



## ACCIDENT PREVENTION PROGRAM



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## **ACCIDENT PREVENTION PROGRAM**

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## ACCIDENT PREVENTION PROGRAM (APP)

### 1.0 INTRODUCTION AND PURPOSE

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It is the policy of Key Technology Inc. to maintain a safe and healthy work environment for its employees, guests, and visitors to comply with all applicable occupational health and safety regulations. Accidents/incidents create a difficult situation for everyone involved.

Employees with injuries because of accidents experience pain, suffering, and incapacitation while the company and its customers suffer from the loss of the injured person's contributions.

The Key Technology *Accident Prevention Program* (APP) exists to establish a framework for identifying and correcting workplace hazards in order to prevent the occurrence of illness and injury. Key Technology is committed to providing a safe workplace for all employees and has developed this program for injury prevention to involve management and employees in identifying and eliminating hazards that may develop.

**The fundamental safety policy of Key Technology is 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 and health rules and are encouraged to participate actively in identifying ways to make Key Technology a safer place to work.

### 2.0 RESPONSIBILITIES

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The Key Technology Safety Officer has primary authority and responsibility to ensure implementation of the APP and to ensure the health and safety of Key Technology employees. This will be accomplished by:

- Communicating Key Technology's emphasis on health and safety
  - Analyzing work procedures for hazard identification and correction
  - Ensuring regular workplace inspections
  - Providing health and safety training
  - Adhering to safety and health regulations and laws
  - Encouragement for prompt reporting of health and safety concerns without fear of retaliation.

## Safety Committee

The Safety Committee has the responsibility to assist Key Technology management with the following:

- Maintaining and updating this APP
- Assessing departmental compliance with regulations and policies
- Evaluating reports of unsafe conditions
- Coordinating necessary corrective actions

The Safety Committee also submits suggestions to department managers and supervisors for the prevention of future incidents and submits recommendations to assist department management in the evaluation of employee safety suggestions.

Membership: the Safety Committee membership rotates periodically and includes the Safety Officer and employee representatives from each department. All vacancies will be filled promptly. While the Safety Committee members may not be from virtually all departments, each employee has a designated representative on the committee. Meetings are open to all Key employees to attend on their own time if they are not already on the committee.

Safety Committee members are involved and trained on the following topics:

- Key Technology Accident Prevention Plan
- Hazard identification
- Job Hazard analysis
- Incident investigation procedures and responsibilities
- Key Technology Emergency Response and Action Plan

Additional training is conducted as needed and is updated as rules change or when new hazard exposures are introduced into the workplace.

Meeting agendas are prepared distributed to committee members ahead of each meeting.

Additional duties of Safety Committee members include:

- A quarterly self-inspection of the area they represent;
- Communicating with the employees they represent on safety issues;
- Encouraging safe work practices among co-workers.

Safety Committee meetings are scheduled approximately around the 15<sup>th</sup> of each month. The day, time, or place may change as needed.

- ✓ The Safety Officer or designated scribe keeps meeting minutes,
- ✓ Copies of the meeting minutes are distributed to each Safety Committee member,
- ✓ A copy of the meeting minutes are posted on the Safety bulletin board after each meeting for a period of one month. The Safety Officer retains the original minutes.

## Management

Management plays a key role in the implementation of the Key Technology APP and are responsible for:

- Ensuring each employee supervised has received an initial safety orientation before beginning work.
- Ensuring each employee supervised is competent or receives training on safe operation of equipment or tasks before starting work on that equipment or task.
- Ensuring each employee receives required personal protective equipment (PPE) before starting work on a task requiring PPE.
- Ensuring periodic, documented inspection of workspaces under their authority including conducting a regular walk-around safety-check of the work area.
- Promptly correcting identified hazards.
- Observing employees while working and promptly correcting any unsafe behavior, providing training and taking corrective action as necessary.
- Setting a good example for employees by following safety rules and attending required training.
- Investigating all incidents in assigned areas and report the findings to management.
- Talking to management about changes to work practices or equipment, which could improve employee safety.
- Communicating to their team members and staff Key Technology's strong emphasis on health and safety.
- Implementing measures to eliminate or control workplace hazards.
- Stopping any employee's work that poses an imminent hazard to either the employee or any other person.
- Encouraging employees to report health and safety issues without fear of retaliation.
- Ensuring that each sub-contractor hired will be pre-qualified by reviewing their safety programs, safety training records and safety statistics. Refer to Appendix G

## All employees

It is the responsibility of all employees to comply with all applicable health and safety regulations, Key Technology policies and established work practices. This includes but is not limited to:

- Observing health and safety-related signs, posters, warning signals and directions.
- Understanding the building emergency action plan and assembly meeting areas.
- Understanding the potential hazards of assigned tasks and work areas.
- Taking part in appropriate safety training.
- Following all safe operating procedures and precautions.
- Using proper personal protective equipment.
- Warning co-workers about defective equipment and other hazards.
- Reporting unsafe conditions immediately to a supervisor.
- Stopping work if an imminent hazard is present.
- Cooperating in workplace safety inspections.



- When employees feel a particular situation is unsafe they have these options:
  1. Approach the situation from a safer position;
  2. Notify their manager, supervisor or Safety Officer of the unsafe situation;
  3. When reasonable and capable, they may replace or repair defective equipment or safety device;
  4. Request that the area be evacuated until the risk is abated;
  5. In all questionable situations, employees are mandated to notify their supervisor immediately.

Unsafe conditions, which cannot be easily and promptly corrected, by an employee or his/her supervisor are reported to the Safety Officer or any Safety Committee member by filling out a "Report of Unsafe Condition or Hazard" form (Appendix A). If it is a serious hazard employees must verbally inform a member of management immediately.

### 3.0 IDENTIFYING WORKPLACE HAZARDS

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#### Workplace Inspections

Workplace and work practices safety inspections are conducted at Key Technology facilities. The inspections are recorded and are maintained by Key Technology.

Additional inspections are completed when:

1. New substances, processes, procedures, or equipment introduced into the workplace represents a new occupational safety and health hazard.
2. Supervisors are made aware of a new or previously unrecognized hazard that requires assessment.

Management and the Safety Committee are responsible for inspections of hazard identification, documentation, and correction. For newly introduced management is responsible for the identification, documentation, and correction. At Key Technology, management checks for safe work practices constantly and provide immediate verbal feedback where hazards are observed. Safety Committee members are also qualified to conduct hazard inspections and accept hazard reports.




The "Report of Unsafe Condition or Near Miss" (Appendix A) is filled out when any employee, inspecting personnel, makes a referral or when a condition is discovered for which the responsible member of management cannot determine an immediate remedy. The "Report of Unsafe Condition" form can be obtained from the Safety office. It may be turned in anonymously.

Hazard assessments for Personal Protective Equipment are completed and kept on file with supervisors and the Safety Officer. See Appendix F for detailed information and forms.

### Known Routine Hazards

There are some inherent hazards at Key Technology that cannot be eliminated through alternative equipment or workplace designs. Consequently, work rules and requirements for wearing personal protection equipment have been instituted to protect employees.

