passing through the **Factory floor** without safety shoes.

Safety Toe Caps are available for **Factory Floor** visitors or guests. **Operators or staff involved in die change-overs** must wear a shoe with metatarsal protection.

d. **Hand and arm protection gloves and sleeves Sharps and High-heat Gloves:** Refer to **CPR40**.

Required when changing out hot dies and/or screws, etc.

e. **Nitrile Gloves:** Refer to **CPR40**.

Required when water resistance is desired.

f. **Respirator:**

Work activities requiring respirators have been **eliminated**; therefore, SPG does not endorse the use of respirators in our facility. Dust masks are available for those individuals working in excessively dusty areas.

g. **Welding Mask w/ #7 shades:** Refer to **CPR164**.

Required whenever using the arc welder.

h. **Full Face Shield or Goggles:** Refer to **CPR165**.

Required when using hand or bench grinders. Safety glasses must also be worn when wearing the face shield.

k. **SPG will provide** protection equipment as follows:

- i. Hearing protection
- ii. Eye protection
- iii. Gloves
- iv. Dust masks as may be required from time to time
- v. Special clothing as and when required
- vi. Specialist equipment as and when required.

l. **Training** in the correct use of safety equipment will be provided.

- i. Where required by statutory regulations personal protective equipment must be used and, where appropriate, procedures must be set up to record the issue and maintenance of equipment.
- ii. It is the employees' responsibility to care for and maintain the personal protective equipment, and that it is stored correctly when not in use.
- iii. Safety equipment must be worn and cleaned / maintained in accordance with the manufacturers' data sheets supplied with the item.

3.2.9 **Display Screen Equipment**

- a. SPG has undertaken to provide all the necessary equipment to ensure that workstations can comply with the Display Screen Equipment Regulations.
- b. Employees are trained in the correct layout and adjustments necessary to comply and are encouraged to ensure they carry out their own requirements.
- c. Eyesight tests are available to users who require these for any correction for Display Screen Equipment work.
- d. Improvements suggested by employees are considered carefully and implemented wherever reasonably practicable.

3.2.10 **Disciplinary Policy**

- a. Employees are expected to use good judgment when doing their work and to follow established safety rules.
- b. We have instituted a disciplinary policy to provide appropriate consequences for failure to follow safety rules.
- c. The disciplinary procedure is designed to bring unacceptable behavior to the employee's attention in a way that the employee will be motivated to make appropriate corrections.

- d. The SPG progressive discipline policy applies to the violation of the same rule or the same unacceptable behavior. Refer to Employee hand book and to Safety Absolutes **CPR97**.

3.2.11 Reporting of Accidents and Record Keeping - OSHA

3.2.11.1 Statutory Requirements

All accidents resulting in personal injury or damage to equipment must be recorded on a Supervisors Investigation Report. Employees must ensure that, if they are involved in an accident, it is reported to their immediate Supervisor immediately.

The following accidents shall be reported on the OSHA 300 form and reported to OSHA/ **Authorized EXTERNAL BODY**, as per the Authorized Body requirements:

- a. Death
- b. Major Injury
- c. Absence from normal work for one or more days
- d. Injury, which, while not keeping an employee from working for a day or more has the effect of:
 - i. Reducing employee's wages.
 - ii. Necessitating them being put on: other duties or restricted.
- e. Prescription medication.
- f. Medical action beyond first aid.



3.2.11.2 Company Requirements **CPR93**

- a. The immediate aim for an investigation after an accident is to act to ensure elimination of the possible recurrence.
- b. To attain efficient monitoring of incidents and ensure elimination steps are taken, it is of the utmost importance that reports are returned to the Health & Safety Mng.Rep as soon as practical for assessment and recording. To record details immediately following an incident helps avoid facts being forgotten.
- c. At the end of each month, accident statistical information will be passed to SPG for collation and assessment.
- d. Employees are required to report any injury to their immediate supervisor or Shift Manager regardless of severity using "Employee's Report of an Accident" form **CPR94**.
- e. The supervisor/Shift Manager will investigate the accident using procedures in the section "Accident Investigation" that follows and complete a "Supervisor's Report of an Accident" form **CPR95**.
- f. These reports will be forwarded to the Safety Mng.Rep who will review the reports and then initiate a Safety Committee follow-up investigation, if necessary.
- g. The Site Safety Mng. Rep will determine if an accident should be recorded on the **300 OSHA / Authorized EXTERNAL BODY** Log of injury and illness based on the reports and any claim form associated with the incident.

3.2.11.3 Recordable and Reportable accidents (as defined below) will be:

- a. Reported to SPG EHS Mng. Rep immediately by email or phone.
- b. Recorded with incident investigation completed within 24 hours in **SOMS** Incident log, after SPG is made aware of the incident.
- c. If the injury is not to be recorded on the 300 OSHA / **Authorized EXTERNAL BODY** log, it is still to be recorded in the **SOMS** Incident log.
- d. All OSHA recordable and reportable accidents as well as any near misses and non-OSHA injuries/illnesses will therefore be recorded in the **SOMS** Incident log.
- e. A copy of the 300A OSHA Summary for current year and several subsequent years can be generated from **SOMS**.
- f. A signed copy of the 300A OSHA Summary for the previous year will be posted on the Safety Bulletin board no later than **February 1**, and will remain until **April 30**. Any employee can view the current OSHA 300/ **Authorized EXTERNAL BODY** log, upon request at any time of the year.

3.2.11.4 If an Injury Occurs

- a. In case of serious injury, **CALL 911**.

