






## HSEQ & WRRR Policy

### APPROVAL

The signatures below certify that this HSEQ & WRRR policy has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Luke Mattin		National HSEQ & Compliance Manager	08/01/2022
Reviewed by	Kristian Carter		Commercial Director	08/01/2022
Approved by	Simon Franklin		Managing Director	08/01/2022

### AMENDMENT RECORD

This HSEQ & WRRR policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
-	-	Initial Release	17/12/2018
13	Addition of Personal Vaporisers & E-Cigarettes	1	02/01/2020
1	Change of document owner	2	15/01/2021
16	Addition of Coronavirus information	2	12/01/2021
All	Removal of internal responsibilities and reference to SSORG, change of names and responsible persons, Update of contractor arrangements	3	08/01/2022

### COMPANY PROPRIETARY INFORMATION

The electronic version of this policy is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this policy is uncontrolled, except when provided with a document reference number and revision in the field below:



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Document Ref.	SSPOL01	Rev	3
Uncontrolled Copy	<input type="checkbox"/>	Controlled Copy	<input checked="" type="checkbox"/>
		Date	08/01/2022

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## 1.0 POLICY STATEMENT

It is the Company's responsibility to take all reasonably practicable steps to ensure the Policies and Procedures are known to all employees. We will also ensure that all relevant statutory duties and obligations are satisfied, including those duties set out in the Health and Safety at Work Act 1974 and any other relevant legislation.

It is the Company's aim to provide and maintain a healthy, safe working environment with the objective of minimising the number of occupational accidents and illnesses and ultimately achieving an accident-free workplace. We will ensure that we provide all our employees with safe working equipment and the necessary information, instruction, supervision and training to ensure we meet our legal obligations and achieve as safe a working environment as is possible.

The Company's duties extend to protecting the health and safety of all visitors on Company premises, including contractors and temporary workers, as well as any members of the public who may be affected by our operations and activities.

Health and safety are also the responsibility of each person employed by the Company; each employee is required to co-operate with Company representatives and take reasonable care of their own health and safety as well as others who may be affected by their actions and omissions. Any situation that may pose a threat to the wellbeing of any of the Company's employees, contractors, visitors, or members of the public must be reported immediately. Any employee unsure of how to perform a certain task or feels it would be dangerous to perform a specific job must report the situation to Senior Management or the Health and Safety representative.

Any employee, contractor, visitors, or member of the public who sustains an injury at work, however small or slight, at the Company premises or during Company activities at a client's premises must report the injury and the appropriate entry must be made in to the Company or client's Accident Report Book as soon as possible after the incident. Accident Records are crucial to the effective monitoring and revision of this Policy and must therefore be accurate and comprehensive.

The Company employs a dedicated safety professional for health and safety matters in order to develop a good working culture and to comply with the Company's legal obligations.

Detailed procedures and notices will be contained in a Master Health and Safety file, held at Head Office and will be reviewed on an annual basis or at any time that legislation may affect the legal obligations of this Policy.

The Company recognises that our activities, products, and services impact the environment and that managing the environmental implications of our activities is an integral part of good management practice.

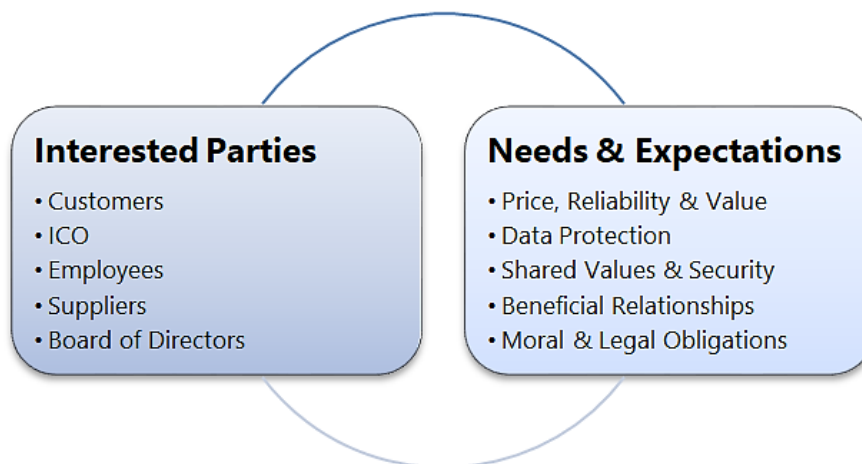
The Company is committed to applying the following principles to all its activities and to promoting these principles:

- ✚ Regulatory compliance as a minimum standard.
- ✚ To continuously seek to improve performance.
- ✚ To reduce the use of raw materials, energy and supplies.
- ✚ To reduce pollution, emissions and waste.
- ✚ To respond to valid concerns from neighbouring communities.
- ✚ The assessment of the environmental impact of current and future operations.
- ✚ To raise awareness and train employees in environmental matters relevant to their obligations.
- ✚ The monitoring and review of environmental performance on an annual basis.
- ✚ To expect similar environmental standards from the Company suppliers and contractors.