These include the following routinely encountered hazards and safeguards:

Potential Hazard	Exposure Controls and Response
<p><b>Non-Ergonomic Body Movements</b></p> 	<ul style="list-style-type: none"> <li>• Most of the hazard exposures from poor ergonomic job design are from repetitive motion injuries e.g. carpal tunnel syndrome/tendonitis.</li> <li>• If ergonomic improvements might be a solution, employees are asked to request an ergonomic assessment by contacting their supervisor.</li> </ul>
<p><b>Hand and Power Tools</b></p> 	<p><b>Required PPE:</b> Wear safety glasses, hearing protection while operating equipment.</p> <p><b>Work Rules:</b></p> <ul style="list-style-type: none"> <li>• ONLY TRAINED AND AUTHORIZED OPERATORS MAY OPERATE EQUIPMENT</li> <li>• Wear proper clothing: not loose-fitting, no jewelry, well-built shoes</li> <li>• Long hair shall be tied back or pinned up while operating equipment</li> <li>• Keep work area clean and uncluttered</li> <li>• Use the correct and proper working tools for the job</li> <li>• Never use equipment that has been tagged “Do Not Use”</li> </ul>
<p><b>Air Compressor</b></p> 	<p><b>Required PPE:</b> Wear safety glasses and ear protection while operating equipment</p> <p><b>Work Rules</b></p> <ul style="list-style-type: none"> <li>• Compressed air used for cleaning is prohibited unless the pressure is reduced to less than 30psi.</li> <li>• Compressed air cylinders must be visually inspected.</li> <li>• Every air compressor shall be equipped with an indicating pressure gauge.</li> <li>• All safety valves shall be tested frequently and at regular intervals to determine whether they are in good operating condition.</li> <li>• The drain valve on air receivers shall be opened and the receiver completely drained frequently and at such intervals as to prevent the accumulation of excessive amounts of liquid in the receiver.</li> </ul>


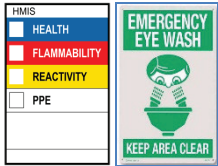
Heavy Materials



**Handling heavy materials and products can lead to lifting hazards and foot crush hazards.**




- Size up the load. Test it to see if you can lift it safely. Can you grasp it securely? Good handhold will make the load easier. Ensure the load is balanced in your hands.
- Test the load before doing the lift.
- Use manual lifting equipment such as dollies, hand trucks, carts, jacks and other lift- assist devices whenever possible.
- Get as close to the load as possible before lifting it. If possible, slide the load towards you before picking it up. If the load is large and cannot be placed between your knees as they are bent, bend at the hips and waist with your knees relaxed.
- Ensure your footing is secure. Do not lift objects that obscure vision and footing.
- Do not lift on slippery surfaces.
- Do not twist while lifting! Move your feet so they point in the direction of the lift as you turn. Turn and take a step. Lift smoothly and slowly. Do not jerk the load.
- Do not lift while in an awkward position.
- Try to avoid carrying the load more than 10 feet without getting mechanical assistance.
- Use a mechanical device such as a forklift, hoist, hand truck, or elevating table whenever possible to do the lifting.
- 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 safe lift.
- Do not overexert!
- Do not jerk the load or speed up. Lift the load in a smooth and controlled manner.
- Avoid long forward reaches to lift over an obstruction.
- Avoid bending your back backwards to loft or place items above your shoulder.
- Use a step stool or platform.
- If you have a lot of lifting to do during the day, try not to do it all at once. Alternate lifting tasks with lighter work to give your body a chance to recover.
- Back injury claims are painful for the worker and expensive for the company. Lift safely!




Potential Hazard	Exposure Controls and Response
<p data-bbox="215 730 414 800"><b>Using Portable Ladders</b></p> 	<p data-bbox="467 233 639 260"><b>Required PPE:</b></p> <ul data-bbox="467 270 1419 298" style="list-style-type: none"> <li>• Wear safe, flat-heeled shoes while climbing or standing on ladders or stools.</li> </ul> <p data-bbox="467 310 613 338"><b>Work Rules:</b></p> <ul data-bbox="467 348 1432 1591" style="list-style-type: none"> <li>• All ladders are required to be maintained in good condition at all times and if they are made out of wood they will be stored in a well-ventilated area and not be exposed to the elements.</li> <li>• All ladders will be inspected periodically for visible defects and after any occurrence that could affect its safe use.</li> <li>• Ladder rungs must be uniformly spaced or meet OSHA/ANSI specifications.</li> <li>• Defective ladders are to be tagged and placed out of service.</li> <li>• All ladders carried on vehicles are required to be properly secured during transit.</li> <li>• No ladders may be used to gain access to a roof unless the top of the ladder extends to at least 3 feet above the point of support, eave, gutter, or roofline and be secured at the top and bottom.</li> <li>• When working with a step ladder over 5 feet high an employee may not stand on a step higher than the third step from the top of the step ladder.</li> <li>• 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.</li> <li>• Do not use a ladder as a brace, workbench or for any other purpose than climbing.</li> <li>• Do not carry objects up or down a ladder if it will prevent you from using both hands to climb.</li> <li>• Always face the ladder when climbing upward or downward.</li> <li>• If you must place a ladder at a doorway, barricade the door to prevent its use and post a sign.</li> <li>• Only one person is allowed on a ladder at a time.</li> <li>• Always keep both feet on the ladder rungs except while climbing. Do not step sideways from an unsecured ladder onto another object.</li> <li>• Do not lean a stepladder against a wall and use it as a single ladder.</li> <li>• Always unfold the ladder and lock the spreaders.</li> <li>• Do not stand on the top step of a stepladder.</li> <li>• Set a single or extension ladder with the base 1/4 of the working ladder length away from the support.</li> <li>• All employees working at ladder heights above 6 feet must adhere to all Key Technology fall protection rules: use of a fall restraint system is required.</li> </ul>
<p data-bbox="245 1646 386 1715"><b>Hazardous Materials</b></p> 	<ul data-bbox="480 1619 1393 1913" style="list-style-type: none"> <li>• KNOW what materials they are working with, the possible hazards from accidental exposure and how to respond to an exposure</li> <li>• WORK in adequately ventilated areas that exhaust unwanted fumes.</li> <li>• READ the chemical's SDS and the container label before working</li> <li>• WEAR the prescribed personal protective equipment (eye, skin and/or respiratory protection devices)</li> <li>• Have ACCESS to an emergency eyewash first aid station within 10 seconds (approximately 50 feet) of their workstation.</li> </ul>

**Unknown and Non-Routine Hazards**



Management is responsible for identifying and responding to non-routine hazards.