- b. First aid kits are located in **production area Refer to site specific location as shown on the Attached SITE EMERGENCY RESPONSE PLAN.**
 - c. A sufficient number of Supervisors will retain current First Aid and CPR certification to allow adequate coverage on all shifts.
 - d. **Form CPR152** lists the current First Aid and CPR certified employees:
 - i. Include the individuals' certification expiration date.
 - ii. The list is to be posted on all **Safety Bulletin Boards and on the First Aid kit.** Refer to site Map for these minimal and any other site specific locations
 - e. **DO NOT** move the injured person unless absolutely necessary. Only help the level of your training.
 - f. Call for help.
- 3.2.11.5 In the event of a fatality, probable fatality, or when an injury requires in-patient hospital as a result of an accident, the Site HR Manager and Safety Mng.Rep will:
- a. Contact the Statutory authority (Federal/OSHA/Department of Labor and Industries/Government department) **within 8 hours** after becoming aware of the accident at the number which is to be posted on the site **Safety Bulletin Boards.**
 - b. The toll-free notification number to use during weekends and evenings is also to be posted on the site Safety Bulletin Boards, and used by the Site HR Mng. and Safety Mng.Rep for REPORTING.
 - c. The notification must be a verbal conversation with a representative of the department.
 - d. Fax and answering machine notifications are unacceptable.
 - e. The notification must report:
 - i. SPG Name
 - ii. Location and time of the accident
 - iii. Number of employees involved
 - iv. The extent of injuries or illness,
 - v. A brief description of what happened; and
 - vi. The name and phone number of a contact person.
- 3.2.11.6 Unsafe Condition / Near Miss Incident **CPR150**
- a. An *Unsafe Condition / Near Miss* is an incident that did not, but could have, resulted in a serious injury to an employee or an unsafe condition in the workplace.
 - b. This should be recorded on the Unsafe Condition Form or Near Miss form, and is to be entered into **SOMS** immediately
 - c. It is to be investigated by the Supervisor/Shift Manger and reported to the Site Safety Mng Rep. this applies to equipment or property damage.
- 3.2.11.7 Accident/Incident/Near Miss Investigation **CPR15**
- a. Whenever there is an accident that results in serious injuries that have immediate symptoms, and is to be entered into **SOMS** immediately.
 - b. A preliminary investigation will be conducted by the immediate Supervisor/Shift Manager of the injured person(s).
 - c. A Safety Committee representative will be notified of the accident and do an investigation.
 - d. That representative will take the information to the Safety Mng Rep and the Safety Committee for review.
 - e. The Safety Committee will make recommendations to prevent the accident from recurring.
 - f. If an accident results in a death, probable death or employee hospitalization, the equipment involved in the accident must not be moved until a representative of the Department of Labor and Industries has investigated the incident.
 - g. An exception for moving the equipment is allowed if it is necessary to remove the victim or prevent further incidents or injuries.
- 3.2.11.8 Safety Bulletin Board
- a. Safety bulletin boards are in SPG plant area and within the office at a minimum. Health and Safety notices provided by or required by statutory authority (Federal/OSHA/Department of Labor and Industries/Government department) are posted, as required.

- b. Periodically additional information or notices designed to make for a safer workplace will be included for employee benefit. Please check this board regularly for new notices.
- c. If anyone wants to include a notice on the Safety Bulletin Board, provide a copy to your supervisor or a Safety Committee Representative for approval. Required posters that will be displayed on the board and must not be covered with other posters which include:
 - i. Statutory authority (Federal/OSHA/Department of Labor and Industries/Government department) Employee Rights and Employer Responsibilities.
 - ii. Industrial Insurance Poster
 - iii. Emergency Telephone numbers
 - iv. Statutory authority (Federal/OSHA 300A log/Department of Labor and Industries/Government department) summary log of Injuries and Illnesses (timing is set by respective Statutory authority)
 - v. Department of Labor & Industry Citation and Notice document will also be post on this board after any inspection.

3.3 Alcohol & Drugs

- a. In any industrial situation, alcohol & work are not compatible. Alcohol is a depressant drug that affects normal brain functions. Employees working at height, or with machinery, or involved in transport are required to be in control always.
- b. SPG has, therefore, made it our policy that if it is suspected that anyone is intoxicated by alcohol, or is under the influence of drugs disciplinary action will be taken against them.
- c. The drinking of alcohol or taking of drugs on site are also strictly forbidden.
- d. See also: Alcohol & drug policy ([CPR51](#))

3.4 Safe Working Procedures [CPR158](#)

3.4.1 General & Engineering

SPG operations cover many disciplines and these activities have specific safety measures that must be taken. The following section sets out the minimum operational safety requirements, as Safe Working Procedures for those operations to ensure a safe method of working and safe environment, they are to be adapted to suit specific requirements and [refer to permit requirements Cl: 3.4.6.](#)

A. The following requirements relate to all operations:

- a. Where work is to be undertaken in tanks, chambers flues or other confined spaces or areas of possible flammable vapors being present, the appropriate 'Gas free and safe for entry' and 'Hot Work Permit' certificates must be obtained prior to personnel entering the area and work commencing, [also refer to permit requirements Cl: 3.4.6. and CPR171 confined space](#)). The appropriate certificate of entry must be posted adjacent to the area. Obtaining these clearances will ensure that areas to be worked in have been decontaminated and are safe. No individual person should enter any of these identified areas unless the policy for confined space entry is followed.
- b. Where practicable all electrical equipment should be 110V rating and, when there is any possibility of flammable vapors being present, all electrical equipment must be of an approved flameproof, or explosion proof type.
- c. In the event of an accident to personnel, immediate medical attention should be obtained and if applicable, the hospital advised to the type of accident, e.g.: inhalation of fumes, (also specify the material that fumes have been generated from).
- d. Where work in confined spaces is planned and undertaken monitoring will be carried out to verify the effectiveness of ventilation equipment.
- e. The no-smoking rules in all areas where smoking is forbidden must be strictly observed. Smoking is permitted only in designated areas. Any breach of this regulation may be treated as an 'instant dismissal' offense for whosoever is smoking in a non-smoking area. If you smoke, you may do so outside the building or in the designated production areas. Pipe or cigar smoking is discouraged but is permitted in the smoking areas only.
- f. Areas are designated for the disposal of rubbish, but burning is strictly prohibited. This includes the 'Burning Out' of empty tins etc. that may have contained paints, oils, solvents, or other contaminants.

