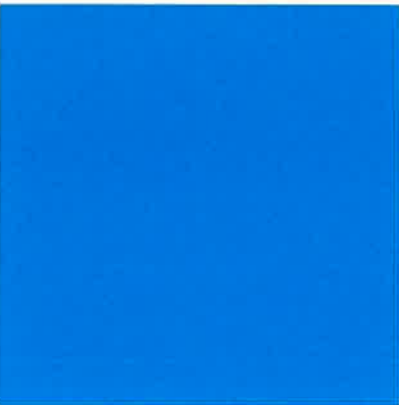




Health and Safety Policy



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Version Control

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This document is approved for content and purpose by:

Name	Title	Date of Approval	Version
Mark Smyth	Chief Operating Officer	17/05/2019	3.0

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HEALTH AND SAFETY POLICY STATEMENT

The Company Directors shall ensure the health and safety of all persons who could be affected by our work activities, as required by the Health and Safety at Work Act 1974. This includes:

- Company employees and the self-employed
- Customers
- Visitors to our premises including contractors, and members of the general public

We will also ensure that whilst delivering, installing or servicing equipment at Clients' premises we will help maintain their own health and safety standards by respecting their policies and procedures and by operating to best practice.

In particular, the Company will:

- Provide adequate control of the health and safety risks arising from our work activities
- Consult with employees on matters affecting their health and safety
- Provide and maintain safe plant and equipment
- Ensure safe handling and use of substances
- Provide information, instruction and supervision for employees and visitors
- Ensure all employees are competent to do their tasks and give them adequate training
- Prevent accidents and cases of work-related ill health
- Maintain safe and healthy working conditions
- Review and revise this policy as necessary at regular intervals

In order to implement this policy, the Company further undertakes to:

- Ensure that adequate resources are available for carrying out this policy
- Appoint competent health and safety consultants to provide expert advice to assist in complying with legal requirements and prohibitions
- Work in accordance with industry best practice standards and whenever practicable, exceed them
- Make continual improvements in health and safety performance

The Company Health and Safety Policy is to be issued to all members of staff as part of the employee information pack.

