

ASSIGNMENT OF RESPONSIBILITIES

General

Management must show its support of the company safety programs and the importance of emergency planning. In an effort to ensure Apple Rubber Products has the highest safety standards all levels of management must see to it that all employees comply with the company Safety Program and Safety Rules.

In an effort to draw management's attention toward safety concerns, a safety suggestion box has been installed at each facility. All employees should feel free to express any safety concerns they may have. All suggestions will be brought to the attention of management and the safety committee.

Loss Time Control Elements

Loss Time control programs and the control of related costs to the company and employee show that successful plans are built around ten elements. These elements are what Apple Rubber Products Inc. has based its safety program on.

1. Management leadership and responsibility toward the program.
2. Assignment of responsibility to Management, Safety Administrator, Safety Committee and supervision for fulfillment of the program.
3. Establishment of a safe working environment.
4. Scheduled safety inspection to maintain a safe workplace.
5. An effective maintenance program.
6. A good system for investigating and analyzing accidents.
7. Records maintained to measure accomplishments and goals.
8. Arrange for effective first aid treatment and transportation to medical facilities.
9. A system for placing, job training and motivating workers.
10. Establishment of safety training.

Based on these elements of successful loss time control programs, the following assignment of responsibilities is defined:

Management/Safety Administrators, Committee

- a. Provide leadership in establishing and promoting the success of the loss control program.
- b. Safety Administrators, under management direction will coordinate the safety program, maintain records, and complete the OSHA 200 and 300 log and provide assistance on all safety activities.
- c. Human Resource Manager, will complete C-2 and C-11 forms. Along with safety coordinator, prepare safety notices and provide assistance on safety related activities.
- d. Provide for engineering controls and personal protective equipment.
- e. Support a loss time control program by assigning responsibilities and authority to Safety Director of the program.
- f. Effective training of those assigned to be responsible for the program to enable them to fulfill their safety responsibilities.
- g. Support procedures for training and motivation of workers.
- h. Direct, coordinate and promote the success of loss time control activities in company facilities.
- i. Provide and maintain a safe and healthful work environment consistent with applicable safety codes and standards.
- j. Develop a positive philosophy and attitude among supervision concerning the importance of loss time control activities.
- k. Effect periodic audits of the implementation of safety policy, programs, and procedures.
- l. Participate in the loss time control program by attendance at safety meetings, being concerned with removal of major causes of accidents within the company and continued support of all areas concerning safety.

Supervision

- a. Set safety examples
- b. Maintain a safe, healthful, clean and orderly work environment.
- c. Ensure the use of personal protective equipment and devices with the necessary training to ensure the proper use of it.
- d. Instruct employees in job hazards and prescribe safe work practices.
- e. Enforce safe work rules, safe work practices, and use of personal protective equipment.
- f. Inspect for unsafe physical conditions and unsafe employee work practices.
- g. Along with the Accident Investigation Committee investigating accidents in their immediate department and promptly correct causes.

Employees

- a. Maintain work area in a clean, orderly condition.
- b. Follow safety rules, regulations, and procedures.
- c. Report all accident and injuries, no matter how minor, to their supervisor.
- d. Use personal protective equipment as instructed.
- e. Submit suggestions for improving the safety and health conditions of the work environment.
- f. Contact a member of the Safety Committee with any safety-related concerns.

Specific Responsibilities and Disciplinary Action

1. The following persons are responsible for the coordination and implementation.
 - A. President
 - B. Safety Health & Environmental Manager
 - C. Safety Administrators
2. It is imperative that all personnel become thoroughly familiar with and comply with the following safety rules. Failure to comply with these rules may result in immediate termination of employment or a notice of discipline to be entered into an individual's personnel file. Three (3) such notices during a twelve- (12) month period may result in the termination of employment.
 1. All production and warehouse personnel in designated areas at all time will wear steel toed safety shoes.
 2. Proper clothing shall be worn at all times. This includes no loose clothing, jewelry or long hair in a down position where there is danger of catching such articles in moving machinery.
 3. Horseplay, running, fighting or any activity that may result in injury or waste will not be tolerated.
 4. Eye protection to be worn in designated areas at all times.
 5. Operate machinery with all guards in place. Tampering with safety devices may result in termination of employment for a first offense.
 6. Do not operate any machinery with which you are not familiar.
 7. Machines must never be cleaned, adjusted, or repaired until after machine is turned off, the circuit is broken at the power source and a warning tag is placed at the controls (lockout). Each person involved in maintenance must have his or her own padlock to ensure total lock out of power until all work has been completed.
 8. Any defect in materials, machinery, tools and equipment must be reported to a supervisor immediately. Do not leave tools, materials or other objects on the floor, which might cause others to trip and fall.

