



Hudson

Technologies

Safety Program

In compliance with

OSHA CFR 1910

Occupational Safety and Health Administration
Code of Federal Regulations 1910

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The safety, health and well-being of all employees are of major importance to the management of Hudson Technologies. We believe that each individual working within the company deserves to have a healthy working environment and will accept personal responsibility for their safety and the safety of fellow employees.

To assist all employees, the company provides education and training programs with sufficient resources to assure protection of all individuals and company materials, equipment and facilities.

All employees are required to assist in the detection of hazards, reporting unsafe conditions and procedures, and to follow the established safe work practices. Each employee is responsible to communicate to their supervisor conditions or procedures that they cannot correct. Employees will NOT be disciplined for reporting these conditions.

Safety is a part of every operation and we believe that every job can and will be done safely. Safety is equal in importance to productivity, quality, customer satisfaction, and personal affiliations.

The success of our safety efforts will depend on the awareness and commitment of each and every one of you. We are all expected to participate in our company's safety and health processes, and strive to assure a safe and healthful working environment. Only through this cooperation can our goal of zero accidents and injuries be reached.

Thank you for your support, participation and cooperation!

A handwritten signature in black ink, appearing to read 'Bret Schmitz', is written over a horizontal line. The signature is fluid and cursive.

Bret Schmitz, President

II. MANAGEMENT COMMITMENT

We at Hudson Technologies, take our employees' health and safety seriously. This Safety Program is designed to inform you of our expectations for all employees, the procedures we take in the event of an incident and the OSHA programs we follow in this facility. It is intended to ensure compliance with the Occupational Safety and Health Administration (OSHA) regulations and standards.

We are dedicated to maintain a safe and injury/illness free environment for all employees, vendors and guests; as well as, an open safety culture.

A. OBJECTIVE

It is company policy that accident/injury prevention be a prime concern of all employees. This includes the safety and well-being of our employees, subcontractors, and customers; including, the prevention of wasteful, inefficient operations, and damage to property and equipment.

B. APPLICATION

The Safety Program and OSHA regulations apply to all employees of Hudson Technologies, all subcontractors and anyone who is on company site. Furthermore, the program is geared towards keeping all employees informed of what Hudson Technologies ensures in regards to safety.

C. SAFETY COMMITTEE

i. PURPOSE

The Safety Committees purpose is to provide a positive safety environment to all employees, make safety an ever evolving entity and provide recommendations to all departments.

1. RESPONSIBILITY

The Safety Committee is responsible for:

- Identifying situations and hazards that may be unsafe for workers
- Recommending effective systems to respond to those problems
- Monitoring the effectiveness of safety programs and systems

- Advising management on proposed changes to the workplace or work processes that may affect worker health and safety
- Ensuring regular workplace inspections are carried out
- Participating in investigations of accidents and/or incidents
- Revising and supervising all safety related training

The Safety Committee is **not** responsible for:

- Administering the disciplinary policy to employees that violate the safety program

2. STRUCTURE

a. Membership

The Safety Committee is comprised of representatives from each process, ranging from all levels of leadership. Members of the Safety Committee will choose an employee from his/her department to become a member. Chosen members may decline participation if they so choose; the safety committee is a volunteer initiative. Committee members will follow these criteria when choosing a new member:

- Ability to get the job done
- Knowledge of various work processes
- Ability to work cooperatively with others
- Has shown an interest in advancing Hudson's Safety Programs

Term of membership is quarterly for line staff; some top management representatives are not rotated.

If there is a safety intern, he/she will be the head of the safety committee. If there is no safety intern, the safety committee can select a leader among themselves.

Here is an example of Safety Committee members:

- Safety Committee Leader
- Management representative
- 2nd Site Leader
- Human Resources representative
- Maintenance Team Leader
- Employee representative from HMP
- Employee representative from HCP
- Employee representative from HPD

*Safety Committee is not required to follow this example, but they are required to have an equal representation of employees.

b. Safety Committee Leader

The Safety Committee Leader is in charge of the committee. He/she may be the safety intern (unless otherwise decided by management) if one is present at Hudson Technologies. Furthermore, only employees that are a part of management or the safety intern may be chosen for the position.