Unexpected or Non-Routine Hazard	Exposure Controls and Response
<p style="text-align: center;"><b>Fire</b></p>  	<p><b>S Sound the alarm:</b> Sound the “alarm” by immediately notifying others nearby of the emergency, or call out to someone else to do this. This allows the emergency personnel to be on their way while other activities are being done. The fire alarm system is an audible, recognizable signal to evacuate the work area. It is loud enough to be heard in all areas and over all work noises. The manually operated alarm pulls are always kept unobstructed, visible, and readily accessible.</p> <p><b>A Alert others:</b> Quickly notify others in the emergency area in a calm, firm manner. Do not cause a panic. Secure the area for the emergency personnel. If the emergency is a fire, close doors and windows if you can to prevent the spread of smoke and flames.</p> <p><b>F Fight the fire:</b> Do this only in the case of a manageable fire, one that you have the training and experience to fight. If possible, two people should fight the fire together using two fire extinguishers. If you have any doubt about your ability to extinguish the fire safely, then do not attempt to fight it.</p> <p><b>E Evacuate:</b> If prudent, instruct the Evacuation Alarm to be issued.</p> <p><b>NOTE: Rescuing people, giving first aid, and remaining behind with a trapped or injured person is voluntary and is governed by the rules of common sense.</b></p>
<p style="text-align: center;"><b>Workplace Violence</b></p> 	<ul style="list-style-type: none"> <li>• <b>What does workplace violence look like?</b></li> <li>• Behavior by a person that is irregular or abnormal for the circumstances is to be immediately reported to a supervisor in charge. This includes:             <ul style="list-style-type: none"> <li>○ Threatening actions – verbal or physical abuse, or written threats.</li> <li>○ Subtle or overt harassment or attacks of any kind.</li> </ul> </li> <li>• <b>Responding to potential or actual violence:</b> <ul style="list-style-type: none"> <li>○ Treat all threats or acts of violence seriously. Leave the area if necessary to protect yourself.</li> <li>○ Request help immediately! Notify any supervisor – or call 9-9-1-1.</li> <li>○ Help calm or defuse the situation if you know how, but DO NOT place yourself in increased danger by doing so.</li> </ul> </li> </ul>

Unexpected or Non-Routine Hazard	Exposure Controls and Response
<p style="text-align: center;"><b>Building Evacuation</b></p> 	<p><b>Please refer to the Key Technology Emergency Response and Action Plan in Policy 7-02 for emergency evacuation procedures.</b></p> <ul style="list-style-type: none"> <li>• Evacuation maps are posted throughout the building in prominent locations.</li> <li>• <b>Whenever a serious fire or other emergency that warrants evacuation is announced, all employees and visitors must quickly leave in an orderly fashion by designated routes to the designated outside assembly area:</b> <ul style="list-style-type: none"> <li>○ Stop what you are doing.</li> <li>○ Those in the shop areas, TURN OFF power equipment</li> <li>○ Walk to the nearest fire exit from the building. (If you do not know which exit to use at the time of the alarm, there are evacuation maps posted throughout the building.)</li> <li>○ Meet at the designated assembly area. Move away from the exit doors of the building. Avoid congregating close to the building where you may hamper emergency operations.</li> </ul> </li> <li>• Each <u>area supervisors</u> in charge will:                     <ul style="list-style-type: none"> <li>○ Direct an orderly evacuation including handicapped employees, guests, clients and other visitors. (Guests and clients should be with a manager, supervisor or other staff person and report to their group.)</li> <li>○ Check all rooms/enclosed spaces and close all fire doors.</li> <li>○ Assure the shutdown of powered and other automatic equipment.</li> <li>○ Take headcount at the designated assembly area after the evacuation alarm.</li> <li>○ Notify the Assembly Area Commander of any person missing from your group. If someone is missing in the building, find out where that person was last seen to inform the rescue crews and Emergency Response Coordinator of their whereabouts. <u>Do not go back into the building to get them.</u></li> <li>○ Keep people in their assembly groups until further instructions arrive.</li> </ul> </li> </ul> <p><b>Upon receiving the "All Clear" or "Re-entry OK" signal from the Emergency Response Coordinator, the Assembly Area Coordinator will allow people to return to the building unless given different instructions from an authorized person.</b></p>

**Other Potential Hazards**

Other potential hazards may be introduced by outside service vendors when conducting routine maintenance or construction. While Key employees do not participate in these activities, it is important to be aware of the hazards these activities can introduce.

Other Potential Hazards	Exposure Controls and Response
<p style="text-align: center;"><b>Scaffolds</b></p> 	<p><b>Required PPE:</b></p> <ul style="list-style-type: none"> <li>• Hard hats are to be worn by persons working on or around scaffolding</li> <li>• Wear safe, flat-heeled shoes while climbing or standing on scaffolding.</li> <li>• Never climb or use scaffolding while wearing high-heeled shoes or sandals.</li> </ul> <p><b>Work Rules:</b></p> <ul style="list-style-type: none"> <li>• Only persons trained on scaffolding hazards, the necessary fall protection, the proper use of the scaffolding and the load capacity are allowed to work on scaffolds.</li> <li>• All scaffolding is required to be maintained in good condition at all times</li> <li>• All scaffolding is to be inspected by a competent person before being put into use.</li> <li>• Scaffolds that are deemed unsafe must be tagged and repaired or replaced before use.</li> <li>• Do not use scaffolding in inclement weather such as rain, snow or high winds.</li> <li>• Do not move scaffolding when a person is on it.</li> <li>• All materials are to be secured before moving a scaffold</li> <li>• Scaffold loads are to be kept to a minimum and be removed when the scaffolding is not in use.</li> </ul>
<p style="text-align: center;"><b>Aerial Lifts</b></p> 	<p><b>Required PPE:</b></p> <ul style="list-style-type: none"> <li>• <b>Safety harnesses attached to the aerial equipment are to be worn when working in aerial lift equipment</b></li> </ul> <p><b>Work Rules:</b></p> <ul style="list-style-type: none"> <li>• Only authorized persons shall operate an aerial lift.</li> <li>• The vehicle will have a working back-up alarm or a spotter will be used when backing.</li> <li>• The minimum clearance between electrical equipment and any part of the vehicle must be at least 10 feet.</li> </ul>

## 4.0 COMMUNICATING WORKPLACE HAZARDS

Key Technology's management is responsible for knowing the hazards in their areas of control and promptly telling their employees. Communication should be in a manner they can understand, about the hazards and how to not be injured or become ill.

Key Technology employees are required to communicate safety concerns to their supervisor, the Safety Officer or a Safety Committee member.

Safety bulletin boards are in the main hall and manufacturing office hall. Key Technology posts all Safety Committee Minutes, Safety Bulletins and the list of certified persons for First Aid/CPR/AED on the Safety bulletin boards. Information about health and safety hazards of tasks performed by employees is available from these sources:

- a) Safety Data Sheets (SDS)
- b) Hazardous chemical container labels
- c) Safety Training and Education
- d) Equipment operating manuals
- e) Additional Key Technology written safety programs including: *Emergency Response and Action Plan*

The Safety Committee on occasion may also sponsor seminars or speakers or coordinate other means to communicate with employees regarding health and safety matters.

### Safety Data Sheets

Safety Data Sheets (SDS) provides the information on the potential hazards of products and chemicals. Printed copies of SDSs for the chemicals used at Key Technology are available in each work area.



The Safety Officer or designated site safety representative, is responsible for maintaining and posting site specific SDS to the company intranet Safety Site. These lists are accessible to all local, remote, and traveling employees. If an SDS for a particular product is found to be missing, a new one can be obtained by sending a request to the manufacturer. Several Internet websites supply SDS information. Refer to Key Standard Procedure *COR 03-04 Obtaining Safety Data Sheets*.

### Container Labels

Every Key Technology Manager and Supervisor is responsible for ensuring that every container of hazardous chemicals within their department is properly and clearly labeled, tagged, or marked with:

- The identity of the hazardous chemical(s) that it contains
- The appropriate hazard warnings
- The manufacturers name and address

The Receiving Department at each Key Technology location is responsible for the following:

- The checking of incoming containers for appropriate labeling of hazardous substances prior to containers leaving the receiving area.
- Providing Safety Data Sheets to the Safety Officer on incoming hazardous chemicals.



