

Rilmac Group of Companies
Crofton Drive,
Lincoln



SHEQ Policy Manual, Organisation and Arrangements

Applicable to:

Rilmac Holdings Ltd.

Rilmac Insulation Ltd. (Inc Asbestos Removal)

Rilmac Scaffolding Ltd.

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Date: 1st March 2019

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Status Index

Policy Manual

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1.0 Aims

- To provide a formally agreed SHEQ Policy Manual and Policy Statement for the Rilmac Group of Companies Safety, Health, Environmental and Quality (SHEQ) activities, products and services.
- To state the organisational measures and arrangements through which the Group of Companies shall manage their SHEQ activities in accordance with OHSAS18001, ISO14001 and ISO9001.
- To identify and react to any potential risks to the company and its business activities.
- Identify and capture suitable business opportunities to maintain the Company's continual quality management improvement and long term operations.
- To define, at Board level, the Context of the organisation addressing both internal and external issues that allow strategic planning to achieve the intended results of the Company's quality management system.
- SHEQ Continuous Improvement within Rilmac Group of Companies.

2.0 Objectives

- Primary Objective is to "Think Safety, Work Safely" which is the Rilmac motto.
- To implement, maintain and improve the Group of Company's SHEQ Management System.
- To assure conformance with Rilmac's written SHEQ Policy Statement.
- To demonstrate such conformance to all Interested Parties.
- To maintain certification/registration of its SHEQ Management System by an external certification body.
- To make a self-determination and self-declaration of conformance with BSEN OHSAS18001 and ISO9001.
- To continually deliver effective planning, implementation and review for all SHEQ activities.

3.0 Scope

The SHEQ Policy Manual and Management System covers all of the activities, products and services listed below that could potentially impact the Safety and/or Health of Rilmac employees, visitors, general public or neighbours, both on and off Rilmac owned premises. The Environmental Impacts, both positive and negative of those activities, products and services and the Quality Management of the services provided or products manufactured. Rilmac Operates in Construction, Industrial and Domestic environments.

These activities are:

- Rilmac Holdings – Accounting and Management
- Rilmac Insulation – Thermal Insulation, Thermal Insulation Covers Manufacture and Installation, and Asbestos Removal.
- Rilmac Scaffolding – Erection, Inspection and Dismantling.

The SHEQ Policy Manual is only applicable for the activities, products and services of the following Company's within the Rilmac Group of Companies:

- Rilmac Holdings Ltd.
- Rilmac Insulation Ltd. (Including Asbestos Removal)
- Rilmac Scaffolding Ltd.

Not all clauses of the standards apply to the SHEQ Management System within each of the individual companies. Rilmac Insulation excludes the following:

8.3 Design and 7.1.5.2 Measurement Traceability.

The Management System has been structured as follows: Rilmac Policy SHEQ-GBO-002, Rilmac Group Overview of SHEQ Management System SHEQ-GBO-001 and the Group Core Processes (GCP) and company specific Operational Processes.

4.0 Safety, Health, Environmental and Quality (SHEQ) Policy Statement

The Rilmac Group of Companies promotes a positive SHEQ culture throughout the organisation, in recognition of current EU and UK legislation and the need to ensure the continual improvement of SHEQ and welfare of its employees and anyone else that may be affected by its activities, products or services. Rilmac Group of Companies also recognises the need to minimize nuisance to the community and protection of the environment.

The Rilmac Group of Companies' Directors overall aim is to achieve high quality standards in SHEQ management and performance. This is to be achieved with the full co-operation of all Rilmac employees.

The SHEQ Policy will be accorded equal priority with all other policies and is the direct concern of the Companies Managing Directors, Directors and Senior Management who are accountable to the Group Managing Director for the implementation and for achieving specific SHEQ Objectives. So far as is reasonably practicable, adequate resources will be made available to ensure that these set SHEQ objectives are met.

The Rilmac Group of Companies will:

- Understand the Context of the organization and needs of interested parties in identifying and addressing any internal or external issues that could have an effect on the Group's business activities and Quality Management Systems.
- Identify, comply and, where possible, exceed all applicable legislation, codes of practice and industry standards. (Including but not restricted to – H&SAWA1974, MHSR1999, SG4, TG20, CAR 2012, Working at Height 2005)
- Identify physical and environmental hazards through risk assessment at the workplace and implement controls to minimize the risks to employees, visitors, contractors and others affected by Rilmac activities.
- Maintain high quality SHEQ policies, procedures and standard operating procedures suitable and sufficient to avoid injury or illness to employees and others, and where possible exceed our Clients expectations, whilst driving a culture of continuous improvement throughout the Group for safety, health and the environment.
- Provide suitable and sufficient welfare facilities, plant and equipment and maintain them in a safe condition, without risk to health.
- Through investigation, follow-up and analysis of accidents, incidents, near misses and ill health reports, strive to eliminate accidents/ incidents that have the potential to result in injury or ill health to employees and others, damage to plant, equipment, property and harm to the environment.
- Provide an effective system of open communication and consultation throughout Rilmac to minimize the risks to employees and encourage co-operation and participation for high standards of SHEQ performance.

- Provide adequate SHEQ information, instruction and training and re-training for all employees to ensure their understanding of their duty in contributing towards successful a SHEQ management system.
- Minimise waste throughout the Companies and aim for a waste free processes wherever possible through better utilisation of materials, energy and water. Increase use of renewable, reusable or recyclable materials and develop a strategy for minimising waste at source.
- Periodically, audit, monitor and review the SHEQ Management Systems, Policies and Procedures for their effectiveness and provide adequate resources to enable continual improvements to be achieved.

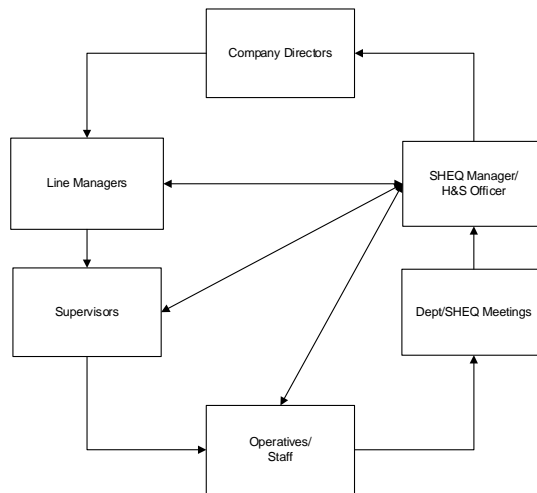
5.0 Organisation for Safety, Health, Environmental and Quality (SHEQ)

5.1 Rilmac Group Company Structure



SHEQ Management Report Structure
1st March 2019

Ref: SF-SHEQ-095



5.2 Organisation Chart - Holdings Ltd.

See Appendix 1

5.3 Organisation Chart – Insulation Ltd.

See Appendix 2

5.4 Organisation Chart – Scaffolding Ltd.

See Appendix 3

5.5 General Duties and Responsibilities

The Health and Safety at Work Act 1974 place specific duties of care both on Employers and Employees. These duties are absolute and it is a criminal offence not to comply with the requirements of the act.

It is important that all persons employed are aware of their legal requirements and responsibilities under the act, specifically Sections 2 and 3 for Employers and Sections 7 and 8 for Employees.

5.6 Rilmac Group Managing Director

Rilmac Group Managing Director has overall responsibility for the management of SHEQ and Welfare of the Company and has delegated the day to day responsibility for the management of SHEQ to the SHEQ Manager.

The Group Managing Director shall ensure that:

The Managing Director, Directors and Line Managers have an understanding of the implications and requirements of current legislation.