- g. Care must be taken always to protect SPG's employees, property, and work in progress, from danger and damage. Any circumstances that give rise to such danger must be reported immediately to the Health & Safety Mng .Rep .
- h. Any item provided for the safety of SPG's employees, or others must not be interfered with i.e., altering existing staging, restricting access, removing ventilation ducts, fire alarms, fire extinguishers, fire hoses, unless specific written instructions have been given by their Supervisor and signed by the Health & Safety Mng. Rep .
- i. Oils, paints, paint thinners, solvents and other harmful chemicals must not be disposed of down the drains and care must be taken to avoid accidental contamination of drains by such materials.

B. Remember before starting work Refer (CPR184):

- a. Employees must be wearing appropriate footwear (Steel/Composite Toe Shoes).
- b. Employees must be wearing appropriate eye protection (Safety rated Prescription or Safety glasses with side shields).
- c. Employees must be wearing appropriate hearing protection.
- d. Employees must check to see if any other safety equipment is required.
- e. Employees must check to see if a Work Permit is required.
- f. Employees must comply with the conditions stated on the Work Permit.
- g. Employees must ensure that there is safe access/egress to and from their place of work.
- h. Employees must ensure that tools and equipment are correct for the job and in safe working order.

C. Safety equipment that one must wear, must be cleaned, and maintained in accordance with manufacturer's safety documentation including data sheets supplied with the equipment, product or item.

D. If in doubt inform or consult with your Supervisor or the H&S-Mng.Rep.

3.4.2 Safe Working Procedure For The Use of Power Tools

- a. Only persons who have undergone the relevant training, are competent, and authorized by Management should use power tools.
- b. Power tools will be of two types, compressed air powered or electric.
- c. Where practicable, only 110V supply electrical tools will be used on site.
- d. Electrically powered tools must be in good condition and have relevant certification.
- e. Prior to use the employee should ensure all air connections, cables, leads etc. are in good and safe condition and that the connections are correctly made. Any worn and damaged airlines, and cables with bare wires and loose connections, should not be used and reported to the Supervisor.
- f. Any persons using power tools MUST do so in a manner that is safe. This includes paying complete attention to the task; working at a steady pace befitting of that operation (i.e. Not working too fast to control the power tool); and operating the equipment with all guards and safety devices in place and in proper working function.
- g. Only approved equipment, tools etc. shall be used.

3.4.3 Safe Working Procedure For The Use of Access Equipment

- a. Scaffolding, when required will be sub-contracted by SPG to a supplier who possesses the necessary experience and ability to carry out SPG's requirements.
- b. All suppliers' must demonstrate their ability to comply with American Standards, OSHA Standards, Contract Regulations and Good Safe Working Practices.
- c. SPG will nominate a person to be responsible for the daily inspection of scaffolding.
- d. The person nominated will be capable and have received the necessary training to carry out these responsibilities.
- e. The person nominated as being responsible for the inspection of all equipment covered by the Construction Regulations, must ensure that proper inspections are carried out and records are kept in accordance with instructions.
- f. Do Not Use Damaged Equipment

- g. Ensure the plant /equipment is not overloaded and that the Safe Working Load is not exceeded where specified.
- h. All plant/equipment should only be used on firm level ground. (Where outriggers are provided they must be used).
- i. All guardrails and toe-boards should be in place prior to commencing work from the platform.
- j. Prior to raising the platform, the operator must check for overhead cables and obstructions.
- k. Prior to moving the platform during working activities, the operator must ensure the path is clear and safe at ground level.
- l. Under no circumstances are persons to step up onto the guardrails or to climb out from the platform when in raised position.
- m. DO NOT use the platform as a jack, prop or tie.
- n. When not in use, ensure that the equipment is left immobilized and in safe condition and position.

3.4.4 Safe Working Procedure For Use of Ladders

- a. Only ladders with a current "fit for use" tag should be used.
- b. Only one person at a time should climb a ladder, which should be suitably fixed top and /or bottom. As a minimum requirement ladders, should be "footed".
- c. Metal ladders will not be used near electrical systems.
- d. Wooden ladders should not be painted. Any damage should be reported immediately, the ladder taken out of use and a tag fitted to indicate "unsuitable".
If in any doubt about the use of ladders, advice must be obtained from a **competent person Refer to Cl: 2.2.6).**

3.4.5 Safe Working Procedure for Mobile Operated Work Platforms

- a. The equipment is available in a wide variety of types ranging from small mobile tower structures which have a self-elevating facility, to large lorry mounted hydraulically operated access units.
- b. Many of the units have 'common' names such as Cherry Pickers or Scissor Lifts
- c. Only persons who have undergone the relevant training, are competent and authorized by management should operate this equipment.
- d. Prior to use, before each working period, the operator must visually check to ensure the equipment /plant is not damaged and in good working order.
- e. **Any damage noted, should be reported and rectified prior to use.**

3.4.6 Safe Working Procedure For The Use of Prefabricated Scaffolds

- a. All aluminum or steel scaffolding will be obtained from suppliers who can demonstrate membership of an accredited Scaffolding Manufacturers Association.
- b. All aspects of aluminum or steel scaffolding use shall be carried out in accordance with the manufacturers Code of Practice.
- c. Erection of access equipment must only be undertaken by competent persons who have received the relevant training.
- d. Always ensure that scaffolds are erected on level ground, are stable, the wheels are locked and that all necessary stabilizers and outriggers are in position before use. Never exceed the manufacturers recommended height.
- e. Integral access ladders /stairs must be used on all scaffolds.
- f. Never move scaffolds with people or materials in any position on the scaffold, and during non-occupied movement ensure that there are no overhead obstructions such as telephone wires, overhead electrical cables etc.
- g. Always ensure that the working platform is fully boarded, including toe-boards and that handrails are fitted where possible.
- h. Do not use scaffolds during high winds and severe weather conditions.
- i. The necessary certificates /records must be available always. Damaged equipment must not be used.
- j. Scaffolds must be re-inspected and certified when altered and on a weekly basis.

- k. Generally hard hats must be worn when working on or near such scaffolds.