**Hazardous Communication Training**

All Key Technology employees who work with, near, or have the potential to be exposed to hazardous chemicals must receive training. The initial training is divided into two sessions.

The first session is a general session given during new hire training. It covers:

- General definitions
- Methods of detection
- SDSs
- Personal protective equipment
- Emergency procedures
- Storage
- Labeling



Annual refresher trainings are conducted on these same topics and are attended by all Key Technology employees. The human resources department keeps training records for each employee’s initial and annual general safety orientation training.

The second training session will be presented in the employee’s department and it covers information associated with chemicals used in that department:

- Hazardous chemicals
- Required and optional personal protection equipment (PPE) measures



- Emergency response
- Storage
- Labeling

**Equipment Operating Manuals**

All equipment is to be operated according to the manufacturer’s instructions as specified in the operating manuals. Copies of operating manuals are kept in the facility maintenance office.



**\*\*\*Only qualified and authorized Key Technology employees may operate equipment. \*\*\***

Before using equipment, training from an experienced operator must be completed and approved by the department’s supervisor.

## GENERAL SAFETY RULES

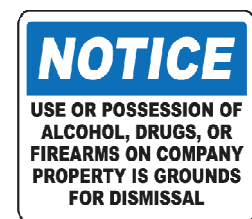
To achieve Key Technology’s goal of an accident-free work place, everyone is expected and required to work safely.

As most accidents are caused by carelessness or absent-mindedness, it takes constant alertness on the part of everyone to prevent accidents.

1. Observe all company safety and health rules, use common sense, and apply the principles of safe work habits in day-to-day duties.
2. If a hazard or unsafe condition is found report it immediately to your supervisor unless you can correct the condition safely yourself.
3. Understand your work assignments and make certain you learn and follow **ALL** safety rules that apply to your job. If you do not know or understand, ask management of the Safety Officer.
4. Never take shortcuts or chances.
5. Comply with the Conduct and Work Rules enforced by Key Technology.
6. In the event of an injury on the job, immediately obtain first aid, report the injury to the supervisor or designee if the supervisor is not available. Get additional medical treatment if needed. Report the incident to the department supervisor to file an accident report and workers compensation paperwork.
7. Key employees, guests and visitors:
  - Guests and visitors must **ALWAYS** be accompanied by a Key employee.
  - Must wear appropriate PPE where required.
  - Must always use marked walkways when walking through the facility.
  - Must not walk on conveyors.
  - Watch out for mobile traffic before crossing any mobile traffic lanes.
  - Do not walk or stand under or beside suspended loads.



8. Personal Conduct:  
Tobacco use is prohibited, except in designated areas.  
Drug and alcohol use or possession is not permitted on company property.  
Firearms and other weapons are not permitted on company property.



9. Forklift operation:
  - Only certified Key Technology employees may operate powered industrial trucks, including forklifts, order pickers and motorized pallet jacks. Drivers must have certificates available when operating PITs.
  - Forklifts forks are to be left in lowered position when not in use.
  - **Drivers must wear their seatbelt when operating a forklift.**
  - Riders are not permitted.
  - Forklift drivers must drive with courtesy and safety in mind at all times.
  - Maintenance will inspect the forklift daily before each shift and immediately correct any defects.



- Before loading and unloading a truck or trailer do an interior inspection, verify the trailer chocks, supports and dock plates are stable and properly secure and make sure its engine is shut off.

**Forklift Certification:**

- ✓ *The certification program is provided by a qualified instructor using the J.J. Keller and Associates Training curriculum. The training includes formal instruction, practical training and an operator evaluation.*
- ✓ *Supervised training includes but is not limited to: forklift basics; forklift inspection; operating instruction that includes the controls and maneuvers; load capacity and stability; picking up, traveling with, and placing a load; charging and refueling.*
- ✓ *Operators will be given re-certified every three years by the Safety Officer.*
- ✓ *Operators will have refresher training when unsafe operations are observed, after an accident, when a different vehicle is introduced, or if there is a change in conditions.*

10. Know where emergency equipment is located, such as fire extinguishers, first aid kits, personal protective safety equipment, etc. Report the use of any first aid supplies or emergency equipment to the Safety Officer so it can be replaced.

**Fire Extinguishers** have signs and arrows displayed above each location.

Training and general familiarization are provided to every employee who is expected to respond to a fire. The facility maintenance team checks the fire extinguishers monthly and they are serviced and refilled on an annual basis.



**Personal Protection:** Key Technology employees are required to wear personal protective equipment (PPE) to reduce or eliminate risk of injury: gloves, eye protection, hearing protection and safety shoes are required in designated areas of the facility. All PPE must meet the required OSHA/ANSI standards.

- All PPE (Company provided or employee owned), must be approved by the supervisor and inspected for proper use and cleaning. Defective or damaged PPE shall NOT be used.
- PPE must be fitted to each affected employee
- Each employee who may need to wear PPE will be properly trained. Retraining of the employee is required when the workplace changes, making the earlier training obsolete, the type of PPE changes or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.
- If an employee is unsure about exactly what PPE is prudent or required to be used, he/she must consult a department supervisor. PPE is provided at no cost to Key employees.

11. Lockout / Tag out:

- Lockout and Tag energized equipment that is under repair or needs to be accessed – even for a short period.
- Do not enter energized equipment unless that equipment has been locked with your lock and tagged “Do Not Use”.
- Never use equipment that has been tagged “Do Not Use” and never remove a lock or tag unless you are authorized to do so.



12. When lifting heavy objects, lift carefully.

- Keep your back straight and lift with your legs.
- Do not try to be a hero or take shortcuts! Get help for lifting or moving bulky objects or too heavy to be safely handled by one person.



## 13. Housekeeping:

- Keep your immediate work area tidy and help in the common areas.
- Keep all aisles, stairways, and exits clear of pallets, boxes, air hoses, equipment, and products improperly stored.
- Work areas should be swept and cleaned at the end of each workday.
- Keep food in closed containers and off workstations. Do not let disposed food items remain in wastebaskets overnight.



## 14. Equipment operation:

- All tools and equipment must be used in accordance with OSHA safety requirements.
- Use the safety equipment guards and devices provided for your protection.
- Make sure equipment is in proper working condition. Never try to repair machinery or electrical circuits, or oil or clean equipment, without being qualified and authorized to do so by your supervisor.
- Only operate equipment that you are trained and authorized to operate.
- Report defective equipment to your supervisor before continuing work.

***Disregarding safe work practices, any of these rules or other safety instructions, is cause for disciplinary action up to and including termination of employment.***

**Bloodborne Pathogens**

Employees are required to use Universal Precautions when in circumstances that introduces the possibility of transmitting bloodborne pathogens. These include:

- ✓ Properly clean/sterilize tools, which may have been exposed to hazardous/bio-hazardous materials.
- ✓ Personal protection and proper disposal of blood stained medical treatment materials.



Additional information on Bloodborne Pathogens is addressed in the Key Technology Bloodborne Pathogen Exposure Control Plan.

