

**Ameritube LLC**  
**1000 N. Hwy 77, Hillsboro TX 76645**

Revision Level:  
C

Procedure No.  
Safety Manual

Revision Date:  
08/15/23

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## Safety Manual

Distributed and Available for Employees

Date	Description Of Change	Signature	Rev. Level
08/15/2013	Initial Release	Parth Siddhpura	
09/01/2019	Incorporation of OSHA requirements for Hazard Identification	Joe Ravitsky	A
09/15/2020	Formatting and Development of Manual for Spanish	Gary Ravitsky	B
07/15/2023	Addition of Aron Garcia as Safety Manager and Maria Muniz as Production Manager	Aron Garcia	C

**Procedure Approval:**

**Company Title:**  
Quality Manager

**Date:**  
08/15/2017

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## **I. Mission Statement**

- a. At Ameritube, people are our most important asset. It is our strongest desire that everyone goes home safe and healthy every day. Ameritube's safety and health program has complete and total management support. We will make every effort to ensure the safety of all our employees. The responsibility for the safety and health program includes everyone at Ameritube; from the office to the plant. Even if it is your first day, you have the power and responsibility to stop work if you believe yours or someone else's safety might be compromised. Safety is a cooperative effort of all employees to identify and eliminate hazards in the workplace. Ameritube's safety program is based on 3 simple principles:

## **II. Employee Hazards**

- a. Please see document: SM-101: Hazard Communication Program
- b. Identification of Hazards - It is the responsibility of every employer to continuously monitor his or her work environment for potential hazards. Once identified, these hazards must be immediately reported.
- c. Elimination of Hazards - Management and employees will make every effort to eliminate identified hazards from the workplace.
- d. Protection from Hazards - If a hazard cannot be eliminated from the workplace, management will take the necessary steps to eliminate the hazard and protect employees.
- e. Management is responsible for providing tools, equipment, and other items that are required to work safely. It is the employee's responsibility to use proper equipment and follow their safety training.

## **III. Employee Rights**

All workers have a right to:

- A safe workplace
- Raise a safety or health concern with the company
- Report a work-related injury or illness without fear of retaliation
- Receive information and training on job hazards, including hazardous substances in the workplace
- Request copies of medical records, tests that measure hazards in the workplace and the workplace injury and illness log.

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#### **IV. Goals of the Safety and Health Plan**

- a. Ameritube has created this safety and health plan to meet the following goals:
- To maintain a workplace that is free from recognized hazards that may cause serious injury or illness
  - To create an environment where employees feel comfortable reporting safety and health concerns
  - To provide clear direction on how to communicate with management on safety and health concerns
  - To solicit feedback and suggestions from employees on following and improving this program
  - To include safety and health as a routine part of business operations
  - To empower all employees to stop work at any time they feel their safety or health is in jeopardy

#### **V. Safety and Health Plan Basic Principles**

- a. Ameritube is completely committed to the safety and health of all employees. It is our priority that every employee goes home safe every day.
- b. Management commitment and Responsibilities
- i) Our strong safety culture is achieved through collaboration and cooperation of employees and management. Management provides the resources for our safety program and is committed to the following general responsibilities:
- To provide a work environment that protects employees from occupational injuries and illnesses.
  - To design, implement and monitor company safety policies and procedures.
  - To provide methods for employee feedback and input on company safety and health programs.
  - To ensure that periodic work hazard assessments are conducted.
  - To set safety and health improvement goals and create action plans for achieving those goals.
  - To clearly establish the safety and health responsibilities of all employees and to include them in written job descriptions.

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- To provide required safety and health training to employees.
- To include safety and health as a part of employee periodic evaluations.
- To provide recognition to employees who demonstrate outstanding commitment to safety and health.
- Employee Commitment and Responsibilities
- Employee involvement in all aspects of the safety program is critical to its success. Employees are closest to the work processes, so they must actively communicate with management to facilitate pro-active solutions to safety problems.

**c. Our employees are committed to the following responsibilities;**

- i) Immediately stop work in any instance where they feel safety or health is in jeopardy
- ii) Follow all company safety and health policies and procedures.
- iii) Analysis of Workplace Hazards

Ameritube has performed a baseline hazard survey in all of its work areas. This was accomplished using a job hazard analysis process and outside consultants as necessary. All hazards found in these surveys are either eliminated or controlled.