9. Do not block exits, fire doors, aisles, fire extinguishers, gas meters, electrical panels or traffic lanes.
10. Avoid risk of rupture, internal injury or back injury in attempting to lift or push excessive loads. If an object is too heavy to move without straining, ask for help.
11. Observe the correct position for lifting. Stand with your feet slightly apart, assume a squatting position with knees bent and tuck your chin. Tilt head forward, grasp the load with both hands and gradually push up with your leg, keeping your back straight and avoiding any abrupt movement.
12. Do not distract others while working. When approaching a machine operator for any purpose, do so from the front or the side in a way that he or she will see you coming and not be shocked or surprised. If conversation is necessary, first make sure the machine is turned off.
13. Do not allow oil, wax, water or any other materials to remain on the floor where you or others may slip. Report any large spills to your supervisor immediately. Clean up any lesser spills properly.
14. When handling hazardous materials, follow the prescribed safety procedures and use required safety equipment. When using secondary containers filled by others, ensure that they are labeled as to their contents and hazards.
15. Use appropriate gloves when handling materials with sharp or jagged edges, which may result in lacerations.
16. Do not attempt to operate machinery for which you have not been properly trained.
17. Unnecessary and excessive haste is the cause of many accidents. Exercise caution at all times.
18. The use of hot production equipment for the purpose of cooking or heating food is strictly prohibited.
19. All work related injuries and accidents, no matter how minor must be reported immediately or within 24 hours to your Supervisor, Human Resource Manager, Safety Director or Plant Manager.
20. Smoking in an unauthorized area or at an unauthorized time is prohibited.

21. The use of, possession of, distribution of, sale of or offering for sale any controlled substance and/or Marijuana in any form. Violation of this rule may result in termination of employment for a first offense.
22. Possession of, drinking of, or presence of persons under the influence of liquor or any alcoholic beverage on company property at any time is strictly prohibited. The only exception shall be if authorized by management for a specific occasion or event.
23. The use of any type of medication, prescription or over the counter that may affect the employee's alertness or ability to function properly must be reported to the employee's immediate supervisor.
24. All unauthorized employees are forbidden to tamper with or work on electrical apparatus.
25. All unauthorized employees are forbidden to enter an electrical distribution center.
26. No electrical cord shall be spliced.
27. Covers must always be replaced on junction boxes, switch panels, etc. after work is completed or if you leave that job for any reason.
28. Observe all hazard warnings and follow all guidelines regarding hazard warnings.
29. Be sure your work area is maintained in a clean and orderly manner as to avoid accident or injury.
30. Sandals and open toed shoes should not be worn in the Inspection, Sampling or Injection Molding Departments.
31. No personal, non-Apple related work will be allowed at any company facility without the express permission of the Company President.
32. No one is permitted to work alone at any company facility if the job involves the use of machinery, power tools, electrical repairs, plant equipment and chemical testing. Computers, lab testing equipment and lab inspection equipment are NOT included in this prohibition.

33. The use or possession of any weapons, including but not limited to guns, asp, batons, stun gun, taser, mace, pepper spray, or knives with a blade longer than 3.5 inches on company property at any time is strictly prohibited. The only exception shall be if authorized by management or the company president.

Accident Prevention/Control

Safe Working Conditions – General

The maintenance of safe working condition has great potential for preventing accidents. The ultimate goal is to design equipment; work processes and jobs so that exposures to accidental damage or injury are controlled as completely as possible.