- a) Prepare and maintain a SHEQ Policy Statement and SHEQ Policy Manual with monthly SHEQ meetings and an annual Management Review.
- b) Directors and Line Managers have the necessary time and resources to meet their legal obligations in accordance with the SHEQ Policy.
- c) All risks to the Companies, both business risk and H&S risk, and SHEQ systems are identified and appropriate systems are put into place to reduce any risk to an acceptable level.
- d) Identify and capture suitable business opportunities to maintain the Company's continual quality management improvement and long term operations.
- e) Suitable and sufficient SHEQ Training is provided to all staff as necessary.
- f) Professional advice is available on SHEQ matters from either a suitably qualified member of Staff who has the role of SHEQ Advisor or Manager or an approved external source or both.

5.7 Rilmac Group SHEQ Manager

The Rilmac Group SHEQ Manager shall be suitably qualified and experienced to ensure and shall have responsibility for the following:

- a) Advising on compliance to current, new and pending SHEQ legislation
- b) Dealing with SHEQ issues on behalf of the company when requested by a Director or his representatives.
- c) Ensure the effective implementation and maintenance of the SHEQ ISO Management Systems.
- d) Provide reports on the performance of the SHEQ ISO Management System to senior management for review and identification of improvement requirements.
- e) Liaison with regulatory officers from the HSE, EA or local authorities on all SHEQ matters as necessary.
- f) Carry out SHEQ investigations of Accidents, Incidents, Dangerous Occurrences and Near Misses where required or deemed necessary by a Company Director.
- g) Maintain Accident, Incident and Near Miss Statistics for the Company.
- h) Assisting in the development and delivery of Specific SHEQ Training requirements where practicable.

5.8 Rilmac Company Directors and Line Managers

Rilmac Company Directors and Managers are responsible to the Group Managing Director in all aspects of SHEQ and are to ensure that all activities are carried out are, so far as is reasonable practicable, without risk to Employees and others Health, Safety or Welfare.

Responsibilities shall include:

- a) The implementation and monitoring of this SHEQ Policy Manual.
- b) Ensure that all Managers and staff under their control are aware of their responsibilities and have the necessary means to meet them.
- c) Ensuring no activities are carried out, which present an unacceptable level of risk to the SHEQ of any person who may be affected by the activity. Suitable and Sufficient Risk Assessments are in place and enforced.
- d) Ensuring all necessary equipment and resources under their control complies with current SHEQ Legislation, Approved Codes of Practice and Standards and is subject to regular safety inspections and tests as defined by either Rilmac or current legislation.
- e) Provide detailed instructions (Standard Operating Procedures or Method Statements) on specific safety systems and requirements to all individuals in the operations of potentially hazardous activities.
- f) Any defects to equipment are reported in the approved method.
- g) All Accidents, Incidents and Near Misses are reported in the approved method to the SHEQ Manager.
- h) Ensuring adequate emergency procedures are adhered to.
- i) Involvement in regular "workplace safety inspections" of all company facilities.
- j) Consult with the SHEQ Manager on all SHEQ and Welfare issues particularly when new hazards and risks are identified.

5.9 Contracts Managers

In addition to the Line Managers responsibilities outlined above the following are to be adhered to.

- a) Contract Managers shall ensure that suitable and sufficient risk assessments are carried out for all works to be undertaken and that suitable and sufficient safe methods of working are defined to reduce those identified risks down to an acceptable level.
- b) Provide detailed instructions (Standard Operating Procedures or Method Statements) on specific safety systems and requirements to all individuals in the operations of potentially hazardous activities.
- c) Relevant information, instruction and training shall be made available to all personnel who are to be engaged in work activities where there are risks to their SHEQ.
- d) Activities involving Contractors and any other persons working on a site shall be co-ordinated to ensure compliance to the Management of Health and Safety at Work Regulations 1999 and that effective communication between individuals is in place.
- e) Regular Site assessments (inspections) shall be carried out in line with predefined schedules.
- f) Where contractors are working on behalf of the Company being identified as working in an unsafe manner, or failing to comply with SHEQ legislation, the Contracts Manager shall identify the requirements to correct the issues raised. The Contractor shall comply with the necessary measures within an agreed timescale.
- g) Failure to comply will result in the re-evaluation of the agreement between the Company and the Contractor.

5.10 Rilmac Employees

Under the Health and Safety at Work Act 1974 all employees have a legal duty to take reasonable care of themselves and others who may be affected by their acts or omissions, whilst at work.

All Members of Staff are responsible for:

- a) Observing all instructions and safety systems issued by a Director, their Line Manager and or the SHEQ Manager on SHEQ related requirements.
- b) Carrying out their activities in compliance to the Company SHEQ ISO Management System and SHEQ Policy Manual.
- c) Observing all safety rules related to the operation of machinery and equipment.
- d) Reporting all Accidents, Incidents and Near Misses to the SHEQ Manager in accordance with the relevant procedures.
- e) Report any hazardous or defective equipment, structure or procedure to their Line Manager.
- f) Not initiating or continuing any activity or process which places persons in danger or breaches legal duties or company policies.
- g) Assist in any investigations carried out in relation to SHEQ issues as required.
- h) All Rilmac Employees have the right to refuse to work if they reasonably believe a situation to be of serious and imminent danger, and take or propose to take appropriate steps to protect themselves and others, without fear of retribution. This is to be judged by looking at all knowledge, facilities and advice available at the time.
- i) Maintain a consistent approach to a continuous improvement culture within the Rilmac Group.

5.11 Departmental SHEQ Meetings

Departmental SHEQ Meetings are intended to communicate on going SHEQ information to Rilmac Employees. SHEQ Meetings are to be held at frequencies agreed by each company. Meeting agendas and minutes are to be produced and distributed to relevant parties, stored electronically and posted on SHEQ Noticeboards. Consultation and communication is to be facilitated through the Departmental SHEQ Meetings.

5.12 SHEQ Communication (SHEQ-GCP-004)

SHEQ/Dept Inductions are to be given to all new employees of Rilmac in line with the Induction Processes within each company.

SHEQ Departmental Meetings are held within each company to raise awareness to each level and function of Rilmac. Meeting minutes are produced and posted on noticeboards and the relevant network Drives.

Memo's/E-mails are created informing employees of SHEQ information, bulletins etc.

Noticeboards are to be regularly updated with new SHEQ information these notice boards are to be monitored to ensure that they are up to date.

Supplying Mobile Phones to its employees, where a business need or risk assessment has identified a requirement, such as lone working or where emergency support may be required.

Comply with the provisions of the Management of Health and Safety at Work Regulations.

5.13 SHEQ Management Systems

Rilmac Insulation Ltd. and Rilmac Scaffolding Ltd. are accredited to ISO9001 (Quality) and have a SHEQ Management System in place.

Rilmac Scaffolding Ltd. are accredited to OHSAS18001 (Occupational Health and Safety). Rilmac Insulation Ltd are also accredited to OHSAS18001 (Occupational Health and Safety) accreditation.

6.0 Arrangements for Safety, Health, Environmental and Quality (SHEQ)**6.1 Risk Assessments – SHEQ-GCP-011**

It is a requirement under the Management of Health and Safety at Work Regulations 1999 for Employers to carry out Risk Assessments to Health and Safety of persons who may be affected by the hazards associated with their activities. Also under the Control of Substances Hazardous to Health Regulations 2002 it is a requirement to conduct and record Risk Assessments

Risk Assessments shall be carried out on all activities to identify those where existing safety measures are not suitable and there is a “significant” risk of injury to persons or damage to equipment. Risk assessments are to be carried out by suitably qualified and experienced persons.