The Safety Committee Leader is responsible for:

- Updating and keeping track of all safety data
 - Incident Report Log
 - Press and Die Crash Log
 - Audits
- Attending and opening every safety committee meeting
 - Producing the Meeting Minutes
 - Making sure everyone signs the attendance roster
- Disseminating projects to safety committee members
 - Holding members accountable
- Motivating safety committee members to improve the safety culture in the plant

The Safety Committee Leader is not responsible for filing OSHA recordables. However, he/she must keep track of all incidents, including the recordables, for statistical purposes. Only the Safety Committee Leader may make changes to the safety data. However, he/she may appoint an assist and give said person administrative control.

3. SAFETY CULTURE

a. Huddle

Before the start of each shift, we have a 10 minute stretching exercise with all employees in each department. We also recommend our employees to use their 10 minute breaks to stretch or even walk around. These practices assist in preventing any strains that might accumulate because of the nature of their operations.

b. Safety Suggestions

If any employees would like to make a suggestion regarding the safety program or would like to inform the Safety Committee an occurrence, they may fill out a *Safety Suggestion Slip*.

The Safety Committee uses these slips to understand what issues the employees are noticing in the plant. During their weekly meetings, the Safety Committee goes over the safety suggestions deliberates on how to correct the issues.

Any employee may write a suggestion; there are no restrictions. If an employee wishes to remain unknown, they have the right to write an anonymous suggestion. Also, an employee may request to receive feedback if they so choose.

c. Audits

At the beginning of each quarter, the Safety Committee may walk the plant floor and perform an inspection/audit. The purpose of an audit is to check how employees and management are performing in their roles in safety. It also allows the Safety Committee to see what the department is lacking and/or accomplishing. Finally, the audits help the committee locate any unsafe conditions in the plant that might have been overlooked.

All members will be split into groups of two or three and inspect their assigned quadrant of the plant. Each group is not required to possess a member from the inspected quadrant. The groups shall record their findings on the audit form of their quadrant. At the end of the inspection, each group will give their completed audit form to the Safety Committee Leader. The leader will then record the information and prepare a discussion for the next meeting.

d. Rewards

Here at Hudson, we show our employees our gratitude for being safety-conscious by giving them prizes. These are the incentives we currently do:

- If Hudson Technologies has zero OSHA recordable injuries in 90 consecutive days, each employee will get a onetime \$50 cash bonus. If during the following 90 days, there are again no OSHA recordable injuries, employees will receive a \$75 cash bonus. Every 90 additional days without an OSHA recordable employees will receive a \$75 cash bonus.

- Occasionally, the safety suggestions may also double as a raffle. Therefore, if an employee turns in a safety suggestion, he/she may be in the running for a purchase prize.

Employees are more than welcome to suggest other reward ideas.

III. EMPLOYEE RESPONSIBILITIES

A. SAFETY RULES AND EXPECTATIONS

Safety is our #1 priority and it requires awareness, commitment and discipline from each and every one of us. The following safety rules and expectations are mandatory for the safety of all Hudson Technologies employees and must be followed at all times.

- ✓ Steel Toed shoes are required inside the yellow lines of the production area
 - Hudson Technologies will reimburse the employee 60% of the cost up to \$40 annually for the purchase of steel-toed safety shoes. Employee must provide a purchase receipt with a tag from the shoe or box for accounting purposes.
- ✓ OSHA approved safety glasses and prescription safety glasses with side shields:
 - Are required on the production floor
 - Must meet Z87 requirements
 - Can be tinted, but not mirrored
 - Wearer's eyes must be clearly visible to an observer; except in the visual inspection areas
 - Hudson Technologies will provide non-prescription Z87 compliant safety glasses to all employees.
 - Hudson Technologies will reimburse the employee up to \$100 annually for the purchase of OSHA approved Z87 compliant prescription safety glasses with side shields. The frames and lens must both meet Z87 requirements. Proof of purchase and of OSHA compliance must be provided to Human Resources for reimbursement.
- ✓ Ear plugs are recommended everywhere, but are mandatory in posted areas
- ✓ Cut resistant gloves and arm protection are required in strip fed and trim operations
- ✓ Hair must be worn above shoulder length while inside the yellow lines
- ✓ Beards must be worn no longer than 3 inches while inside the yellow lines
- ✓ No loose fitting watches or bracelets will be worn while working machinery
- ✓ No rings will be worn while working machinery
- ✓ Stud and small hoop earrings may be worn, no larger than 1 inch in diameter

If an employee, contractor, or anyone on the jobsite commits a safety violation they are subject to immediate termination; depending on the severity of the incident.

