

Safety & Health Program

Management Commitment

Safety Policy

NMC INDUSTRIES PVT. LTD. places a high value on the safety of its employees. **NMC INDUSTRIES PVT. LTD.** is committed to providing a safe workplace for all employees and has developed this program for injury prevention to involve management, supervisors, and employees in identifying and eliminating hazards that may develop during our work process.

It is the basic safety policy of this company that no task is so important that an employee must violate a safety rule or take a risk of injury or illness in order to get the job done.

Employees are required to comply with all company safety rules and are encouraged to actively participate in identifying ways to make our company a safer place to work.

Supervisors are responsible for the safety of their employees and as a part of their daily duties must check the workplace for unsafe conditions, watch employees for unsafe actions and take prompt action to eliminate any hazards.

Management will do its part by devoting the resources necessary to form a safety committee composed of management and elected employees. We will develop a system for identifying and correcting hazards. We will plan for foreseeable emergencies. We will provide initial and ongoing training for employees and supervisors. And, we will establish a disciplinary policy to insure that company safety policies are followed.

Safety is a team effort – Let us all work together to keep this a safe and healthy workplace.

Safety and Health Responsibilities

Manager Responsibilities

1. Ensure that a plant/store wide safety committee is formed and is carrying out its responsibilities as described in this program.
2. Ensure that sufficient employee time, supervisor support, and funds are budgeted for safety equipment, training and to carry out the safety program.
3. Evaluate supervisors each year to make sure they are carrying out their responsibilities as described in this program.

4. Ensure that incidents are fully investigated and corrective action taken to prevent the hazardous conditions or behaviors from happening again.
5. Ensure that a record of injuries and illnesses is maintained and posted as described in this program.
6. Set a good example by following established safety rules and attending required training.
7. Report unsafe practices or conditions to the supervisor of the area where the hazard was observed.

Supervisor Responsibilities:

1. Ensure that each employee you supervise has received an initial orientation *before* beginning work.
2. Ensure that each employee you supervise is competent or receives training on safe operation of equipment or tasks *before* starting work on that equipment or project.
3. Ensure that each employee receives required personal protective equipment (PPE) *before* starting work on a project requiring PPE.
4. Do a daily walk-around safety-check of the work area. Promptly correct any hazards you find.
5. Observe the employees you supervise working. Promptly correct any unsafe behavior. Provide training and take corrective action as necessary. Document employee evaluations.
6. Set a good example for employees by following safety rules and attending required training.
7. Investigate all incidents in your area and report your findings to management.
8. Talk to management about changes to work practices or equipment that will improve employee safety.

Employee Responsibilities

1. Follow safety rules described in this program, HIOSH safety standards and training you receive.
2. Report unsafe conditions or actions to your supervisor or safety committee representative promptly.
3. Report all injuries to your supervisor promptly regardless of how serious.
4. Report all near-miss incidents to your supervisor promptly.
5. Always use personal protective equipment (PPE) in good working condition where it is required.
6. Do not remove or defeat any safety device or safeguard provided for employee protection.
7. Encourage co-workers by your words and example to use safe work practices on the job.
8. Make suggestions to your supervisor, safety committee representative or management about changes you believe will improve employee safety.

Employee Participation

Safety Committee

We have formed a safety committee to help employees and management work together to identify safety problems, develop solutions, review incident reports and evaluate the effectiveness of our safety program. The committee is made up of management-designated representatives and one employee-elected representative each from the office, factory and outside sales divisions of our company.

- ◆ Employees in each division will elect from among themselves a representative to be on the committee. If there is only one volunteer or nomination, the employees will approve the person by voice vote at a short meeting

called for that purpose. If there is more than one volunteer or nomination, a secret paper ballot will be used to elect the representative.