- iv) When dealing with workplace hazards, the company's hazard management priority is as followed:
  - (a) Engineer out the hazard
  - (b) Change the work process to eliminate the hazard
  - (c) If the hazard cannot be eliminated through engineering or work controls, provide employee with proper personal protective equipment.
- i) Work processes and hazards are both constantly changing. To ensure employee protection, new hazard analysis will be performed as work processes, equipment and environments change. Employees will participate in these hazard assessments, which will be reviewed by management. Work will not be allowed to continue until these hazards are properly dealt with.
- ii) Hazard analysis will occur on a regular basis in accordance with Ameritube's job hazard analysis program.

## **VI. Basic Safe Work Practices for Manufacturing**

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**a. Employees:**

- i) Inform supervisors of unsafe conditions**
- ii) If you happen to see something that could potentially hurt you or anyone in the plant, clean the area if you can do so safely. If you are not able to handle the problem on your own (must have training) inform your supervisor since your supervisor is obligated to keep you and your fellow employees working environment safe.**
- iii) Use Equipment, Machines, and Tools Properly - Misusing tools and machines is the most prevalent cause of workplace injuries. When using equipment, make sure that you are using each piece of equipment for its intended purpose and are using it correctly. This includes regularly cleaning and inspection equipment to ensure that it is safe.**
- iv) Wear Safety Equipment (PPE) - When cleaning up messes and using equipment, make sure you wear the proper safety equipment. Making sure you wear the proper safety equipment and checking that your safety equipment is undamaged significantly lowers your likelihood of getting injured.**
- v) Keep Work Areas and Emergency Exits Clear - Make sure to remove any clutter blocking emergency exits, equipment shutoffs and areas that you are working. A cluttered work area can lead to not having enough space to use tools and pick up heavy objects properly. If an exit is obstructed, you may not be able to quickly escape if an emergency occurs. Placing equipment in proper storage areas after use will help keep the work and emergency exits clear.**
- vi) Prevent Objects from Falling**
  - (1) To keep objects from falling, use protection. If you have boxes to stack, make sure they are straight up and down, the heavier boxes on the bottom. Make sure all stacked objects are out of the way of aisles and work areas.**
  - (2) Use Correct Posture when Lifting - To avoid injuring your back when you are trying to pick up a heavy item, keep your back straight, use your legs to lift and pick up the item without stooping or twisting. Whenever possible, use mechanical aids such as a dolly or forklift.**
  - (3) Take Work Breaks from Time to Time - Many work-related injuries occur when a worker is tired and cannot adequately observe dangers in their surroundings. By taking regular breaks, you are able to stay more alert when working.**

**b. Reporting Safety Concerns**

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i) If there is ever a moment where any employees have safety concerns the very first person you need to address safety concerns with is your immediate supervisor

ii) Safety Timeouts

iii) Safety Incident Investigation

(1) The benefits of conducting incident investigations are:

- (a) It helps you find the root cause of the incidents, which helps you create an action plan to prevent the same and similar incidents from happening again
- (b) It helps you find gaps in any measures you have already taken to control risks to your business
- (c) It would also bring out any flaws in your health and safety compliance that you may have not known about, enabling you to fix them.
- (d) In case of any legal liabilities or claims, an incident investigation would demonstrate that you have been proactive in exploring why an incident may have occurred and in taking steps to prevent future incidents. This shows a positive attitude towards occupational safety and health, which would benefit you in any court hearings.

## VII. Maintenance Program

- a. Properly functioning equipment is a critical component of Ameritube's safety plan. Management uses a scheduled maintenance plan and ensures that the worksite and all machinery are cared for properly so that the environment remains safe and healthy. If maintenance needs exceed the capability of the worksite employees, contract employees are hired to do the work and are screened and supervised to ensure they work according to the site's safety and health procedures.
- b. Please see document SM-002 Basic Electrical Safety and Lockout Tagout
- c. Please see document Preventative Maintenance

## VIII. Discipline Policy

- a. All employees, including all levels of management, are held accountable for obeying company safety and health rules. The following four step disciplinary policy will be applied to everyone by their supervisor.
  - i) Verbal Warning: The supervisor will provide a verbal warning to the employee for failing to adhere to a safety policy



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ii) Written Reprimand: A reprimand will be written by the supervisor, discussed and signed by the employee. The reprimand will be placed in the employee's file

iii) Suspension: The employee will be suspended without pay for an amount of time determined by management

iv) Dismissal: The employee's employment will be terminated

b. Employee discipline will typically occur in the order listed above. However, depending on the severity of the infraction, management may decide to skip steps in the process. Any willful violation of policy that places the safety of any employee at risk may result in immediate dismissal. Visitors, including contractors who violate safety and health rules and procedures, will be asked to leave the site immediately.

