

## Occupational Health and Safety Policy |

### OHSPLGP010 v 2.2

#### Introduction

It is the policy of Electrical Waste Recycling Group T/A Waste Experts (Waste Experts) to demonstrate through the way we work and behave, all our employees, subcontractors and stakeholders will be protected from the risks of occupational injury or ill health.

#### Our Health and Safety Policy

It is our intent to demonstrate an ongoing and determined commitment to improving health and safety at work. At all levels, everyone has a part to play, and we will ensure the health and safety of all our employees and any other people who may be affected by our work activities, and we will comply with the requirements of Health and Safety legislation.

Waste Experts will lead industry by promoting best practice and exceeding the guidance of the Health and Safety Executive and other regulatory bodies. This Policy reflects our commitment to ensuring that health and safety at work is vital to the business and contributes to our success.

#### **1.0 Awareness – All employees and stakeholders have an awareness and understanding of health and safety hazards and risks affecting our business.**

- 1.1 Staff at all levels have a role to play in health and safety and employees must be aware of the responsibilities for themselves and others. Resources will be provided to ensure all staff, subcontractors and stakeholders are aware and understand this policy and associated procedures as relevant to their role within the organisation.
- 1.2 There will be open communication and consultation with employees, subcontractors and stakeholders with health and safety incorporated in all communications as appropriate. To build and actively maintain a

health and safety environment, cooperation between workers at all levels is essential.

- 1.3 Employees and subcontractors are expected to cooperate with the nominated Safety Officer and accept their duties under this policy. Employees and subcontractors must not undertake duties which will expose them or others to risks and hazards. The company looks to all employees, subcontractors, and stakeholders for continuous awareness of safety requirements.
- 1.4 Waste Experts will identify all workplace health and safety hazards and inform employees, contractors, and stakeholders as appropriate of all workplace risks associated with these hazards. Subcontractors and other stakeholders are required to identify health and safety hazards from their activities that may impact on our workforce.

## 2.0 Management Roles and Responsibilities

Area of Responsibility	Named Person
Overall and final responsibility for Health and Safety	Shaun Donaghey
Safety Officer with day-to-day responsibility for ensuring this policy is put into practice	Charlie Butler
Operational Responsibility for the Huddersfield Facility	Josh Ratcliffe
Inhouse competent person for Health and Safety as specified in Regulation & of the Health and Safety at work Act	Charlie Butler

Senior Management will ensure that:

- Adequate resources, training, instruction, and supervision is provided to individuals
- Adequately assess, control and monitor Health and Safety
- Encourage active participation from all employees on matters that affect Health and Safety.

Area to be managed	Person(s) Responsible
Equipment maintenance to include statutory inspections to include but not limited to LOLER (1998) and PUWER (1998)	Charlie Butler
Prevent accidents and cases of work-related ill-health by management of workplace risks via regularly reviewed and updated risk and COSHH Assessments	Charlie Butler Oliver Sherratt
Provide clear instructions, operating procedures, and adequate regular training to ensure all employees are competent to carry out work activities	Charlie Butler Josh Ratcliffe Oliver Sherratt
Engage and consult with staff via monthly health and safety meetings on day-to-day health and safety conditions	All staff
Implement and test emergency preparedness plan (CPSERHU001)	Charlie Butler Oliver Sherratt Josh Ratcliffe
Maintain safe & healthy working conditions, provide, and maintain plant, equipment, and welfare facilities.	Charlie Butler Shaun Donaghey

### **3. Competence – all employees, subcontractors and stakeholders have competence to undertake their work with minimum risks to health and safety.**

- 3.1. All employees will be instructed and trained on health and safety issues and safe systems of work as appropriate to their role. All subcontractors will be assessed and confirmed as competent prior to commencement of works/services for Waste Experts.
- 3.2. Senior Management will demonstrate leadership in health and safety with systems in place to empower all employees to raise health and safety concerns. A tour of the site will be completed monthly by members of the Management Team to ensure health and safety issues are identified, assessed, and managed.
- 3.3. We will assess the risks associated with hazards within the workplace taking action to prevent, reduce or control risks to an acceptable level to minimise the potential for incidents and accidents. All employees will be informed of the health and safety hazards that will impact their work activity. Subcontractors are required to identify hazards that may impact

on our work activities to provide clear systems of work and risk assessments in advance of work commencing.

**4. Compliance – our work activities achieve compliance with legislation and our employees are empowered to take action to minimise health and safety risks.**

- 4.1. All accidents, incidents and near misses will be reported to drive improvement in our health and safety management. Outcomes of investigations will be used to take corrective action to prevent reoccurrence.
- 4.2. We will actively and openly review and report on health and safety performance against our published objectives (OHSOTGP001). Improvement plans will be developed to support delivery of objectives and targets.
- 4.3. We will maintain our Health and Safety Management System to comply with health and safety legislation and to fulfil our requirements under our ISO45001 accreditation.
- 4.4. We will engage and collaborate with our subcontractors to ensure their:
  - Health and safety capability and competence fulfils our expectations.
  - Health and safety performance is monitored and reviewed.
  - Work activities have minimal health and safety impacts on our operations.

