

# **Iwaki America, Inc.**

## **EMPLOYEE SAFETY HANDBOOK**

### **A Guide to Iwaki America, Inc.'s Safety Policies and Procedures to Support a Safety-Conscious Work Environment**

*Provided by: Fred C. Church, Inc.  
March 10, 2005*

#### **About This Handbook**

**The materials presented herein are for general reference only. Federal, state or local laws, or individual circumstances may require the addition of policies, amendment of individual policies, and/or the entire Handbook to meet specific situations. These materials are intended to be used only as guides and should not be used, adopted, or modified without the advice of competent legal counsel.**

## Preface

**These materials are presented, therefore, with the understanding that the Company is not engaged in rendering legal, accounting, or other professional service. If legal advice or other expert assistance is required, the services of a competent professional should be sought.**

Iwaki America, Inc. recognizes that our people drive the business. As the most critical resource, employees will be safeguarded through training, provision of appropriate work surroundings, and procedures that foster protection of health and safety. All work conducted by Iwaki America, Inc.'s employees will take into account the intent of this policy. No duty, no matter what its perceived result, will be deemed more important than employee health and safety.

Iwaki America, Inc. is firmly committed to the safety of our employees. We will do everything possible to prevent workplace accidents and we are committed to providing a safe working environment for all employees.

We value our employees not only as employees but also as human beings critical to the success of their family, the local community, and Iwaki America, Inc..

Employees are encouraged to report any unsafe work practices or safety hazards encountered on the job. All accidents/incidents (no matter how slight) are to be immediately reported to the supervisor on duty.

A key factor in implementing this policy will be the strict compliance to all applicable federal, state, local, and company policies and procedures. Failure to comply with these policies may result in disciplinary actions.

Respecting this, Iwaki America, Inc. will make every reasonable effort to provide a safe and healthful workplace that is free from any recognized or known potential hazards. Additionally, Iwaki America, Inc. subscribes to these principles:

1. All accidents are preventable through implementation of effective Safety and Health Control policies and programs.
2. Safety and Health controls are a major part of our work every day.
3. Accident prevention is good business. It minimizes human suffering, promotes better working conditions for everyone, holds Iwaki America, Inc. in higher regard with customers, and increases productivity. This is why Iwaki America, Inc. will comply with all safety and health regulations which apply to the course and scope of operations.
4. Management is responsible for providing the safest possible workplace for Employees. Consequently, management of Iwaki America, Inc. is committed

## Preface

to allocating and providing all of the resources needed to promote and effectively implement this safety policy.

5. Employees are responsible for following safe work practices and company rules, and for preventing accidents and injuries. Management will establish lines of communication to solicit and receive comments, information, suggestions and assistance from employees where safety and health are concerned.
6. Management and supervisors of Iwaki America, Inc. will set an exemplary example with good attitudes and strong commitment to safety and health in the workplace. Toward this end, Management must monitor company safety and health performance, working environment and conditions to ensure that program objectives are achieved.
7. Our safety program applies to all employees and persons affected or associated in any way by the scope of this business. Everyone's goal must be to constantly improve safety awareness and to prevent accidents and injuries.

Everyone at Iwaki America, Inc. must be involved and committed to safety. This must be a team effort. Together, we can prevent accidents and injuries. Together, we can keep each other safe and healthy in the work that provides our livelihood.

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President

March 10, 2010

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Risk Manager

March 10, 2010

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## Employee Safety Responsibilities

The primary responsibility of the employees of Iwaki America, Inc. is to perform his or her duties in a safe manner in order to prevent injury to themselves and others.

As a condition of employment, employees **MUST** become familiar with, observe, and obey Iwaki America, Inc.'s rules and established policies for health, safety, and preventing injuries while at work. Additionally, employees **MUST** learn the approved safe practices and procedures that apply to their work.

Before beginning special work or new assignments, an employee should review applicable and appropriate safety rules.

If an employee has any questions about how a task should be done safely, he or she is under instruction **NOT** to begin the task until he or she discusses the situation with his or her supervisor. Together, they will determine the safe way to do the job.

If, after discussing a safety situation with his or her supervisor, an employee still has questions or concerns, he or she is required to contact the Safety Coordinator.

**NO EMPLOYEE IS EVER REQUIRED** to perform work that he or she believes is unsafe, or that he or she think is likely to cause injury or a health risk to themselves or others.

## Employee Safety Rules

1. **Conduct:** To ensure orderly operations and provide the best possible work environment, Iwaki America, Inc. expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization.
2. **Drugs and Alcohol:** Use and/or possession of illegal drugs or alcohol on company property or on company time is forbidden. Reporting for work while under the influence of illegal drugs or alcohol is forbidden.
3. **Housekeeping:** The following areas must remain clear of obstructions:
  - Aisles/exits
  - Fire extinguishers and emergency equipment
  - All electrical breakers, controls, and switches
  - Eye wash/safety showers

You are responsible to keep your work area clean and safe. Clean-up several times throughout the day, disposing of trash and waste in approved containers, wiping up any drips/spills immediately, and putting equipment and tools away as you are finished with them.

4. **Injury Reporting:** In the event of injury at work, employees should report the incident immediately regardless of the degree of severity. Failure to immediately report injuries can result in loss of Workers' Compensation benefits. Supervisors must complete accident reports as soon as possible and submit the reports to the HR office. After all medical appointments resulting from a work-related injury, you must contact your supervisor to discuss your progress.

In the event of severe injury or illness, the emergency phone number, "911" should be called from the nearest phone. After the call for emergency services has been made, the switchboard should be notified.

For minor injuries, eye wash stations are available in the service areas and a first aid cabinet is outside the production floor washrooms.

Iwaki America, Inc. provides Transitional Return to Work (light duty) jobs for persons injured at work. Transitional work is meant to allow the injured employee to heal under a doctor's care while she/he remains productive. Employees are required to return to work immediately upon release.

