

## Health and Safety Policy (v2.8) GTK UK Limited

### Policy Statement

GTK UK Limited recognises and accepts its responsibility to provide a safe and healthy working environment for employees and people entering our premises. To achieve this objective, we will comply with all applicable legal requirements, and:

- Pursue continuous improvements in health and safety performance through the development of the safety management system
- Systematically identify hazards, and adequately assess and control risk, to which employees and others may be exposed
- Develop and maintain a positive health and safety culture through communication and consultation with employees
- Provide and maintain safe infrastructure and equipment for employee use
- Select substances with the least hazard potential to ensure safe handling and use
- Provide information, instruction and training, on health and safety issues to staff appropriate to their role
- Prevent accidents and cases of work-related ill health
- Maintain safe and healthy working conditions.

The Health and Safety at Work etc. Act (1974) places general responsibilities on employers and employees. The ultimate responsibility for health and safety lies with the managing director, who will ensure that safety issues are given suitable and sufficient attention. However, health and safety responsibilities are clearly defined. GTK expects all employees and non-employees on company premises, and employees on company business on other sites, to comply with applicable safe working practices.

This policy is brought to the notice of all employees. It is reviewed by directors on an annual basis and modified as required.



John Morath  
29<sup>th</sup> Jul 2024



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## 1. Health and safety (H & S) responsibilities

GTK UK Limited (GTK) has a culture of safety awareness and needs the cooperation of all staff and contractors to achieve this. This health and safety policy is part of the overall effort to achieve a safe working environment and all employees are reminded that disciplinary action will be taken against anyone who does not comply with this policy. The responsibilities are outlined below.

Relevant legislation is detailed in GTK F56 Impact Assessment & Register of Legislation.

| All staff and contractors   | Managers and supervisors   | Health and safety officer  | Directors   |
|---|--|--|---|
| <p>Work safely and without causing risk to themselves or other people who may be affected by their work, taking note of any particular requirements appropriate to their role</p> <p>Use all personal protective equipment provided for the work being carried out</p> <p>Report to their supervisors or managers all incidents or situations that have led or may lead to injury or damage</p> <p>Adhere to all company safety rules and procedures that have been designed for securing a safe work place</p> <p>Obey all instruction notices</p> <p>Assist, when required, in the investigation of accidents and the development of risk assessments with the object of introducing measures to prevent recurrence</p> <p>Cooperate as required to enable the effective implementation of the health and safety policy</p> | <p>Monitor staff adherence to the H &amp; S policy, especially their direct reports ensuring they have:</p> <ul style="list-style-type: none"> <li>- H &amp; S information and advice made available to them</li> <li>- safe practices within the meaning of any relevant legislation or code of practice</li> <li>- adequate supervision, instruction and training</li> </ul> <p>Together with the health and safety officer, investigate all accidents and incidents within their sphere of operations and complete a report on the incident. Where appropriate, progress action to prevent a recurrence and:</p> <ul style="list-style-type: none"> <li>- not introduce new processes or chemicals or make major changes to the building, doorways, gangways etc, without consultation with the health and safety officer; they must ensure that all risk assessments are carried out before making the changes and that identified safety precautions are implemented</li> <li>- set a personal example in fully complying with company H &amp; S rules and procedures</li> <li>- provide close supervision to those who require it either out of necessity e.g., a person carrying out an operation for which they have little or no experience, or because it is required by legislation eg a person under the age of 18</li> <li>- undertake work equipment risk assessments</li> </ul> | <p>Advise the board on any changes necessary to meet the requirements of this policy</p> <p>Have an understanding of the application of the Health and Safety at Work etc. Act 1974 and subordinate legislation to GTK business operations</p> <p>Make arrangements for maintaining an awareness of changes in legislation which affect the organisation</p> <p>Administer the effective implementation of the H &amp; S policy by ensuring that:</p> <ul style="list-style-type: none"> <li>- risk assessments are current and reviewed appropriately</li> <li>- H &amp; S training and awareness is conducted when required</li> <li>- the company has adequate first aiders, and that the provisions of the Health and Safety (First Aid) Regulations together with the Approved Code of Practice and Guidance Notes are observed</li> <li>- the company has adequate fire marshals</li> </ul> <p>Maintain an annual programme for H &amp; S activities</p> <p>Assist with accident investigation and associated corrective actions and advise the Health and Safety Executive of such accidents as appropriate</p> | <p>Under the direction of the managing director, they shall:</p> <ul style="list-style-type: none"> <li>- review and revise the policy on a regular basis</li> <li>- provide sufficient resource to make the policy effective</li> <li>- ensure staff are competent for their H &amp; S roles</li> <li>- be supportive of the activities of the health and safety officer</li> <li>- review accident investigations and report</li> </ul> |