When undertaking risk assessment to determine the necessary controls the following information needs to be taken into account:

- 1) Routine and non-routine.
- 2) Who will have access to the workplace (Contractors/Visitors).
- 3) Human behaviour, capabilities and other human factors.
- 4) Identified other hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of Rilmac within the workplace.
- 5) Potential hazards created in the vicinity of the workplace by work related activities under the control of Rilmac.
- 6) Infrastructure, equipment and materials at the workplace provided by Rilmac or others the client/customer.
- 7) Changes or proposed changes that could have a significant effect to the process
- 8) Modifications to the SHEQ Management System including temporary changes and their impacts on operations, processes and activities.
- 9) Legislative requirements relating the activities being carried out.
- 10) The design of work areas, processes, installations, machinery/equipment, operating procedures and work organisation, including their adaptation to human capabilities.

Where “significant” risks are identified the requirement is for the Employer to document the findings of the risk assessment and to develop safe systems and methods, to reduce the risk to an acceptable level, so far as is reasonably practicable.

The safe systems adopted are to be documented in Standard Operating Procedures (SOPs) or method statements. Where elimination is not possible then other means shall be adopted including engineering, management techniques and PPE/RPE in order to reduce the risk to As Low As is Reasonably Practicable. (ALARP).

Standard Operating Procedures, information, instruction and training are all means of adopting safe working practices and shall be put in to place when necessary.

Risk Assessments Review Frequency

Risk Assessment	Review Frequency in Years (Maximum)
Task Specific	2 Years

Manual Handling	2 Years
Display Screen Equipment	2 Years
Control of Substances Hazardous to Health	2 Years
Fire	1 Years
Asbestos	1 Years
Legionella	4 Years
Racking Inspections	1 Years

Risk Assessment 3 x 3 Matrix:

The matrix works by selecting the appropriate consequences from across the top, and then cross referencing against the row containing the likelihood, to read off the estimated risk rating.

Risk Rating	Slightly Harmful	Harmful	Extremely Harmful
Likely	Medium Risk	High Risk	Extreme Risk
Unlikely	Low Risk	Medium Risk	High Risk
Highly Unlikely	Insignificant Risk	Low Risk	Medium Risk

The following is a guide to the matrix's risk rating clarification.

Insignificant Risk, No action is required.

Low Risk, Largely acceptable, subject to reviews periodically or after significant changes. Consideration maybe given, to a more cost effective solution or improvement, that imposes little or no additional cost burden.

Medium Risk, Efforts should be made to mitigate the risk. Risk should only be tolerated for the short term, and then only whilst further control measures to mitigate the risk are being planned and introduced, and these within a pre-defined time period. However, the costs of prevention should be carefully measured.

Where the moderate risk is associated with extremely harmful consequences, further assessment maybe necessary to establish more precisely the likelihood of harm, this as a basis for determining the need for improved control measures.

High Risk, Work activities should not be started until the risk has been mitigated. Significant resources may have to be allocated to mitigate the risk. Where the risk involves work in progress, urgent action should be taken.

Extreme Risk, Work should not be started or continued until the risk has been mitigated. If it is not possible to mitigate risk even with unlimited resources, the work should remain prohibited.

Task Specific Risk Assessments shall be completed, documented and be made readily available.

Generic Risk Assessments

These shall be documented to cover activities that are repetitive. Generic Risk Assessments shall be reviewed on a periodic basis to ensure relevance. Reviews shall occur when an activity has changed, the assessment is no longer valid or following an Accident, Incident or Near Miss.

Persons in charge of Sites shall carry out a Site/Job Specific Risk Assessment to identify areas of risk not covered by existing systems. Significant risks shall be documented and appropriate safety measures implemented.

New and Expectant Mothers

Once the company has been notified in writing that an employee is a new or expectant mother, a risk assessment shall be carried out to identify any increased risks to themselves and/or their child as part of work activities. The assessment shall take into consideration any physical, biological and chemical risks associated with her duties.

Young Persons

A young person is a term given to a person who has not reached the age of 18.

An assessment of the activities required of a young person shall be carried out to ensure there is no risk to their health and safety. The assessment shall take into consideration the tasks to be carried out, the person physical capabilities of the person and their inexperience of the work required.

Wherever necessary the person shall be supervised by a competent person and shall not be allowed to carry out activities that are beyond their capabilities or present an unacceptable risk to their health and safety.

Confined Spaces

Wherever practicable entry into a Confined Spaces shall be avoided.

Entry in to confined spaces (as defined by the current legislation) shall only be carried out by Employees who have received suitable and sufficient training.

Entry in to confined spaces shall be carried out in accordance with the Company Procedure Working in Confined Spaces ASB-SOP-060 Working In Confined Spaces.

6.2 Environmental Policy and Impact Assessments

Each Company will identify and document its environmental aspects of its activities, products and services within the defined scope of its SHEQ ISO Management System. From each Company's identified environmental aspects the associated significant Environmental Impacts are to be determined.

The SHEQ Manager will maintain these records and are to be reviewed on a periodic basis to ensure relevance. Reviews shall occur when activities, products and services have changed, the assessment is no longer valid or following an accident, Incident or Near Miss, also at Management Review.

Environmental Statement – See Appendix 4.

6.3 Information, Instruction, Training and Refresher Training – SHEQ-GCP-007

It is a requirement of the Health and Safety at Work Act 1974 for all Employers to provide such information, instruction, training and refresher training and supervision as is necessary to ensure, so far as is reasonably practicable, the health, safety and welfare at work of their employees.

All relevant information, instruction, training and refresher training required to implement the SHEQ ISO Management System shall be implemented and provided to all staff as necessary.

This requirement extends to provide such information, instruction, training and refresher training and supervision as necessary to any other person(s) using the Company facilities for any purpose where there is a risk to their Health and Safety.

All new employees, including persons under temporary employment terms, shall receive an Induction to the Company. This shall include information on general SHEQ requirements and issues specific to their role within the Company. The information shall also include general information about the Company and who to contact when they require further assistance. Line Managers will monitor new temporary employees to ensure they are effectively integrated into the Company.

No employee shall attempt to carry out any operation where there is risk to Health and Safety of themselves or others who may be affected by their actions. Employees must have received suitable and sufficient information, instruction and training to enable them to carry out the operation in safe manner.

Any requirement for specialist training shall be identified and arrangements made for the training to be provided to all relevant persons.

A Training Database is used in order to track individuals training gained, required or not required. Line Managers are to use this in order to be able to assign the correct level of training and competence to a particular job/task.

Proactive Tool Box Talks are to be encouraged across the Rilmac Group of Companies. These are designed to be quick, clear and concise, with relevant up to date information being given.

Reference to the Company SHEQ Management System should be made where information on safety related matters is required.

Where information relating to SHEQ is not available or clearly understood then advice shall be sought from the SHEQ Manager.

6.4 Emergency Response – SHEQ-GCP-013

Under the Regulatory Reform (Fire Safety) Order 2005 the Company shall ensure that a Fire Risk Assessment is carried out for each of the Company premises either owned or leased. The Fire Risk Assessment shall be carried out, documented by a suitably qualified person. This shall be retained by the SHEQ Manager and reviewed on an annual basis.

The SHEQ Manager has been identified as the “responsible person” for Fire Safety in the Company owned and leased premises.

Employees shall be provided with suitable induction training on fire safety.

Suitable means of fire detection shall be installed at all Company premises.

Suitable means of raising the alarm in the event of a Fire shall be provided and confirmation gained that the alarm can be clearly distinguished and heard in all areas. The Fire Alarm System should be tested weekly and maintained at suitable intervals by qualified persons.