Adopting strong Health, Safety, Environment and Quality principles in everything we do is our main competitive advantage.

Shred Station Ltd recognises that we have a unique set of interested parties whose needs and expectations change and develop over time, and furthermore; that only a limited set of their respective needs and expectations are applicable to our operations or to our HSEQMS.

Such needs and expectations broadly include those shown below.



This Policy and the arrangements it contain will be reviewed and if necessary, updated periodically or at any time legislation may determine its effectiveness.

## 2.0 ORGANISATION AND ARRANGEMENTS

### 2.0.1 INTERNAL ROLES AND RESPONSIBILITIES

- ✚ INTERNAL ROLES AND RESPONSIBILITIES ARE DEFINED IN SSORG\_RESPONSIBILITIES ORGANISATIONAL CHART V10.
- ✚ IT IS THE NATIONAL HSEQ & COMPLIANCE MANAGERS RESPONSIBILITY FOR THE UPKEEP OF THIS DOCUMENT
- ✚ COMMUNICATION OF RESPONSIBILITIES WILL BE DONE THROUGH EMAILS, SAGE HR AND PRINTED TEXT DOCUMENTS FOR THOSE WHO DO NOT HAVE ACCESS TO EMAIL.

## 2.4 CONTRACTORS AND SUBCONTRACTORS

### ***Contractors and Sub Contractors have the following responsibilities:***

- ✚ All contractors and sub-contractors will be expected to comply with the Company Policy for Health and Safety and must ensure that their own Company Policy is made available on site whilst work is being carried out.
- ✚ All work must be carried out in accordance with the relevant statutory provision, taking into account the safety of themselves and other persons on the site. This requirement includes the safety of members of the general public.
- ✚ Analysis of any/all risks associated with any substance, process or work activity on the premises that may be considered hazardous to health and safety must be handed to the Manager/Supervisor of the area or the employee who originally organised for the contractor to be onsite before work commences. The HSEQ & Compliance department will support

those Managers/Supervisors to review the adequacy of contractors RAM's and associated statutory paperwork before work commences.

- ✚ Scaffolding used by contractors/sub contractors' employees (even when the scaffold has been erected for other contractors) must be inspected by their employer or competent person appointed by their employer before use and at suitable intervals to ensure that it is erected in accordance with Regulations and Codes of Practice.
- ✚ All plant and equipment brought on to site must be safe and in good working condition, fitted with the necessary guards and safety devices and with any necessary certification and information being made available for inspection prior to use.
- ✚ No power tools or electrical equipment of greater than 110 volts may be brought on to the premises, without prior permission. All transformers, generators, steam cleaners, electrical extension leads, plugs and sockets must be to the latest British/European Standards for industrial use and in good condition. Any such equipment must be suitably certified and with all relevant documentation being made ready for inspection as required.
- ✚ Any injury sustained or damage caused by contractors/sub contractor's employees must be reported immediately to the Shred Station Manager/Supervisor of the particular area the work is being carried out in and subsequently HSEQ & Compliance Team).
- ✚ Contractors/subcontractors' employees must comply with any safety instructions given by the Shred Station Managers/Supervisors.
- ✚ A detailed Method Statement will be required from contractors/subcontractors carrying out high risk activities, e.g., roofing, work in confined spaces, welding etc. The Method Statement must be agreed with the Company's Health and Safety Officers before the commencement of the work and copies made available so that compliance with the Method Statement can be maintained.

### 3.0 COMMUNICATION, COOPERATION AND MEASUREMENT

***As a Company, we are dependent upon the co-operation of all personnel. All employees have a responsibility to:***

- ✚ Follow Company procedures, in particular, to report any incident that has or may have led to injury or damage.
- ✚ Understand the Company Health and Safety Policy and any additional rules in place on our clients and customer sites and premises.
- ✚ Understand and abide by the Driver's Hours and/Working Time Directives and Regulations.