B. *HOUSEKEEPING

Good housekeeping is a fundamental part of employee safety. Every employee must follow these steps at the end of their shift or when their job is completed:

*Subject to change

1. Check under press/belt for any additional parts.
2. Remove/empty all scrap, slugs, misc. from under and around machine and place in the appropriate labeled collection bins.
3. Wipe up excess lube/oil from work surfaces (to include: hand buttons, shields, belts, chairs, etc).
4. Place used rags in proper collection bins.
5. Dispose of all unneeded items (used gloves, extra ID sheets, etc).
6. Sweep & mop the immediate work area, including walkways around machine.
7. Check mop and water after use clean/dirty – replace if needed.
8. Return lube to correct identified storage area when job is complete.
9. Return clean empty totes to Blank & Draw area.

IV. PROCEDURES

This section is to inform all employees of what procedure they must follow in case of an emergency. These are in place, not only to inform employees, but also to improve the company's Safety Data. This data allows us to understand what the real issues are and how we may combat them. If you have any questions, please do not hesitate to contact your Team Leader or HR representative for assistance.

A. ACCIDENT AND INCIDENT INVESTIGATIONS

i. DEFINITIONS

Accident: An undesired event that results in personal injury or property damage.

Incident: An unplanned, undesired event that adversely affects completion of a task.

Near Miss: Incidents where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or injury easily could have occurred.

Press and Die Crash: Any instance where the punch makes contact with the die is considered as a ***near miss***. Including any double or greater; where the part gets punched more than once on the die.

Not a die crash: If the punch crushes the can and the die has not been touched.

Emergency: An unforeseen combination of circumstances or the resulting state that calls for immediate assistance or relief.

First Responder: Employees trained and certified to respond to accidents, incidents and emergencies involving Hudson Technologies employees.

Occupational Safety and Health Administration (OSHA): Is a federal organization (part of the Department of Labor) that ensures safe and healthy working conditions for Americans by enforcing standards and providing workplace safety training.

ii. REPORTING PROCESS

a. Incident/Accident

This procedure is applicable to injuries that only need basic first aid treatment; anything beyond that is stated under the **Medical Intervention** bullet.

If an employee is injured, a first responder must be contacted immediately. Once the responder arrives, he/she must treat the injury by using supplies in the Fastenal Vending Machines. The first responder must also fill out the ***Incident Identification Report*** form that is included with the supplies. We ask first responders to fill out this form to the best of their ability.

Once completed, the first responder must give the form to the Human Resources director as soon as possible. Human resources needs the incident report for reporting to the state, as well as to report to insurance. Human resources manages the cases with Gallagher/Bassett and reports to JSJ at JSJ structured schedules. Human resources will provide a copy of the incident report in a timely manner to the head of the safety committee for review and data entry.

In the event that a contract employee is involved in an incident/accident, Hudson Technologies will notify the staffing agency as soon as possible.

The staffing agency will be responsible for transportation and management of the case.

b. Press and Die Crashes

In the event of a Press and Die Crash, all employees must follow these procedures; depending on their job title:

- Die Setter/Press Operator:
 1. Lock out the machine
 2. Contact your Team Leader immediately
 3. Answer any questions he/she asks you about the incident
- Team Leader:
 1. Retrieve the Press and Die Crash form from your Safety Binder
 2. Gather the Investigation Team:
 - Production Representative
 - Tool room Representative
 - Maintenance Representative
 3. Investigate the incident
 4. Fill out all the information as best as possible
 5. Once completed, pass the form to the Safety Committee Chair so he/she may record the data.

c. Medical Intervention

The purpose of this policy is to provide the First Responder with a specific process in the event of an incident, accident and/or emergency situation involving treatment and/or transportation to a medical facility.