The Company shall ensure that adequate firefighting appliances are made available in accessible and prominent locations. All emergency lighting appliances shall be inspected and maintained at suitable intervals by qualified persons.

Fire exit signs shall be provided and placed in prominent places to provide clear instruction on the means of escape in the event of a fire.

Means of escape in the event of a fire shall be maintained to ensure that they are in working order and are not obstructed.

Provision of emergency lighting shall be made as identified as necessary on the fire certificate (Plan of Buildings). The operation of emergency lighting shall be tested at suitable intervals by a qualified person.

Suitable and sufficient provision shall be made for the assembly of all persons on the premises in the event of a fire. Assembly areas should be clearly identified and all Employees, Visitors and Contractors made aware of the evacuation procedure.

Arrangements shall be made for the safe evacuation of any disabled persons using the Company facilities.

Records of all tests and inspections of fire safety shall be maintained by the “responsible person” as identified.

Surge Planning and Disaster Recovery

These plans are required to be documented and held at relevant locations. These plans are to be reviewed periodically or following significant change to the business or their locations.

6.5 Occupational Health

6.5.1 Health Surveillance

The Company realises the importance of the health and wellbeing of all its employees and will ensure on recruitment that persons are medically fit for the work they are employed to undertake. All applicants for employment shall be requested to complete a confidential pre-employment medical questionnaire and return it to the relevant Director, who will advise them on their rights under the Confidentiality of Medical Reports Act.

Where necessary the Director shall inform a relevant Line Manager on the suitability of the candidate, without the disclosure of confidential information, and may recommend the candidate be referred to a local medical General Practitioner (GP) appointed by the Company.

Employee may be required to attend periodic medical examinations as required by their work. Annually for Asbestos Managers, Supervisors, Surveyors and Operatives. Employees may also be requested to attend a medical examination in cases of frequent absence or following prolonged illness to ensure they are fit to resume their duties so as not to endanger their own safety or that of others.

Some staff will be requested to maintain immunisations relevant to their work so as to ensure their own safety and welfare.

The Line Manager will also arrange health surveillance where appropriate and as requested by an appropriate SHEQ or HR Manager.

6.5.2 Manual Handling

Where ever possible the requirements for Manual Handling shall be eliminated. Where it is not possible, or impracticable to eliminate, provision of mechanical aids shall be employed.

Where this is not possible suitable and sufficient training shall be provided on Manual Handling Techniques to all relevant personnel.

Where Manual Handling cannot be avoided an assessment of activity shall be carried out by a suitable qualified and or experienced person to identify the risks and develop suitable and safety measures.

6.5.3 Hazardous Substances (CoSHH)

It is the policy of the Company that no substance hazardous to health shall be used where a substance with no hazard or where one with less hazard is available. All substances that need to be used shall be assessed to determine the nature of the substance and the risks involved.

A Safety Data Sheet (MSDS) for each substance shall be obtained from the supplier/manufacturer of the substance. The information on the SDS shall be used to determine the measures needed to reduce the risks to health and safety to those using or exposed to the substance.

It is the responsibility of the relevant Line Manager to ensure that an assessment is carried out for each substance in line with the Companies CoSHH Assessment Procedure by a qualified CoSHH Assessor (SHEQ Manager and Group H&S Officer).

This information will identify the measures required to eliminate, or reduce to an acceptable level, the risks to the health and safety of persons exposed.

The relevant Line Manager shall ensure that information relating to the hazards, associated risks and required safety measures are communicated to their members of staff who are to use the substance.

The use of highly toxic, explosive or environmentally damaging substances should be prevented wherever possible.

6.5.4 Asbestos

Asbestos Management Surveys are to be completed for all Rilmac owned and leased buildings. A suitably qualified and experienced person is to conduct this work. The type, amount and location of all asbestos containing materials within the Companies premises shall be identified and recorded. Records shall include identification as to the purpose of the asbestos, i.e. lagging, ceiling tiles, partitions etc. for all Rilmac owned/ leased premises.

Where asbestos has been located it shall be clearly identified at all access points and shall include the type of asbestos at that location.

An assessment of the risks of exposure to all on site shall be carried out by a suitably qualified person. Exposure to "untreated" (where there is a risk of free asbestos dust/fibres) asbestos shall be restricted to persons who have approved access to that location, and are suitably qualified and experienced to be able to carry out their duties in a safe manner.

Prior to any works being undertaken on Rilmac owned/leased premises a review of the Management Survey is to be completed. Where Refurbishment or Demolition (R&D Survey) works are to be undertaken a localised R&D Survey is to be completed.

Inspections of asbestos shall only be carried out by suitably qualified persons.

Work on or removal of asbestos shall only be carried out by competent contractors (Rilmac Asbestos Removal Dept) who have been approved and licensed by the HSE. Prior to carrying out such work the SHEQ Manager shall be supplied with a suitable and sufficient Risk Assessment and Method Statement to identify how the work is to be carried out in a safe manner.

Where the presence of untreated asbestos is identified on premises not under the control of the company and employees (or Contractors working on behalf of Rilmac Group of Companies) are required to work in its location, the risk to Health and Safety shall be determined by a suitably qualified person. Notification of such instances shall be reported to the teams immediate supervisor or Manager and work ceased until clarification have been received that suitable controls have been adopted.

Where necessary the Owner/ Occupier of the premises shall be notified. Where necessary the Companies client shall be notified.

6.5.5 Noise

The Companies within the Rilmac Group shall so far as is reasonably practicable ensure that no Employee is subjected to levels of noise whilst at work that may cause damage to their hearing.

Wherever necessary noise assessments shall be carried out to assess the risks associated with the specific activity or location. It is the responsibility of the Line Manager so far as is reasonably practicable, to ensure that suitable and sufficient hearing protection is provided to relevant employees in line with current legislation and that Personal Protective Equipment is worn in appropriate risk situations.

The levels at which employers must provide hearing protection and hearing protection zones is 85 dbA (daily or weekly average exposure) and the levels at which employers must assess the risk to workers health and provide them with information instruction and training is 80 dbA. There is also an exposure limit value of 87dBA, taking into account of any reduction in exposure provided by the hearing protection above which workers must not be exposed.

Employees identified as “at risk” of hearing damage shall be provided with annual audiometry testing. These are to be paid for by the Company and employees are required to attend at the company’s request and in the companies time.

6.5.6 Vibration

Vibration exposure from prolonged work with powered hand tools or equipment can have an adverse effect on the hands and arms of the user. Various forms of injuries can be caused by not effectively controlling vibrating equipment, collectively known as Hand Arm Vibration Syndrome (HAVS). The most common condition is vibration white finger (VWF) which is a reportable disease. Signs and Symptoms of HAVS

1. Tingling and numbness in the fingers and hands
2. In cold and wet, fingers go white, then blue, then red and are painful.
3. Feeling is reduced in the fingers and difficulty on picking up items may be experienced.
4. Loss of strength in hands and grip.

Hand Arm Vibration Assessments are to be completed for items of equipment where exposure may occur. Records of the equipment’s vibration are to be maintained and employee’s actual

exposure recorded. Where required occupational health assessments may be necessary to ensure the employees are not exposed to Hand Arm Vibration.

6.5.7 Substance Misuse (Drugs and Alcohol)

Rilmac Group of Companies has a specific Substance Misuse Policy (HR-P-026)

It is the policy of the Company to ensure that all alcoholic drinks and drugs, apart from those used for medical purposes, are prohibited from all areas of our operations.

No person shall present themselves for work whilst their efficiency and judgment is impaired after the use of alcohol or drugs.