## Employee Safety Rules

5. **Personal Protective Equipment (PPE):** Inspect PPE prior to each use. Do not use damaged PPE. You are required to maintain and keep PPE clean.
  - a) Safety Glasses – must be worn at all times in designated areas in this facility.
  - b) Gloves – work gloves must be worn at all times when handling sharp or rough stock, welding, or performing other jobs, which could cause hand injuries. Synthetic gloves must be worn when handling chemicals.
  - c) Welding – appropriate filter lens, welding helmet, gloves, and sleeves are required for welders at all times.
  - d) Respirators – only employees trained and authorized to use respirators are allowed to do so.
  - e) Hearing Protection – is required in areas where noise exposure is more than 90dBA (85dBA if you already have experienced a hearing loss).
6. **Equipment Operation:** You must specifically be trained and authorized by your supervisor to operate the following:
  - Company vehicles,
  - Forklifts,
  - Machine and power tools,
  - Paint sprayers,
  - Welders, and
  - Cranes/hoists.

When operating machines: do not wear loose clothing, long hair should be tied up and back, remove jewelry, and sleeves should either be rolled all the way up, or all the way down.

Never operate damaged or defective equipment. Turn the machine off and report it to your supervisor immediately.

Never tamper with, remove, or deactivate machine guards or controls designed to ensure safe operations.

Never reach into an operating machine or moving machine part.

# Employee Safety Rules

## 7. Ladders:

- Inspect all ladders prior to each use;
- Ladders must be placed on secure footing;
- Only one person is allowed on a ladder at a time;
- Never stand on the top two steps of a stepladder;
- Always maintain 3-point contact when working on ladders;
- Never reach beyond arm length when working on a ladder; and
- Never use metal ladders when working on or around electrical equipment.

## 8. Cranes/Hoists/Lifting Devices:

- a) Inspect all cranes, hoists and lifting devices (slings, hooks, etc.) prior to each use. Never use damaged equipment.
- b) Never walk under a load suspended from a hoist or crane.
- c) Keep all personnel clear of the 'fall zone' of the crane/hoist.
- d) Know the weight of material being lifted. Never overload a crane/hoist.

## 9. Lockout/Tagout – prior to working on any machinery when guards are removed, every energy source (electrical, hydraulic, chemical, mechanical, etc.) must be deactivated, stored energy dissipated, and the control locked in the off (safe) position.

Never remove or tamper with a lockout performed by another employee or contractor. A lockout could consist of a lock applied to a control such as a switch, breaker, or valve. A tag containing words such as "DANGER - DO NOT OPERATE" may also be used for lockout. If you see the lock, the tag, or both applied to an energy control device it means, "keep your hands off."

## 10. Hazard Communication:

- a) All chemical containers must be labeled to identify contents and hazards. Most labels use numbers to rank the hazard level in three important areas:
  - FIRE** (red background color) - will the material burn?
  - HEALTH** (blue background) - is the material dangerous to my body?
  - REACTIVITY** (yellow background) - is the material dangerously unstable?

## Employee Safety Rules

After each hazard (Fire, Health, Reactivity), a number from 1-4 will be assigned. The numbers reflects the degree (or amount) of hazard:

- 0 Minimal
- 1 Slight
- 2 Moderate
- 3 Serious
- 4 Severe

- b) A Material Safety Data Sheet (MSDS) must be secured for all chemicals purchased or brought on site. You have a right to access MSDSs – ask your supervisor.
- c) Follow all label and MSDS instructions – including amount instructions.
- d) Do not mix chemicals unless authorized to do so.
- e) Keep all chemicals in closed containers.
- f) Store all flammable liquids in safety cabinets or safety cans. Never use flammable chemicals around ignition sources such as smokers, pilot lights, or arcing/sparking electrical equipment.
- g) Wear required Personal Protective Equipment and minimize contact with the chemical.
- h) Do not eat, drink, or smoke while using chemicals. And always wash your hands after handling chemicals.

**11. Confined Space Entry** – only trained and authorized employees are permitted to enter confined spaces. If you believe that your job requires confined space entry, contact your supervisor prior to undertaking the work. (Confined spaces are areas not meant for human occupancy, have limited means of entry/exit, and have electrical, chemical, thermal, atmosphere, or entrapment hazards).

### **12. Emergencies:**

- a) In the event of any serious injury or fire call 911. Send someone to the facility entrance to meet the Fire Department. If in doubt, call 911.
- b) Upon discovering a fire, alert others in immediate danger and initiate facility-wide fire alarm.

## Employee Safety Rules

- c) When the evacuation signal is given, all employees should immediately turn off equipment, close doors, and evacuate to their designated evacuation areas. Attendance will be taken to account for all personnel. Stay together in the group until further instructions are received.
- d) Do not attempt to fight any fire which is uncontained, too hot, too smoky, or if you are too frightened.
- e) To use a fire extinguisher, remember PASS:
  - P = Pull (the safety pin)
  - A = Aim (at the base of the fire)
  - S = Squeeze (the lever)
  - S = Sweep (side to side)

If you use a fire extinguisher, remember:

- Stay low,
  - Keep yourself between the fire and an exit,
  - Do not turn your back on a fire, and
  - Immediately report the use to your supervisor.
- d) Do not touch blood or any other bodily fluid during or following an incident. If you are trained to administer first aid, gloves and other barriers are located with the first aid equipment. If you think that you have been exposed to bodily fluid, notify your supervisor immediately.

### 13. Company Vehicles and Driver Safety:

- a) Only employees authorized by Iwaki America, Inc. are permitted to operate Iwaki America, Inc. vehicles.
- b) No 'side trips' or personal use of company vehicles are permitted.
- c) Seat belts/shoulder harnesses must be worn whenever the vehicle is in motion.
- d) All local and state traffic regulations and signs must be followed.
- e) No unauthorized riders, hitchhikers, etc., are allowed.
- f) All moving violations resulting in points being assigned to your license must be reported to your supervisor.
- g) Driving while under the influence of alcohol or other drugs is forbidden.

## Employee Safety Rules

- Employees driving their personal vehicles on company business must follow steps 'c – g,' shown above.