i) Job Site Safety Plan

ii) Basic Electrical Safety and Lockout Tagout

iii) Emergency Exit Routes

iv) First Aid and Medical Emergencies

v) Company Safety Orientation

All new employees receive a safety and health orientation before they begin work. This training will include a review of all the company safety policies. New employees will not be permitted to work without direct oversight from an experienced employees until they have completed all required safety training and their supervisor has deemed them competent to perform work in their own.

vi.) Types of Injuries and Illnesses

vii.) Procedure for submitting Work-Related Injuries and Illnesses

viii.) Record Keeping Coordinator Actions

**IX. Company Safety Policy Review**

a. Ameritube's safety policy will be reviewed at least annually cooperatively by both management and employee representatives. The reviewers will consider:

i) The rate of injury and illnesses in the workplace

ii) The effectiveness of written safety policies

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- iii) The effectiveness of company safety training
- iv) The overall company safety culture
- b. Once the review has been completed, the group will make recommendations for improvements and assist management in setting the next year's safety and health goals. Recommendations will be presented to management and made available to employees for review.
- c. Determination of work-relatedness
  - i) An injury or illness will be considered work related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a preexisting injury or illness. Work-Relatedness is presumed for all events or exposures that occur in the work environment unless an exception specifically applies.
- d. Working from Home
  - i) Injuries or illnesses that occur while an employee is working from home, including work in the home office, will be considered work-related if it occurs while the employee is working for pay and the incident is directly related to the performance of that work. Injuries or illnesses that are caused by the general home environment and are not related to work will not be considered work-related.
- e. Travelling Employees
  - i) An injury or illness that occurs while the employee is in work-related travel status will be considered work-related. This includes injuries that may occur in the airport or other travel
- f. Fire Prevention
  - i) The purpose of this Fire Prevention Plan is to eliminate the causes of fire, prevent loss of life and property by fire. Fire is a dangerous hazard and we will take all the precautions necessary to protect our employees.
  - ii) Objectives
    - (1) Ameritube is committed to minimizing the threat of fire to employee visitors and property. We will comply with all applicable laws, regulations, codes and best



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practices pertaining to fire prevention. The Fire Prevention Plan serves to reduce the risk of fires at the workplace by:

- (a) Identifying materials that are potential fire hazard and their proper handling and storage procedures.
- (b) Distinguishing potential ignition sources and the proper control procedures of those materials.
- (c) Describing fire protection equipment and/or systems used to control fire hazards
- (d) Identifying persons responsible for maintaining the equipment and systems installed to prevent or control ignition of fires
- (e) Describing good housekeeping procedures necessary to ensure the control of accumulated flammable and combustible waste material and residues to avoid a fire emergency
- (f) Providing training to employees on fire hazards to which they may be exposed

**X. Fall Prevention**

- a. The objective of Ameritube's fall protection program is to make sure that employees are protected from the hazards of working at heights. This program outlines the requirements for assessment and mitigation of fall hazards. This program operates in conjunction with fall protection regulations. It does not replace or supersede rules on the use of fall protection. The company will always comply with the regulations, but at times may impose stricter rules in order to improve employee safety.
- b. Management has the following responsibilities:
  - i) To provide a workplace that minimizes fall protection hazards
  - ii) To provide ANSI company fall protection systems
  - iii) To develop a company, fall protection program that complies with regulations
  - iv) To designate a fall protection coordinator
  - v) To identify employees who are affected by the policy and ensure that they receive the required training
  - vi) To provide required protective equipment at no cost to employees
  - vii) To provide technical support to employees for fall protection issues

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viii) To ensure Ameritube is operating in accordance with this policy by performing periodic reviews and audits

ix) To review this safety policy for effectiveness periodically and when deficiencies are discovered

**XI. Program Responsibilities**

a. Management has the following responsibilities:

- i.) To provide adequate controls and procedures to maintain a workplace with minimal fire risk
- ii.) To ensure that regular fire hazard assessments are performed
- iii.) To select equipment and work processes that minimize the risk of fire
- iv.) To create and authorize a fire prevention plan
- v.) To designate a company fire prevention plan
- vi.) To provide training to employees on fire prevention and how to manage the fire hazards of the workplace