- ✚ Develop a personal concern for the safety of themselves and others.
- ✚ Use the correct equipment for the job.
- ✚ Report any defects to vehicles or equipment.
- ✚ Familiarise themselves with the procedure for summoning the emergency services in the event of an accident, fire or other emergency situation, on both our and clients' sites and premises.
- ✚ Familiarise themselves with the arrangements for first aid treatment.
- ✚ Refrain from 'horseplay' and the abuse of welfare facilities.
- ✚ Suggest ways of improving safety conditions.

Shred Station Ltd.'s corporate policies act as a compass by providing the direction and framework for establishing key business performance measures, as well as related objectives and targets. Top management ensures that our corporate policies are established and documented, and that the policies are available to all interested parties via our website.

We shall communicate this policy throughout the organisation, train our employees in the appropriate use of the HSEQ management system and engage them in the regular setting, measuring and revision of objectives.

Disciplinary action under the Company's Disciplinary Procedure may be taken against any employees who violates safety rules and procedures or who fails to perform their duties under this Policy.

## 4.0 TRAINING

Training sessions will be held as often as is deemed necessary and will provide another opportunity for employees to express any fears or concerns they may have in relation to potential hazards within their job role.

The Company will take every practical step to employ competent people to undertake the Company's work and activities and to ensure that every employee is trained to perform their job effectively and safely.

All employees will be trained in Safe Working Practices and Procedures prior to being allocated any new role. Training will include advice on the use and maintenance of personal protective equipment appropriate to the task concerned and the formulation of emergency contingency plans.

## 5.0 INSPECTIONS

To demonstrate compliance with the Workplace Health, Safety and Welfare Regulations 1992 the Company will ensure that regular systematic inspections of the workplace are carried out at appropriate intervals. Additional inspections will be carried out whenever there are significant changes in work activities, after the purchase and introduction of new equipment or the development of new business activities which may affect the Company's working practices.

## 6.0 COMPANY VEHICLES

All drivers, other employees, contractors and visitors will wear high visibility clothing in areas that are highlighted with appropriate signage.

Any person employed to drive Company vehicles must hold a current UK driving licence applicable to the class of vehicle to be driven and to drive within the speed limits laid down in the Highway Code.

Copies of all driving licences will be taken every six months and held in the employee's personal file.

Drivers must report any infringements, convictions, offences, or any situation that may affect the legal requirements of the Road Traffic Acts to the Company's Management.

Drivers must not carry any unauthorised passengers at any time.

Drivers must not use mobile phones, satellite navigation or any type of in cab technology whilst driving.

Drivers must take all reasonably practicable steps to ensure that their vehicle is roadworthy and legal to be used on the public highway.

Drivers must at all times drive the vehicles in a safe manner according to the rules of the road, and within the speed limits.

Drivers and loaders must not load the vehicles above their specified capacities.

Drivers must carry out their vehicle Defect Check before commencing work.

Drivers must show a minimum of 11 minutes on their tachograph before moving the vehicle.

Drivers must ensure to take their legal breaks while driving Company vehicles.

The driver has responsibility for the security of their vehicle during their duty time.

Fines and parking fines will be investigated to ascertain who is at fault.

Repeated minor offences or deliberate falsification of records will be dealt via the Company disciplinary procedure.

Company vehicles must meet the criteria set down in the Safer London Lorry Control Scheme.

Vehicle selection will be specific to the work requirement and the protection of other road users.

## 7.0 WORK EQUIPMENT

The Company will take every reasonably practicable step to ensure the safety of all employees using work equipment provided or hired by the Company, as well as to ensure the safety of others who may be affected by the equipment. All equipment purchased will comply with the regulations laid down in the Provisions of Use of Work Equipment Regulations and will liaise with suppliers to ensure that any new machinery is designed and supplied to work in a safe manner. Employees involved in the use of new equipment will be informed, instructed and trained on its safe use.

Any employee having a problem or concerns in the use or safety of the operation of any new equipment should inform their Manager/Supervisor so that the appropriate steps can be taken to remedy the situation promptly. All defects should be reported and the equipment will be taken out of use until inspected and repair taken place.

Vehicle defects must be rectified before the vehicle is allowed on any Public Highway.

All work equipment must be clearly marked with health and safety warnings where appropriate.

Any piece of work equipment that could pose a threat to the safety and wellbeing of anyone in or around the workplace will be restricted to authorised persons only.

Only trained and authorised persons are permitted to use potentially hazardous equipment.

Disciplinary action will be taken against any improper use of Company equipment.

## 8.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

All employees will be provided with Personal Protective Equipment (PPE) as is required to protect them from dangers occasioned by the use of work equipment and/or where risk



assessment identifies the requirement for worker protection or where we are unable to control the risk presented by any other means.