### Hazardous Materials Safety Rules

While doing work you could be exposed to many different materials that have been determined to be hazardous substances. *They must be handled in a safe manner.*

***These are the rules you must follow when using hazardous chemicals.***

1. Never use any hazardous substance until after reading its label and SDS and know its hazards.
2. If you have questions or have not been instructed on the safe use of, hazardous substances ask your supervisor and do not touch it.
3. In order to protect yourself it is important that you know what information on hazardous substances is available and how to use it. As required, a SDS for each hazardous material is located in the work area in which it is used so that emergency response information is available quickly when needed.
4. In the event of exposure to a hazardous material, first aid procedures should be administered immediately according to the chemical's exposure instructions.

*Chemicals are all different. Treatment for one could be harmful for another. Do not guess or assume. Read the SDS first aid information for the chemical first.*

HMIS	
<input type="checkbox"/>	HEALTH
<input type="checkbox"/>	FLAMMABILITY
<input type="checkbox"/>	REACTIVITY
<input type="checkbox"/>	PPE

### First Aid

At least one employee in each Key Technology work area is trained and currently certified by the American Heart Association in first aid medical response, CPR, and AED. A list of certified employees is posted on the Safety Bulletin Boards. These employees are responsible for assisting in the treatment of injured or ill employees until qualified medical professionals arrive. Documentation of certified employees is kept on file with the Safety Officer.



Employees are trained in First-Aid/CPR/AED bi-annually, and can demonstrate and use their skills in the following subject areas:

- Know the warning signs, how to respond and who to call for any ill or injured employees.
- How to isolate and handle any bloodborne pathogens or hazardous situations.
- Stabilizing an ill/injured person into a safe recovery position.
- Provide rescue breathing, open and manage an obstructed airway until help arrives.
- Perform CPR, recognize and care for shock victims, control external bleeding.
- Assess best way to get the injured persons to a physician or hospital either by using a personal vehicle, ambulance or by calling 911.

During a medical emergency all injured or illness, employees requiring emergency medical care for life/death medical emergencies are transported by local Emergency Medical Services to the nearest local hospital or one suited to handle the type of injury.

Key Technology ensures the workplace has the proper amount of First-Aid Stations that are well marked and properly supplied. The primary First Aid kit is located in the manufacturing office and consist of appropriate items which will be adequate for the environment in which it will be used. The contents of the first aid kits are checked weekly to ensure adequate first aid supplies are available to all employees. Smaller kits are kept within various departments.

## 5.0 CORRECTING WORKPLACE HAZARDS

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Hazards discovered either because of an inspection or during normal operations must be promptly corrected. Supervisors direct the correction of unsafe conditions as quickly as possible after discovery of a hazard, based on the severity of the hazard.

Actions used to correct hazards include:

- a) Locking the energy control, tagging unsafe equipment "***Do Not Use until Repaired***", and providing alternatives for employees to use until it is repaired.
- b) Stopping unsafe work and providing retraining on proper procedures before work resumes.
- c) Reinforcing and explaining the need for proper personal protective equipment and making sure it is available to employees and visitors.
- d) Barricading areas that have chemical spills or other hazards and reporting the hazardous conditions to a Key Technology supervisor or manager.

Use the "Hazard Correction Report" (Appendix B) to document corrective actions. If necessary, seek assistance in developing appropriate corrective actions by submitting a "Report of Unsafe Condition" (Appendix A) to management, the Safety Officer or a member of the Safety Committee.



If a serious imminent hazard exists, stop all work in the area and notify the appropriate supervisor immediately. If the hazard cannot be immediately corrected without endangering employees or property, all employees are to be removed from the area except for those qualified and necessary to correct the condition. These qualified individuals must be equipped with the necessary safeguards before addressing the situation.



## 6.0 INVESTIGATING INJURIES AND ILLNESSES

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### Injury Reporting and Returning to Work

Key Technology employees who are injured at work MUST report ALL injuries immediately to their supervisor.

***If more than first aid is needed, call 9-1-1.***

The supervisor of the injured employee ensures that the injury/illness incident is immediately investigated (see Appendix C) and a "Workers' Compensation Claim Form" is completed properly and submitted to Human Resources in a timely manner. These forms can be obtained from the Safety Officer, or Human Resources.

### Injury Investigation

An injured employee's supervisor and the Safety Officer will be responsible for performing an investigation to determine and correct the cause(s) of an injury or illness incident, and will be responsible to facilitate any necessary equipment to assist in conducting the investigation and helping with the collection, preservation and security of evidence. An initial report is to be sent to the Safety Officer within 48 hours of an accident, injury or illness and the final report with complete investigation and corrective action within 72 hours of the incident.

SUPERVISORS PROCEDURES TO INVESTIGATE WORKPLACE SAFETY, INJURY, OR ILLNESS INCIDENTS:

- A. First and foremost, attend to the injured as needed. Employers must report to the state OSHA regulatory agency within 8 hours the death, probable death, or the in-patient hospitalization of any employee due to an on-the job injury. Supervisors will be given the regulatory contact information and procedures required by the state that the facility operates in (Washington/Oregon). Incidents that involve a Key employee and occur on a customer's site must be immediately reported to the customer, as well as their Key supervisor.
- B. Supervisors will begin the investigation immediately by securing the area for safety by abating the hazard and/or setting up barriers, tape, or other measures to keep people away from the area.
- C. Interview injured personnel and witnesses privately and as soon as possible after the accident/incident. Document the interviews and attach it to the Accident/Incident report.
- D. Examine the injured employee's work area for causative factors.
- E. Review established procedures to ensure they are adequate and were appropriately followed.
- F. Review training records of affected employees.
- G. Determine all contributing causes to the accident. Investigate the accident scene by verifying information, reenacting the accident with employee if possible, measuring, sketching, photographing, or videotaping as necessary to document the accident sequence.
- H. If the supervisor is unable to determine the cause(s) and corrective actions, the Safety Officer will complete the investigation.
- I. Take corrective actions to prevent the accident/exposure from reoccurring.
- J. Record all findings and actions taken, complete the report, and forward all documentation to the corporate Safety Officer. The findings and corrective actions are documented using the "Accident, Injury or Illness Report" (Appendix C).
- K. Accident Investigation Report forms are to be confidentially (no names mentioned) reviewed at monthly Safety Committee Meetings.

Key Technology management reviews each accident or injury report and makes sure that the investigation was thorough and that all corrective actions are completed. Investigations or corrective actions that are found to be incomplete must be routed back to the supervisor for further follow-up, with specific recommendations noted.

Corrective actions that are not implemented within the timeframe determined in the accident report must be brought to the attention of Key Technology senior management.

## 7.0 EMPLOYEE HEALTH AND SAFETY TRAINING

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Employee safety training is provided at no cost to Key Technology employees and is conducted on company time. Safety training is presented by the Safety Officer, a knowledgeable supervisor or manager, other expert, or by representatives from other organizations. Regardless of the instructor, all safety training is documented using the “Safety Training Attendance Record” (Appendix E) or an equivalent record that includes all the information required on Appendix E. This documentation is retained for at least three years.



### Initial Accident Prevention Program (APP) Training

When first hired, employees are trained on the goals of the APP, including individual responsibilities under the program, and the availability of the written program. Training is provided on how to report unsafe conditions, how to access members of the Safety Committee, and where to obtain information on workplace safety and health issues. Some job responsibilities and safety topics will require annual refresher training.

Individual training sessions are documented using the “Individual Employee Safety Training Record” (Appendix E), or the equivalent. These documents are kept on file for at least three years.