If, in the opinion of the Management, a person has consumed alcohol or drugs and they have presented themselves for work, they will be suspended pending an enquiry.

If any employee believes that a colleague is unfit for work for any reason, then they must report this to their immediate Supervisor immediately.

Drugs prescribed by a Medical Practitioner or Pharmacist may still affect safety performance. It is the employees' responsibility to inform their immediate Supervisor or Manager if they are taking any medication which impairs their performance.

6.5.8 Display Screen Equipment (DSE)

Users of display screen equipment (DSE) shall be identified and assessment carried out by out by a suitably qualified person to identify the workstation is appropriate for the user.

Line Managers shall ensure that suitable break periods are built into a "users" working days.

Eyes tests shall be made available to users on request and in line with the company policy.

6.5.9 Stress at Work

Stress can produce physical symptoms (headaches, tiredness, real or imaginary pains), behavioural symptoms (increase in alcohol abuse, smoking, irritability, inability to cope) and psychological problems (feeling of anxiety, depression, paranoia), which will result in poor performance, increasing absenteeism, a potentially higher rate of accidents/incidents and general inefficiency.

It is the duty of all Directors, Managers and Supervisors to be alert to these symptoms in employees, seek guidance, and instigate pro-active measures to reduce work related stress. Indicators such as work performance, sickness absence monitoring and staff behaviour are useful to assess if there is a stress problem.

The following measures are taken to reduce the likelihood of stress:

- a) Job descriptions issued and updated when required.
- b) Adequate training provided for the work.
- c) Monotonous work routines avoided.
- d) Monitoring of workloads to ensure individuals have enough work but are not overburdened.

6.5.10 Driving at Work

Movement of vehicles shall be kept separate from pedestrian areas so far as is reasonably practicable to avoid risk of injury from contact with moving vehicles.

Wherever necessary warning signs shall be placed to warn of drivers and pedestrians of locations where areas merge.

Adequate facilities for the safe parking of vehicles shall be made.

Where the Company has in operation a Fork Lift Truck, suitable and sufficient measures shall be implemented to maintain separation of the Fork Lift Truck operation areas and pedestrians.

Warning signs shall be placed to identify where a Fork Lift Truck is in operation.

No persons are permitted to operate a specific vehicle unless adequate training has been received.

Persons who drive vehicles/equipment on behalf of the Company (including licensed operators) should ensure that they are fully licensed and that details of their license, including any changes to it are made available to the company. Driving licenses are to be viewed annually for Insurance purposes.

Persons are advised to make themselves fully aware of all controls on relevant vehicles prior to use, and the Highway Code and its guidance.

Further information with regards Company Vehicles is documented within the Company Vehicle Driver Policy.

6.6 First Aid Provision

An appropriate assessment of First Aid requirements shall be carried out at each of the Companies premises. Where necessary a suitable number of trained First Aiders and or Appointed persons shall be provided.

Names and Contact numbers of all First Aiders or Appointed Persons shall be displayed at prominent locations (SHEQ Notice boards).

Provision of suitable and sufficient First Aid equipment shall be made available. Locations of First Aid equipment shall be communicated to all Employees. Periodic inspection of First Aid Equipment shall be made to ensure their content is up to date and in date.

6.7 Bomb Threat and Emergency Evacuation

On receipt of a bomb threat by any member of staff the recipient shall inform their line manager immediately.

The Line Manager shall then initiate the alarm and notify the emergency services on 999 from any landline.

The premises shall be evacuated in line with the fire evacuation procedures.

6.8 Accident, Incident and Near Miss Reporting – SHEQ-GCP-014

All Accidents, Incidents and Near Misses involving the Company's employees MUST be reported however small.

Accidents, Incidents and near misses shall be recorded on the Database which is maintained by the SHEQ Manager.

Any Accidents or Incidents that are "Reportable" as defined under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) shall be reported by the SHEQ Manager.

Any investigations carried out as a result of an Accident, Incident shall be carried out in accordance with the Accident Incident Investigation and Reporting Process (SHEQ-GCP-014).

The SHEQ Manager shall maintain records of all Accidents, Incidents and Near Misses and associated documentation. These are to be maintained in an easily accessible format with due regard for the data protection act requirements.

Further information in relation to Accident, Incident and Investigation Reporting is documented in the Accident Incident and Investigation Reporting Procedure (SHEQ-GCP-014)

6.9 Access and Egress/ Slips Trips and Falls

All means of access and egress to the company's premises shall be suitable and sufficient so as not to place any person at risk to their Health and Safety.

All stairs, corridors, doors and passageways shall be maintained free from obstruction.

Facilities for the safe access and egress of disabled persons shall be made available where required. These arrangements shall include emergency evacuation of disabled persons.

Adequate lighting shall be provided and maintained in areas requiring such equipment in the interest of SHEQ.

Consideration shall be made to the provision of equipment and systems to maintain safe access and egress in the event of inclement weather where there is a risk to the Health and Safety of those using the premises.

Persons should be encouraged in good housekeeping techniques:-

- a) Ensuring that any spillages either liquids or solids are effectively cleaned up.
- b) Clear up waste as it is created and store correctly.
- c) Ensure work (Inc. offices and desks) areas are clean and tidy at the end of the day/shift to the required acceptable levels.
- d) Clear up equipment and tools at the end of the operation, process or shift.
- e) Ensure trip hazards are removed and or people aware of them if necessary for short periods of time.

6.10 Personal Protective Equipment (PPE)

Suitable and sufficient Personal Protective Equipment (PPE) shall be made available to persons free of charge carrying out operations and activities where the risk assessment has identified a need for PPE.

PPE must comply with the current Personal Protective Equipment Regulations and be CE approved.

All users of PPE shall be provided with adequate information and instruction as to the correct use of the equipment.

A register of all PPE shall be maintained and inspections made at suitable intervals by qualified persons to ensure the equipment is not damaged or out of date.

All instances of damage or lost PPE shall be repaired or replaced as identified as necessary by the Line Manager and a record kept if its issue.

6.11 Working at Height (See Operational Process)

Rilmac recognises the need for work at height hierarchy of control as required by the Work at Height Regulations 2005 to avoid, prevent and mitigate the need to work at height. At all times collective protection measures rather than personal protective measures are to be used.

Working at Height is deemed as any place from which, if measures required by these regulations were not taken, a person could fall a distance liable to cause personal injury including below ground level.

Where working at height is unavoidable, it should be assessed and considerations given to the options that are available to carry out working at height safely by a competent person.

Following a Working at Height Risk Assessment the following options, in order of preference for safety, should be considered along with whether the option chosen is the most appropriately safe.

Equipment	Inspection	Timing of Inspection
Mobile Elevate Work Platform (MEWP)	6 Monthly Inspection	Pre-use Inspection
Scaffolding	7 Day Inspection, Following adverse weather, following damage or impact with plant, when adjustments to the scaffold have been made.	Pre-use Inspection,
Mobile Tower Scaffold	7 Day Inspection	Pre-use Inspection
Ladder	6 Monthly Inspection	Pre-use Inspection
Podiums	6 Monthly Inspection	Pre-use Inspection
Scaff Steps	6 Monthly Inspection	Pre-use Inspection
Step Ladder	6 Monthly Inspection	Pre-use Inspection
Hop-ups	6 Monthly Inspection	Pre-use Inspection

All design scaffolding provided or used by Rilmac employees will be erected to strength and stability calculations or erected to a recognised standard such as TG20 current edition.

Signs and barriers must be in place on working platforms showing danger areas where access is not permitted.

In each case the Working at Height Risk Assessment should consider other issues to ensure that the chosen method is the safest option. Environmental conditions (Weather), Use of safety harness and use of stabiliser/devices.