### 14. Electrical Safety:

- Never operate or tamper with the electrical main switch or breakers. You are authorized only to operate switches/disconnects on/for individual machines.
- Report all electrical problems and suspected problems to your supervisor.
- All junction boxes, control boxes, connections, and other wiring must have covers securely installed to prevent accidental contact.
- Inspect all plugs, cords, and portable equipment prior to use.
- Report any damaged electrical equipment to your supervisor. Only authorized personnel are permitted to make repairs.
- Extension cords are to be used only for temporary applications. Never stretch cords across aisles or areas where others may trip over them. Do not attach extension cords to the building or run them under rugs/mats or through walls.
- Any personal electrical devices must be approved by Iwaki America, Inc. prior to use.

### 15. Lifting:

- If you need help moving material, request assistance.
- When you lift, use your leg muscles by squatting close to the load, preserving the curve in your back, spreading your feet, and lifting with your legs, keeping the load close to your body.
- When you turn holding an object, move your feet, and do not twist.

16. **Staying Safe** - Report any unsafe conditions or situations to your supervisor. If you have suggestions on improving any aspect of safety in the facility, discuss it. If you are unsure of how to operate a piece of equipment or complete an assignment, **ask for help**. Asking for help when you are unsure reduces the chance of injury.

## Employee Safety Rules



These rules have been established to help you stay safe and injury free. Violation of the above rules, or conduct that does not meet minimum accepted work standards, will result in discipline, up to and including discharge.

When working at a customer location, employees are required to follow the above rules, as well as all customer rules and procedures, and work in a manner that reflects positively on the company. Before operating any equipment at a customer location, permission must first be secured from the customer contact.

## Safety Coordinator Responsibilities

Amy Francer is designated as Iwaki America, Inc.'s Safety Coordinator. The Safety Coordinator is responsible for implementation and compliance with the Safety and Health Policy of Iwaki America, Inc. and is accountable for results as measured by criteria, such as incident rates.

Other responsibilities include:

1. Resolve questions, approve and/or recommend necessary expenditures to correct unsafe conditions.
2. Make regular shop, warehouse, office and ground job site tours, and safety inspections to determine if safe work practices are being observed; ensure that unsafe conditions do not exist.
3. Actively participate and follow the safety and health programs.
4. Plan, coordinate, perform, or delegate all safety training and testing given to supervisors and employees. Review results to be sure they are satisfactory. Maintain appropriate records of training and testing.
5. Review disciplinary actions with the employees.
6. Personally perform safety inspections, and review safety inspection reports and unsafe conditions reported by supervisors, employees, or others. Make or obtain corrections as required to maintain a safe workplace and ensure compliance.
7. Conduct regular safety meetings with employees to promote safety awareness and compliance with the Safety and Health Policies.
8. Ensure safety awareness among workers through regular meetings.
9. Ensure compliance with safe work practices and Iwaki America, Inc.'s safety rules. Take appropriate disciplinary action to ensure compliance. This includes safe working procedures in flange and fitting machine shop operations, saw shop operations, the warehouse, yard, and office operations.
10. Investigate accidents and assist with completion of accident report forms when required.
11. Review reports of first aid incidents and reportable injuries to determine possible preventative actions. Take immediate corrective actions as required.
12. Ensure that specific programs (i.e. hazard communication, protection from bloodborne pathogens, hearing conservation, forklift safety/operator certification) are implemented and complied with consistently.

## Client Visits

1. Employees of Iwaki America, Inc. are required to follow all client safety and security procedures during client visits.
2. If your client host does not advise you regarding safety hazards consider the following:
  - Emergency exit location(s).
  - Keep your eye on the path you are walking and avoid any tripping/slipping hazards. When on stairs maintain three point contact (hand on rail and feet on stairs).
  - When visiting manufacturing or construction sites, eye protection, hearing protection, and hard hats are frequently required. Ideally, this equipment will be in the possession of the Iwaki America, Inc. employee and not provided by the client.
3. If you will be touring a factory or construction site, dress appropriately. Wear shoes that support your feet and are slip resistant. Avoid clothing that is either constrictive or too loose; loose clothing can get caught in machinery or other equipment.

## Reporting Injuries

1. Any work-related injury or suspected injury must be reported immediately to your supervisor and to Human Resources. A Report of Injury form must be completed. Failure to promptly report an injury may result in disciplinary action.
2. After each practitioner appointment, the employee must report to his/her supervisor and Human Resources to review his/her progress.
3. Iwaki America, Inc. provides light duty work for employees recovering from injury. Employees are required to return to light duty work immediately upon release.
4. An accident investigation will be conducted to determine the root cause of the accident. The injured employee will be asked to participate in the investigation.
5. Employees are urged to report hazardous conditions and “near miss” incidents to their supervisors before injuries result.
6. Any attempt to defraud Iwaki America, Inc. with a false workers’ compensation claim will result in disciplinary action. The case can also be referred to the district attorney for possible prosecution.

# Emergency Action Plan

## GENERAL EMERGENCY GUIDELINES:

- Stay calm and think through your actions.
- Know the emergency numbers:
  - Fire/Police/Ambulance 9-911
  - Internal Emergency Number (if applicable) – N/A
  - Human Resources x2074
  - Page 561
  - Operator “0”
- Know where the stairwell exits are located – N/A.
- Do not hesitate to call/alert others if you believe that an emergency is occurring — you will not “get in trouble.”
- Know where emergency equipment is located.

## FIRE:

### 1. EVACUATION

- Employees will be notified of a fire alarm by either the fire alarm system or by a paged announcement.
- Upon becoming aware of a fire alarm, employees should immediately evacuate the building using the closest stairs. Do not delay evacuation to get personal belongings or to wait for co-workers. Also, all doors should be closed as the last person passes through.
- Supervisors should be the last persons to leave the area. Check in conference rooms, lavatories, and offices to be sure that all personnel have evacuated.
- Any employee having a mobility, visual, hearing, or other condition, which may hinder them from becoming aware of an emergency or evacuating, should request special assistance through Human Resources.
- Upon exiting the building personnel should report to the parking lot for a headcount. Supervisors will account for all employees and an employee count will be provided to the Program Administrator John Miersma.
- If any employee is missing, an immediate report should be made to John Miersma who will in turn report to the first available fire department officer.