### Training on Specific Hazards

Supervisors are trained on the hazards to which employees under their immediate control may be exposed. This training aids a supervisor in understanding and enforcing proper protective measures.

All Key Technology supervisors ensure that the employees they supervise receive precautions for protection against those hazards. Initial training and re-training is **required** when:

- ✓ new employees are hired;
- ✓ a new hazard is introduced into the workplace;
- ✓ Employees are given new job assignments on which they have not previously been trained; or
- ✓ Employees are observed working in an unsafe manner indicating initial safety training may not have been understood.

Specific training topics include, but are not limited to, the following:

- a) Health and safety for jobs that require repetitive motions of specific body parts
- b) Back care, body mechanics, proper lifting techniques, and other ergonomic related injury prevention
- c) Mandatory and optional personal protective equipment (PPE)
- d) Right-To-Know hazard communication, including training on SDSs, chemical hazards and container labeling
- e) Chemical spill or hazardous exposure reporting procedures
- f) Proper housekeeping

## 8.0 ENSURING COMPLIANCE

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All employees have the responsibility for complying with safe and health work practices, including applicable regulations, policies, and Key Technology safety procedures.

Overall performance in maintaining a safe and healthy work environment is recognized by management and noted in performance evaluations. At no time, will employees be discriminated against for work-related injuries. Injuries are not included in performance evaluations. Unsafe acts are included in evaluations.

Standard disciplinary measures using Key Technology disciplinary policies are issued when employees fail to comply with safety regulations, policies, or instructions.

### Disciplinary Policy

Employees are expected to use good judgment when doing their work and to follow established safety rules. Key Technology has established a disciplinary policy to provide appropriate consequences for failure to follow safety rules. This policy is not to punish; it is to protect employees and visitors from injury and illness and to bring any unacceptable behavior to the employee's attention in a way that the employee will be motivated to make corrections.

***Employees will be disciplined for unsafe practices.***

For offenses that are not serious enough to warrant immediate termination of employment, employees are given instruction and an opportunity to correct unsafe behavior.

Repeated failure to comply or willful and intentional non-compliance **WILL** result in disciplinary measures up to and including termination.

The following consequences apply to the violation of safety rules or other unacceptable behavior:

- ✘ First Instance -verbal warning, notation in employee file and instruction on proper actions
- ✘ Second Instance - written reprimand (Safety Ticket will be issued) and instruction on proper actions
- ✘ Third Instance – Formal written disciplinary report and action up to and including termination of employment.

## 9.0 RECORD KEEPING

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The certified OSHA 300A Summary will be posted on the Company Bulletin Board no later than February 1<sup>st</sup> of the year following the year covered by the records and the posting will be kept in place until April 30<sup>th</sup>. The OSHA records will be maintained for five (5) years following the end of the calendar year that these records cover. The master copy of Key Technology APP is stored in the Corporate Safety office for safekeeping.

Other written records kept by the Corporate Safety Officer include:

- 📁 Reports of Unsafe Conditions or Hazards (Appendix A);
- 📁 Hazard Correction Reports (Appendix B);
- 📁 Safety Committee Meeting Documentation;
- 📁 Fatality, Accident, Injury or Illness Investigation Reports (Appendix C);
- 📁 OSHA 300 Logs – All recordable illnesses or injuries must be recorded on the OSHA 300 Log within seven calendar days of receiving information that the injury occurred.
- 📁 Annual OSHA 300A Summary certified by a Corporate Officer.

# APPENDIX A

REPORT OF UNSAFE CONDITION OR HAZARD



**KEY TECHNOLOGY**

**REPORT OF UNSAFE OR HAZARD CONDITION /NEAR MISS**

*Unsafe/Hazard Condition or Near Miss (Circle One)*

Department:
Name: (optional)
Location:
Date and time of the observation or occurrence:
Description of unsafe condition or near miss:
What changes would you recommend to prevent or correct the condition?
Name of supervisor or Safety Committee member notified:
Employee Signature: (optional)

*Management /Safety Committee Investigation (use additional pages if needed)*

Name of person investigating unsafe condition or near miss:
Results of investigation (What was found? Was condition unsafe or a near miss? Attach pictures )
Proposed action to be taken to correct hazard/unsafe condition or near miss(Complete and attach a Hazard Correction Report)
Signature of investigating party:
DATE:

# APPENDIX B

HAZARD CORRECTION REPORT

**HAZARD CORRECTION REPORT**

**KEY TECHNOLOGY**

*NOTE: This Form is used in conjunction with the "Report of Unsafe Condition" form (Appendix A), when appropriate in order to track the correction of identified hazards. All hazards are to be corrected as soon as possible, based on the severity of the hazard. If a serious imminent hazard cannot be immediately corrected, remove personnel from the area and restrict access until the hazard is addressed and abated.*

<b>Department:</b>
<b>Supervisor /Safety Officer Name:</b> _____
<b>Date:</b> _____

Description and Location of Unsafe Condition or Hazard	Date Discovered	Required Action/Responsible Party	Completion Date	
			Projected	Actual

<b>Supervisor Signature:</b>	<b>Date:</b>
<b>Safety Officer Signature:</b>	<b>Date:</b>

# APPENDIX C

## SUPERVISOR'S INVESTIGATION OF ACCIDENT REPORT



**SUPERVISOR'S INVESTIGATION OF ACCIDENT REPORT**



Each incident, whether serious or minor, should be investigated to prevent recurrence. The real causes can be determined and corrected only after thorough investigation. Reports should be determined and turned in to the Safety Officer within 48 hours of incidence.

Employee Name:	Location of Accident:
Position:	Date Accident Occurred:
Department:	Time of Accident: <span style="float: right;">A.M. P.M.</span>
Branch Location:	Date Reported to Supervisor:

**INJURY OR ILLNESS**

Part of body injured:

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Nature of Illness/Injury:

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On Company premises?  Yes  No      Do you question this claim?  Yes  No

**DESCRIPTION OF ACCIDENT/ILLNESS**

How did the injury occur? Clearly describe what took place. Describe the materials, vehicles, equipment, buildings, and people involved. If vehicle accident, provide explanation and diagram on reverse side. (Photographs of the area may be taken.)

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**List any witnesses:**

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Required Treatment:     Clinic     E.R.     On-site 1st Aid     1<sup>st</sup> Aid Declined

**UNSAFE ACTS AND/OR HAZARDS**

What unsafe acts or conditions contributed most directly to this injury/illness?

Lack of training/skills                       Horseplay  
 Using improper methods                       Improper instruction  
 Operating without authority                       Improper dress  
 Failure to follow rules/instructions                       Failure to secure equipment  
 Improper protective equipment                       Unsafe equipment/tools  
 Improper equipment maintenance                       Other, explain/reverse side

**DEFECTIVE EQUIPMENT**

What type of defective equipment/tools contributed to this accident?

Unsafe use of equipment/tools  
 Poor ventilation  
 Improper machine guarding  
 Physical work limitations/restrictions  
 Faulty safety device  
 Other, explain/reverse side

**RECOMMENDATIONS:** What action(s) should be taken to prevent this type of accident/injury from happening again?

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Disciplinary action issued to the employee(s) involved.  Yes     No

<b>Supervisor Signature:</b>	<b>Date:</b>
<b>Injured Employee Signature:</b>	<b>Date:</b>

**SUPERVISOR'S INVESTIGATION OF ACCIDENT REPORT (continued)**


**UNSAFE ACTS AND/OR HAZARDS:**

Please provide a detail if "Other" be checked under this section.