3.4.7 Safe Working Procedure For The Use of Fork Lift Trucks - CPR179 & 180

- a. The use of forklift trucks by untrained personnel is strictly forbidden. All personnel driving forklift trucks must have received written authorization from SPG. Site and model specific training instituted and required by OSHA must be completed prior to operation of any lift on company premises. This document must be available always while on site.
- b. The carrying of passengers is strictly forbidden.
- c. When the forklift truck is parked, the forks must be lowered flat to the ground position, the drive shaft placed in NEUTRAL, the engine switched off with the ignition key removed, and the emergency brake set.
- d. Daily checklists are to be completed by the operator. These must include, warning lights system, oil, water, tires, forks, and lift mechanisms as appropriate per manufactures recommendations. A copy of the report is to be turned in to the responsible supervisor and auctioned if necessary.
- e. Any defects whatsoever must be noted by the operator and rectified before use of the truck.
- f. Forklift trucks must only be used in designated areas and only operated at safe speeds.
- g. The driver must ensure that the stacking of loads allows safe transit and clear visibility always.

3.4.8 Abrasive Wheels

- a. SPG will ensure that any abrasive wheel machine owned or hired, and abrasive wheel disc used by the organization, will be provided and maintained in accordance with the requirements of the appropriate legislation and standards, plus other control measures considered necessary as follows:
- b. Equipment will be fitted with suitable guards and marked with spindle speeds.
- c. Equipment will be fitted with properly adjusted tool rests, on /off and isolation controls.
- d. Dressing tools will be provided.
- e. Screens and eye protection will be provided and must be used.
- f. Sufficient working and storage space will be made available.
- g. Wheels and discs will be marked with maximum speed.
- h. Trained, competent persons will be approved and appointed in accordance with all OSHA regulations where required.

3.5 SPG Fire Prevention & Emergency Action Plans

A. *In Case of Fire*

- a. Evacuation maps are posted on the Safety Bolton Boards, exit points, within each work area and in office/work/Plant passageways.
- b. All emergency exit locations are clearly marked and directional signs are posted throughout the plant. Exit lanes are painted yellow.
- c. Maps contain location of exits, fire extinguishers, first aid kits and gathering points for employees
- d. All fire extinguishers are clearly numbered and location posted.
- e. In case of fire or earthquake, exit building at closest exit, then go directly to the area you are assigned in front of the building.
- f. Refer to the Safety Bolton Boards to identify the plant/shift designated Plant Fire Marshall. In his/her absence, the Site Safety Mng.Rep will assume the role of Plant Fire Marshall.

B. *If you discover a fire:*

- a. Notify another person, sound the fire alarm, call 911 or a Supervisor/Shift Manager
- b. If the fire is small and there is minimal smoke, you may attempt to put it out with a fire extinguisher. Only those properly trained should attempt to fight the fire. *As an employee, you are not required to fight fires. Unless you have been specifically trained in accordance's with SPG requirements and certified to do so.*
- c. If the fire grows or there is thick smoke, **do not** continue to fight the fire.
- d. Notify other employees to evacuate.
- e. Go to the designated gathering point outside the building. **Refer Site specific SPR# in SOMS and/or Attachment 4.2**

C. SUPERVISOR/SHIFT MANAGERS

- a. If you are a supervisor/manager instruct your employees to evacuate to the designated gathering locations.
- b. Verify that 911 has been called
- c. Determine if the fire has been extinguished. If the fire has grown or there is thick smoke, evacuate any employees attempting to fight the fire.
- d. Notify other supervisors to evacuate the building.
- e. Ensure that all employees are accounted for and have evacuated the area.
- f. **ALL MANAGERS MUST HAVE A COMPLETE ROSTER OF THEIR EMPLOYEES WHO ARE PRESENT DAILY!**
- g. If you cannot account for an employee DO NOT re-enter the building. Notify the responding Fire Fighter that an employee is missing and may be in the building.
- h. All managers are to meet the Company Fire Marshall at the respective assembly points outside of the building(s). This/these area(s) clearly marked and visible and the site-specific Evacuation Map.
- i. Report employee headcount to the Company Fire Marshall and any missing to the Company Fire Marshall.
- j. The Company Fire Marshall should have a complete list of employees from the reporting managers and will provide this and any other pertinent information such as: a Map of the facility showing hazard areas, storm water outfalls and drainage systems, gas and other valves, basements, attic spaces, booster pumps and sprinkler control systems, electrical boards and any necessary information important to the Rescue Team Leader or Fire Fighter Service Marshal.
- k. **DO NOT** re-enter the building until your manager releases you back to work.

D. **Evacuation Map - Refer to your Site Map in SOMS and/or Attachment 4.2 of this document.**

E. Earthquake Procedures **Where applicable!**

Earthquake is a sudden shaking. There will be no advance warning. After the earthquake, has stopped go to the same designated gathering places as you would for a fire.

F. **The natural gas needs to be turned off from the main building immediately.**

G. **All Supervisors are instructed in emergency, if safe to do so, to turn off gas line following the site specific **shut off procedures.****

H. **If you are inside the building:**

- a. Take cover under a sturdy desk, table or bench, or against an inside wall, and hold on. Stay away from glass, windows, outside doors or walls and anything that could fall, such as stacked gaylords, racks, light fixtures or furniture.
- b. When shaking is stopped, Supervisors are to assess damage and available evacuation routes and begin an orderly evacuation of their area. Employees are to proceed to their designated gathering spots.
- c. Be prepared for aftershocks! Evacuate as quickly as possible. The secondary shock waves can cause additional damage to already damaged structures.
- d. Supervisors should account for each employee in their work groups as quickly as possible.
- e. If you smell gas or hear a hissing or blowing sound, notify a supervisor.
 - o If it is safe to do so turn the gas valve off at the source.
 - o If not turn off the gas at the main line.
 - o Open the windows and leave the building.
 - o If the electricity is off or goes off - Do not use candles, matches, or open flames.
- f. First aid certified employees should check for injuries and aid in the evacuation of injured employees. Do not attempt to move seriously injured persons unless they are in immediate danger of death or further injury. If you must move an unconscious person, first stabilize the neck and back, then immediately call for help.
- g. All managers are to meet the Company Fire Marshall at the respective assembly points outside of the building(s). This/these area(s) clearly marked and visible and the site-specific Evacuation Map.