A. Requirements

1. Management/Safety Administrator, Committee

- a. In order to eliminate work-related accidents, Management, Safety Administrator and Safety Committee must control working conditions. This can be done through adequate housekeeping, preventive maintenance, continual upgrading of conditions, specification of safety features in purchase specifications and a work place inspection program.
- b. Management, Safety Administrator, and Safety Committee are required to review and recommend solutions to safety hazards noted on safety inspection reports.
- c. They may assist supervision by supporting efforts to correct the hazard, but supervision will not be bypassed. Supervision, not the Safety Administrator, is responsible for making corrective action work properly.
- d. Management, Safety Administrator, and Safety Committee have the responsibility to devise specific procedures for control of hazardous conditions, changes in requirements, standards, etc.

2. Supervision

- a. Supervision is required to control the equipment, material and people within their assigned area in order to prevent employee injury or property damage.

- b. Supervision shall make periodic inspections to locate any deficiencies and effect corrective action.

B. Unsafe Conditions – Priorities

The varying nature of unsafe conditions requires a means of establishing procedures for control. Safety deficiencies will be assigned a priority for control in accordance with the degree of hazard.

1. Safety Stop Order

- a. A Safety Stop Order is a statement from management, Safety Administrator or Safety committee directing an immediate halt of an operation or process where imminent danger jeopardizes the health or safety of an employee or presents significant property damage potential. In the absence of, or the reasonable availability of management, Safety Administrator, or Safety Committee, supervision may decree the stopping of an operation or process. In the event of an injury or accident as the direct result of a certain operation or process, the Accident Investigation Committee may issue a Safety Stop Order.
- b. When a Safety Stop Order is issued, DANGER TAGS and appropriate lockouts will be attached to affected equipment to prevent its use until the unsafe condition has been corrected. Under no circumstances may equipment affixed with a DANGER TAG be operated. Violation of this will be considered grounds for termination. Management, Safety Administrator, Safety Committee or Accident Investigation Committee has the final authority for placement and removal of the DANGER TAG.
- c. In the absence of Management, Safety Administrator, Safety Committee, or Accident Investigation Committee, Supervision may remove the DANGER TAG with the advice and consent of the above only after corrective action has been taken.
- d. The use of a DANGER TAG for any purpose other than the described above is prohibited.
- e. Whenever a Safety Stop Order is issued, all parties affected shall be notified immediately.

Accident Investigation – General

An industrial accident or incident is any unexpected occurrence that interrupts or interferes with the orderly progress of work. Accidents do not necessarily involve injuries, but usually involve added costs and is an indication that something has gone wrong. Therefore, it is desirable to have the Accident Investigation Committee investigate every accident or incident that might or did cause personal injury, property damage, or interruption of normal operations.

A. Accident Investigation Committee – Purpose

1. To find and correct conditions responsible for accident losses of any nature.
2. To increase Supervisions sense of responsibility for controlling accidents in their area.
3. To help Supervision learn about the kinds of conditions that must be controlled in order to prevent accidents before they occur.
4. To provide a continuing record of facts that can be usefully analyzed for trends in areas of common recurrence.

B. Responsibilities

1. Accident Investigation Committee/Supervision

The Accident Investigation Committee along with the Department Supervisor shall have the primary responsibility for investigating and correcting conditions causing accidents. Their responsibilities specifically include:

- a. Conducting a thorough investigation of all accidents.
- b. Forwarding a report of their findings to the Safety Coordinator no later than 24 hours from the date and time of accident.
- c. Recommending or taking action to correct conditions needing attention.
- d. Contacting the Safety Health & Environmental Manager or Safety Director for assistance when necessary.

2. Management / Safety Administrator

Each Accident/Incident investigation report shall be reviewed by the above listed. Their duties are:

- a. Returning unsatisfactory investigation reports to supervision for completion.
- b. Coordinate and follow up on any actions necessary to ensure that causes are corrected.
- c. Offering assistance to Supervision as required. In no case, however, shall management or Safety Administrator perform the investigation for the accident Investigation Committee or Supervision.
- d. Check other areas where similar causes might exist.
- e. Adding their comments and suggestions directly to the Accident Investigation report.
- f. Using the data contained in these reports to help determine the remedy of employee injuries.
- g. Training supervision in conducting comprehensive investigations.

C. Process

It is the Company's policy to carry out a thorough program of accident investigation. The following procedures have been found to be effective doing this:

- a. **GO** to the scene of the accident at once.
- b. **TALK** to witnesses or injured person if possible. Stress getting the facts, not placing the blame.
- c. **LISTEN** for clues in the conversations around you. Unsolicited comments often have merit.
- d. **ENCOURAGE** people to give their ideas for preventing similar accidents.
- e. **STUDY** possible causes – unsafe conditions, unsafe practices.
- f. **CONFER** with interested persons about possible solutions.