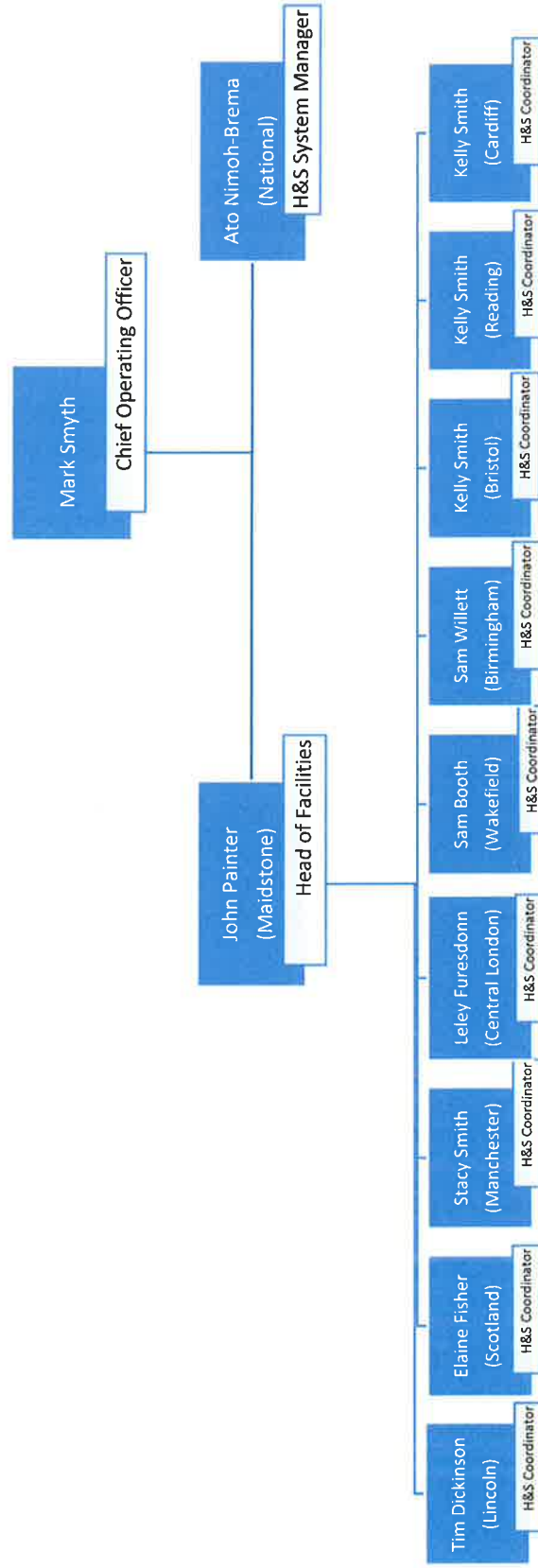
Signed



Mark Smyth
Chief Operating Officer
Apogee Corporation Limited

Effective: 17th May 2019

HEALTH AND SAFETY STRUCTURE CHART



ORGANISATIONAL ARRANGEMENTS AND RESPONSIBILITIES

These are set down below to ensure that everyone understands their own and each other's responsibilities for Health and Safety throughout the organisation.

Health and Safety is included in induction training when new staff commence employment and a copy of this document is issued to them. They will be given the opportunity to raise concerns and comments with their line Manager and/or with the Head of Facilities. This document will be regularly reviewed and discussed at appraisals thereafter.

Chief Executives' responsibilities

Accepts overall and final responsibility for Health and Safety throughout the organisation

Receives the findings of the risk assessments carried out, prioritises responsibilities and allocates the necessary resources to remove or reduce the risk and ensures that all necessary actions are carried out

Ensures that the Health and Safety Law Poster is displayed

Head of Facilities; responsibilities

- Ensures the Health and Safety Policy is put into practice throughout the organisation
- Consults with managers on matters affecting Health and Safety and provides information, instruction and supervision for managers
- Maintains the building and its equipment and facilities, ensuring that effective maintenance procedures are drawn up and that maintenance work is implemented. Receives repair requests and concerns from staff. Carries out regular inspections of the building
- Maintains safe and healthy working conditions to prevent accidents or ill-health
- Ensures that Health and Safety is an agenda item at all monthly regional meetings, team meetings and appraisals, and that action is taken in respect of any matters arising there from
- Ensures that the Health and Safety policy is reviewed as necessary at regular intervals (at least annually) or whenever there is a major change
- Provides and monitors training to ensure that staff are competent to do their tasks. This training will cover both induction and job-specific issues. Maintains records of all training given
- Co-ordinates recruitment of staff and monitors staff illness in case of work-related ill health
- Undertakes risk assessments, reporting the findings to the Directors and ensures that the results of risk assessments are communicated to staff
- Reviews risk assessments at least annually or whenever a major change occurs or if the work activity changes
- Ensures that on site work will meet any Health and Safety policies and standards notified by individual clients
- Ensures that new contractors have satisfactory Health and Safety policies and arrangements in place and are made aware of Apogee's Health and Safety requirements
- Checks that new equipment meets Health and Safety standards before procurement
- Identifies which substances require a COSHH assessment and undertakes these assessments in conjunction with the relevant Director/Manager, also checking potential new substances before procurement
- Undertakes and monitors the supervision of young workers/trainees
- Provides Health and Safety advice to directors/managers
- Appoints and organises training for various staff to act as first aiders, appointed persons and fire marshals (these duties will be added to the job description), ensuring that there is sufficient provision to allow for holidays, sickness etc
- Maintains the Accident Book and takes responsibility for reporting accidents, diseases and

dangerous occurrences to the enforcing authority under RIDDOR. Analyses accidents to prevent recurrence

- Ensures that the fire risk assessment is undertaken, implemented and reviewed at least annually
- Organises fire drills at 6 monthly intervals and maintains a record of same
- Checks escape routes, fire extinguishers and alarms at the required intervals
- Ensures that arrangements are enforced for security of the building out of hours
- Ensures that PPE is provided and is correctly used and that replacements are available
- Actions any communication from suppliers on safety issues
- Receives reports from staff on Health and Safety concerns

During the Head of Facilities absence, cover will be provided by the Chief Executive, with the assistance of the Health and Safety Management System Manager.