- h. Report employee headcount to the Company Fire Marshall and any missing to the Company Fire Marshall.
- i. The Company Fire Marshall should have a complete list of employees from the reporting managers and will provide this and any other pertinent information such as: A map of the facility showing hazard areas, storm water outfalls and drainage systems, gas and other valves, basements, attic spaces, booster pumps and sprinkler control systems, electrical boards and any necessary information impotent to the Rescue Team Leader or Fire Fighter Service Marshal.
- j. **DO NOT** re-enter the building until you are released by your manager to return to work.
- k. First aid and CPR certified employees and supervisors **must not** re-enter the building once the evacuation is complete unless your assistance has been specifically requested by Police, Fire or Relief Organizations.
- l. Use the telephone only if necessary to report a life-threatening emergency.
- m. Turn on any radios and listen for public safety instructions.

If you are outside the building

- a. Stay there. Move away from buildings, streetlight and utility wires.
- b. Do not touch any downed power lines or objects that are touched by downed power lines.

If you are in a moving vehicle (car, truck, this does not apply to forklifts)

- a. Stop as quickly as safety permits, and stay in the vehicle.
- b. Avoid stopping near or under buildings, trees, overpasses or utility wires
- c. Once you have determined that the earthquake has stopped you should proceed cautiously, watching the road and any bridges for damages.

Emergency Evacuation Drills

- a. Department heads, and Shift Managers will be given word about the drill.
- b. Shift Managers will direct which production lines can be evacuated and which ones must remain in operation.
- c. The Plant Manager, or the Shift Manager will announce that there will be an evacuation drill some time during the day.
- d. Everyone that is not designated as running a production line will go out to the designated evacuation area using the nearest available emergency exit.
- e. Operators told to stay on their lines will be quizzed on the emergency evacuation procedures and leads will reports the quiz results to the Shift Manager.
- f. Do Not re-enter the building until your supervisor or Department Manger instructs you to return.

3.6 On-going Safety Training (SOMS)



3.6.1 Training Schedule

- a. Annual Training and re-certification schedules associated with the State and Federal mandated safety programs are included as part of the Accident Prevention Plan and will be conducted monthly at the facility Crew Meetings
- b. Training is an essential element to ensure a safe working environment. Although, the majority of our training program is “Performance-Oriented,” some regulations still have annual re-training specifications.
- c. The Site Safety Mng. Rep. and the Human Resource Administrator are responsible for insuring that necessary Safety Training and re-training requirements are achieved.
- d. Prior to starting work, each new employee will attend a Health and Safety orientation. New employees are provided with an initial orientation that includes information on: The Employee’s “Right-to-Know” and Hazard Communication, Occupational Noise, Electrical Safety and Equipment Lock-Out/Tag-Out Procedures, First-Aid/CPR and Blood-Borne Pathogens, and Safety procedures if a fire should occur.

- e. In addition to the basic APP training information, the company has developed detailed written programs and procedures that explain necessary steps for performing certain kinds of work that have special hazards. Following is a list of those programs, when they apply, and where you can go to locate a copy:

3.6.2 Hazard Control Programs CPR14 & (currently CPR175 is a blank best practice place holder)

<u>A. Programs/Procedures</u>	<u>Applies to Employees</u>
1. SPECTRUM P.G. training video	All Employees
2. Employee Right to Know	All Employees
3. Lockout/Tag out	Servicing Equipment / All EE's
4. Hearing Conservation	All Employees
5. First-Aid/CPR	Leads/Supervisors
6. Safe Lifting Practices	All Employees
7. Fire Extinguisher Safety	All Employees
8. Accident Investigation	Safety Committee/HR/HSE
9. Forklift Operation	Forklift Operators
10. Welding Safety	Task Specific
11. Elevated Work Activities	Task Specific

Training records are kept in a training specific file maintained by the Human Resources Department and entered in to **SOMS**. Additional training records may also be located with each Department and/or Shift Manager depending on the nature of the training program. A re-training schedule that includes federally mandated programs is referenced on the company **SOMS** system

B. Hazard Communication Program (currently CPR175 is a blank best practice place holder)

The following hazardous information program has been established to ensure that information about the dangers of potentially hazardous chemicals that may be present in the work place is available for all employees.

- a. Written material is at all SDS stations **Refer to your Site Map in SOMS and/or Attachment 4.2 of this document**
- b. Shipping will verify all containers will be clearly labeled to note appropriate hazard warning
- c. The Materials Manager (or designee) will review labeling procedures annually and update as required
- d. Any employee can contact the Materials Manager, Safety Representative or Site Safety Mng. Rep for information regarding hazardous materials.
- e. PPE is available for working with hazardous materials: PPE includes safety glasses, dust masks, gloves, or additional PPE as recommended.

C. Blood Borne Pathogens CPR52

- a. AIDS/HIV and Hepatitis B are the primary infectious diseases of concern in blood. *All blood should be assumed to be infectious.*
- b. Employees are not required to perform first aid as part of their job duties.
- c. In the event of a bleeding injury where first aid is needed, gloves should be used.
- d. Gloves and a mouth barrier for rescue breathing are available in the first aid kits.
- e. If an employee is exposed to blood, he/she must wash immediately with soap and water and report the incident to a Supervisor/Shift Manager and the Site Safety Mng. Rep.
- f. The appropriate follow-up procedures will be initiated, including medical evaluation, counseling, provision of Hepatitis B vaccine and blood testing of the source person.
- g. Blood Borne Pathogen Safety CPR52 and is the **SOMS** Training Module.
- h. A copy of the State Department of Labor and Industries regulations is available in the Site Safety Mng. Rep's office for review.

3.6.3 Safety Procedure for Elevated Work CPR173

This procedure describes the precautions to be taken when work activities require the employee to work from an elevated location. The procedure is designed to provide worker protection from falls, and protect persons below from objects falling from the elevated work location.