- g. **WRITE** the report giving an accurate account.
- h. **FOLLOW UP** to ensure conditions is corrected.
- i. **PUBLICIZE** corrective action so that all may benefit.

D. Required Reports

1. An investigation by the Accident Investigation Committee is required for any accident, which results in:
 - a. Injury to an employee requiring medical treatment or diagnosis.
 - b. Fire of any size, regardless of whether it results in injury to employees.
 - c. Property damage in excess of \$1,000.00.
 - d. Release of, exposure to or mishandling of any hazardous substance.
2. When, in unusual circumstances, an investigation cannot be completed within 24 hours, a preliminary report shall be made. This will be followed by the completed report as soon thereafter as conditions permit. The Accident Investigation Committee will indicate when the complete report will follow.
3. In order for the Report to be effective, it should contain at a minimum, a detailed answer to the following questions:
 - a. What was the employee doing? Explain in detail the activity of the employee at the time of the accident.
 - b. What Happened? Indicate in detail what took place; describe the accident, the type of injury, the part or parts of the body affected and whether the employee was wearing appropriate safety equipment.
 - c. What Caused the Accident? Explain in detail the condition, act, malfunction, etc. that caused the accident. Remember that it is possible to have more than one reason or cause for an accident.
 - d. What can be done to prevent a similar accident? Indicate corrective action to prevent recurrence.

II Scheduled Inspections – General

Inspections work because they are an essential part of hazard control. It is an important management tool. Inspections will be viewed as a fact-finding process, not one of fault finding. Locating potential hazards that can adversely affect health and safety will be emphasized.

All personnel shall be responsible for continuous, on going informal inspections of the workplace. When uncovered, potentially hazardous, unsafe and unhealthy conditions shall be corrected in a timely manner based on the severity of the hazard.

Management, Safety Administrator and Supervision shall develop an atmosphere and provisions, which encourage employees to inform them of hazards at the work place without fear of reprisal.

Safety Committee members will conduct formal inspection of work areas on a scheduled basis. This inspection will be documented on a standard form (See sample form in separate binder “Self Inspection Checklist”) and corrective action will be initiated by supervision and maintenance personnel. It is the responsibility of Management and the Safety Administrator to review these inspection reports to assure that the same discrepancies are not reappearing and thus indicating inadequate corrective action.

Inspection Form Distribution:

Maintenance Personnel

Department Supervisors where violations were found

President, include abatement measures

Safety Administrator

Safety Health & Environmental Manager

Safety Committee members

A copy will be posted on employee bulletin boards

EMERGENCY ACTION PLAN

This Emergency Action Plan encompasses the steps to be taken in the event of FIRE, WEATHER EMERGENCY, BOMB THREATS, AND/OR ANY OTHER TYPE OF DISASTER.

- A. It is not the intent of the company to engage employees in structural fire fighting. However, the need for an emergency action plan, which provides for training in the usage of portable fire extinguishers to control small stage fires, is recognized. Inherent in this concept is the requirement that employees in the fire area immediately evacuate the affected area upon the sounding of the fire alarm.
- B. Management and the Safety Administrators are responsible for the development of this emergency action plan.
- C. As part of the Emergency Action Plan, layouts of the work areas, showing exit doors and fire extinguisher locations shall be posted permanently throughout the facility as to be easily visible to everyone on the premises. All employees will be instructed as to alternative exits in their immediate work area as well as all general exits.
- C. The integrity of fire extinguishing devices is to be maintained by the Safety Administrator.

EMERGENCY ACTION PLAN MODEL

I. INTRODUCTION

Major disasters must be anticipated and procedures must be developed if the well being of our personnel is to be protected. The following pages detail the organizational structure of our plan and outlines emergency measures to be taken in the event of fire or other emergency. Remember, your conduct and actions during the first few minutes of any emergency may not only save your life, but the lives of your fellow employees as well.