Directors/ Managers

Directors/Managers are expected to:

- Liaise with the Head of Facilities on all matters affecting Health and Safety (and in his absence, with one of the Joint Chief Executives)
- Communicate the results of risk assessments to staff and also to communicate other Health and Safety issues/guidance to staff in a clear manner
- Regularly monitor the work operation to ensure that good Health and Safety practice and guidance is being put into practice, and that PPE is being worn
- Ensure that staff are trained to use equipment safely and correctly and in how to carry out their tasks with regard to good Health and Safety practice (training requests to be submitted through the Head of Facilities)
- Ensure that the workplace is maintained in an efficient, tidy and safe manner
- Ensure that doors and windows in their working area are closed at the end of the day

Directors/ Managers with any specific Health and Safety responsibilities (e.g. vehicles) must ensure that during periods of absence these responsibilities are covered by liaising with the Head of Facilities.

Employees

All employees are expected to:

- Attend induction Health and Safety training and follow advice/guidance given
- Read the Health and Safety policy and discuss this with their line manager and/or the Head of Facilities, raising queries on any point they do not understand and/or any concern they may have relating thereto
- Follow any instruction/good advice contained within the above and/or which has been communicated to them by any means
- Co-operate with directors, managers and supervisors on Health and Safety matters
- Not to interfere or tamper with any item provided to safeguard Health and Safety as it is illegal to do so
- Ensure that accidents or near-misses are reported to the Head of Facilities, whether they result in injury/damage or not, and to ensure that these are entered in the accident book and are signed by both the employee and their line manager
- Report any work-related health problems to their line manager immediately
- Use equipment safely and correctly
- Wear any Personal Protective Equipment (PPE) provided, keep it in good condition and store it correctly, advising their line manager when replacements are needed

- Report all Health and Safety concerns or hazards to an appropriate person (i.e. their line manager, the Head of Facilities or in their absence, to one of the directors of the company)
- Take reasonable care of their own and other's Health and Safety
- Report any potential hazards to their manager and/or the Head of Facilities

Appointment of Competent Persons in respect of Health and Safety Issues

Day-to-day Health and Safety issues can be covered by the arrangements and persons set down in this document.

Competency for Tasks and Training

Apogee will ensure that staff are recruited who are capable and fit for the proposed job (within the spirit of the Disability Discrimination Act) and will ensure that any training (whether on-site or external) is provided.

Health and Safety training has been provided but refresher training must be provided at appropriate intervals.

Training records will be kept on file by the relevant line Manager.

Consultation and Communication

Legislation: Health and Safety (Consultation with Employees) Regulation 1996

Under these regulations, employers are required to demonstrate that they consult with staff over Health and Safety. Apogee believe that good communication is vital to maintain good Health and Safety awareness and practice throughout the company, so the directors will ensure that efficient two-way communication systems are in place.

Health and Safety will be included at regular board meetings, team meetings and briefings and will include field-based and sales staff in addition to workplace staff.

Health and Safety is included in induction training for all new staff.

Letters will be sent to clients explaining Apogee's concern for the Health and Safety of their staff and seeking advice from them on any specific Health and Safety instruction that the client requires our staff to comply with and the identification of any specific hazards on site which our staff need to be made aware of.

Contractors working for Apogee will be similarly advised of our own Health and Safety requirements and of any specific hazards on site.

Risk Assessment and Monitoring

Legislation: The Management of Health and Safety at Work Regulations 1999

Detailed risk assessments have been carried out in respect of a range of issues including the building, fire, COSHH, manual handling, services, equipment (including display screens) and specific tasks.