# Emergency Action Plan

- Employees should stay together in a group so that periodic updates on the situation can be issued.
- The order to re-occupy the building will be issued by Program Administrator – John Miersma.
- In the event of inclement weather, information can be obtained by calling the main number (508) 429-1110.

## 2. EMPLOYEE DISCOVERING A FIRE:

- Alert other persons in the immediate hazard area.
- Activate a fire alarm or call [insert name] to page an emergency announcement.
- If you have been trained, you can decide to use a fire extinguisher following these instructions:
  - P=Pull the safety pin
  - A=Aim the nozzle at the base of the fire
  - S=Squeeze the operating lever
  - S=Sweep side to side covering the base of the fire

*\*When using a fire extinguisher always stay between the fire and an exit; stay low and back away when the fire is extinguished.*

*\*Never feel that using a fire extinguisher is required. If the fire is too hot, too smoky or you are frightened, evacuate.*

- Have someone notify [insert name of incident commander] where the emergency is located. He/she will relay this information to the fire department.

## 3. MEDICAL EMERGENCY: (chest pains, loss of consciousness, fall from a height, etc.)

- Upon discovering a medical emergency, Call 911.
- Call the operator (“O”) and report the nature of the medical emergency and location.
- Stay with the person involved being careful not to come in contact with any bodily fluids, unless properly trained and equipped.
- Send two persons (greeters) to the building entrance to await the fire department. Often two fire department units will arrive, so the second greeter should wait at the entrance to receive the second unit while the first greeter escorts the fire dept. personnel to the scene.
- Employees in the immediate vicinity of the emergency, but not directly involved, should leave the area.
- Human Resources will make any necessary notifications to family members of the person suffering the medical emergency.

## Emergency Action Plan

### **4. SEVERE WEATHER:**

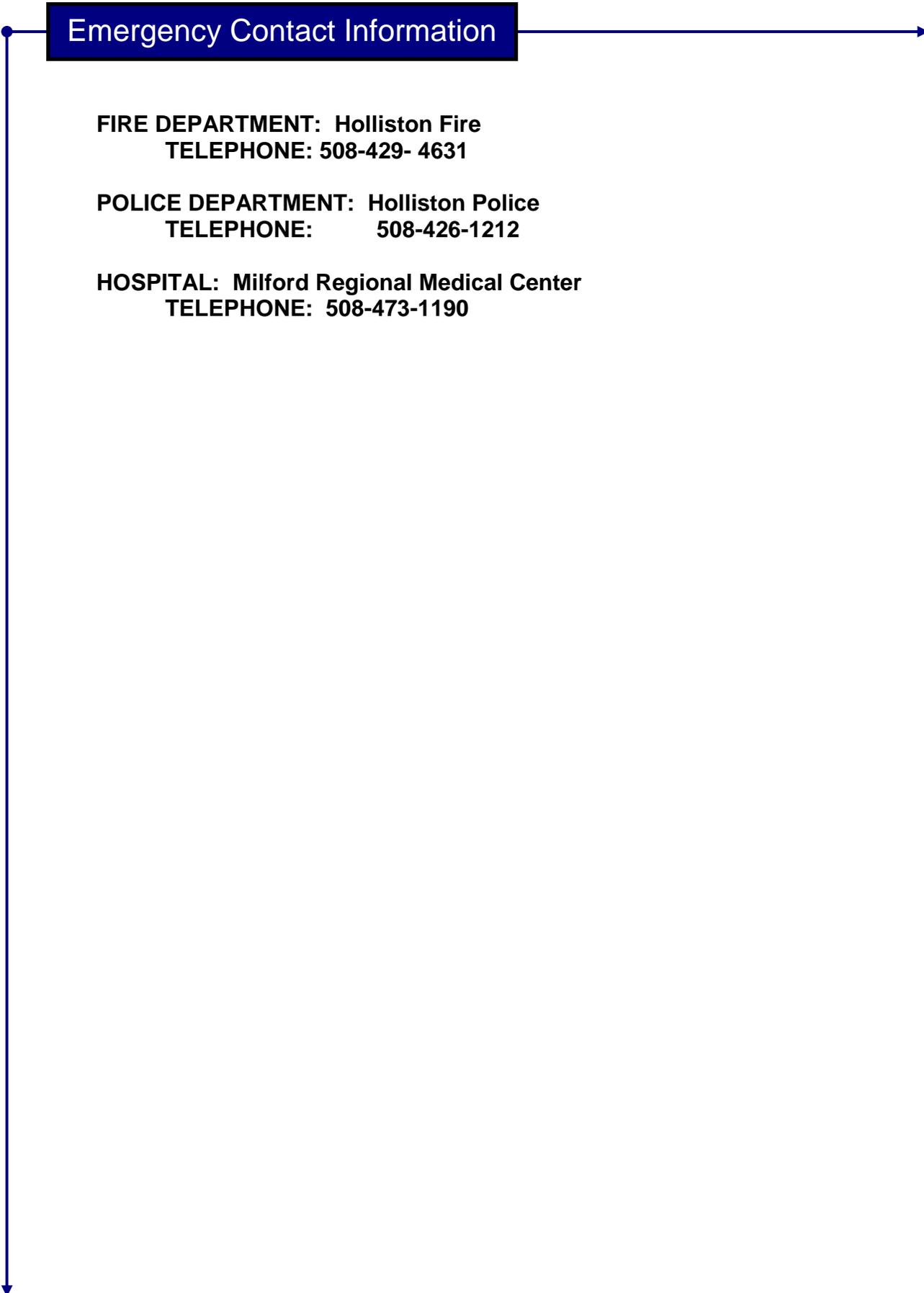
- If a severe weather report is issued the Program Administrator (John Miersma) will be notified. An announcement will be made at that time notifying employees where to go for safety.
- Employees will shut down all office equipment.