All employees required to use PPE will be provided with adequate information and training to enable a full understanding of the issues associated with its use.

The Company will carry out an assessment of proposed PPE to determine whether it is suitable, and where appropriate:

- ✚ Take action following the assessment of risk.
- ✚ Ensure that where two or more items of PPE are used together, these items are compatible and are as effective used together as they are separately.
- ✚ Provide locations for correct storage of PPE.
- ✚ Arrange for the maintenance, cleaning and repair of PPE (this includes training in individuals to undertake before use and after use checks).
- ✚ Replace PPE as necessary.

## 9.0 WORK ON CUSTOMER/CLIENTS SITES

All employees must observe all customer rules and notices whilst on their premises or sites; drivers must pay particular attention to speed restrictions and one-way systems. Many sites will require drivers and others visiting to be inducted in their Health and Safety Procedures before being permitted to do any work. If this is not the case, then employees work to the same standards as would be expected on the Company's sites.

## 10.0 SECURING LOADS

Sheeting, strapping and roping are responsible for a large number of injuries. In all but exceptional circumstances, any such work must be conducted from ground level or purpose-built access platforms. Any employee who needs to work on the back of the vehicle or trailer must gain access by purpose-built vehicle steps fixed to the vehicle or a suitable set of safety certificated industrial steps supplied specifically for the purpose.

Restraints that are appropriate for the load must be used at all times. Load security should be checked before leaving site and at other suitable stopping points during the journey.

## 11.0 MANUAL HANDLING OPERATIONS

It is the Company's responsibility to ensure that we comply with the Manual Handling Operations Regulations 1992 and our objective is to minimise any risk to our employees of accident or injury resulting from manual handling operations.

The Company will supply mechanical means to lift, carry, pull, push or move heavy items to avoid injury through manual handling.

If mechanical means is not possible a risk assessment for the operation must be carried out to avoid injury to the individual carrying out the manual handling.

Assessments will be reviewed when there is a significant change in:

- ✚ The activity or process.
- ✚ The working environment.
- ✚ The number or abilities of personnel.
- ✚ The nature of the loads to be loaded.

## 12.0 REPORTING OF INJURIES, DISEASES AND DANGEROUS OCCURRENCES (RIDDOR)

The reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 require that certain prescribed events, injuries and diseases be formally reported.

Notwithstanding the Company's legal obligations, the Company views accident investigation as a valuable tool in the prevention of future incidents.

In the event of an accident resulting in injury, a report will be drawn up by the Managers/Supervisors attending, detailing:

- ✚ The circumstances of the accident including photographs and diagrams wherever possible.
- ✚ The nature and severity of the injury sustained.
- ✚ The identity of any eye witness
- ✚ The time, date and location of the incident.
- ✚ If relevant, details of the vehicle(s) involved.

Any eye witness account will be collected as near to the time of the accident as is reasonably practicable.

For incidents on public highways, personal injury, insurance details, vehicle damage and details must be recorded at the scene.

Photographic evidence must be taken at the scene.

Details of any Police Officers attending the scene of a traffic accident must be taken down as evidence.

Weather conditions must be reported as evidence.

All evidence will be investigated and used to discover the cause and avoid a recurrence of the problem.

The HSEQ & Compliance Team are responsible for reporting cases of accidents and diseases to the relevant enforcing authority under the regulations where applicable.

## 13.0 FIRST AID

First aid boxes are located on every vehicle and in the Company's site offices. The location of the first aid boxes must be clearly marked and accessible to all employees. Items to restock kits are supplied by the Company. Drivers are responsible for ensuring any items used are replaced in their vehicles.

The Managers/Supervisors are responsible for restocking the kits on the Company sites and ensuring that the contents have not exceeded the manufacturer's expiry date.

In an emergency, if speed is considered essential, an ambulance should be called.

## 14.0 FIRE SAFETY PRECAUTIONS

Fire is a significant risk in the workplace and on vehicles in general. The Company has undertaken specific fire risk assessments to reduce this. All employees are under a duty of care to report immediately any fire, smoke or potential fire hazards and to be aware of and follow the relevant procedures. Those applicable to Company sites are detailed below.

Customer sites should be covered by similar requirements but it is the employee's responsibility to ensure they are aware of those arrangements.

The premises are of a significant size and levels, therefore on hearing the fire alarm or someone shouting fire, all employees must vacate the buildings from each floor by means of the stairs and assemble at the designated fire assembly point outside the gate where a head count will be taken.

All employees must remain at the designated fire assembly point until the all clear is given by the Fire Authority or a Company Fire Marshal.