Copies of these assessments are available from the Head of Facilities on request.

Special risk assessments will be carried out in respect of workers who are pregnant, new mothers or staff/trainees that are under the age of 18. Action will be taken in respect of any issues identified and in the

case of the latter, careful supervision and training will be given. These risk assessments must be documented and reviewed regularly.

The results of risk assessments will be communicated to staff, and actions required will be prioritised on the basis of greatest risk with control measures implemented to remove or reduce the risk.

General risk assessments will be regularly monitored and reviewed annually or whenever a major change is implemented, whichever is soonest.

To check our working conditions, and ensure our working practices are being followed, monitoring will be carried out as follows:

- Managers and/or the Head of Facilities will inspect the workplace at regular intervals and will occasionally accompany staff on deliveries and maintenance visits
- Any concerns identified by staff will be investigated and any necessary action taken to reduce the risk. This may mean making adjustments to the temperature, noise levels, ventilation and layout of the office and/or to equipment and/or to procedures and systems
- Investigate any accidents that occur within the office or on site and take action to prevent recurrence
- Investigate employee absenteeism to establish whether this is work-related and take relevant action if so
- Check that Health and Safety responsibilities are being discharged properly
- Check employee's awareness of Health and Safety issues at regular intervals (i.e. at team meetings, appraisals and/or during inspections)

Accidents, First Aid and Work-related ill Health

Legislation: Health and Safety (First Aid) Regulations 1981

The company will make every effort to avoid accidents and stress in the workplace and/or ill-health resulting from work activities. Major factors in this are:

- Risk Assessments
- Maintaining a good Health and Safety culture throughout the organisation
- Ensuring the building and its facilities are safe and in good condition
- The following arrangements are in place to cover any accidents that may occur:
- First Aid Kits are provided and equipped to appropriate levels. These will be regularly checked and replenished by on-site staff
- The appointed person is the Head of Facilities who also keeps the accident book for recording all accidents and cases of work-related ill health
- First Aiders will be trained and appointed for each site
- The Head of Facilities will report any incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations October 2013 (RIDDOR) to the enforcing authority

Personal Protective Equipment (PPE)

Legislation: Personal Protective Equipment Regulations 2002

Where risk assessment has shown that PPE is necessary the relevant items will be provided by Apogee with replacements issued as necessary.

Employees must wear the PPE provided for their own protection. They must also store, maintain and clean such items as appropriate, and request replacements when they become damaged or worn. If an item of PPE is not provided or is damaged; the employee must not continue the task without it.

Examples of PPE are steel-capped boots for warehouse staff, gloves/anti-stat strips for engineers, hi-vis jackets etc. although various other items of PPE are provided across the organisation.

Health, Safety and Welfare

Legislation: The Workplace (Health, Safety and Welfare) Regulations 1992

The workplace and its facilities and equipment will be maintained to provide a comfortable and safe environment for staff, visitors, contractors and anyone else who may enter the premises.

Comfortable working temperatures, adequate lighting and ventilation is provided to our offices, along with adequate toilet and refreshment facilities.

On external sites, employees must ensure that they consult with the client about any specific Health and Safety concerns which may affect them, or if there is any specific Health and Safety instruction they must comply with.

Any Health and Safety concern on-site which the client does not address must be notified to your line manager and/or to the Head of Facilities and work discontinued until advice is given.

Equipment

Legislation: The Provision and Use of Work Equipment Regulations 1998 (as amended)

The Head of Facilities is responsible for identifying all equipment and facilities needing maintenance, and for ensuring that effective maintenance procedures are drawn up and for implementation.

The Head of Facilities will check before purchase that new items of equipment meet current Health and Safety standards.

Equipment must be correctly and safely sited and used in accordance with the manufacturer's instructions.

Staff must not use equipment for which they have not been thoroughly and correctly trained, nor if an item of equipment is faulty. Should a member of staff discover a fault they must advise their manager or the Head of Facilities immediately and ensure that the item is taken out of use until it has been repaired by a competent engineer.

