

Plastica Ltd

Health, Safety and Environmental Policy

(ISO 14001:2015, Clause 5.2, ISO 45001:2018, Clause 5.2)

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1.0 General Statement of Policy

We have established this HSE policy to be consistent with the purpose and context of our organisation. It provides a framework for the setting and review of Quality, Environmental and Occupational Health and Safety objectives in addition to our commitment to satisfy applicable customers', regulatory and legislative requirements as well as our commitment to continually improve our management system. As an organisation, we have made a commitment to understand our current and future customers' needs; meet their requirements and strive to exceed their expectations. We are a professional and environmentally conscious organisation, which acknowledges the impact that our operations may potentially have on the environment.

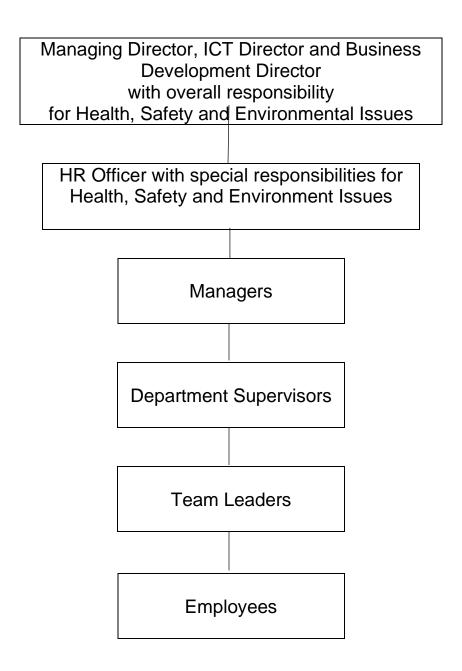
- Leadership: Directors have committed to creating and maintaining a working environment in which people become fully involved in achieving our objectives.
- Engagement of people: As an organisation, we recognise that people are the essence of any good business and that their full involvement enables their abilities to be used for our benefit.
- Process approach: As an organisation, we understand that a desired result is achieved more
 efficiently when activities and related resources are managed as a process or series of
 interconnected processes.
- Improvement: We have committed to achieving continual improvement across all aspects of our quality, environment and OHS&E management systems; it is one of our main annual objectives.
- Evidence-based decision making: As an organisation, we have committed to only make decisions relating to our IMS following an analysis of relevant data and information.
- Relationship management: We recognise that an organisation and the relationship it has with its
 external providers are interdependent and a mutually beneficial relationship enhances the ability of
 both to create value.
- OHSF&E Performance: We are committed to providing safe and healthy working conditions for the
 prevention of work-related injury and ill health appropriate to the nature of our OHS&E risks to which
 workers and others are exposed; eliminating hazards and reducing OHS&E risks and consulting
 and participating with workers and where they exist, workers' representatives on OHS&E issues.
- Environmental Performance: We are committed to protecting the environment, including the prevention of pollution, to the use of sustainable resources, to climate change mitigation and to the protection of biodiversity and ecosystems.

Our policy is also to meet the requirements of other interested parties and in meeting our social, environmental, charitable, regulatory and legislative responsibilities. We have produced OHS&E and Environmental objectives which relate to this policy, and they can be found in document HSEF 115. This policy is communicated to all interested parties as well as being made available through publication on our Company Noticeboard.

Signed:	Date:
	Edward Campbell-Salmon
	Managing Director with specific responsible for Health, Safety and Environmental issues
	(MD HSFE)

2.0 Health, Safety and Environmental Organisation

Plastica Limited has a Health, Safety and Environmental Committee, headed by the Managing Director (MD HSFE), ICT Director (ICTD HSFE) and Business Development Director (BDD HSFE) who have overall responsibility for Health, Safety and Environment at Plastica Limited.



3.0 Health, Safety and Environmental Responsibilities

The MD HSFE, ICTD HSFE and BDD HSFE have overall responsibility for the Health, Safety and Environmental Policy, its implementation and any issues.

They will ensure that:

- the Health, Safety and Environmental Policy is available to all employees on the Company Intranet
- all employees are made aware of their personal responsibilities
- appropriate training, resources and support are available to all staff
- health, safety and environmental issues are to be given appropriate consideration
- risks to the Company relating to potential incidents at work, environmental impacts, loss or damage to Company property, and risks to the public through the Company's activities are properly evaluated.
- liability is covered by appropriate insurance and that advice is given to the extent to which risks are acceptable, whether insured or not
- report to the Board and keep them appraised on all matters regarding health, safety and environmental management
- ensure that health, safety and environmental management data is collected, reviewed and reported on
- ensure that Company procedures, instructions and guidance are regularly reviewed and amended as necessary
- provide health, safety and environmental advice to managers, employees and customers using, as necessary, specialist external advisors/consultants
- promote positive health, safety and environmental values throughout the Company
- communicate effectively with external organisations, such as the HSE and Environment Agency, regarding the policy and its implementation
- investigate health, safety and environmental incidents and record all findings and make recommendations for the prevention of similar incidents
- liaise with the procurement and project managers on contract standards and any future changes or additions required to the policy
- monitor the effectiveness of the procedures by workplace inspections and audits and report on any improvements that may be required.