**5. Excellence – Waste Experts is recognised for excellence in the way it manages health and safety.**

- 5.1. We will develop a framework for continual improvement by conducting regular audits to assure progress and management commitment. We will consider the latest technical development scientific understanding, customer and client needs and community expectations.
- 5.2. We will only work with partners and clients who are willing to meet and achieve our health and safety expectations through audit assessment of health and safety systems. We will engage and influence stakeholders to drive improvements in health and safety.

- 5.3. Waste Experts will continually assess occupational health risks for employees to include physical and mental wellbeing. Action is in place to prevent, reduce and control occupational health risks to an acceptable level and reduce the potential for ill health including assessing employee's fitness for work. Health surveillance to include but not limited to urine testing for mercury, dust, and noise monitoring together with any other surveillance needed to satisfy Health and Safety legislation is carried out at regular pre-agreed intervals.

## 6. Health and Safety Arrangements

Area	Arrangements & Reference	Responsibility
Accident Reporting	As detailed in OHSOPPGP016 – all employees have responsibility for accident prevention and reporting. Employees must understand their own responsibilities for health and safety and must follow H&S rules. Employees must only use work equipment they have been trained and authorised to use and only use for the tasks intended. All accidents and near misses must be reported to the Team Leader/Line Manager where the incident took place. A full investigation will be made into all accidents and incidents and witness statements will be taken as needed. CCTV is in operation around site and is used as required as part of the investigation. All near miss forms and incident investigations must be passed to the Compliance Team to be logged and closed when appropriate. The Head of Operations and/or QHSE Manager will review all accidents and near misses. In addition, A RIDDOR accident/incident must be reported by the Head of Operations/ QHSE Manager immediately in the event of a major RIDDOR and as soon as it becomes apparent for an injury that results in a 7 day or more absence, or that is notifiable under the Regulations.	<p>Charlie Butler – Head of Operations</p> <p>Oliver Sherratt – QHSE Manager</p> <p>Shaun Donaghey – Managing Director</p> <p>All Employees</p>

Auditing – Internal & External	<p>To ensure continued monitoring of Health &amp; Safety on site, monthly Health and Safety walkarounds are completed at the Huddersfield plant by the Compliance Team to template OHSFNMHU021. Actions are highlighted to Team Leaders and Operational Managers which are then checked for completion. All actions and remedial work are discussed at monthly Health &amp; Safety Meetings.</p> <p>Internal Auditing is carried out to an agreed yearly schedule by QEMB Consultant in conjunction with the Compliance Team, and actions reviewed after completion by the Compliance Manager and Head of Operations</p> <p>External auditing is carried out by Alcumus as part of our 9001/14001/45001/SSiP Accreditation annually. An annual Management Review is carried out to confirm any actions have remedied.</p>	<p>Oliver Sherratt – QHSE Manager</p> <p>Charlie Butler – Head of Operations</p> <p>Neil Wilkinson – QEMB Consultant</p>
COSHH	<p>All materials used on site must have either a MSDS or COSHH data sheet stored within the Integrated Management System . COSHH Assessments are in place for all activities on site and are subject to an annual review. A detailed COSHH register is maintained within the Integrated Management System</p> <p>All employees must have access to COSHH Assessments either via the Integrated Management system within the Interactive Document Library or printed copies. The Compliance Team will manage all COSHH assessments.</p>	<p>Shaun Donaghey – Managing Director</p> <p>Oliver Sherratt – Compliance Manager</p> <p>Charlie Butler – Head of Operations</p>

Display Screen Equipment	As detailed in OHSPLGP004 – Display Screen Equipment Policy, eyesight tests are provided for users of display screen equipment upon request, up to a maximum of once per year. Where spectacles are required to correct vision defects at the viewing distance used for display equipment, the Company will contribute an amount equal to the cost of a basic appliance. Line Managers will identify display screen users and must issue a VDU assessment (OHSRAGP001) at the start of employment and periodically (minimum annually) throughout employment. All workstations must be maintained to meet the minimum standard set out in the Health & Safety (Display Screen Equipment) Regulations 1992.	All Line Managers
Emergency Procedures	As detailed in CPSERPHU001 – the Huddersfield Facility has a detailed Emergency Action Plan that covers the designated actions that Managers, Team Leaders, Employees, and any contractors on site must take to ensure safety from emergencies. All named personnel must be familiar with the plan and their duty within it. It is the duty of named personnel to ensure the safe evacuation of staff/contractors and visitors and alerting the emergency services as required.	<p>Charlie Butler – Head of Operations</p> <p>Shaun Donaghey – Managing Director</p> <p>Sharon Ennis – Credit/General Office Manager</p> <p>Oliver Sherratt – QHSE Manager</p>