II. GENERAL INFORMATION

An important telephone call must be made if the facility is to be evacuated for any of the following reasons:

- 1. A fire, disaster or hazardous condition within the facility.
- 2. An external hazardous condition threatening the facility.
 - If any of these situations occur, emergency personnel must be notified immediately. (PHONE: 911)

- Upon the order of evacuation by person(s) in charge, the following action shall be taken:
 - a. Initiate facility evacuation plan.
 - b. Priority of evacuation may be a necessity if there are handicapped employees.
 - c. Materials and Supplies to be evacuated:
 - 1. First Aid Kits
 - 2. Personnel Roster

III. RESPONSIBILITIES

A. Management / Safety Administrator will:

1. Coordinate the Emergency Evacuation Plan at each facility
2. Make certain the Plan is familiar to all personnel, and that new employees are promptly oriented.
3. Schedule fire classes as necessary.
4. Arrange and execute fire drills at each facility.
5. Maintain a log of fire drills conducted. The log shall include the date and time of each drill, the time required to evacuate and the initials of recording person.
6. Report any deficiencies noted during the fire drill.
7. Correct any deficiencies noted during the fire drill.

B. Management / Safety Administrator; shall be aided by designated personnel who shall:

1. Facilitate the Emergency Evacuation Plan
2. Keep constant check on all personnel to be sure they are completely familiar with all phases of the Plan that they are required to know.
3. See that all personnel participate in ALL fire drills, fire classes and other practice sessions.
4. Make thorough fire prevention inspections when they are assigned to do so.

5. Take the necessary steps required to correct any fire hazards discovered.

C. It is the duty of every employee to:

1. Be familiar with the Emergency Evacuation Plan and his or her duties and responsibilities in the program.
2. Participate in all fire drills and practice sessions.
3. Attend all fire prevention classes when assigned.
4. Learn the location of and how to operate fire-extinguishing equipment.
5. Report any fire and/or safety hazard located anywhere on the Company's property.

D. Emergency Evacuation Team

The Emergency Evacuation Team has been established to aid in the calm and orderly evacuation of all persons on the premises of the facility in the event of fire or other evacuation emergency.

1. Responsibilities will include:

- a. Ensure all employees are evacuating the building in a calm and orderly manner.
- b. Account for all employees once the building has been evacuated.
- c. Stay in contact with emergency personnel who may be summoned to the scene.
- d. In the event of evacuation due to weather conditions, it will be under the direct authorization of Steven Apple to evacuate the facilities.

FIRE PROCEDURE

KEEP CALM...Report All Fires and Smoke

Personnel have been assigned to: (See Evacuation Plan)

1. Sound internal fire alarm / alert all employees.

2. Remove ALL personnel from the building.
3. Close all door and windows in the fire area, ONLY if this can be done safely.
4. Notify the Fire Department

The person reporting the fire to the fire department will provide them with the following information:

1. Company Name
2. Address
3. What is burning (machines, paper, etc.)?
4. Location of Fire (Roof, plant, office, etc.)
5. Type of Fire (electrical, chemical, etc.)

Additional assignments have been made to:

1. Attempt to extinguish the fire with the use of on-site equipment. A minimum of two persons is required to fight a fire. To ensure employee safety, this is to be done only during the early stages of the fire.

Working away from the involved area, personnel will be assigned to:

1. Clear the aisles, hallways and other areas of personnel and visitors.
2. Close all doors and windows.
3. Check driveways to see that they are clear for entry of fire fighting equipment.
4. See that any gates are unlocked and open.
5. Wait at the front entrance for arrival of fire fighting equipment.
6. Direct the firemen to the fire if necessary.

Re-entry onto the property will not be permitted until it is declared safe to do so by professional emergency personnel.

Emergency personnel will notify management when it is safe to return to the facility.