Fork Lift

The Fork lift should only be used by trained and competent persons who have attended the appropriate training course at least once every three years. The operator is responsible for carrying out daily checks to ensure the equipment is maintained in an efficient state e.g. steering, brakes, tyres and lights.

Stair Climber

Stair climbing equipment should only be used by trained and competent person who has received the appropriate training. The operator is responsible for carrying out daily checks to ensure the equipment is maintained in an efficient state.

Electricity

Legislation: Electricity at Work Regulations 1988 (as amended)

The Low Voltage Electrical Equipment (Safety) Regulations 1988.

The mains electrical system at our sites will be checked by a competent engineer at least every 5 years and a certificate retained by the Head of Facilities.

Portable appliances will generally be checked annually. A note will be kept on file of all these checks and be signed by the engineer responsible for carrying them out.

Staff must check flexes, plugs and sockets each time before use to ensure there is no visible sign of danger (e.g. frayed wires, damaged cable etc).

Fire

Legislation: Regulatory Reform (Fire Safety) Order 2005

The main sources of ignition for our offices are:

- Arson
- Equipment (sparks or overheating)
- Hot Surfaces
- Naked Flames

Combustible materials include:

- Paper
- Fabric of building (e.g. carpets and wall coverings)
- Oil
- Chemicals.

Fire risk assessments will be carried out and be documented. These will be reviewed at regular intervals.

Staff are made aware of the dangers from fire and therefore fuel, oxygen and heat sources are controlled to avoid the elements of the "Fire Triangle" coming together. Equipment is regularly maintained

Staff are aware of the procedure to take if they discover a fire or if the alarm is given. Evacuation routes are clearly marked and an Assembly Point nominated. Fire drills are held every 6 months and a record is maintained of these.

Fire Marshalls will be appointed and trained and will oversee safe evacuation of the premises in the event of a fire drill or a real fire. Appropriate hi-vis or armbands for Fire Marshalls will be provided ensuring that these are distinctive from the landlord's Fire Marshalls within the building "i.e. Fire Marshall for Apogee Corporation" should be displayed, rather than just "Fire Marshall" or this may cause confusion.

Fire fighting equipment will be checked annually, contracts are also in place for the regular maintenance of fire alarm equipment and emergency lighting at the intervals recommended by the manufacturers.

A Fire Assembly Point has been designated on the opposite side of Queens Road. It is essential that Fire Notices are displayed around communal areas (e.g. corridor doors, kitchens etc) ensuring that staff know what to do in the event of fire, and where to assemble.

Fire routes, both internal and external, must be kept clear at all times. Fire doors must always be unlocked whenever anyone is working on the premises.

If a risk has been identified it should immediately be reported to the Health & Safety manager who will take appropriate actions to control or cull the danger.

The health & Safety manager will,

- Carry out a fire safety risk assessment
- Keep sources of ignition and flammable substances apart
- Avoid accidental fires, eg make sure heaters cannot be knocked over
- Ensure good housekeeping at all times, eg avoid build-up of rubbish that could burn
- Consider how to detect fires and how to warn people quickly if they start, eg installing smoke alarms and fire alarms or bells
- Have the correct fire-fighting equipment for putting a fire out quickly
- Keep fire exits and escape routes clearly marked and unobstructed at all times
- Ensure your workers receive appropriate training on procedures they need to follow, including fire drills
- Review and update your risk assessment regularly

Safe Handling and Use of Substances

Legislation: Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Service managers, under the responsibility of the Head of Facilities, will identify substances which need a COSHH assessment and will be responsible for carrying this out and for informing staff of the results of the assessment. They will also identify, before purchase, that new substances can be used safely. Every effort will be made to reduce hazardous substances to the minimum by seeking safer alternatives where available and by standardising products as far as possible across the sites.

Assessments will be carried out and reviewed annually or whenever new substances are introduced, or whenever updated Safety Data Sheets are issued, whichever is the soonest.