It is the responsibility of the MD HSFE, ICTD HSFE and BDD HSFE to ensure the allocation of adequate finances and other resources for the effective implementation of the Health, Safety and Environmental Management system. Key topics requiring specific resource allocation are: management representation; training; emergency response equipment; monitoring and measuring equipment and record keeping systems.

The HR Officer with Special Responsibilities for Health, Safety and Environmental Issues (HR HSFE) will:

- assist the MD HSFE, ICTD HSFE and BDD HSFE with ensuring that the Environmental Policy is available to all employees on the Company Intranet
- assist the MD HSFE, ICTD HSFE and BDD HSFE with ensuring all employees are made aware of

- their personal responsibilities
- assist the MD HSFE, ICTD HSFE and BDD HSFE to ensure appropriate training, resources and support are available to all staff
- assist the MD HSFE, ICTD HSFE and BDD HSFE to ensure health, safety and environmental issues are to be given appropriate consideration
- assist the MD HSFE, ICTD HSFE and BDD HSFE to ensure risks to the Company relating to
 potential incidents at work, environmental impacts, loss or damage to Company property, and
 risks to the public through the Company's activities are properly evaluated.
- assist the MD HSFE, ICTD HSFE and BDD HSFE with administration to ensure that health, safety and environmental management data is collected, reviewed and reported on
- assist the MD HSFE, ICTD HSFE and BDD HSFE to ensure that Company procedures, instructions
 and guidance are regularly reviewed and assist with the administration of amendments as
 necessary
- assist the MD HSFE, ICTD HSFE and BDD HSFE with promoting positive environmental values throughout the Company
- assist the MD HSFE, ICTD HSFE and BDD HSFE to communicate effectively with external organisations, such as the HSE and Environment Agency, regarding the policy and its implementation
- assist the MD HSFE, ICTD HSFE and BDD HSFE to investigate environmental incidents and recording all findings
- assist the MD HSFE, ICTD HSFE and BDD HSFE to monitor the effectiveness of the procedures by workplace inspections and audits and administer report on any improvements that may be required.

Managers and supervisors are at all times responsible for implementation of the Company's Health, Safety and Environmental Policy. All members of the management and supervisory team shall:

- understand the Company's Health, Safety and Environmental Policy
- set a positive personal example
- identify and organise appropriate training for their staff
- actively promote a positive health, safety and environmental culture through their areas of responsibility
- ensure the Policy is implemented properly and that any delegated duties are correctly performed
- ensure that all agreed actions are implemented as soon as practicable
- suspend any work or other activity which is considered to constitute an immediate danger to the
 environment. The circumstances should then be fully investigated and no work shall be allowed
 to continue until the appropriate remedial action has been taken
- ensure that regular health, safety and environmental inspections are carried out and that health, safety and environmental issues are actively managed and controlled
- ensure that the overall health, safety and environmental performance of company sites is discussed at regular intervals with all contractors and sub-contractors
- report any problems or improvements to this policy to the appropriate director
- actively promote, at all levels, the Company's commitment to effective health, safety and environmental management

All employees are required to:

- understand the Company's Health, Safety and Environmental Policy
- co-operate with the Company in complying with duties and requirements imposed by relevant statutory provisions and Company procedures
- co-operate with the Company in complying with health, safety and environmental management duties and requirements imposed by management
- not interfere with, or misuse anything provided in the interests of health, safety and environmental protection
- report all health, safety and environmental incidents to your manager/supervisor.