**DEFECTIVE EQUIPMENT**

Please provide a detail if "Other" was checked under this section.




<b>EMPLOYEE OR OTHER WITNESS ACCOUNT OF INJURY/ILLNESS</b>	
This statement is to be completed by the witness to a work-related accident/illness. This form must be completed by the witness in its entirety and turned in to the Safety Officer within 48 hours of the accident/illness.	

<b>Witness Name:</b>	<b>Date Accident Witnessed:</b>
<b>Position:</b>	<b>Date Accident Reported:</b>
<b>Department:</b>	<b>Branch Location:</b>

**DESCRIPTION OF ACCIDENT/ILLNESS**

Please describe in detail how the accident/illness occurred (how it happened). Describe the materials, vehicles, equipment, buildings, and people involved. List the type of injury (cut, strain, etc.) and any body part(s) injured.

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The above information is true and correct to the best of my knowledge.	
<b>Employee or Other Witness Signature:</b>	<b>Date:</b>

# APPENDIX D

**SAFETY TRAINING ATTENDANCE RECORD**



**SAFETY TRAINING ATTENDANCE RECORD**

**KEY TECHNOLOGY**

Department: \_\_\_\_\_

Topic of Training Session: \_\_\_\_\_

(Attach a copy of the training session materials)

Instructor(s) \_\_\_\_\_

Attendee's Name (Please Print)	Department	Signature	
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

# APPENDIX E

INDIVIDUAL EMPLOYEE SAFETY TRAINING RECORD

**INDIVIDUAL EMPLOYEE SAFETY TRAINING RECORD**

**KEY TECHNOLOGY**

**Employee Name:** \_\_\_\_\_ **Department:** \_\_\_\_\_

**Please Circle:**    New Hire                      Transfer                      Annual                      Other

This document is to certify and record that this employee has been trained on the following: (Check appropriate boxes.)

- My right to ask any question, or report any safety hazards, either directly or anonymously without any fear of reprisal or retaliation
- The location of departmental safety bulletins and safety postings
- OSHA 300 Log – Injury/Illness Reporting
- Disciplinary procedures that may be used to ensure compliance with safe work practices
- Reporting safety concerns
- Accessing the department Safety Committee representative
- Reporting occupational injuries and illnesses
- First Aid procedures/location of First Aid Stations
- Emergency evacuation procedures – Key Emergency Action & Response Plan
- Pedestrian safety practices in areas in which forklifts or hoists are used
- PPE requirements
- Bloodborne Pathogens (for all employees at new hire and annually)
- Fire extinguisher safety (for all employees who are authorized to respond to fire emergencies)
- Safe Lifting (for any employee who lifts more than 20 pounds)
- Forklift Training (includes all PITs; mandatory for stockroom) **N/A** or **Date TBD** (circle one)
- Overhead Crane Training (for employees who operate overhead cranes/hoists) **N/A** or **Date TBD** (circle one)
- Hazard Communication Training (**must be given by Supervisor**)
  - The potential occupational hazards in the work areas of my job assignment (**Supervisor**)
  - The safe work practices and personal protective equipment required for my job (**Supervisor**)
  - The location and availability of Safety Data Sheets (**Supervisor**)
  - The hazards of any materials to which I may be exposed, and my right to the information contained on Safety data sheets (SDSs) for those materials (**Supervisor**)

Other Safety Training                      Describe Subject Covered: (Attach documentation)

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*I understand the above items and agree to comply with safe work practices in my work area.*

**Employee Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Safety Officer Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Supervisor Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

# APPENDIX F

HAZARD ASSESSMENT FOR PERSONAL PROTECTIVE EQUIPMENT

**HAZARD ASSESSMENT FOR PERSONAL PROTECTIVE EQUIPMENT**

<b>Position/Task</b>	<b>Department</b>
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**LIFTING/BENDING/TWISTING EXPOSURE**

**Assessment of Hazard:**

**\* Is lifting required?** \_\_\_\_\_  
 If yes, what is the maximum weight? \_\_\_\_\_  
 If yes, what is being lifted? \_\_\_\_\_  
 If yes, what is the frequency of lifting? \_\_\_\_\_  
 Engineering control? \_\_\_\_\_  
 Administrative rule? \_\_\_\_\_  
 Required PPE? \_\_\_\_\_

**\* Is bending required?** \_\_\_\_\_  
 If yes, what is the frequency of bending? \_\_\_\_\_  
 Engineering control? \_\_\_\_\_  
 Administrative rule? \_\_\_\_\_  
 Required PPE? \_\_\_\_\_

**\* Is twisting required?** \_\_\_\_\_  
 If yes, what is the frequency of twisting? \_\_\_\_\_  
 Engineering control? \_\_\_\_\_  
 Administrative rule? \_\_\_\_\_  
 Required PPE? \_\_\_\_\_

**HAZARDOUS MATERIALS EXPOSURE (corrosives, oxidizers, flammables, physical health hazards)**

**Chemical Name:**

**\* To eliminate and minimize chemical hazard exposure:**

Chemical Engineering control? \_\_\_\_\_  
 Administrative rule? \_\_\_\_\_  
 PPE as required by SDS?  
     Eye protection: \_\_\_\_\_  
     Inhalation protection: \_\_\_\_\_  
     Ingestion protection: \_\_\_\_\_  
     Hand/Feet/Skin protection: \_\_\_\_\_

**Special precautions:** \_\_\_\_\_

# APPENDIX G

## CONTRACTOR SAFETY REQUIREMENTS AND EVALUATION CHECKLISTS



**CONTRACTOR SAFETY REQUIREMENTS AND EVALUATION CHECKLISTS**

<b>GENERAL:</b>	<p>Key Technology requires that all subcontractor safety programs, training, and procedures coordinate with Key’s own standards of safety. In addition, subcontractors utilized by Key to provide services to Key customers will be reviewed and qualified by the Customer prior to performing work.</p> <p>Key Technology contractors are charged with the responsibility of seeing that all listed rules and procedures are followed.</p>		
<b>CONTRACTOR FIRM:</b>		<b>DATE:</b>	
1.	<input type="checkbox"/> A pre-job safety conference will be held between the Key project coordinator, safety officer, and the contractor representatives. Items to be discussed are operational hazards in job area, first aid, hazard communication, lockout/tagout, special safety equipment required because of plant operation hazards, where safety equipment can be obtained, hot work permits, confined space entry permits, and plant safety program. The safety officer will also review Key’s Emergency Response and Action Plan. All accidents must be reported immediately to the project coordinator and safety officer.		
2.	<input type="checkbox"/> All contractors must be competent and capable to perform assigned duties in a safe and environmentally sound manner.		
3.	<input type="checkbox"/> All contractors have an established line of communication with Key and have been given defined roles and responsibilities.		
4.	<input type="checkbox"/> All contracted work performed will be done in accordance with all local, state, and federal regulations pertaining to health and safety of employees.		
5.	<input type="checkbox"/> All contractors must have the appropriate licenses, registration, insurance, and certification to perform the contracted work.		
6.	<input type="checkbox"/> All tools and equipment issued or used must be maintained in a safe condition regardless of ownership, and must conform to all appropriate sections of the federal occupational safety and health codes. Any defective tools will be removed from service immediately.		
7.	<input type="checkbox"/> The following reports will be forwarded to Key Technology Corporate Administration for the purpose of approving subcontractors and monitoring their safety activities;		
	<input type="checkbox"/> OSHA 300 logs for the purpose of calculating TRIR and DART		
	<input type="checkbox"/> EMR Letter from Contractor Insurance Company		
	<input type="checkbox"/> General inspections;		