## Health and safety responsibilities (continued)

| <b>First aiders</b>  | <b>Fire wardens</b>   |
|--|---|
| <p>Inspect all first aid facilities to ensure that kits are fully equipped and clean</p> <p>Ensure that their training is kept up to date and request that the health and safety officer arranges retraining in good time</p> <p>Perform duties as outlined in the first aid procedure</p> | <p>Be so familiar with the current procedures that they will not find it necessary to refer to procedures in the event of an emergency</p> <p>In the event of a fire, and without placing yourself at risk, commence the evacuation procedure</p> <p>Arrange fire evacuation exercises at least once a year and keep appropriate records</p> <p>Ensure fire extinguishers are tested annually and keep appropriate records</p> <p>Assist fire risk assessments and, during the normal course of their working day, keep an eye out for issues and arrange for them to be fixed promptly</p> |
| <p><b>Appointed persons</b></p>  |   |
| <p>Look after first-aid equipment</p> <p>Call the emergency services when required</p> <p>Provide emergency cover within their role and competence where a first aider is absent</p>   |   |

## **2. Procedures (“arrangements for implementing the policy”)**

### **2.1. Personal protective equipment (PPE) procedure**

Warehouse staff must wear safety shoes when working in Goods In and Goods Out.

Gloves are available and must always be worn when handling heavy loads or scrap metal.

If any work proves to be excessively dusty, employees should ensure that a face mask and, if necessary, safety goggles are worn.

Employees must let their supervisor or manager know should the PPE provided not be suitable and an alternative will be sourced.

Warehouse and Production staff must wear closed shoes when working in Production, Kitting and Inspection.

### **2.2. Accident investigation, reporting of injuries, diseases & dangerous occurrences procedure**

To assist GTK in investigating all accidents, employees are required to report:

- Injury and non-injury accidents or near misses
- Traffic accidents occurring while on company business
- Incidents or near-misses
- Any episode of ill health which they feel could be related to their work
- Accidents involving non-employees if:
  - they result in admission to hospital and
  - they arise out of the work activity.

To obtain treatment for an injury or health problem, contact your nearest first aider, who will administer the appropriate first aid and record your accident in the accident book (kept next to the first aid box in the canteen). The manager shall monitor any absence following injury.

Managers and supervisors must report all accidents and near misses to the managing director or health and safety officer involving employees, contractors or visitors, except for minor cuts or nicks to fingers as a result of the production process, and including if:

- They result in a major injury such as a broken bone, loss of sight, amputation or unconsciousness
- They result in admission to hospital for more than 24 hours
- They result in the employee being incapacitated for more than 3 days (including Saturdays and Sundays).

The health and safety officer will keep a record of all accidents that are reported in the accident book and health and safety policy file. Whenever possible and certainly, if a fatal or serious injury is involved, the scene of the accident must be left untouched until the manager has been informed and investigations are complete. After such an accident, the Health and Safety Executive must be informed and their decision obtained as to whether they wish to investigate. If so, the accident scene must remain untouched until the Health and Safety Executive and the health and safety officer have completed their investigations.

GTK complies with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations; please refer to the government HSE webpage <http://www.hse.gov.uk/riddor/> for up-to-date information.

All lost time accidents and serious incidents must be reported to Volex ideally within 24 hours of the incident occurring or as soon thereafter at GTK is made aware of the incident.

The Volex accident reporting template is available in Knowledgebase.

Please refer to Appendix A for accident definitions.

### **Accident prevention**

Good housekeeping is crucial to safety; walkways, stairs and fire exit routes must be clear at all times. Please ensure:

- Floor spaces around and under desks and workbenches are free from piles of papers, files and other tripping hazards
- Cables must not create tripping hazards; waste bins must be properly sited where they do not form a hazard
- Food switches are kept close to the machines when testing and are isolated from power when not in use
- Strapping is not dropped onto the floor
- Hand tools are stored on a rack
- Report any tripping hazards to your manager

### **2.3. First aid procedure**

The first aid arrangements shall be maintained as required by the first aid risk assessment.

Notices in the office inform employees who the first aiders are. Contact the first aider directly if you need first aid.