Fire Safety	All Operational staff where appropriate are trained as Fire Marshalls to ensure full awareness of action needed in the event of a fire as detailed in CPSERPHU002. The site storage plan as detailed in the EPR Permit QP3034KA/V003 ensures that potentially flammable materials i.e. batteries are stored away from combustible materials. All batteries are treated and sorted before being packaged for transport.	Shaun Donaghey – Managing Director  Charlie Butler – Head of Operations  Oliver Sherratt – QHSE Manager
First Aid	The Company will train and maintain qualifications for First Aid across the business to always ensure adequate cover across all areas. First Aid kits are placed around the site and are checked daily to ensure contents remain intact and in date.	Charlie Butler – Head of Operations  Oliver Sherratt – QHSE Manager
Manual Handling	All employees receive manual handling training in line with our policies and procedures reference OHSPLGP001 and OHSOPPGP001. Followed by regular assessments to ensure that the risk is injury is minimised. Lifting equipment is available to be used as required, and any lifts above 25kg must be managed by 2 or more people.	Charlie Butler – Head of Operations  Josh Ratcliffe – Operations Process Manager
Personal Protective Equipment	Where a risk assessment deems Personal Protective Equipment (PPE) to be a necessary control, this will be provided for all employees. PPE is issued at initial start of employment and replaced as required. Where operatives work within Unit 5 – RPE is required to the specification detailed in the appropriate COSHH assessments. All RPE must be checked daily by the Unit Leader and filters replaced every 50 hours.	Charlie Butler – Head of Operations  Josh Ratcliffe – Operations Process Manager.  Oliver Sherratt – QHSE Manager



Staff Training	As detailed in CPSRTGP001 – Everyone who performs duties that impact on the health and safety, quality, and environmental output of our activities on customers (internal and external) will have suitable skills and conditions of work to carry out roles at the required level. Inductions are provided to all employees at the start of employment and internal and external training is provided as required. Continuing competency assessments must be carried out by line managers to ensure that skills are maintained and changes to procedures and legislation are captured.	Jane Richardson - Head of ESG & Sustainability Emma Butler - Head of Commercial Charlie Butler – Head of Operations Sharon Ennis – Credit/ General Office Manager. Charlie Prosser – Transport Planner Josh Ratcliffe – Operations Process Manager Oliver Sherratt – QHSE Manager
Welfare Facilities	Welfare facilities are provided for all employees, contractors, visitors, and drivers. Facilities must be checked regularly throughout the day and always kept in a clean and hygienic state. Facilities are regularly cleaned, and sanitised and cleaning materials are available for cleaning throughout the day.	Josh Ratcliffe – Operations Process Manager
Work Equipment Safety	All work equipment is covered by the Provision and Use of Work Equipment Regulations. A daily housekeeping regime must be maintained by operatives and all machinery is managed by an external contractor to a predetermined maintenance contract	Shaun Donaghey – Group Manager  Charlie Butler – Head of Operations

This policy will be delivered by generating a culture that does not tolerate threats to health and safety by ensuring real involvement of all our employees, subcontractors, and stakeholders. This policy is available to all employees, subcontractors, clients and stakeholders and Senior Management are committed to ensure adequate resources are available for implementation and management of this policy. This policy will be reviewed and amended as required.



S Donaghey  
January 2025

## VERSION CONTROL

Version	Date	Author	Approver	Change Description
2.2	02/01/2024	O Sherratt	S Donaghey	Reviewed and updated with personnel changes
2.0	29/01/2024	O Sherratt	S Donaghey	Reviewed and updated with personnel changes
1.9	03/01/2023	J Richardson	S Donaghey	Policy reviewed and updated to include personnel changes
1.8	30/06/2022	J Richardson	S Donaghey	Policy updated to incorporate IMS policies & Procedures
1.7	01/04/2022	J Richardson	S Donaghey	Reviewed April 2022
1.6	05/01/2022	J Richardson	S Donaghey	Reviewed 2022
1.5	02/01/2021	J Richardson	S Donaghey	Reviewed 2021
1.4	01/01/2020	J Richardson	S Donaghey	Reviewed & Updated 45001
1.3	01/01/2018	N Wilkinson	S Donaghey	Reviewed 2018
1.2	09/03/2017	A Mottram	S Donaghey	Updated
1.1	30/03/2015	S Donaghey	S Donaghey	Updated
1.0	19/10/2011	S Donaghey	S Donaghey	New Policy