Safety Data Sheets will be retained on file with copies clearly displayed. Summaries of the main points will be given to engineers and workplace staff.

Working with Display Screen Equipment (DSE)

Legislation: Health and Safety (Display Screen Equipment) Regulations 1992 (as amended)

Staff are advised of the risks that can be caused by DSE equipment as follows:

- Eyestrain
- Headaches
- Upper Limb Disorders
- Backache

Risk assessments will be carried out and reviewed annually and any comfort aids and new furniture needed will be supplied.

To reduce the risk, users are advised:

- To maintain a good posture, sitting at the correct height with forearms parallel to the surface, adjusting the chair height and tilt to give you the best support and by also adjusting the screen

height and angle

- Ensure the top of the screen is approx level with the eyes and to momentarily glance into the distance every few minutes
- Take breaks from the VDU after 50 minutes of continuous use and have a change of task (e.g. telephone calls, filing, making a drink, using the toilet etc)
- Position keyboard and mouse sensibly to avoid stretching or other awkward movements
- Avoid glare or reflections on the screen, and keep the screen clean and free from flicker
- Adjust brightness and contrast controls

VDU users are entitled to eye tests provided by the company and an allowance towards the cost of corrective lenses where a prescription shows these are required for VDU use.

Report any problems immediately to your manager or to the Head of Facilities, particularly if these are affecting your health.

Manual Handling/Moving and Handling

Legislation: Manual Handling Regulations 1992 (as amended)

Manual Handling includes lifting, carrying, bending, stretching.

Risk Assessments are carried out on all manual handling operations. However staff are advised that care must always be taken and to follow the following guidance:

- Consider if the item really needs to be moved at all and if there is any aid to assist (e.g. trolley, lift). M/H aids must be kept in good condition
- Before moving an item consider the following:
 - Load (shape, size, weight, stability and nature)
 - Individual (your fitness and ability to move it)
 - Task (how and where it is to be moved to?)
 - Environment (are there any hazards, obstructions or obstacles such as slippery floors or stairs that may cause a problem?)
- Plan your route to overcome any obstacles or obstructions
- Do you need assistance?
- Wear PPE where appropriate.
- Carry items close to your body so that you have more control over them
- Bend at the knees slowly keeping your back straight
- Raise the load to waist height, move the load and reverse the procedure to lower it
- Where equipment (e.g. fork lift trucks and pallet trucks) are used then clearly marked pedestrian walkways must be maintained at all times

Posters on best manual handling practice are displayed at Alton where heavy manual handling tasks are Undertaken.

Asbestos

Legislation: Control of Asbestos at Work Regulations 2012

The Directors are not aware of any asbestos within the building, but should there be reason to doubt this then a specialist survey will be commissioned and the results actioned in compliance with the regulations.

Driving

Drivers must ensure that they keep their vehicles (whether company vehicles or own vehicles used for business purposes) in a safe and roadworthy condition.

You must not drive if:

- You are feeling unwell or excessively stressed
- You are under the influence of alcohol or drugs
- You have been banned
- You do not have road tax, insurance or current MOT
- If you require spectacles for driving and these are not available.
- If you have been advised not to drive

Always carry a portable first aid kit, blanket, water and some emergency food rations (e.g. biscuits, chocolate etc.) in case of breakdown.

Do not eat, drink, use a mobile phone or similar device nor read whilst driving and ensure your full attention is given to your driving and to other road users and pedestrians.

Always park facing the building with exhausts away from windows

Smoking

In accordance with current legislation all of Apogee's premises and their environs are designated as non-smoking following the introduction of the Smoke-free (Premises and Enforcement) Regulations 2006.

Staff must not smoke on our clients' premises or their environs.

Staff must not smoke in company vehicles.

Lone Working

Lone working will be avoided wherever possible, but in some cases where this is unavoidable (e.g. Telephone Installation Operative, cleaners and similar), risk assessments must be carried out and documented and be reviewed at regular intervals.

Control measures must be put in place to reduce this risk to the lowest level.