- ◆ Elected representatives will serve for one year before being re-elected or replaced. If there is a vacancy then an election will be held before the next scheduled meeting to fill the balance of the term.
- ◆ In addition to the employee-elected representatives, management will designate no more than three representatives but a minimum of one who will serve until replaced by management.
- ◆ A chairperson will be selected by majority vote of the committee members each year. If there is a vacancy, the same method will be used to select a replacement.
- ◆ In addition to the committee responsibilities explained above, duties of safety committee members include:
 - A monthly self-inspection of the area they represent
 - Communicating with the employees they represent on safety issues and
 - Encouraging safe work practices among co-workers.
- ◆ The regularly scheduled meeting time is 7:30 am for one hour on the first Thursday of each month, at the employee lunchroom. This may be changed by vote of the committee.
- ◆ A committee member will be designated each month to keep minutes on the attached minutes form. A copy will be posted on the employee bulletin board after each meeting. After being posted for one month, the minutes will be filed for one year. The minutes form contains the basic monthly meeting agenda.

Employee Safety Meetings

All employees are required to attend a monthly safety meeting held on the first Thursday of each month in the lunchroom. This meeting is to help identify safety problems, develop solutions, review incidents reports, provide training and evaluate the effectiveness of our safety program. Minutes will be kept on the attached minutes form. Meeting minutes will be kept on file for one year.

Hazard Recognition

Record Keeping and Review

Employees are required to report any injury or work related illness to their immediate supervisor regardless of how serious. Minor injuries such as cuts and scrapes can be entered on the first aid only log posted ***(Customize by adding location of First Aid Only Log)***. The employee must use an "Employee's Injury/Illness Report Form" to report more serious injuries.

The supervisor will:

- Investigate a serious injury or illness using procedures in the "Incident Investigation" section below.
- Complete an "Incident Investigation Report" form.
- Give the "Employee's Report" and the "Incident Investigation Report".

Incident Investigation

Whenever there is an incident that results in death or serious injuries that have immediate symptoms, a preliminary investigation will be conducted by the immediate supervisor of the injured person(s), a person designated by management, an employee representative of the safety committee, and any other persons whose expertise would help the investigation.

The investigation team will take written statements from witnesses, photograph the incident scene and equipment involved. The team will also document as soon as possible after the incident, the condition of equipment and any anything else in the work area that may be relevant. The team will make a written "Incident Investigation Report" of its findings. The report will include a sequence of events leading up to the incident, conclusions about the incident and any recommendations to prevent a similar incident in the future. The report will be reviewed by the safety committee at its next regularly scheduled meeting.

When a supervisor becomes aware of an employee injury where the injury was not serious enough to warrant a team investigation as described above, the supervisor will write an "Incident Investigation Report" to accompany the "Employee's Injury/Illness Report Form" .

Whenever there is an incident that did not but could have resulted in serious injury to an employee (a *near-miss*), the incident will be investigated by the supervisor or a team depending on the seriousness of the injury that would have occurred.

Safety Inspection Procedures

NMC INDUSTRIES PVT. LTD. is committed to aggressively identifying hazardous conditions and practices which are likely to result in injury or illness to employees. We will take prompt action to eliminate any hazards we find. In addition to reviewing injury records and investigating incidents for their causes, management and the safety committee will regularly check the workplace for hazards as described below:

Site Survey -- an inspection team made up of members of the safety committee will do a wall-to-wall walk through inspection of the entire worksite. They will write down any safety hazards or potential hazards they find. 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 Safety and Health Program.

Periodic Change Survey -- We will assign a supervisor or form a team to look at any changes we make to identify safety issues. Changes include new equipment, changes to production processes or a change to the building structure. A team is made up of maintenance, production, and safety committee representatives. It examines the changed conditions and makes recommendations to eliminate or control any hazards that were or may be created as a result of the change.

Job Hazard Analysis -- As a part of our on-going safety program, we will use a "Job Hazard Analysis" form to look at each type of job task our employees do. This analysis will be done by the supervisor of that job task or a member of the safety committee. We will change how the job is done as needed to eliminate or control any hazards. We will also check to see if the employee needs to use personal protective equipment (PPE) while doing the job. Employees will be trained in the revised operation and to use any required PPE. The results will be reported to the safety

committee. Each job task will be analyzed at least once every two years, whenever there is a change in how the task is done or if there is a serious injury while doing the task.

