

Health and Safety Policy

Statement of Intent

Sackers Limited is committed to ensuring the health, safety and welfare at work of its employees, so far as is reasonably practicable, by fully complying with all statutory health and safety requirements of the Health and Safety At Work Act 1974 and all subsequent Regulations and by positive action to prevent work related injury and ill health and promote healthy working practices. Sackers Limited is committed to continual improvement in all areas of health and safety management and recognises its responsibility for providing a safe and healthy workplace and work environment for employees and others (contractors, visitors and the public) who may be affected by its work or undertakings.

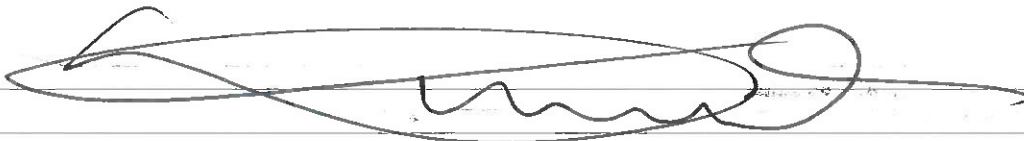
We commit to giving the time, manpower and equipment that is necessary to make the work of our organization appropriately safe while also protecting people's health. To do this, we value competence, encourage the sharing of information and work to create the right conditions to enable everyone to work safely, no matter what work they are doing.

All Directors are accountable for the health and safety of our workforce and others who are affected by our work.

Mr David Dodds the Chief Executive Officer Director has been appointed with responsibility for keeping the Board informed on health and safety matters.

Our Health & Safety targets for the next 12 months include:

- Bring in a formalised H&S management system such as HSG65 with the goal to move on to ISO 45001.
- Reducing the number of accidents / incidents.
- Fully investigate all accidents, incidents and near misses to ensure a root cause is identified and controlled, where required.
- Continual improvement in Occupational Health and Safety Management and Performance.
- Reduce health and safety risks by keeping training up to date and appropriate.
- Keep all RIDDOR incidents within the published guidelines
- Increase the number of Mental Health trained personnel on site for all team members



David Dodds
Chief Executive Officer
November 2021

Roles and Responsibilities

The Directors will:

- Lead by example. Advocating and following the H&S guidelines set by the company.
- Create a risk profile of all the organisation's risks, resourcing all aspects of the business sufficiently well to enable those risks to be properly managed.
- Keep themselves informed of the Company's health and safety performance.
- Act promptly to stop any bad practices and improve risk control. Making any rectifications as required to bring issues into line with the company policy.
- Ensure that the Company is at all times compliant with health and safety legislation.
- Consult the workforce on how Sackers manages its risks and take their views into account when updating its systems and procedures.

Divisional & Senior Managers, Heads of Department

Divisional Managers, Senior Managers and Heads of Departments are responsible for the day-to-day management of occupational health, safety and welfare, with the help and advice of the SHEQ Team. They will:

- Consider the health and safety risks in their area of responsibility and use this policy and its procedural outputs to control those risks.
- Keep themselves informed of the legal obligations that they and the Company must meet and ensure that they and their staff work to those as a minimum standard.
- Use the Company's systems to check the effectiveness of risk control in their area and make any necessary improvements.
- Take part in the annual management review of Sackers occupational health and safety performance.
- Consider advice given by the SHEQ Team and ensure that it is implemented by their plant and site managers.
- Provide the SHEQ Manager with their Division's active and reactive monitoring data for submission to Board meetings.
- Set objectives for plant and site managers and supervisors that accord with the Board's SHEQ objectives for the year and track them to completion.
- Make sufficient resources available to their sites to enable full compliance with Sackers IMS.
- Lead by example.

Site, Area, Plant and Operations Supervisors

At this level, Supervisors are responsible for ensuring that Sackers occupational health and safety policy is fully implemented in their area of responsibility. They will:

- Actively promote high standards of occupational health and safety.
- Ensure that all staff under their control are aware of the contents of this policy and work in accordance with it.
- Ensure that the risks of the work in their area of control are properly assessed, that the required risk controls are in place and are effective in reducing risks.
- Manage all contractors used in their area of operations, in accordance with the procedures set out in the Arrangements section of this policy.
- Actively monitor the health and safety performance of their area of operation, through inspections and document checks.
- Ensure that all cases of occupational ill health, near misses and incidents/accidents are reported and recorded in accordance with Sackers current arrangements.
- Ensure that their staff are released for training when required.
- Consult with line management & SHEQ Team on any difficulties or concerns.
- Lead by example.