- a. Fall protection systems include: fixed guardrails, restraint systems, lifelines, full body harness, shock absorber, fall arrestor
- b. Full instructions for elevated work can be found in the **CPR46**
- c. No overhead work shall be performed when, because of that work, objects falling from the overhead work location would endanger a person below.

3.6.4 Permits to Work

The procedure for Permits to Work CPR46 contains formal safety documents to be used when working in identified hazardous conditions. The permits are designed to identify the hazards, specify control measures and describe work procedures. A permit to work must be completed and signed by the Plan Manager or Project Manager and involved employees.

SPG operates a "Permit to Work" systems for the following situations:

- a. Record 1 - General Permit to Work **CPR50**
- b. Record 2 - Contractors Permit to Work **CPR46 & 47**
- c. Record 3 - Electrical Work **CPR174**
- d. Record 4 - Live Work on Electrical Equipment **CPR174**
- e. Record 5 - Hot Work Permit **CPR172**
- f. Record 6 – Confined/Enclosed Spaces **CPR171**
- a. Record 7 - Work Permit Overhead **CPR173**

These permits will form the framework for all relevant procedures (e.g.: Maintenance/Engineering procedures).

3.6.5 Work Order **(CPR187)**

- a. A Work Order is a request for Maintenance.
- b. Anyone can request a Work Order (WO), especially if equipment presents a hazard to the employee.

3.6.6 Violence in the Workplace – refer to **(CPR51)**

- A. Violence in the workplace is a growing concern. For your own safety, you must know how to diffuse potentially hostile persons. Because the causes of hostility are not likely to disappear, neither will hostile people. They may come to you confused or frustrated. These feeling can rapidly escalate to anger and even outright hostility if not handled properly. Some may come to you already angry or hostile. You can often make a difference between a seething individual and a calm one. Your attitude is crucial. With a caring, composed and objective manner you may be able to calm an angry person. Let your attitude reverse their anger. It is your responsibility to try. The following guidelines are recommended to assist in addressing violence in the workplace:

B. Prepare Yourself

- a. Know your exits
- b. Be alert to what is going on around you
- c. If a situation looks suspicious, ask your co-worker if they need help
- d. Get your lead or supervisor involved
- e. Work out a signal with co-workers to let them know you are in trouble
- f. Chose someone in your area who is designated to call police
- g. Review the facts:
 - i. Do you know this person?
 - ii. Do they have a criminal history?
 - iii. Are they easily agitated?

- iv. Are they alcoholic or a drug user?
- v. Do you need to take special precautions?

3.6.7 When People Get Hostile

A. Remain calm

- a. Watch for opportunities to escape
- b. **Do not do anything to get yourself or others hurt**
- c. Do not confront the person
- d. If you must use force, use only as much as is necessary to control the situation
- e. Memorize the persons features, clothing, and identifying marks
- f. As soon as they leave, write down any information to identify the person.
- g. When they leave, try to watch which direction they go, which road they take, what they are driving, a license number, how they are traveling (car, foot, bike),

B. **Call the police immediately. Give as much information as possible over the phone. Stay calm.**

C. How to diffuse the Anger

- a. When tempers flare, best response is simply to listen
- b. Ask what you can do to help
- c. Ignore any obscene language
- d. Remember this is not a PERSONAL attack, be objective
- e. Chose your words wisely, calmly
- f. Watch your body language and the tone of your voice
- g. If the company is at fault, admit it and ask what you can do “fix it”
- h. Write down their frustrations and concerns. This makes them think you are taking them seriously.
- i. Try to keep the discussion on the problem. If they attack you, as a person, back off.
 - i. Ask them to calm down
 - ii. Tell them you will end the conversation if they do not calm down
 - iii. Have someone assist you if they will not calm down.
 - iv. Alert your lead, Shift Manager, and have someone call police if they do not calm down and appear to be dangerous.
 - v. Walk away immediately if you feel you are in imminent physical danger. **DO NOT BE A HERO.**
 - vi. If the person heads for another office, call that office and alert them. Suggest they take special precautions.

3.6.8 Forklift Operator Retraining (CPR179)

Operator retraining is required whenever any operator is:

- a. Operating a vehicle in an unsafe manner
- b. Involved in an accident or a near-miss incident
- c. A performance evaluation revealed unsafe vehicle operation
- d. Assigned to a different type of vehicle
- e. Or changes in the workplace have occurred that could affect safe vehicle operation
- f. Operator certification is done when a new employee needs access to a forklift. Re-certification is performed as needed, as outlined above, or every three years for all previously certified employees.

3.7 On-line Equipment Safety (CPR158)

3.7.1 Responsibilities

- a. All Production Personnel should be familiar with the safety devices **associated roles and responsibilities within their facility, i.e. process equipment, tools and their hazards and any specific safety requirements and operation limitations.**
- b. Shift Managers and Lead Operators are responsible for implementing On Line Equipment Operation and Safety Training procedures.
- c. It is the Operators responsibility to comply with the rules and guidelines that apply when working in dangerous or potentially dangerous conditions.
- d. Safety Work Instructions specific to company machines and equipment are available through the On-Line Equipment Safety Procedures (Work Instruction Reference # **(CPR158, Equipment Risk Assessments (ERA), Job Hazard/Work-Area, Hazard-Sub/Mat Risk Assessments (JHA/WAA) and LOTO).** Typical list of Plant equipment is included in the table below:

Air Compressor	Corona Surface Treater	Engineering Lathes	Up Cut Saws
Air Rack Tables	Fence Routers	Wire EDM Machines	Other types of Saws
Fence Bag Sealer	Fork Lift Trucks	Sand Blasters	Product Spoolers
Extruders	FG 300 Surface Treater	Marker Line Tables	Screw Carousel
Conveyor Tables	Grinders (Granulators)	Batch Mixers	Band Saws
Drill Press Machines	Calibrator Hoist	Die Oven	Box Staplers
Barricade Drill	Steps & Ladders	Punches	Strapping Machine
X-Tube Drill	Lift Tables	In-Line Printers	Weigh & Blends
Servo Cutters	Material Dryers	Belt Pullers	Guillotines
Fly Cutters	Milling Machines	Miter Saws	And any other equipment at the facility



***Perform all operations in a safe manner using good judgment at all times.
Refrain from any activity that might endanger yourself or fellow workers.***

HORSE PLAY, PRACTICAL JOKES, AND FIGHTING WILL NOT BE TOLERATED!