### **5. WORKPLACE VIOLENCE:**

- Any employee who feels that she/he has been threatened should immediately report their concern to their manager and to Human Resources.
- If any person is observed exhibiting threatening behavior or making threatening statements, the person discovering the situation should warn others in the area and immediately notify Human Resources and stay away from the person exhibiting threatening behavior.
- Depending upon the level of concern, the Holliston Police (911) should be called immediately.
- Never attempt to confront any person exhibiting threatening behavior.

\*If you have reason to believe that events in your personal life could result in acts of violence occurring at work, you are urged to confidentially discuss the issue with Human Resources so that a prevention plan can be developed.

## Emergency Contact Information



**FIRE DEPARTMENT: Holliston Fire**  
**TELEPHONE: 508-429- 4631**

**POLICE DEPARTMENT: Holliston Police**  
**TELEPHONE: 508-426-1212**

**HOSPITAL: Milford Regional Medical Center**  
**TELEPHONE: 508-473-1190**

## Fire Prevention Plan and Electrical Safety

1. Smoking is not allowed in any interior area of the building. Smoking is only allowed in designated exterior smoking areas.
2. No candles or open flames are allowed within the facility.
3. Hot work: contractors performing hot work (welding, grinding, flame cutting, brazing, soldering, etc.) must contact [insert name] for approval prior to the start of the work.
4. Only space heaters provided by the company are approved for use within the facility. Employees using space heaters are responsible to turn the heater off when leaving their desk for extended periods of time (lunch, end of the work day, etc.).
5. No flammable chemicals are allowed inside the building at any time. If you feel that there is a work-related need to use a flammable chemical, contact Human Resources for guidance.
6. Electrical safety:
  - With the exception of independently fused multi-tap cords for computers, extension cords are not allowed.
  - Keep electric cords out of areas where they will be damaged by stepping on/kicking them.
  - Turn electrical appliances off with the switch, not by pulling out the plug.
  - Turn all appliances off before leaving for the day.
  - Radios/tape/CD players and PDAs are the only personal electrical devices allowed to be used in offices/cubes. These devices must be in good repair. Iwaki America, Inc. reserves the right to instruct you to remove personal electrical devices at any time.
  - Never run cords under rugs or other floor coverings.
  - Any electrical problems should be reported immediately to [insert name].
7. The following areas must remain clear and unobstructed at all times:
  - Exit doors,
  - Aisles,
  - Electrical panels, and
  - Fire extinguishers.

## Return to Work Program

It is our goal to prevent work-related injuries from happening. We are always concerned when one of our employees is injured or ill due to a work-related condition. We believe that such absences cost both Iwaki America, Inc. and its employees. We want our injured employees to get the best possible medical treatment immediately to assure the earliest possible recovery and return to work.

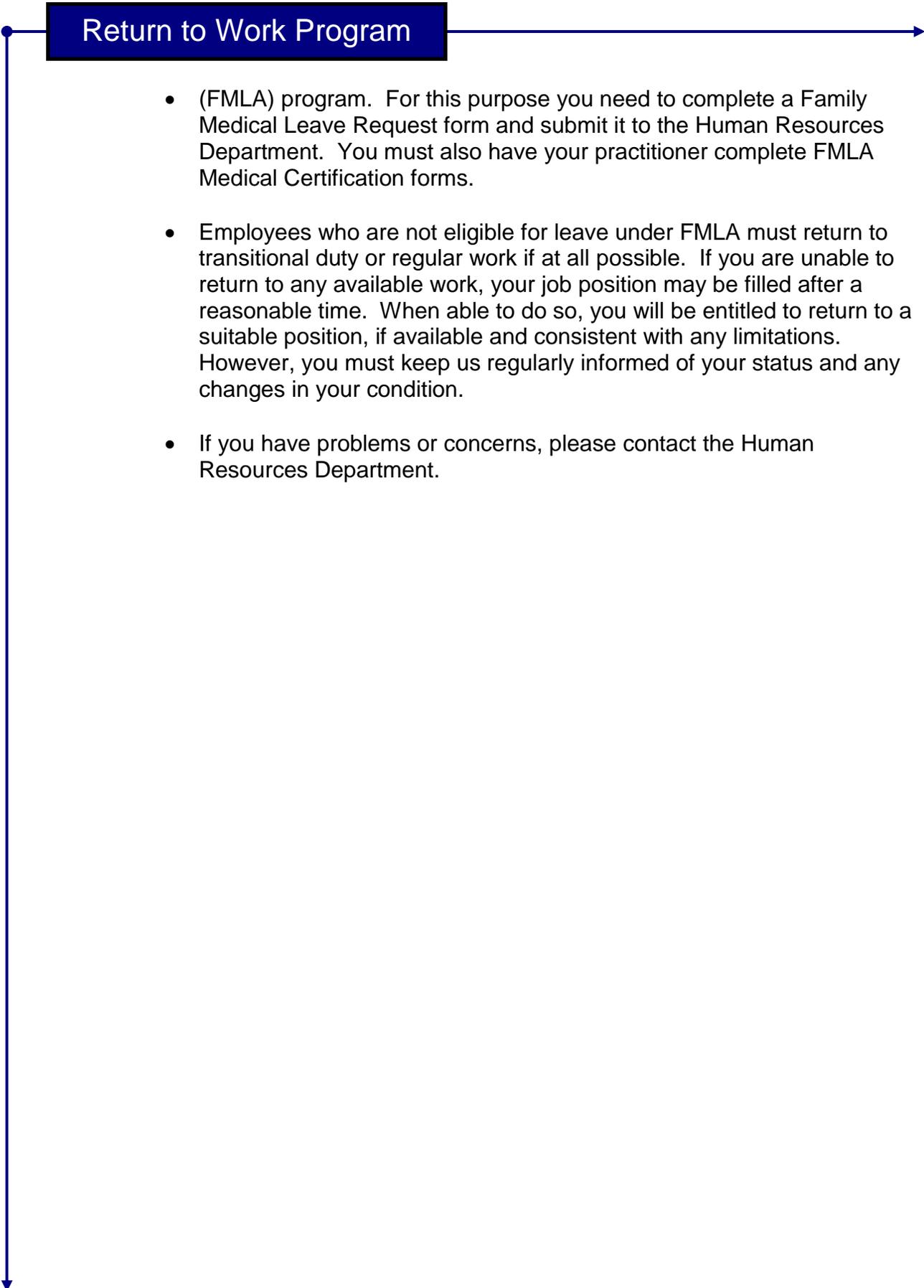
Iwaki America, Inc. has a workers' compensation program available for employees who have suffered work-related injuries. Human Resources will determine, based upon their guidelines, whether you are eligible for wage loss or medical expenses under that program.