	<input type="checkbox"/> General inspections by outside agencies;
	<input type="checkbox"/> OSHA citations/fines
	<input type="checkbox"/> Records of safety training.
8.	<input type="checkbox"/> No smoking is permitted within the facility. Smoking is allowed in designated areas located outside the building.
9.	<input type="checkbox"/> Fire watches will be furnished by the contractor when welding or burning. Fire extinguishers will be provided by the contractor.
10	<input type="checkbox"/> Contractor employees will remain within the designated area of contractor's work.
11	<input type="checkbox"/> Hazard Communication: Contractors will be informed of any hazardous chemicals to which they may be exposed while on the job-site. Contractors bringing chemicals into a Key facility must supply a copy of the Safety Data Sheet to the safety officer.
12	<input type="checkbox"/> Contractors will be included in all safety meetings, safety orientations, job safety analysis or hazard assessment and on the job safety inspections.
13	<input type="checkbox"/> If directed by Key personnel to leave the area, contractor personnel must do so immediately.
14	<input type="checkbox"/> In the event of a plant emergency, contractors are to evacuate the building to the nearest assembly area as designated on the evacuation map.
15	<input type="checkbox"/> PPE including eye protection, hearing protection and safety shoes must be worn in designated areas. All contractors sending employees to Key Technology will provide the necessary Personal Protective Equipment as required for the type of work to be done.
16	<input type="checkbox"/> All energy sources are to be locked/tagged out before any work is performed. Key Technology and the contractor will inform each other of respective lockout or tagout procedures.
17	<input type="checkbox"/> All temporary electrical wiring will comply with National Electric Code. All electrical equipment must be periodically inspected and properly repaired as necessary.
18	<input type="checkbox"/> Running, shouting or horseplay are strictly forbidden.
19	<input type="checkbox"/> Working without shirts is not permitted in the plant.
20	<input type="checkbox"/> All openings and floors, wall or railways are to be barricaded to prevent personnel from falling into or through a set opening.
21	<input type="checkbox"/> Consumption of alcoholic liquids or the use of illegal drugs is not allowed. Any persons under the influence or in possession of alcohol or drugs (Rx or otherwise) will not be allowed onto Key Technology grounds.
22	<input type="checkbox"/> All areas where work is being done overhead are to be roped off and suitably marked.
23	<input type="checkbox"/> All work areas are to be left in a neat and safe condition before leaving and all trash must be disposed of properly everyday. Waste material must never be thrown from upper level to lower level.



24	<input type="checkbox"/> All passageways, operating areas and roadways must be kept clear of stumbling hazards. Welding cables, hoses and temporary lines should be kept clear of passageways, preferably suspended overhead to eliminate tripping hazards.
25	<input type="checkbox"/> All scaffolding provided will be erected and maintained in accordance with applicable safety and health regulations.
26	<input type="checkbox"/> All ladders must be in accordance with OSHA's safety codes and are to be kept in good repair. Applicable safety laws must be observed in the use of ladders.
27	<input type="checkbox"/> Oxygen and acetylene cylinders must be fastened securely in an upright position.
28	<input type="checkbox"/> Key Technology reserves the right to question unsafe equipment and practices.
29	<input type="checkbox"/> Copies of these specifications are to be issued to the contractor. Employees assigned to work on site or with a Key Service Technician, are to have read these rules before starting the job.
30	<input type="checkbox"/> Contactor will participate in post-job performance review to include a safety review and overall job performance.
31	<input type="checkbox"/> These contractor safety regulations are a minimal standard. Each contractor must take the other precautions necessary to prevent injuries to employees or damage to equipment.
32	Additional information here:

<b>CONTRACTOR FIRM:</b>		<b>DATE:</b>	
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*As an authorized representative of the above contractor firm, I have thoroughly reviewed the contractor safety regulations required by Key Technology.*

*I agree to abide by all of the Key Technology Inc. regulations and will ensure that all contractor work performed on Key Technology Inc. property will be in accordance with these regulations.*

<b>Authorized Contractor Representative (Signature)</b>	<b>Title</b>	<b>Date</b>
<b>Key Technology Inc. Witness (Signature)</b>	<b>Title</b>	<b>Date</b>

# APPENDIX H

## INJURY REPORTING AND RETURNING TO WORK

## KEY TECHNOLOGY

### INJURY REPORTING AND RETURNING TO WORK

All Key Technology employees who are injured at work MUST report the injury immediately to their supervisor BEFORE the end of the shift in which the injury or illness occurred. If more than first aid is needed, call 9-1-1.

The supervisor of the injured Key Technology employee makes sure that the injury/illness incident is promptly investigated (see Appendix A-2) and a "Workers' Compensation Claim Form" are completed properly and submitted to management in a timely manner.



### EMPLOYEE STEPS FOR RETURNING-TO-WORK (RTW) AFTER AN INJURY, ILLNESS, OR OTHER MEDICAL ABSENCE

Key Technology is very concerned about injured or ill employees missing work, losing pay, and the effects that even one absence has on work schedules and keeping customer satisfaction high.

It is the policy and practice of Key Technology to offer eligible injured or ill employees modified work when it is available, and to return eligible injured or ill employees back to their regular jobs, when they become capable of performing them without unreasonable risk of re-injury.

**1. Light/Modified Duty:** If the employee's injury or illness is so serious that it prevents the employee from doing his/her regular job, the employee is required to ask their doctor for permission to perform "modified work". Key Technology has several jobs that require varying degrees of physical actions and can usually find useful work for an injured or ill employee. The employee's supervisor has the paperwork for the employee to take with them to the doctor's office for this purpose.

Remember that if working in a modified job is not permitted by the doctor and the doctor authorizes time away from work completely, there is at least a three-day waiting period before workers' compensation time-loss benefits begin.

To avoid loss of income, tell your doctor that modified work is available at Key Technology and ask your physician to complete the modified duty paperwork. Key Technology is prepared to complete whatever paperwork a physician may need in order for him/her to authorize modified work.

**2. Returning to Work:** After seeing a doctor (or other medical provider) and before their next regularly scheduled work shift begins, an injured or ill employee is required to inform his/her supervisor what the doctor said about their injury or illness in terms of their ability to work.

Every time an employee goes to the doctor (or other medical provider), he/she is required to ask the provider to complete the modified work paperwork and then bring it back with them to give to their supervisor. Employees must always report for their next regularly scheduled shift once the doctor releases them to any kind of work.

The paperwork that the doctor completes to allow an employee to do modified work (called the Work Release/Physical Capacities form) is also to be given to the employee's supervisor after the medical provider completes it.

I understand and agree to follow all of these responsibilities, and agree that not following them may (1) cause a delay or denial of worker's compensation benefits, and (2) result in disciplinary warnings up to and including termination of employment.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date