All employees are to conduct their task in such way as to minimise the risk of fire. This includes keeping combustible materials separate from any source of ignition and avoiding unnecessary accumulation of combustible materials and waste on the premises.

All employees must use heaters with caution and keep flammable materials away from sources of heat. Portable gas or diesel hot air blowers such as those typically used in workplaces are particularly likely to cause problems.

Faults with such equipment must be reported to Managers/Supervisors.

Electrical equipment that does not require continuous operation should be switched off when not in use and plugs removed from the socket outlets. Under no circumstances must any employee attempt to repair or interfere with wiring or electrical equipment themselves.

Key employees will be trained in the use of all fire appliances and procedures in which to reduce the risk of fire.

Fire doors must never be blocked open or obstructed by goods or debris.

Stairs and corridors must not be obstructed by goods or debris. Emergency exits must be kept clear at all times.

Take extra care at customer/client sites as these procedures may not be so effectively enforced.

Fire awareness training will be carried out annually.

## 15.0 SMOKING

The Company operates a strict non-smoking policy to comply with the current 'Smoke Free Legislation'. Smoking inclusive of personal vaporisers and E-cigarettes is strictly prohibited in all areas of the workplace (offices, warehouse, storage areas, yard, toilets and Company vehicles).

The Company has provided a designated smoking area for its employees, contractors and visitors, failure to comply by these regulations will result in disciplinary action and may result in dismissal.

## 16.0 DRUGS AND ALCOHOL

In the interest of safety for individual employees and other work colleagues, no employee shall:

- ✚ Report for or undertake any work activity on behalf of the Company whilst under the influence of alcohol or any controlled substance or drugs.
- ✚ Misuse, sell or distribute legitimate drugs, either purchased or prescribed for their own use whilst on Company premises, customer or client's premises or otherwise undertaking Company business.
- ✚ Use, possess, distribute or sell non-prescribed or illicit controlled substances whilst on Company premises, client premises or otherwise undertaking Company business.
- ✚ Use, possess, distribute or sell alcoholic beverages, or items containing alcohol whilst on Company premises, client premises, or otherwise undertaking Company business. The possession or distribution of such beverages constituting a gift is allowed, with prior approval from the Company Management.
- ✚ The Company reserves the right to random searches of all employee's lockers and vehicles.
- ✚ The company reserves the right to hold random drug and alcohol screening tests.
- ✚ Failure to comply with these arrangements will constitute a serious disciplinary offence and may result in dismissal.

## 17.0 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

Within the working environment, substances are often used that could potentially be hazardous to health if not properly stored and handled. The control of Substances Hazardous to Health Regulations 2002 establishes a duty on the Company to assess the risks from the use of substances at work.

Datasheets are collected for all such substances and where necessary a risk assessment will be conducted. The assessment will be based on manufacturers and suppliers' Health and Safety Guidance and the Company's own knowledge of the work process.

The Company will ensure that employees are not subjected to excessive exposure to hazardous substances and that controls are put in place to adequately control such potential incidents. All employees who come in to contact with hazardous substances will receive comprehensive and adequate training on the health and safety issues relating to that type of work. Assessments will be reviewed periodically or whenever there is a substantial modification to the substance or work process.

## 18.0 NOISE

The Company will take all reasonably practicable measures to protect the hearing of all individual employees who are required to work in designated noise areas.

Wherever appropriate, suitable assessments of the working environment are undertaken to determine any circumstances or areas where employees are exposed to noise levels in excess of 80dB (A), (Lepd). Employees exposed to such noise levels are advised of the risk.

Areas where the noise levels exceed 85dB (A) are clearly demarcated and all persons, including visitors, entering such areas are required to wear suitable hearing protection provided by the Company.

Drivers and others visiting customers/client sites, should be aware that they too may have to enter areas subjected to high noise levels and must check with the customer/client for suitable hearing protection.

## 19.0 EMPLOYEES AT SPECIAL RISK

The Company recognises that some employees may from time to time be at increased risk of injury or ill health resulting from work activities. The Company therefore requires that all employees advise their Line Manager and subsequently the HSEQ & Compliance Team) if they become aware of any change in their personal circumstances which could result in their being an increased risk.

## 20.0 CORONAVIRUS

The company will take reasonable steps to reduce the risk of transmission of coronavirus not just at our premises but also whilst operating on a customer's site.

The company has carried out a detailed Coronavirus risk assessment which we will ensure is maintained and updated as the risk and legislation changes.

For further details on how the company controls Coronavirus risk see Document SSRA\_22\_Coronavirus Covid-19 Business Risk Assessment

DOCUMENT END