Iwaki America, Inc. wants to provide meaningful work activity for all employees who become unable to perform all, or portions, of their regular work assignment. Thus we have implemented a Transitional Duty program (light duty).

### **EMPLOYEE PROCEDURES**

- All work-related injuries must be reported immediately to your supervisor regardless of the degree of severity.
- Supervisors must complete and sign an Injury/Accident Report as soon as possible and submit the reports to the HR office.
- When medical treatment is sought, the injured employee must advise their supervisor that they are seeking treatment.
- If you are unable to return to your regular job, but are capable of performing transitional duty, you must return to transitional duty. Failure to do so will result in your not being eligible for full disability benefits under the workers' compensation program, and may result in disqualification for certain employee benefits and, in some cases, be a basis for termination.
- Employees who are unable to work and whose absences Iwaki America, Inc. approves, must keep us informed on a weekly basis of their status. Failure to do so will result in a reduction in benefits available and discipline, up to and including termination from employment.
- If you are unable to return to your regular job or transitional duty, your absence must be approved under the Family Medical Leave Act

## Return to Work Program



- (FMLA) program. For this purpose you need to complete a Family Medical Leave Request form and submit it to the Human Resources Department. You must also have your practitioner complete FMLA Medical Certification forms.
- Employees who are not eligible for leave under FMLA must return to transitional duty or regular work if at all possible. If you are unable to return to any available work, your job position may be filled after a reasonable time. When able to do so, you will be entitled to return to a suitable position, if available and consistent with any limitations. However, you must keep us regularly informed of your status and any changes in your condition.
- If you have problems or concerns, please contact the Human Resources Department.

## Hazard Communication

1. All Iwaki America, Inc. employees have a right to know what chemicals they work with, what the hazards are, and how to handle them safely.
2. Material Safety Data Sheets (MSDS) are documents provided by the supplier of a chemical. MSDS detail the chemical contents, associated hazards, and general safe handling guidelines. At Iwaki America, Inc., the MSDS collection is located in the production area of manufacturing with each Supervisor. Employees are free to utilize the MSDS as needed.
3. General rules for handling chemicals in an office environment are:
  - Read all label warnings and instructions.
  - When changing toner cartridges, consult with an experienced employee if you are unsure how to proceed.
  - Follow instructions for quantity. More is not better.
  - Minimize contact with chemicals. Use double layer cloths or gloves to protect your skin and keep your face clear of the area to reduce inhalation.
  - Always wash your hands after handling chemicals.
  - If a chemical enters your eye(s) immediately hold open the injured eye(s) and rinse it/them with clean, cool water for 15 minutes. Then be sure to report the injury immediately.
  - Any questions or concerns regarding chemicals should be reported to Human Resources.

## Office Safety & Security

### Office Safety:

1. Never leave file drawers open, or open multiple file drawers at once.
2. Do not stack heavy or bulky objects on top of cabinets.
3. Do not store frequently used objects above shoulder height or below knee height.
4. Never reach into office machines without turning them off and unplugging them if possible.
5. Keep your work area free of trip hazards such as storage in walkways, cords across aisles, and damaged floor coverings.
6. Inspect step stools/ladders before use. Be sure to keep a stationary object in front of you when using a step stool to provide stability.
7. Never use defective or broken equipment. Report these problems to your supervisor.

### Security:

1. Always be aware of your surroundings. Keep your head up and hands out of your pockets while walking to and from your car.
2. Immediately report any suspicious activity or persons to [insert name]. And immediately report any theft to [insert name].
3. When parking, remove all valuables from sight and lock car doors.
4. Keep all valuables (money, purse, jewelry, etc.) out of sight when at your desk. Do not bring large sums of money or other valuables into the building.
5. Secure laptop computers, PDAs, and other small electronic devices before leaving your workspace for extended periods of time (lunch, meetings, etc.).
6. If you are working alone and are in the office before or after regular business hours, on weekends, or holidays, observe these additional guidelines:
  - Be sure doors close and lock after you.

## Office Safety & Security

- Turn on lights as you move through the building.
  - Always be aware of the closest telephone (do not hesitate to call 911 if you feel threatened).
  - Be sure that someone at home knows that you are at work and is expecting you to check in by a specified time.
  - As you leave the office, be sure to turn off all equipment, lights, etc., after use.
8. Weapons, including firearms, knives with blades longer than two inches, bow/arrow, pepper spray (mace, tear gas), and clubs, are not allowed on Iwaki America, Inc. property.

## Sexual Harassment

Sexual harassment in the workplace is unlawful, and it is unlawful to retaliate against an employee for filing a complaint of sexual harassment or for cooperating in an investigation of such a complaint. Iwaki America, Inc. subscribes to guidelines concerning sexual harassment and has adopted them as Company policy.

### **Sexual Harassment Policy**

It is the goal of Iwaki America, Inc. to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace, or in other settings in which employees may find themselves in connection with their employment, is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment, or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint, is similarly unlawful and will not be tolerated.