Operatives will:

- Wear all necessary personal protective equipment (PPE) as required in risk assessments.
- Check any plant or machinery that they use before starting work and only use it if it is in a fit condition and they have had the right training for that piece of equipment.
- Take reasonable care of their own health and safety and think about how their work could affect others around them.
- Help Sackers to comply with the law by following the systems and procedures set by the site supervisor/Team Leader.
- Report promptly to the site supervisor/Team Leader anything that could harm themselves or someone else, such as damaged machinery, unsafe work conditions, defective equipment, worn-out PPE. Not doing so is potentially a disciplinary offence.
- Keep their own work area tidy.
- Stop the work if they do not think that it can be done safely.
- Stop and think about the risks of a job and make sure that they have everything they need to do the work safely and without risking their health.
- Report anything they see on site which is dangerous, if they cannot do anything about it themselves.

Arrangements for putting the policy into practice

3. Arrangements for implementing the policy

Health and Safety Management

3.1 Assessing and controlling risks

3.1.1 Responsibility for assessing and controlling risks lies with each Manager or responsible person in regards offices/non-op's staff, who will be held accountable for ensuring that good, proportionate risk control is exerted in their area of control. The task of assessing risks may be delegated but only to a person who is competent to do them. In this context, 'competence' means someone who has had training in the basic principles and techniques of risk assessment and/or who has experience of the work to be assessed. The SHEQ Team will only provide advice and guidance and will not do risk assessments on behalf of managers. Risk assessment shall not be exclusive and where applicable employees of any level may be asked to aid with the assessment of risks to themselves and others.

3.1.2 The process of risk assessment should be regarded as a process of **information-gathering and careful thought**, rather than as merely completing a form. The people involved in the task must be involved in the risk assessment process.

3.1.3 Any significant findings should be recorded on the documents referenced in SACKERS Procedure SACKMS 2.1 Risk Assessment and Environmental Aspect and Impact Evaluation. Once recorded, the risk assessment must be physically signed off by the relevant Manager who is responsible for that area of operations.

3.1.4 In applying risk controls, assessors must take a proportionate approach. Where a risk is high, the first task should be to try to eliminate the source of the risk. If that is not possible then the risk should be reduced at source by engineering or physical means, keeping the expenditure required in proportion with the level of risk. If that is not reasonably practicable, then the risk will need to be managed through providing safe systems of work, training, information and instructions. Personal Protective Equipment (PPE) is not a risk control in itself and will be used only as a back-up to other controls.

3.2 Monitoring health and safety performance

3.2.1 Regular site inspections will be completed by the Company's Health and Safety representative. The results of each inspection will be discussed with the Site Manager at the time of the inspection to agree any immediate changes in work practices or site conditions that need to be made.

3.2.2 Results and findings of all the site inspections will be provided to the Company's senior managers each month, as required.

3.3 Accidents, incidents and sickness absence

3.3.1 Until a complete management system is set up, Site Managers will be given a concise list of information that they must collect and record. They will record the

information either manually in a day book or electronically on a spreadsheet which will be kept available for inspection at the monthly site inspections.

- 3.3.2 Where an incident has either caused an injury or 'dangerous occurrence' that is reportable under RIDDOR, the Site Manager will immediately contact the Company's Health and Safety Manager and will take whatever action is directed by them to take.

3.4 Managing contractors

- 3.4.1 Sackers Limited acknowledges the value of the work that contractors do on its behalf and Sackers responsibility for ensuring that the contractors work does not harm the health and safety of the contractors' staff or Sackers staff.

- 3.4.2 All staff responsible for engaging and working with contractors are required to follow Sackers management system for selecting, managing and monitoring contractors.

3.5 Consultation

- 3.5.1 Sackers consults with staff directly in each department. Each Site Supervisor/Team Leader and Site or department Manager ensures that staff meetings are held regularly and that all employees have the opportunity to be briefed and to comment on sackers procedures and systems, working conditions and any future plans. The meetings will be attended by a member of the SHEQ Team once per year for each site as a minimum. The views of staff are recorded using the appropriate form. Where there are issues that are of concern and that cannot be resolved at a local level, they are escalated to the Operations meetings.

3.6 Communication

- 3.6.1 The SHEQ Team is available to provide information and advice on operational health and safety. They will keep all the management team informed on any Company-Wide safety or health issues via email bulletins.

- 3.6.2 The HSE law poster is put up on each site in a place where everyone can read it. When they need replacing they can be ordered through the PA to the FD, the relevant administrative staff or the SHEQ Team.

3.7 Competence

- 3.7.1 Managers are responsible for ensuring that everyone has the skills, knowledge and experience they need for their work.