4.0 Health, Safety and Environmental Arrangements

- All risks are assessed using the Risk Assessment Method, they are suitable, sufficient, documented and reviewed, for the risks involved. Control measures are implemented using a hierarchy of control ensuring hard controls are prioritised. (This includes health, safety and environmental Risk Assessments).
- Where identified in a risk assessment, a safe system of work will be provided as part of other control measures.
- All lifting equipment is inspected in line with the Lifting Operations and Lifting Equipment Regulations (L.O.L.E.R).
- All work equipment complies with the Provisions and Use of Work Equipment regulations (P.U.W.E.R).
- Plastica Limited employs a permit to work system for Hot Works and working in confined spaces.
- A control of contractor's procedure is in place to help minimise the risk to the contractors, staff and visitors.
- Fire Risk Assessments and Escape Plan have been carried out according to the Regulatory Reform (Fire Safety) Order 2005.
- Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR). All
 incidents and ill health are reported to RIDDOR when applicable.
- Staff routinely consulted on Health, Safety and Environmental matters.
- Employers Liability Insurance on display.
- Health and Safety at work posters on display in a prominent place in line with the Health and Safety Information for Employees Regulations (HSIER).
- Plastica Limited has first aid arrangements in line with the First Aid at Work Regulations 1981.
- Control of Substances Hazardous to Health (COSHH) 2002. All hazardous substances are risk assessed and control measures implemented.
- Control of Major Accident Hazards (COMAH). Plastica Limited is a Lower Tier COMAH site and adheres to the Control of Major Accident Hazards Regulations (as amended) 2015 (COMAH).
- Young workers and new and expectant mothers are risk assessed according to Management of Health and Safety Regulations 1999.
- Display screen equipment (DSE). All staff who use display screen equipment are assessed in line with Display Screen Equipment Regulations 2002.

In addition we also have a number of practices on individual topics including: energy
management, waste hierarchy, waste minimization and recycling, noise monitoring and
assessment, nuisance noise reduction and control, waste water management, diesel storage,
incident investigations, incident reporting, continuous improvement, audits, fire prevention, flood
prevention, permit compliance, pollution response, dust management and fume and odour
management.

4.1 <u>Competence, Training and Information</u>

Plastica is advised by the competent authority, the ESFRS and the DGSA on health, safety and environmental matters.

Health, safety and environmental training programmes will be implemented with the object of achieving personal awareness of the risks and hazards to the environment associated with the work we undertake.

We are planning to create an internal Health, Safety and Environmental Training package for staff to cover the relevant policies including the Health, Safety and Environmental Policy.

Our Health, Safety and Environmental Policy is available on the Company Intranet.

Information about new health, safety and environmental issues, incidents, procedures etc. will be shared with staff via emails, notices and the intranet.

4.2 <u>Management and Measurement of Health, Safety and Environmental Performance</u>

When planning work activities, full account is taken of those factors that help to eliminate potentially harmful emissions/discharges, waste or other forms of pollution such as noise. Decisions about operational priorities are to take proper account of the health, safety and environmental constraints that may be present and the environmental impact created.

An annual review of our Health, Safety and Environmental Policy will be carried out to ensure that the procedures and control measures remain valid and relevant to our work activities. Further reviews may be carried out as and when required. All updates and amendments to the documentation will be circulated to all company personnel.

4.3 Health, Safety and Environmental Impact/Risk Assessments

Health, safety and environmentally considerate systems of work will be established and monitored. These will incorporate where applicable the findings of health, safety and environmental risk assessments. Health, safety and environmental risk assessments are used to identify the standards, requirements and prohibitions which apply to any particular work activity or workplace.

Where required in relation to particular projects we will undertake an environmental impact assessment.

4.4 Identifying Relevant Legislation

We will identify the legislation which applies to our activities and ensure that our policies and procedures reflect the legal requirements placed upon us. We will ensure that new and updated legislation is promptly identified and that senior managers and directors consider the changes which are needed to accommodate any new legislative requirements.

4.5 <u>Incident Management</u>

All incidents, no matter how minor, will be reported and recorded on:

HSEF 20 Accident Report – Damage to Property Only

HSEF 21 Accident Report – Injury to Person and Damage to Property

HSEF 22 Accident Report – Injury to Person Only

HSEF 23 Near Miss Report

HSEF 24 COMAH Incident Report

HSEF 71 Environmental Incident Report

HSEF 72 Environmental Incident – Witness Statement

HSEF 73 Environmental Incident – Action Record

Significant incidents will be promptly investigated to ensure that the appropriate preventative measures are implemented to prevent a recurrence.

In the immediate aftermath of an incident we will, where applicable, follow H&S 02 The Major Accident Prevention Policy.

5.0 Review Process

- The Health, Safety and Environmental Policy is reviewed annually or in the event of changes to process or incident.
- The COMAH Policy is reviewed annually or in the event of changes to process or an incident.
- Risk Assessments are reviewed annually or in the event of changes to process or an incident.
- Safe Systems of Work are reviewed annually or in the event of changes to process or an incident.

In the event of an incident, any required policy changes are enacted within a reasonable period of time.

Plastica has a process of regular Health, Safety and Environmental walkthroughs and procedural auditing. Any findings will be acted upon.

Following a review any significant findings will be noted at the Health, Safety and Environmental Meeting.