Iwaki America, Inc. subscribes to the following guidelines concerning sexual harassment and has adopted them as company policy. Moreover, as a part of the company's overall nondiscrimination policy, Iwaki America, Inc. prohibits *all* forms of harassment of others because of race, color, religion, sex, age, national origin, ancestry, sexual orientation, physical or mental handicap, veteran, or other protected status. In particular, an atmosphere of tension created by discriminatory remarks or discriminatory animosity does not belong in our workplace and will not be tolerated.

For purposes of this policy, sexual harassment is defined as any type of sexually-oriented conduct, whether intentional or not, that is unwelcome and has the purpose or effect of creating a work environment that is hostile, offensive or coercive to a reasonable woman or man, as the case may be. The following are examples of conduct that, depending upon the circumstances, may constitute sexual harassment: (a) unwelcome and unwanted sexual jokes, language, epithets, advances or propositions; (b) written or oral abuse of a sexual nature, sexually degrading or vulgar words to describe an individual; (c) the display of sexually suggestive objects, pictures, posters or cartoons; (d) unwelcome and unwanted comments about an individual's body, sexual prowess or sexual deficiencies; (e) asking questions about sexual conduct; (f) unwelcome touching, leering, whistling, brushing

## Sexual Harassment

against the body, or suggestive, insulting or obscene comments or gestures; and (g) demanding sexual favors in exchange for favorable reviews, assignments, promotions or continued employment, or promises of the same.

### Complaints of Sexual Harassment

If you believe that you have been the subject of sexual harassment or subjected to hostile, offensive or coercive work environment, or if you are not sure whether certain behavior is sexual harassment or whether it is actionable under this policy, you are strongly encouraged to immediately notify your supervisor or Amy Francer or John Miersma whose work addresses and telephone numbers are listed below, so that Iwaki America, Inc. may have the opportunity to investigate and deal promptly with your complaint. An investigation of all complaints will be undertaken immediately, and all information will be handled with the highest degree of confidentiality possible under the circumstances and with due regard for the rights and wishes of all parties.

Any employee of Iwaki America, Inc. who is found by after an investigation to have harassed another in the workplace will be subject to appropriate discipline up to and including termination, depending upon the circumstances.

Amy Francer  
Iwaki America Inc.  
5 Boynton Rd.  
Holliston, MA 01746  
(508) 474-2029

John Miersma  
Iwaki America Inc.  
5 Boynton Rd.  
Holliston, MA 01746  
(508) 474-2080

# Sexual Harassment

## State and Federal Remedies

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC – 180 days; MCAD – 6 months).

Employees may also contact:

Massachusetts Commission Against Discrimination  
One Ashburton Place, 6th Floor  
Boston, Massachusetts 02108  
(617) 994-6000

Equal Employment Opportunity Commission  
One Congress Street, 10th Floor  
Boston, Massachusetts 02114-2023  
(617) 565-3200

## Blood-borne Pathogens

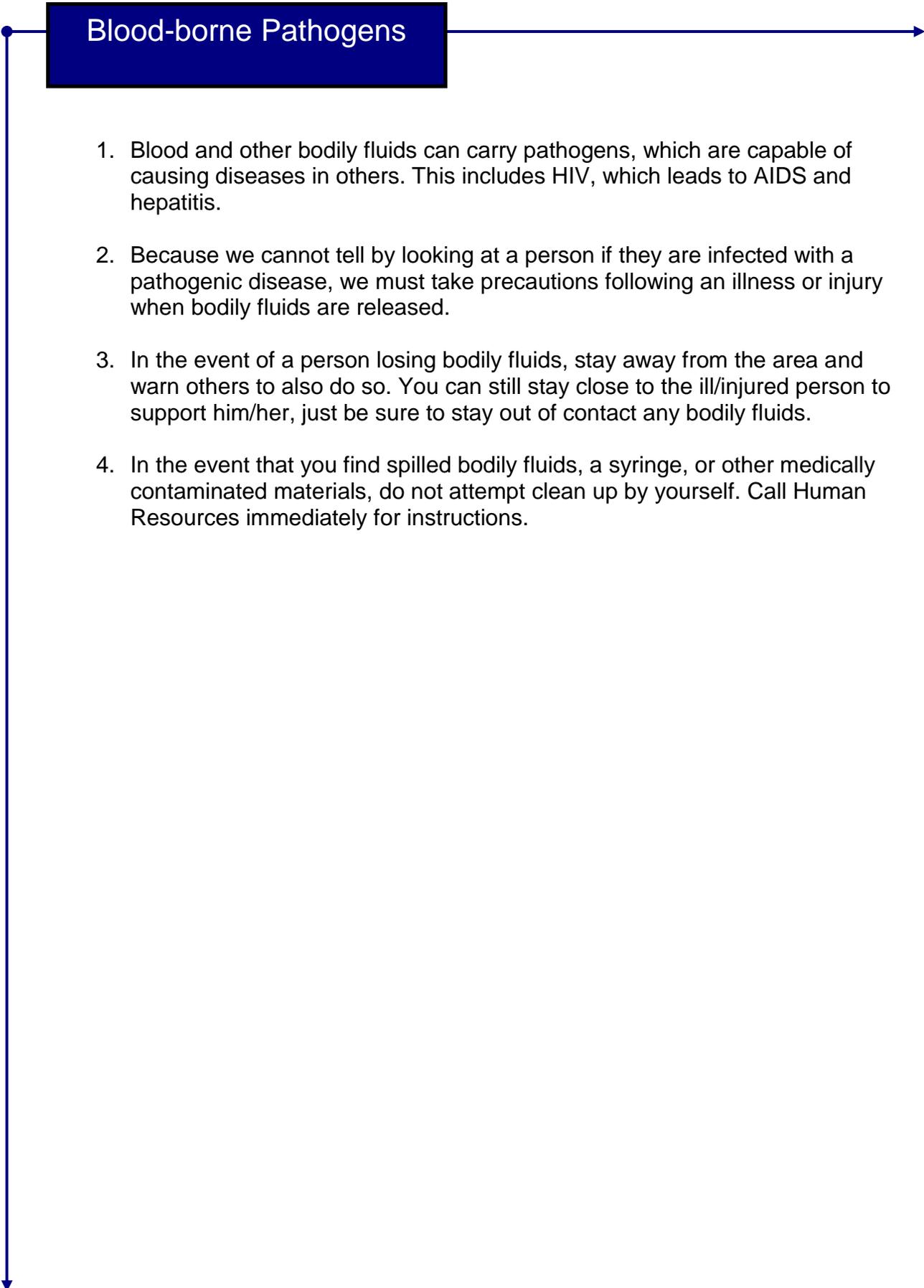
Any work-related accident resulting in serious injury or the death of an employee presents significant emotional challenges for management. Following are some guidelines, which may reduce the effects on fellow employees and minimize the impact from regulators, such as OSHA.