Report any observed unsafe conditions or acts in a timely manner.

Report all injuries, no matter how slight, at once.

3.7.2 Safety Training for Power Tools (also refer to 3.4.2 above)

A. Purpose

- a. The purpose of this procedure is to minimize the potential for personnel injury during routine production processes and to describe the safety requirements that need to be satisfied when using Power Tools.
- b. This equipment includes, but is not limited to: pneumatic nailers (nail guns), stitchers, staplers, cement mixers, and pallet banders

B. Responsibility

- a. The Maintenance Department is responsible for routine maintenance and insuring that the power tools have adequate safety features.
- b. Shift Managers/Supervisors are responsible for implementing training and safety procedures.

- c. It is the employee's responsibility to know the manufacturer's instructions before using the tool and to operate the tool per manufacturer's instructions, including any safety precautions.

C. Basic rules to operate power tools safely:

- a. Keep all tools in good condition with regular maintenance
- b. Use the right tool for the job
- c. Examine each tool for damage before use
- d. Operate per the manufacturer's instructions
- e. Use the proper protective equipment
- f. If you are unsure how to use a specific tool, check with your Lead or Shift Manager
- g. Good housekeeping is essential to keep from slipping with a power tool
- h. Special attention should be paid to the following:
 - i. Never carry a tool by the cord or hose
 - ii. Never yank the cord or hose to disconnect
 - iii. Disconnect tools when not in use, before servicing and when changing accessories
 - iv. Wear proper apparel. No loose clothing, dangling objects or jewelry, unrestrained long hair.
 - v. Use tools only for the job they were intended to do.
 - vi. Do not carry a power tool with your finger on the trigger

D. Nail Gun Specific Rules

- a. **Never point the tool at anyone**
- b. Never rest the tool against any part of your body
- c. Keep your free hand out of the line of fire
- d. Keep hands out of way of exit path
- e. Design the setup to keep co-workers out of the line of fire

3.7.3 Special attention should be paid to the following general safety rules:

- a. Do not rush. Haste is a common cause of accidents. Speed will develop with work experience. **Obey all safety rules.**
- b. Wear the required personal protective equipment (PPE) for general operation hazards. PPE includes but is not limited to safety glasses, hearing protection and heat resistant gloves;
- c. **Safety Glasses are required when on the Production Floor, whether working or not!!**
- d. **Safety Shoes are required when on the Production Floor.**
- e. Do not wear loose clothing or jewelry and keep long hair tied back when working around moving machinery;
- f. Use tools only for the job they were intended to do;
- g. Do not operate any item of equipment unless you are familiar with its operation and have been authorized to operate it. If you have any questions regarding the use of equipment ask your area supervisor.
- h. Know the location(s) and correct operation of the emergency shut-down (kill) switch (es);
- i. All machines must be operated with all required guards and shields in place.
- j. In case of injury, no matter how slight, report it to your area supervisor.
- k. Think through the entire job before starting.
- l. Observe Proper lifting techniques.
- m. Get help in lifting or moving any heavy tool, attachment, or equipment.
- n. Practice cleanliness and orderliness throughout the plant. Keep the floor around the machines clean, dry and free of trip hazards. Do not allow plastic chips or water to accumulate.
- o. The operational equipment should be inspected and maintained on a regular basis. The frequency of inspection and maintenance shall be dependent on the specific use. If repair is needed or equipment is unsafe, any employee may implement a Maintenance Work Order **CPR187**.
- p. If you are unfamiliar with a piece of equipment, check with your Lead Operator or Shift Manager for proper operation, prior to using the equipment.
- q. Use extreme caution during extruder start-up.
 - i. **DO NOT** stand in front of an extruder during start-up.
 - ii. Start-up is the most likely time for pressure release hazards to occur.

- iii. Be aware of shock hazards. Grounding of heater bands, terminals or lead damage can contribute to shock possibilities.
- iv. Extruders operate at extremely high temperatures. Wear hot gloves when handling hot dies.
- v. Be aware of Pinch and Shear points to fingers and hands. The following list of equipment are examples that have pinch and shear points: pullers, hoppers, loaders, punches, fly cutters
- vi. Guards should never be removed during operation
- vii. Always disconnect all equipment from power sources before beginning any type of maintenance.
- viii. Do not overfill grinder bins.
- ix. Get help to empty grinder bins.
- x. Use good lifting techniques when moving objects. (see 3.2.6 above)
- xi. ALWAYS practice good housekeeping.
- xii. Keep walkways clear.

Every effort should be made to prevent accidents with good housekeeping techniques and careful attention to detail.
Remember to always **THINK SAFETY!!!**

3.8 Control/Action Plans - Procedure Inspections/Audits

3.8.1 Procedures/Control Plans/programs are site specific and developed and controlled by site for:

- i. Energy control program
- ii. Fire Prevention & Emergency Action Plan
- iii. Written Hazard Communication Program
- iv. Lock-out-Tag-out (LOTO) Policy and Procedures CPR166-167 and 186.
- v. Disaster Recovery Plan
- vi. Emergency Control Procedure Inspection including training on Power tools

3.8.2 Inspection/Annual Audits of written plans/programs:

- a. Will be conducted to ensure that each procedure is being followed and that each procedure is providing adequate protection for employees.
- b. An authorized employee will be designated as inspector for those procedures that he/she does not use.
- c. The inspector will review the procedure with each authorized employee who uses the procedure and with affected employees.
- d. The inspector will identify any deviations or inadequacies of the procedure and the procedure will be modified and/or additional training will be provided as needed.
- e. Typical Inspection/Audit sign off form: CPR166 is to be used and backed up with appropriate evidence and photos of the procedure being inspected/audited being carried out.
- f. A written record of the inspection will be kept, including the ID number of the machine or the equipment on which the procedure was used, the date of inspection, the names of the employees included in the inspection and the inspector's name.
- g. These inspections/audits will include:
 - i. Multiple energy sources controls Lock-out-Tag-out (LOTO) including tagout only conditions.
 - ii. Accident Action Plans.
 - iii. Evacuation Action Plans.
 - iv. Emergency Action Plans.
 - v. Fire Prevention Action Plan.
 - vi. Written Hazard Communication Program.
 - vii. Disaster recovery plan testing in respect of key elements in conjunction with external sources response contacts.