If it has been determined that an ambulance is necessary for medical treatment, First Responders must immediately call 911 and provide appropriate treatment until EMT's/ambulance arrives.

A medical authorization must be provided to EMT's authorizing treatment and a drug and alcohol screen at the time of ambulance transportation by the First Responder. Signed, **Medical Authorization** forms can be found in all First Responder boxes located throughout the plant.

If it has been determined that an ambulance is not necessary but medical treatment is warranted beyond what a Hudson First Responder can administer, transportation of the injured employee must be provided by a

First Responder, Team Leader or Site Leader. A *Medical Authorization* form must be provided to the medial facility authorizing medical treatment and a drug and alcohol screen.

All incidents and accidents must be reported at the time the incident or accident occurs to management.

ALL transportation of employees who have sustained an injury will be handled by an EMT called by Hudson or by a certified First Responder, Site Leader, or Team Leader. At no time is it permissible for an employee to provide their own transportation to a medical facility.

All sections of the Injury/Incident Investigation Report must be completed the same day as the accident – immediately when possible and in no case later than 24 hours after the incident is reported. Applicable OSHA and state worker's compensation reporting requirements must also be followed.

Copies of the Injury/Incident Investigation form are located under the Safety Tab in the Hudson Intranet. The form shall be completed by the Team Leader, First Responder and/or the Site Leader. Once complete, the form must be given to Human Resources. The Human Resources representative will then forward the information to the Safety Committee Chair so the Safety Committee may review the incident.

The investigation process will require the time of the injured employee, his/her Team Leader, the Safety Committee and the Human Resources Manager. In most cases, the information can be acquired through an interview conducted by the manager.

If the injury or illness requires professional medical treatment, this treatment must be coordinated through the Human Resources department and Hudson Technologies Worker's Compensation insurance carrier.

Incident review sessions are required for all OSHA recordable accidents indicating date, time, nature of accident, body part affected, what act/condition caused the accident, and corrective actions recommended preventing a similar accident from occurring. The counseling session will include the injured employee and will be signed off by the Operations Director and Human Resources. The incident review session form must be turned into HR to become part of their personnel file (counseling form can be accessed in "Forms and Applications" under HR tab of Intranet).

iii. NOTIFICATIONS

a. In Case of Inspection by OSHA Inspector

All guests must enter Hudson through the front entrance. Employees cannot open the side doors for anyone without a badge; they must be redirected to the front entrance. The inspector will then be escorted by members of management throughout the building. Employees have the right to participate and cooperate in an inspection. If an employee wishes to join in the investigation, they must first ask their Team Leader. Employees also have the right to ask the inspector questions if they so choose.

B. EMERGENCY/ENVIRONMENTAL PLANS

The Blood borne Pathogen Plan, Disaster Preparedness Plan and the Emergency Response Map are located in the Hudson Intranet site under EMERGENCY/ENVIRO PLANS.

V. OCCUPATIONAL HEALTH AND SAFETY PROGRAMS

The purpose of an Occupational Health and Safety (OHS) program is to prevent injuries, occupational diseases and to deal effectively with accidents or incidents that occur. Only the maintenance team deals with the majority of these programs. Even so, all employees, contractors, vendors, and guests must follow the OHS programs. The following are OHS programs that Hudson possesses:

- Hazard communication (Hazcomm)
- Personal protective equipment (PPE)
- Lockout/tag out
- Powered truck operations
- Hearing conservation
- Confined space entry
- Respiratory
- Fall protection
- Electrical

Hazcomm, Hearing conservation, Confined Space Entry, Lock out/Tag out, and the Respiratory Program is located in the Hudson Intranet site under EMERGENCY/ENVIRO PLANS. PPE training documents are located in the SHARE drive; all employees must follow this program. If any employees are interested in the Powered Truck, fall protection, and Electrical programs, they

may contact the Maintenance Team Coordinator. Lastly, contractors must fill out a liability waiver before working in the building.