Working at Heights

Where this is unavoidable, risk assessments must be undertaken and control measures put in place to reduce this risk to the lowest level. These assessments must be documented and regularly reviewed.

Staff must be advised of safety precautions they can take, be trained in all aspects of the work, equipment to be used and in how to use ladders safely.

Ladders must be suitable for the job in hand and be checked regularly and replaced when necessary. Staff must ensure that they use the correct ladder for the task.

Working Time Directives

Staff must work within the recommendations of the Working Time Directive – for further information on this aspect please contact the Company Secretary.

Stress

The company has a responsibility to monitor and reduce stress levels within the organisation. Employees can help to reduce stress by:

- Effective team working and co-operation
- Planning their work to avoid stress and repetition
- Maintaining general fitness
- Using relaxation techniques

If you feel that you are suffering from stress caused by the workplace please discuss this with your line manager as soon as possible so that preventative measures can be taken.

Violence

Apogee staff should be able to go about their work without fear of violence. If an incident does occur whether this is on company premises, clients' premises or during travel between sites please let your line manager and the Head of Facilities know as soon as possible.

It is important that the building is kept secure and that all staff are vigilant about possible intruders.

Pests

Pests pose a hygiene problem as well as having the capacity to cause considerable damage to a building. For sites used solely by Apogee a pest control contract should be in place.

For multi-occupancy sites (e.g. Maidstone Head Office) if signs of pests are discovered then the Management Company of the landlord should be notified and a pest control contractor

Accident Reporting

Employees must report all injuries, dangerous occurrences, cases of disease, and damage resulting from incidents on company premises, in other workplaces, or whilst driving on company business, however minor.

Immediate actions

The first priority in the event of an accident is to render first-aid to any injured persons; having assessed the situation and made sure the area is safe. Do this if you are competent - and if not (and in any case, as soon as possible) contact a trained first-aider. You or the first-aider may decide to call an ambulance (999), or in non-urgent / serious cases, the injured person could be taken to an A&E if required or dial 101 for advice.

If you have a road traffic accident involving injury to another person, damage to another person's vehicle, property or animal, you must stop and remain at the scene for a reasonable period and exchange details. If you do not exchange details, you must report to the police within 24 hours. More detailed information can be found in Appendix 2, below.

Secondary action by employees

After carrying out any immediate actions, the employee must report the accident / incident.

During office hours, the employee must report the accident / incident to the Site H&S Co-ordinator.

Out of office hours, the employee must report the accident / incident to the Site Nominated Person, the following working day. Road traffic accidents must be reported ASAP to the Insurance Company on their 24hr Emergency number 0345 850 5194 (option 4).

Accident Investigation

When instructed to carry out an investigation, the company's H&S Consultants will send a full report of the investigation to the Company together with any photographs, statements or other relevant material for use by Company Insurers or legal advisers. This investigation report is privileged information and must not be issued to any other person without the permission of the Company, its insurers or legal advisers. Assistance (access to the scene, witnesses, and office facilities) is to be provided to the investigating H&S Consultant.

All fatalities, major injuries, reportable diseases, dangerous occurrences and other noticeable injuries will be recorded in a register at head office. These records, as well as those of non-reportable injuries, will be kept by the Company who are responsible for ensuring that all details are entered and that records are kept for at least 3 years.

Health & Safety Training

The company will provide health and safety to ensure that employees know how to work safely and without risks to health, this will help to develop a positive health and safety culture, one where safe and healthy working becomes second nature to everyone. Training will be issued with relevance to the employee's job role and will be reviewed on a regular basis. For further information on Health & Training requirement for your role please ask the Head of Facilities for a copy of document Apo-Form-27, this document is a matrix outlining which job roles require which training.

Further information on Health & Safety in your work place can be found at www.hse.gov.uk

Remember, Health and Safety is everyone's responsibility.

If you have any query or concern on any aspect of this policy please speak to your Manager and/or to the Head of Facilities.

John Painter

Head of Facilities

01622 358 482

facilities@apogeeCorp.com