Personnel are to have received working at height training.

Site specific rescue plan is to be in place either working to the Client's rescue plan or within the Rilmac method statement and SOP ASB-SOP-012 Emergency Situations.

Under no circumstances should personnel interfere with the design or stability of the scaffold structure.

6.12 Lone Working

Managers must ensure that no employee or persons working for and on behalf of the company is allowed to work alone where there is, or may be a significant risk to their health and safety.

Employees and those operating on the companies behalf should, for their part, continually assess if the work they are carrying out when alone, places them at risk (difference in weather, time of day, location etc.). Where they feel a situation has changed to a point that they feel there is risk they should cease work and inform their Line Manager.

All Employees and persons working for and on behalf of the company should inform their relevant line Manager of any medical condition that should be taken in to account in lone working situations.

An effective means of communication should always be implemented and tested in known lone working situations.

Encourage regular communication between individuals, colleagues and managers, in order that potential problems can be addressed before they cause work related stress.

Arrange regular appraisals with staff to provide an opportunity for constructive response and discussion.

6.13 Violence

The Company recognises that it has an obligation to strive to eliminate the danger posed by the threats of violence related to employment.

The scope of violence is not limited to physical assault, but permits the inclusion of equally distressing and intimidating verbal aggression. Incidents arising from discriminatory behaviour are also included.

Examples of threatening or violent behaviour include:

- a) Intimidation, such as shouting and swearing.
- b) Threatening behaviour in the form of verbal threats, gestures and obstruction etc.
- c) Possession of any weapon, regardless of the lack of any overt threat to use it.
- d) Being incapable whilst under the influence of drink or drugs.
- e) Any unwanted physical contact.
- f) Personal insults.
- g) Racial harassment.
- h) Sexual harassment.

- i) Harassment on the grounds of disability.
- j) Bullying.

In order to achieve this, the Company will:

- a) Endeavour to minimise the risks to Employees by providing a safe and healthy working environment. In particular, attention will be paid to employees working on Reception and Employees working away from the Company premises.
- b) Not tolerate verbal or physical harassment of it's employees, assaults upon employees or their property by Clients or other members of the public.
- c) Record and investigate all incidents; threats of, or actual violence at work and take any remedial action that may be necessary.
- d) Employees must report any incident involving violence and/or aggression to their immediate Supervisor or Manager.

6.14 Equality and Diversity Policy

Rilmac Group of Companies has a specific Equality and Diversity Policy (HR-P-012)

6.15 Electricity at Work

It is the policy of Rilmac to carry out electrical testing and inspection for fixed installations of its premises on a five yearly basis (minimum). The frequency of fixed installation checks may be increased, as advised by the electrical contractor, where there are increased risks.

Fixed electrical installation inspection and testing will be carried out by an external NICEIC electrical contractor.

Portable Appliance Testing (PAT) will either be carried out in-house, following suitable training for appropriate staff, or by an external NICEIC Contractor. All tested equipment will be labelled in order that, it is apparent whether or not the equipment has recently been tested.

Appliances at fixed sites will be inspected and tested on an annual basis.

6.16 Plant and Equipment (Work)

It is the Company policy to comply with the Provision and Use of Work Equipment Regulations 1998. To this aim the Companies will endeavour to ensure that all plant and equipment used in the work place is suitable and fit for purpose.

All workers will be provided with adequate information, instruction and training to enable them to use the plant and equipment safely. Where the use of specific equipment may present a risk to persons its use will be restricted to those specifically authorised to use it.

All plant and equipment will be maintained in good order and state of repair.

All test equipment/instruments requiring it are to be calibrated in line with manufactures guidance/recommendations.

All employees will be provided with adequate Personal Protective Equipment (PPE) relevant to the Plant and Equipment to be used and associated hazards identified.

To comply with legislation all items of plant and equipment which require regular inspection and testing, such as Portable Appliance Testing (PAT), shall be clearly identified and records kept. The Plant and Equipment Register shall be kept up to date.

The frequency of testing and or inspection shall be defined and by the requirements of the regulations or by guidance in the associated Approved Code of Practice (ACoP).

Only suitably qualified persons shall carry out all inspections and testing.

Records of all inspections and testing shall be recorded and maintained by the relevant qualified persons in line with the relevant processes.

Clear identification of the inspection/test carried out shall be identified on the equipment tag and on the Plant and Equipment Register. The next due inspection/ test date shall be identified.

Plant and Equipment shall not be used if the inspection/ test are out of date. Where Plant and or Equipment is in use but out of date the Supervisor remove the Plant and Equipment from service immediately. This is to be reported to the Stores for replacements to be issued.

6.17 Materials (Work)

All materials to be used are to be in a suitable and safe state prior to being used on a job/contract. Scaffolding boards, tubes and fittings are to have been inspected prior to arrival on site. Insulation materials are to be the right specification and Asbestos removal materials are to be the correct gauge of polythene or UN approved asbestos waste bag.

Any defective materials are not to be used and dealt with by the appropriate supervisor or manager. When dismantling structures, materials are not to be removed by dropping or "bombing". All materials are to be passed from hand to hand in a controlled manner. Scaffolders found to be "bombing" materials or equipment will be subjected to disciplinary action.

6.18 Control of Suppliers, Contractors and Sub-Contractors – SHEQ-GCP-023

Evaluation and Control of Suppliers, Contractors and Sub-Contractors shall be carried out in accordance with the relevant processes and procedures. Assessments shall include the Contractors ability to manage SHEQ effectively.

On request the contractor shall provide suitable and sufficient method statements to cover the activities to be carried out detailing how their employees, and all other on site shall be protected.

Where necessary the Suppliers, Contractors and Sub-Contractors shall be supervised, inspected and audited.

Any tools and equipment brought on site by a contractor shall conform to any specific SHEQ requirements and legislation.

Where necessary documented evidence of the required inspections and tests shall be made available by the Contractor or Sub-Contractors on request.

If, in the opinion of a Manager or supervisor, a Contractor or Sub-Contractor is working in an unsafe manner, the Contractor shall be requested to cease the activity in question and not resume until the issue has been resolved.

Records of all such instances shall be reported via incident reporting procedures SHEQ-GCP-014 and where necessary reported back to the Contractors Supervisor. Where necessary the SHEQ Manager is to be informed.

6.19 Working on Highways and Public Roads

If required to work on highways and public roads employment shall be trained and certified to the appropriate standards as laid down by the highways authorities.

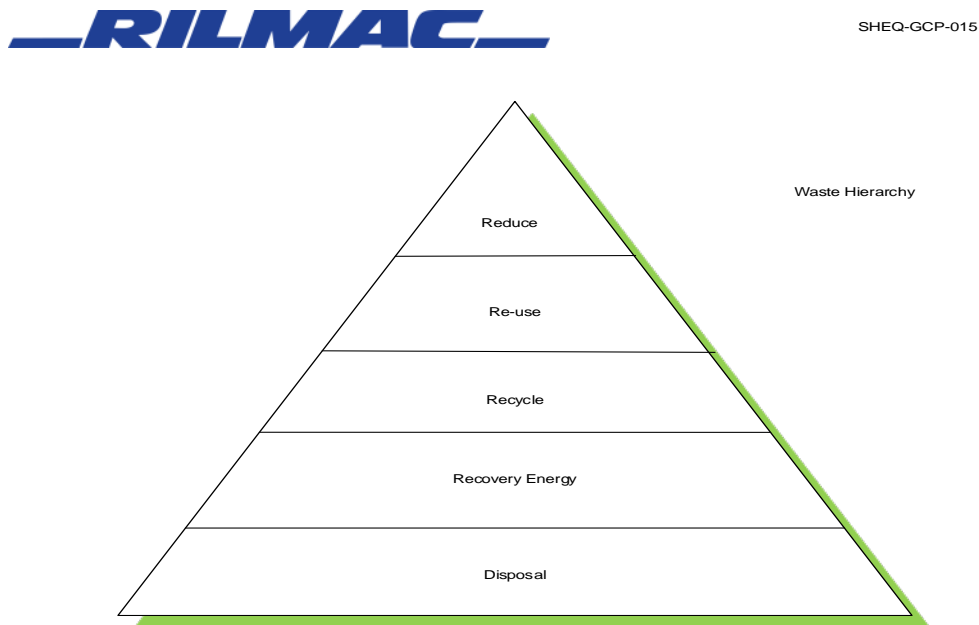
6.20 Workplace Welfare

Contracts Managers shall ensure that all Employees have access to suitable and sufficient welfare facilities including the provision of toilet and washing facilities providing both hot and cold water, soap and towels or hand dryers.