Hazard Prevention and Control

Eliminating Workplace Hazards

NMC INDUSTRIES PVT. LTD. is committed to eliminating or controlling workplace hazards that could cause injury or illness to our employees. We will meet the requirements of state safety standards where there are specific rules about a hazard or potential hazard in our workplace. Whenever possible we will design our facilities and equipment to eliminate employee exposure to hazards. Where these engineering controls are not possible, we will write work rules that effectively prevent employee exposure to the hazard. When the above methods of control are not possible or are not fully effective we will require employees to use personal protective equipment (PPE) such as safety glasses, hearing protection, foot protection etc.

Basic Safety Rules

The following basic safety rules have been established to help make our company a safe and efficient place to work. These rules are in addition to safety rules that must be followed when doing particular jobs or operating certain equipment. Those rules are listed elsewhere in this program. Failure to comply with these rules will result in disciplinary action.

- Never do anything that is unsafe in order to get the job done. If a job is unsafe, report it to your supervisor or safety committee representative. We will find a safer way to do that job.
- Do not remove or disable any safety device! Keep guards in place at all times on operating machinery.
- Never operate a piece of equipment unless you have been trained and are authorized.
- Use your personal protective equipment whenever it is required.
- Obey all safety warning signs.
- Working under the influence of alcohol or illegal drugs or using them at work is prohibited.
- Do not bring firearms or explosives onto company property.
- Smoking is not permitted outside the building away from any entry or ventilation intake.
- Running and fighting are prohibited
- Clean up spills immediately. Replace all tools and supplies after use. Do not allow scraps to accumulate where they will become a hazard. Good housekeeping helps prevent injuries.

Job Related Safety Rules

We have established safety rules and personal protective equipment (PPE) requirements based upon a hazard assessment for each task listed below:

Work in or pass through any production area

Required PPE:

- Safety glasses. Check prior to use for broken or missing components (such as side shields) and for scratched lenses.

Work Rules:

- Walk within marked aisles.
- Do not distract or talk with employees when they are using a machine.

Work with Ladders: All locations

Required PPE:

- Full body harness when working at greater than 25' and both hands must be used to do the job. See the fall protection plan instructions described elsewhere in this program

Work Rules:

- Before you use a ladder check it for defects such as loose joints, grease on steps, or missing rubber feet.
- Do not paint a ladder! You may hide a defect.
- Do not use a ladder as a brace, workbench or for any other purpose than climbing.
- Do not carry objects up or down a ladder if it will prevent you from using both hands to climb.
- Always face the ladder when climbing up or down.
- If you must place a ladder at a doorway, barricade the door to prevent its use and post a sign.
- Only one person is allowed on a ladder at a time.
- Always keep both feet on the ladder rungs except while climbing. Do not step sideways from an unsecured ladder onto another object.
- If you use a ladder to get to a roof or platform, the ladder must extend at least 3' above the landing and be secured at the top and bottom.
- Do not lean a step ladder against a wall and use it as a single ladder. Always unfold the ladder and lock the spreaders.
- Do not stand on the top step of a step ladder.

Set a single or extension ladder with the base 1/4 of the working ladder length away from the support.

Lifting Tasks:

Required PPE:

- Hand gloves – for sharp objects or surfaces

- Steel toe safety shoes in production and shipping areas (to be supplied by the employee) must be in good condition.