- 3.7.2 A training matrix is held centrally, which records the competence levels required for all jobs and the training that has been delivered or is outstanding. The SHEQ Coordinator is responsible for checking this periodically. The matrix is reviewed annually by the Health and Safety Directors.

- 3.7.3 The Health and Safety Directors are responsible for ensuring that all new managerial staff receive a health and safety induction within two weeks of joining the Company.

The induction programme will include a concise explanation of the contents and purpose of this Policy, the arrangements for dealing with accidents and other emergencies, Sackers expectations of staff and the arrangements in place for them to feed information back to the senior management team.

- 3.7.4 Site Supervisors or Team Leaders are responsible for giving every new starter an induction to their site, which includes the way that accidents and incidents are to be reported, the emergency arrangements for the site, the site rules and the safe way to do their work.

- 3.7.5 All sub-contractors and employees hold a basic health and safety qualification or relevant experience. Operatives who use plant or equipment are also required to have training in its use and to keep their skills up to date.

Site operations

3.8 Static plant and equipment

- 3.8.1 Site Managers will be responsible for ensuring that all plant and equipment on their site is in an efficient state, efficient working order and good repair. To that end, they will log all the plant and equipment on site, check each piece and note its condition on the log. Where defects are found that pose a risk of serious injury to operators or others on site, the Site Manager will take all reasonable steps to correct the defects. Where this is not possible the piece of plant or equipment will be taken out of use. Where other defects are found that are less serious, the Site Manager will set a reasonable programme for correcting them.
- 3.8.2 Essential maintenance of plant and equipment must be given high priority where poor condition would effect safety, damage the environment or hinder production.
- 3.8.3 All safety-critical parts of plant and equipment will be subject to regular user checks, as set by the Site Manager, in conjunction with the Company's Health and Safety Manager.
- 3.8.4 Where any piece of plant or equipment carries specific risks, the Site Manager will ensure that it is only operated by people who have demonstrated their competence.
- 3.8.5 Clear instructions, written or pictorial, will be given to all those who operate plant and equipment on the site, along with information on its use and maintenance.
- 3.8.6 The Site Manager will ensure that all machinery has the correct type and amount of guarding and that it is in place at all times when the machinery is being operated.

3.9 Vehicles and mobile plant

- 3.9.1 The Site Manager is responsible for ensuring that all vehicle movements on site are properly controlled and that, where reasonably practicable, a high degree of separation between vehicles and pedestrians is achieved.
- 3.9.2 Speed limits will be enforced and reversing vehicles will be controlled by a banksman in any areas where there may be pedestrians.

- 3.9.3 Traffic routes will be clearly marked and crossings provided for pedestrians where this is reasonably practicable. Where it is not, speed limits will be strictly enforced and pedestrians walking in these areas will be required to wear high-visibility clothing.
- 3.9.4 Drivers of mobile plant will have their licences checked by the Site Manager to ensure they are competent to drive the piece of plant they are assigned to.
- 3.9.5 Telehandlers and other mobile plant will be checked by the user before the start of each shift, using the checklist provided to them. If defects are found the user will immediately inform the Site Manager who will decide whether the defect is sufficiently serious to warrant the plant being taken out of use.

3.10 Electrical safety

- 3.10.1 The electrical installation in all site buildings will be tested to ensure that it is compliant with BS7671, if no such test has been done in the previous five years.
- 3.10.2 If work is required on any permanent or temporary installation, it will be done by a qualified electrician using a permit-to-work system to ensure correct isolations are in place.
- 3.10.3 Portable appliances will be tested for electrical safety to a regime decided by the Site Manager, in consultation with the Company's Health and Safety Advisers. Defective appliances will be clearly marked as not to be used, taken out of service and either repaired or disposed of as electrical waste.

3.11 Work at height

- 3.11.1 Work will only be done at height if there is no other way to do the job.
- 3.11.2 Ladders will only be used as a means of access and not as a workplace, unless the work will take no more than 20 minutes and does not involve stretching or using tools.
- 3.11.3 Properly constructed stepladders that have a top platform with a guard rail may be used where any other means of access would not be practicable.
- 3.11.4 Mobile scaffold towers will be used where the work will take some time. They will be assembled and dismantled only by a competent person, using either the 3T or advance guard rail system.
- 3.11.5 Every tower will be erected with a height to least base ratio of not more than 3.5. Wheels and outriggers will be locked and base plates used wherever necessary to provide sufficient stability. Edge protection will be provided and used.
- 3.11.6 Every tower will be inspected after it has been assembled and before it is used for the first time, to ensure it has been assembled properly and that it is safe to work on. If anything happens that could affect the stability of the tower, it will be inspected to ensure the safety of the tower has not been compromised. If the tower is over 2m in height, it will be inspected at intervals of not more than 7 days.
- 3.11.7 Every tower will be dismantled using either the 3T or advance guard rail method, ensuring that the person dismantling the tower does not at any point stand on an unguarded platform.