EARTHQUAKE PROCEDURE

In the event of an earthquake, the following procedures shall be followed:

1. Assess damage and injuries.
2. Give first aid as needed. Remember, after earthquake; utilities, police and fire agencies may not be readily available. DO NOT ATTEMPT TO TELEPHONE UNLESS ESSENTIAL.
3. Notify an Officer of the Corporation as soon as possible.
4. Call the Fire Department ONLY in the case of fire.
5. The nearest hospital for treatment is:

Name: ST. JOSEPH HOSPITAL
Address: 2606 HARLEM ROAD
CHEEKTOWAGA, NY 14225
Telephone: 891-2400
6. Have damaged or potentially damaged utilities shut off at the main controls.
7. Personnel are to be instructed during orientation that they are to take shelter under a sturdy table or desk and remain there until all shaking has ceased.
8. Evacuate as necessary. Supervision shall be responsible for seeing that employees are evacuated to a safe area outside the building and clear of electrical lines, utility poles, block walls, etc., which may fall during aftershocks. All are cautioned to be alert for fallen high-tension lines.
9. Have all areas of the building inspected for damage before allowing personnel to return to the building.
10. Have gas, electrical, water and fuel systems checked for damage before allowing personnel to return to the building. Local building codes must be followed regarding the installation of gas shut off valves and the like.
11. Drinking water should be checked to determine that it is not contaminated. Bottled water is available at each facility.

BOMB THREAT PROCEDURES

1. Evacuate the premises immediately.

2. Contact the local law enforcement agency.
3. Do not allow employees back on site unless it is declared safe to do so by law enforcement officials.

GENERAL – NATURAL OR MAJOR DISASTERS

In the event of evacuation due to a natural or major disaster, the Emergency Evacuation Team will be responsible for all evacuation procedures. This Group Will:

1. Aid in the calm and orderly evacuation of the facility
2. Remain in contact with emergency personnel
3. Account for all employees once the building has been evacuated.

APPENDIX A

Management / Safety Personnel

- A. President: Steven L. Apple
- B. Safety Administrator: Kimberly L. Haberer

Emergency Evacuation Team:

CEMETERY ROAD LOCATION:

- A. CHRIS CHIODO – MIKE TRANQUILLI – JOHN TRANQUILLI
- B. DAN DZIERZAK – SECOND SHIFT

ENTERPRISE DRIVE LOCATION:

- A. MIKE KALCZYNSKI
- B. JOHN ENSER

ERIE STREET LOCATION:

- A.

SAFETY COMMITTEE MEMBERS:

KIMBERLY L. HABERER – SAFETY ADMINISTRATOR (CEMETERY)
CHERYLYN PHILLIPS (CEMETERY)
BECKY OSHEA (ERIE)
JUSTINE MAURO (CEMETERY)
KEITH SCHWERTFEGER (CEMETERY)
JOE MARLOW (ENTERPRISE DRIVE)
MIKE KALCZYNSKI (ENTERPRISE DRIVE)
DAWN ANTONACCI (CEMETERY)
LISA HAFFA (CEMETERY)
CHRIS FERRARO (CEMETERY)
MARTIN HILL (CEMETERY)
CAT CRUMLISH (CEMETERY)
MATT LENHARD (CEMETERY)
CHRIS HEBERT (CEMETERY)
TODD SCHULTZ (CEMETERY)

SMOKING POLICY

The Safety committee of Apple Rubber Products, Inc. has reviewed Erie County's Clean Air Act. The purpose of the Clean Air Act is to limit smoking throughout Erie County in order to protect the people of the County from the health risks of second hand smoke. This Erie County law goes into effect on January 1, 1997. Apple Rubber Products must be in compliance with this law by April 1, 1997.

It will be the policy of Apple Rubber Products, Inc. that all of its facilities will be smoke free environments. This includes our facilities located at:

- 310 Erie Street
- 12 Enterprise Drive
- 204 Cemetery road

Employees at these locations will be able to smoke outside of the building.

Employees will be given two (2) ten-minute breaks per day in addition to their lunchtime when they can smoke. Breaks will be scheduled for one in the morning and one in late afternoon (after lunches). Some department supervisors will stagger employee break times as not to interfere with production. This policy will take effect April 1, 1997.

If you have any questions, please do not hesitate to ask Safety Administrator or any Safety Committee Member.

EMPLOYEE CONFIRMATION

I, the undersigned, have read the Apple Rubber Products, Inc., Safety Program I was issued, and fully understand its contents.

I agree to adhere to any procedures outlined in this Safety Program. I fully understand if I do not adhere to specific procedures I may be subject to disciplinary actions.

I have full understanding that I may bring any safety concern I may have after reading this program to the attention of the Safety Director or Safety Committee. I am aware that safety in the work place not only will benefit me, but my fellow employees as well.

Employee Name: _____
(Print Name)

Signature: _____

Date: _____