Employees engaged on work involving hazardous materials shall be provided with relevant information, instruction and training with regards to the hazards and associated risks and control measures required when exposed to such materials (CoSHH).

6.21 Waste Management – SHEQ-GCP-015

Waste generated is to be considered following the Waste Hierarchy shown below.



Waste is to be managed following the Waste Management Regulations 2006. Waste streams are to be identified and wherever possible reuse, recycling is the preferred option over disposal.

6.22 Energy Management – SHEQ-GCP-016

The company is committed as part of its ISO Management System to continual improvement. As part of the commitment, responsible energy management practices throughout the company and energy efficiencies are to be adopted where it is cost effective to do so.

6.23 International Travel

Where instances require employees to travel aboard on company business an assessment of the safety issues shall be carried out.

Where there is known conflict or other serious issues ongoing in the country involved, then travel to that country should be avoided wherever possible.

Time should be allowed for the employees involved to complete any course of inoculations that may be necessary.

Briefings and information shall be made available to employees involved regarding all issues related to their safety.

Where ever necessary safety kits shall be made available, which contain items such as water purification tablets, anti-malaria tablets and protection against Hepatitis and HIV/AIDS infections.

6.24 Construction Design Management (CDM)

If required the Company will fully comply with the requirements of the Construction Design and Management Regulations 2015.

The main purpose of the CDM is to raise the construction safety standards by improving co-ordination between the various parties involved within a project. They introduce a framework for controlling the management of all stages of a construction project from conception, design, commissioning of work, planning and execution.

Projects that require notification to the Health and Safety Executive (HSE) are scheduled for more than 30 days and involves more than 20 workers at any one time; or will involve 500 individual worker days.

A Construction Phase Plan will be produced before work commences and submitted for approval. A project folder will be compiled throughout the project and handed to the client/customer on completion of the works.

7.0 Monitoring, Audit and Review (Continuous Improvement)

7.1 Inspections

A program of regular workplace inspections shall be put into place and involve all members of the staff. Inspections shall consist of a workplace inspection of a specific area of the Company to check on SHEQ aspects such as clear walkways, waste disposal equipment inspections and test.

Site SHEQ Inspections are carried out as part of the SHEQ Managers function.

7.2 Audits (See Operational Processes)

Audits of the SHEQ Management System shall be carried out as part of the Auditing Process SHEQ-GCP-005. The audit will assess the content of the SHEQ Policy Manual. This is to verify its contents and philosophy are current and valid.

7.3 Reviews

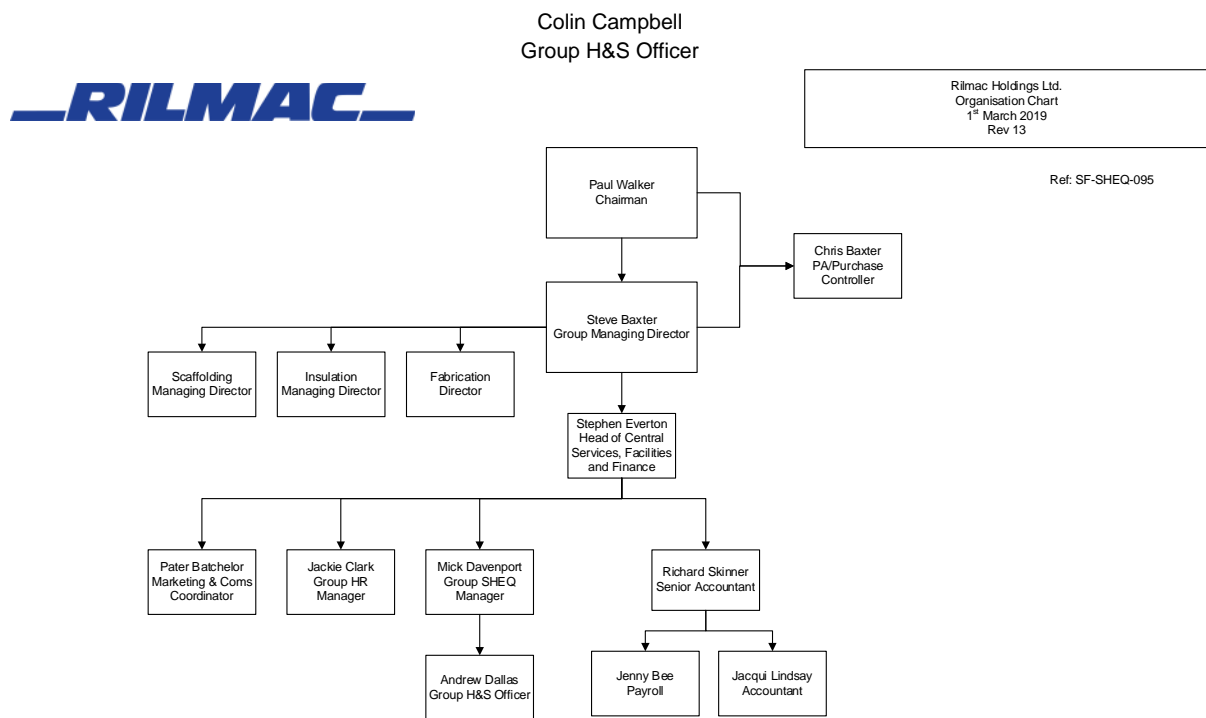
Reviews of the SHEQ Management System shall be carried out in accordance with the Management Review Process SHEQ-GCP-002. Additional reviews will be conducted following:

- a) Changes Made to the SHEQ Management System
- b) Changes to the Roles and Responsibilities
- c) Organisational Changes

- d) Requirements of New or revised Legislation
- e) As a result of an Major Accident or Incident

At intervals not exceeding 12 months the SHEQ Policy Statement shall be reviewed to confirm the contents are still valid. Any amendments shall be made and approved this are to be highlighted in blue for one issue and then black text for the following issues. The revision of the document shall be increased and signed by the Group Managing Director. A record of changes shall be maintained by the SHEQ Manager.