- 3.11.8 Where a fixed scaffold is needed, a specialist contractor will be employed to erect and dismantle the scaffold. The Site Manager will check that it is fully boarded, that the guard rails are fitted at the correct height and that the access is properly tied in to the scaffold, where an internal stairway has not been used. It will be inspected before first use and then every 7 days, unless there is reason to suspect the scaffold may have been damaged or altered.
- 3.11.9 On occasions a Mobile Elevated Work Platform (MEWP) may be hired for access to some workplaces. Only those staff who hold an IPAF certificate will be authorised to use the MEWP.
- 3.11.10 Under no circumstances will RSS operatives be required or allowed to use personal fall arrest. If there is no safe working platform, work at height will not proceed.

3.12 Fire and emergencies

- 3.12.1 The Site Manager will ensure that there is a viable fire and emergency plan on site and that all those who work on the site are briefed on the plan. The plan will cover fire, environmental emergencies and serious accidents.
- 3.12.2 The Site Manager will ensure that fire precautions - fire doors, extinguishers, alarms and detection systems - are kept to the required standard.
- 3.12.3 Emergency procedures will be practised regularly to ensure that the plan is viable in practice.

3.13 Occupational Health and Hygiene

- 3.13.1 The Site Manager will ensure that welfare facilities on site are well ventilated, well lit, clean and tidy and that all washrooms are equipped with hot and cold or warm running water, soap and hand driers or towels.
- 3.13.2 The Site Manager will arrange for regular air monitoring to be done to monitor the levels of bioaerosols and other pollutants in the atmosphere where required.
- 3.13.3 Where risks to health cannot be controlled by other means, Personal Protective Equipment (PPE) will be provided.
- 3.13.4 PPE will be selected that is effective to protect against the risk, will not interfere with other protective equipment and that is suitable both for the work and for the person who will wear it. The advice of the Company's health and safety advisers will be sought where necessary.
- 3.13.5 Employees will be advised on how to keep the equipment in good condition, how to clean it, store it and how to wear it. Employees will report any missing or defective equipment to the Site Manager.
- 3.13.6 PPE will be replaced by the Site Manager as soon as it becomes ineffective in protecting the wearer against the risks for which it was provided.

3.14 Lifting operations

- 3.14.1 The Site Manager will ensure that all lifting operations are properly planned and executed in accordance with the plan. Any lifting equipment will be maintained in

accordance with the relevant regulations including; Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

3.14.2 Where lifting equipment is hired, the Site Manager will ensure that there is documented evidence of its thorough examination and maintenance.

3.15 Confined spaces

3.15.1 Entry into confined spaces is prohibited unless there is no other way to do the job.

3.15.2 Where entry into confined spaces is unavoidable, the risks of the work will be assessed and a safe system of work drawn up that includes provision for dealing with emergencies.

3.15.3 The Site Manager will ensure that a permit-to-work is used and that the work is done in accordance with the safe system of work.

3.15.4 Only staff competent to work in confined spaces will be authorised to do so.

3.16 Asbestos Management

3.16.1 Under the Control of Asbestos Regulations 2012, the Company has a duty to:

- Provide staff with information and instruction if they are liable to be exposed to asbestos
- Identify possible asbestos on sites by arranging a survey including bulk sampling or by examining existing survey records
- Arrange the safe removal and disposal of asbestos on its own premises by a licensed contractor
- Provide asbestos awareness training for staff
- Manage any asbestos-containing materials that remain on any Company premises.

3.16.2 Any material discovered on site that is known or suspected to contain asbestos must be left intact and immediately reported to the Site Manager in charge. Examples include asbestos cement sheeting, insulation board, cladding and sprayed lagging on pipes etc.

3.16.3 The Site Manager will notify the H&S and arrange for competent persons to sample, analyse and remove any asbestos-containing materials before any work starts.

3.16.4 Asbestos awareness will be included in site safety briefings and in operative safety training programmes.

3.16.5 Sackers will carry out an asbestos survey of its own site(s) and will make staff and contractors who may undertake work there aware of the location of any asbestos-containing materials. Where there is a significant risk to health due to the condition of the asbestos material, the Company will arrange to encapsulate, seal

or remove the material using a licensed contractor.