Work Rules:

- Do not lift on slippery surfaces.
- Test the load before doing the lift.
- Get help if the load is too heavy or awkward to lift alone.
- Break the load down into smaller components if possible to provide a comfortable lift.
- Do not overexert!
- Make sure you have a good handhold on the load.
- Do not jerk the load or speed up. Lift the load in a smooth and controlled manner.
- Do not twist while lifting (especially with a heavy load). Turn and take a step.
- Keep the load close to the body. Walk as close as possible to the load. Pull the load towards you before lifting if necessary.
- Avoid long forward reaches to lift over an obstruction.
- Avoid bending your back backwards to lift or place items above your shoulder. Use a step stool or platform
- Do not lift while in an awkward position.
- Use a mechanical device such as a forklift, hoist, hand truck or elevatable table whenever possible to do the lift or to bring the load up between the knees and waist before you lift.
- Back injury claims are painful for the worker and expensive for the company. Lift safely!

Disciplinary Policy

Employees are expected to use good judgment when doing their work and to follow established safety rules. We have established a disciplinary policy to provide appropriate consequences for failure to follow safety rules. This policy is designed not so much to punish as to bring unacceptable behavior to the employee's attention in a way that the employee will be motivated to make corrections. The following consequences apply to the violation of the same rule or the same unacceptable behavior:

First Instance -- verbal warning, notation in employee file, and instruction on proper actions

Second Instance -- 1 day suspension and instruction on proper actions

Third Instance -- 1 week suspension and instruction on proper actions

Fourth Instance -- Termination of employment.

An employee may be subject to immediate termination when a safety violation places the employee or co-workers at risk of permanent disability or death.

Equipment Maintenance

The machinery and equipment that must be inspected or serviced on a routine basis. A checklist/record to document the maintenance items will be maintained and kept on file for the life of the equipment.

Emergency Planning

What will we do in an emergency?

In case of fire

An evacuation map for the building is posted. It shows the location of exits, fire extinguishers, first aid kits, and where to assemble outside. All employees will receive training on how to use of fire extinguishers as part of their initial orientation. A fire evacuation drill will be conducted once a year

- If you discover a fire: Tell another person immediately. Call or have them call Fire Department and a supervisor.
- If the fire is small (such as a wastebasket fire) and there is minimal smoke, you may try to put it out with a fire extinguisher.
- If the fire grows or there is thick smoke, do not continue to fight the fire.
- Tell other employees in the area to evacuate.
- Go to the designated assembly point outside.
- If you are a supervisor notified of a fire in your area: Tell your employees to evacuate to the designated assembly location. Check that all employees have been evacuated from your area.
- Verify that Fire Department has been called.
- Determine if the fire has been extinguished. If the fire has grown or there is thick smoke, evacuate any employees trying to fight the fire.
- Tell supervisors in other areas to evacuate the building.

- Go to the designated assembly point and check that all your employees are accounted for. If an employee is missing, *do not* re-enter the building! Notify the responding fire personnel that an employee is missing and may be in the building.

In case of earthquake

In case of Earthquake, there will be no advance warning. The shock will be your only warning. An earthquake drill will be conducted each year during the first week of September. In the event of an earthquake:

If you are inside a building:

- Drop under a desk or table, cover your head and hold on. Stay away from windows, heavy cabinets, bookcases or glass dividers.
- When the shaking stops, all must check for damage and available evacuation routes then begin an evacuation of their area to the designated assembly location.
- Evacuation should proceed as quickly as possible since there may be aftershocks.
- Supervisors must account for each employee in their work group as quickly as possible.
- First aid certified employees should check for injuries and help evacuate injured employees. Do not attempt to move seriously injured persons unless they are in immediate danger of further injury.
- If a gas odor is in the building, tell a supervisor to turn off the gas at the main. Open windows.
- Supervisors and first aid employees must not re-enter the building once evacuation is complete.
- Do not approach or touch downed power lines or objects touched by downed power lines.
- Do not use the phone except for emergency use.
- Turn on a radio and listen for public safety instructions.

If you are outside: Stand away from buildings, trees, telephone and electric lines.

If you are on the road: Drive away from underpasses/overpasses. Stop in a safe area. Stay in the vehicle.

If an injury occurs

- A first aid kit is kept near exit points.
- In case of serious injury, do not move the injured person unless absolutely necessary. Only provide assistance to the level of your training. Call for help. If there is no response, call Ambulance.