Appendix 1 Rilmac Holdings

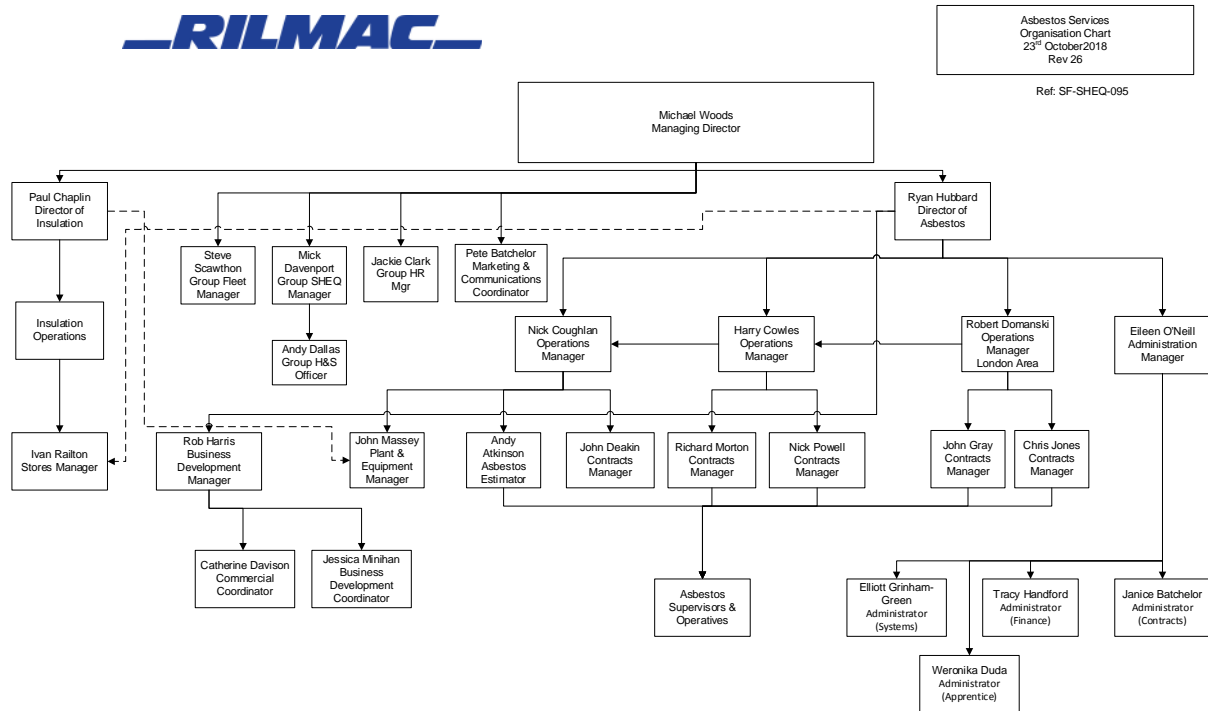


Group Managing Director: Steve Baxter

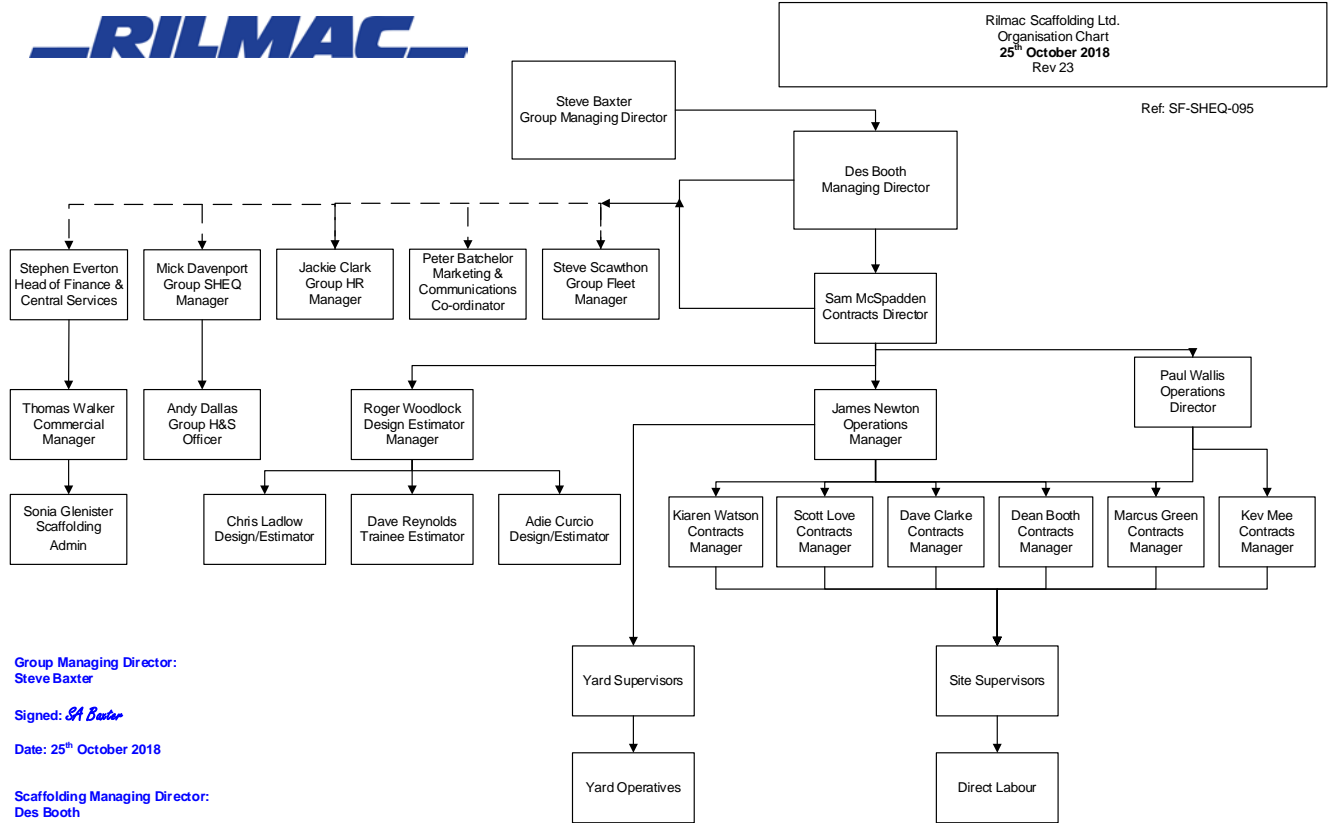
Signed: *SB Baxter*

Date: 1st March 2019

Appendix 2 Rilmac Insulation



Appendix 3 Rilmac Scaffolding



Group Managing Director:
Steve Baxter

Signed: *SA Baxter*

Date: 25th October 2018

Scaffolding Managing Director:
Des Booth

Signed: *DB Booth*

Date: 25th October 2018

Appendix 4

The Rilmac Group of Companies Environmental Statement

The Rilmac Group of Companies believes that the protection of the environment is everyone's responsibility and that all Rilmac employees are accountable for our environmental performance.

As a minimum, Rilmac will aim to fulfil its compliance obligations for all appropriate environmental legislation and other requirements relating to its activities. We will endeavour to protect the environment through the prevention of pollution and enhance our environmental performance through the continual improvement of our environment management processes and procedures by monitoring, measuring and reviewing any significant environmental impacts.

Environmental Objectives

Rilmac will seek to:

- Carry out Environmental Impact Assessments for our Companies activities.
- Manage emissions to air, water and land to prevent pollution.
- Maximise the efficient use of materials.
- Where possible, minimise waste generation through promotion of re-use and recycling.
- Demonstrate best practice and continual improvement in environmental activities.
- Utilise energy more efficiently to reduce use of fossil fuels through energy management procedures.
- Maintain a regular open dialogue with appropriate legislative bodies and other interested parties.
- Communicate with local communities and immediate neighbours, ensuring that potential problems and issues can be highlighted and resolved.
- Make efficiency an important concern when buying any new equipment or any building works.
- Increased training and awareness of our staff to ensure all equipment is unplugged and switched off when not in use.

S A Baxter

S A Baxter
Rilmac Group Managing Director