Section 4 – Attachments

Attachment 4.1 Memo of Understanding

1) I have read and understand SPECTRUM PLASTICS GROUP Health & Safety Policy Manual and agree to follow all the safety rules it contains.

(Revision Number _____).

YES/ NO

I understand and agree to:

- a) Follow all the safety rules THIS/THESE documents contain and to support them.
- b) When applicable, I will ensure that those who may work for me will be kept informed of:
 - i. The rules that pertain to them and
 - ii. Any rule changes that may occur in the future.

Employee Signature _____ Employee Name (Print
Please): _____

Date _____

Attachment 4.2
Site specific Evacuation Map and other key location identifications

Attachment 4.3
SOPs and Forms referenced in CPR54

CPR1	Business Management System Manual
CPR5	Management Review, Analysis of Data and Continual Improvement
CPR8	Training
CPR9	Identification of Health, Safety and Environmental Aspects and Impacts
CPR10	Emergency Preparedness and Response Plan – (Refer site specific SPR)
CPR13	Internal and External Communication
CPR14	Hazard Identification, Risk Assessments (RAs) and Determining Controls
CPR15	Incident / Accident Investigation - EHS & Quality
CPR25	Internal Audits
CPR26	CAPA
CPR27	EHS Records
CPR31	Legal and Other Requirements
CPR32	Objectives and Targets
CPR34	Document Control
CPR36	Hazardous Communication Program
CPR40	Hand Protection
CPR41	Hardhat and fall protection
CPR44	Rules of the Road
CPR45	Eye Protection
CPR46	Notes of guidance for contractor safety coordinators (English/Spanish)
CPR47	Notice to Contractors
CPR50	Permit to work General Notes
CPR51	Employee Handbook
CPR52	Blood Borne Pathogens
CPR53	Foot Protection
CPR54	H&S Manual
CPR56	Pandemic Response Plan
CPR57	NFPA 70E – 2009 (Arc Flash)
CPR62	OSHA 18001:2007 Standard and Current 3 rd Party Cert
CPR63	ANSI B11.6-2001-Safety Requirements (W & W/o Controls)
CPR91	Safety Message from the Plant Manager (Typical – Refer site specific SPR)
CPR92	Safety Responsibilities - General
CPR93	Company requirements with respect to Accident investigation
CPR94	Employee’s Report of an Accident
CPR95	Supervisor’s Report of an Accident
CPR96	Site Monthly Safety Audits ‘Grass Roots’ SOP and checklist
CPR97	SPECTRUM PLASTICS GROUP Absolutes

- CPR98 Progressive Disciplinary Procedure
- CPR99 Site Monthly Safety Committee Meeting Agenda

- CPR105 Crew/Tool-Box Meeting
- CPR106 Employee Orientation Training
- CPR107 Temporary Worker Training Standards

- CPR150 Near-Miss and Unsafe Conditions/Practice Report
- CPR151 Plant Safety Team Members
- CPR152 Plant First Responders (1st Aid & CPR) Team Members
- CPR153 Medical Care Response Packet (Supervisor) Checklist
- CPR154 Medical Care Response Packet (HR Manager) Checklist
- CPR155 Medical Care Response Packet (EHS-Mng. Rep) Checklist
- CPR156 Medical Care Package
- CPR157 General and Safety Committee EHS Safety Inspection Checklist
- CPR158 Inline Equipment safe working procedures
- CPR159 Accident Reporting Procedure (Including Corp CAPA17 notice)
- CPR160 Plant Emergency Evacuation & Hazard Location Map – (Refer site specific SPR)
- CPR161 Plant Emergency Contacts – (Refer site specific SPR)
- CPR162 Work Related Accident/Illness – WR treatment location & Employee’s WR visit notification(s)
- CPR163 Hearing Conservation/Protection program
- CPR164 Welding Mask w/#7 shields
- CPR165 Full Face Shields & Glasses
- CPR166 Lock-Out-Tag – Out Periodic Inspection/Audit – Check List 166A / Log 166B / Form 166C
- CPR167 Lock-Out-Tag –Out and Stored Energy
- CPR168 Qualified Contractors
- CPR169 Purchase Materials & Services

- CPR170-174 Permits - See point 3.6.4 Permits to Work in CPR54

- CPR175 Hazardous Communication Program (currently is a blank best practice place holder)
- CPR176 On-line Equipment Safety
- CPR177 Safety Training Power Tools
- CPR178 Light Duty Release and Return to Work Authorization
- CPR179 Forklift Operator Retraining

- CPR180 Forklift Operator Daily check list
- CPR181 Safety Review Board (SRB)
- CPR182 Correction Safety Review Board CASRB
- CPR183 Housekeeping
- CPR184 Remember before going to the floor and starting to work checks
- CPR185 PO Request form - for Contractor services
- CPR186 Trouble shooting equipment where guards and safety devices are purposely compromised as a last resort for trouble shooting – SPECIAL CASE ONLY
- CPR187 Work Order
- CPR188 Rack Inspection (Monthly)

- CPR189 Qualified Electrician (NFPA 70E and Energy sources LOTO)
- CPR190 Contractor/Visitor requirements
- CPR191 Workplace inspection form – Executive version
- CPR192 F - Approved Contractor Assessment

Attachment 4.4

Site specific Fire Prevention & Emergency Action Plan

Attachment 4.5

Site specific Written Hazard Communication Program

Attachment 4.6

Site specific Lock-out-Tag-out (LOTO) Policy and Procedures

Attachment 4.7

Site specific Disaster Recovery Plan