1. Be prepared to talk to local police officials, district attorney investigators, coroners, and OSHA compliance officers. Be aware that police and district attorneys can conduct criminal investigations. Be truthful but do not speculate or offer unsolicited opinions, information, or theories. Also be prepared for contacts from local news media. Consult with legal advisors if in doubt. (Operate under the assumption that OSHA will investigate. Take steps to be sure that your entire facility is as prepared as possible).
2. Fatalities and incidents resulting in three or more employees receiving inpatient hospitalization must be reported within 8 hours to the closest OSHA area office. If after hours, the incident can be reported to OSHA at: 1-800-321-6742.
3. Have a representative of your company contact the employee's next of kin to inform her/him of the circumstances. If possible this contact should be made in person. Offer to provide transportation and/or other support. (For example, providing a Iwaki America, Inc. representative at the hospital will convey the company's concern).
4. Get all witnesses names. If some witnesses are not employees, be sure to get full addresses and phone numbers.
5. Render safe any hazards created by the accident scene. (i.e. material that may fall, leaking chemicals, etc.). Rope off or otherwise isolate the accident scene early on to prevent it from becoming a "tourist attraction."
6. Conduct an initial investigation. If equipment and/or duties directly involved in the accident are duplicated elsewhere in the company take immediate steps to assure that there will be no re-occurrence of the accident.
7. Take pictures to document the scene. Note anything that may help you identify specific equipment involved such as serial numbers, license plate numbers, etc.

## Blood-borne Pathogens

8. Follow Iwaki America, Inc.'s procedure for bloodborne pathogens in cleaning any bodily fluid spills.
9. Consider meeting with employees in small groups to discuss, in general terms:
  - a) The serious accident that occurred.
  - b) That all the necessary steps were taken to care for the person involved.
  - c) That an accident investigation is being performed.
  - d) That all employees will be kept informed.
  - e) The availability of the Employee Assistance Program (EAP) (if applicable).
  - f) Provide encouragement and request that employees work safely.
10. Request your supervisors be alert for employees who may not be paying full attention to their jobs and thereby jeopardizing their own safety. During these discussions, do not discuss fault, discipline, opinions, etc.
11. If your company has a physician on contract, have him/her follow the case.

## Blood-borne Pathogens



1. Blood and other bodily fluids can carry pathogens, which are capable of causing diseases in others. This includes HIV, which leads to AIDS and hepatitis.
2. Because we cannot tell by looking at a person if they are infected with a pathogenic disease, we must take precautions following an illness or injury when bodily fluids are released.
3. In the event of a person losing bodily fluids, stay away from the area and warn others to also do so. You can still stay close to the ill/injured person to support him/her, just be sure to stay out of contact any bodily fluids.
4. In the event that you find spilled bodily fluids, a syringe, or other medically contaminated materials, do not attempt clean up by yourself. Call Human Resources immediately for instructions.

## Employee Acknowledgement Form

Iwaki America, Inc. is firmly committed to your safety. We will do everything possible to prevent workplace accidents and are committed to providing a safe working environment for you and all employees.

We value you not only as an employee but also as a human being critical to the success of your family, the local community, and Iwaki America, Inc..

You are encouraged to report any unsafe work practices or safety hazards encountered on the job. All accidents/incidents (no matter how slight) are to be immediately reported to the supervisor on duty.

A key factor in implementing this policy will be the strict compliance to all applicable federal, state, local, and Iwaki America, Inc. policies and procedures. Failure to comply with these policies may result in disciplinary actions.

Respecting this, Iwaki America, Inc. will make every reasonable effort to provide a safe and healthful workplace that is free from any recognized or known potential hazards. Additionally, Iwaki America, Inc. subscribes to these principles:

1. All accidents are preventable through implementation of effective Safety and Health Control policies and programs.
2. Safety and Health controls are a major part of our work every day.
3. Accident prevention is good business. It minimizes human suffering, promotes better working conditions for everyone, holds Iwaki America, Inc. in higher regard with customers, and increases productivity. This is why Iwaki America, Inc. will comply with all safety and health regulations which apply to the course and scope of operations.
4. Management is responsible for providing the safest possible workplace for Employees. Consequently, management of Iwaki America, Inc. is committed to allocating and providing all of the resources needed to promote and effectively implement this safety policy.
5. Employees are responsible for following safe work practices, company rules, and for preventing accidents and injuries. Management will establish lines of communication to solicit and receive comments, information, suggestions, and assistance from employees where safety and health are concerned.

## Employee Acknowledgement Form

6. Management and supervisors of Iwaki America, Inc. will set an exemplary example with good attitudes and strong commitment to safety and health in the workplace. Toward this end, management must monitor the company's safety and health performance, working environment, and conditions to ensure that program objectives are achieved.
7. Our safety program applies to all employees and persons affected or associated in any way by the scope of this business. Everyone's goal must be to constantly improve safety awareness and to prevent accidents and injuries.

Everyone at Iwaki America, Inc. must be involved and committed to safety. This must be a team effort. Together, we can prevent accidents and injuries and keep each other safe and healthy in the work that provides our livelihood.

By signing this document, I confirm the receipt of Iwaki America, Inc.'s employee safety handbook. I have read and understood all policies, programs, and actions as described, and agree to comply with these set policies.

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

\_\_\_\_\_  
Date