When a first aider gives any treatment, an entry shall be made in the accident book. First aiders shall remember that the treatment they give must be limited to first aid – never give out paracetamol for a headache or other medication. If trained to do so, an Epi-Pen dose may be administered.

Injuries to non-employees on site, such as contractors or visitors, shall be recorded using the same system.

### **2.4. Noise regulations guidance procedure**

Excessive levels of noise, if continued, can damage hearing. Little of the work of GTK involves noisy machinery and equipment. However, GTK intends to prevent damage to the hearing of employees by complying with the Noise at Work Regulations and associated guidance.

GTK will assess the sound levels produced by all machinery and equipment under their control where there is thought to be a risk; this "Rough and Ready" guide shall be used - if a conversation at normal voice levels cannot be held by 2 people 1m away from each other, the noise level is at or about 85 dBa and hearing defenders must be worn.

Where noise levels are considered to pose a risk, the area concerned will be designated a hearing protection zone and signs provided accordingly. Employees will be briefed about the risk to their hearing and the necessity to use hearing defenders. As far as possible, employees will be allowed to select the hearing defenders they prefer.

### **2.5. Fire procedure**

GTK takes all reasonably practicable steps to prevent fire from occurring at our premises or on any site where employees are working. The company has a duty under the Fire Safety Order to carry out a formal fire risk assessment for the premises. This risk assessment is available to all employees who work at the premises. It is reviewed at annual intervals.

Fire risk assessments are carried out under the guidance of the health and safety officer.

Whilst wishing to preserve property if possible, GTK puts the lives and health of our employees first in any fire situation. Means of early warning against fire have been provided and also precautions to ensure employees can escape from a fire.

All employees are trained in what to do in the event of a fire. Further information on the fire procedure is posted on notice boards and issued to all employees at the outset of their employment as part of their induction training. In addition, annual fire drills test the efficiency of the fire procedure.

If you hear the fire alarm - believe it! In a serious blaze, you get the warning of fire in time to give you just a few minutes to get out. Don't go back to your desk or fetch your bag - just get out and go straight to the assembly point.

If you find a fire, your priorities are to warn others, by activating the nearest call point and exit the building immediately. If you are a fire warden and have been trained to use a fire extinguisher, and if you feel it is safe to do so, you can tackle the fire providing someone else is with you to watch what is happening around you. Always keep your back to a safe exit - don't get cut off from your escape route by the blaze. If in doubt, retreat. Firefighting is best left to experts.

- Fire extinguishers appropriate for the likely type of fire in the area are provided at all premises. They are positioned in the most appropriate locations adjacent to fire exit routes and have identification signs. A competent person is contracted to maintain fire extinguishers at yearly intervals. Appropriate employees are instructed in how to use them

Fire is a serious risk in the office. Combustible materials such as paper and cardboard are always around, and sources of ignition are in every electrical fitting

Prevent fires by keeping accumulations of combustible material to a minimum, and by keeping combustible material away from sources of ignition. **Escape routes must be kept clear.** Items must not be stored or placed temporarily under stairs as these are all fire exit routes. Fire appliances, exit doors and alarm points must never be obstructed. Walkways through the premises shall be kept clear

- **Solvents and flammable liquids** - solvents are a high-risk fire hazard. Their use must be strictly controlled. The amount of solvent stored shall be the smallest possible for the operation to proceed. The solvent must be stored in the COSHH cupboard.
- **Smoking** is a major cause of fire in commercial premises and is not permitted in GTK buildings. The company provides designated smoking areas.

## 2.6. Visitors on site at GTK Basingstoke procedure

All visitors must sign in, wear a visitor's badge and sign out before leaving the building.

All visitors must be accompanied when in the production, kitting, goods in and goods out areas. Unaccompanied visitors including contractors in these areas must receive Health and Safety induction training. Training instructions, which must be signed by the visitor, are available in Knowledge Base Health and Safety – visitor(s) on site.

Any contractors working at GTK must be (from) an approved supplier, with appropriate evidence of competence, risk assessments and methods of work provided.

## 2.7. Electrical safety procedure

The mains wiring of the office building, warehouse and factory areas is required to be inspected and tested by a competent electrical engineer at five-yearly intervals. A certificate shall be provided by the electrical contractor undertaking the work to show that this has been done and the results obtained.

Portable electrical appliances (anything which plugs in to the mains) shall be tested and checked by a competent person at regular intervals. These intervals will vary according to the amount of wear the appliance receives from three yearly to annually.

Portable electrical appliances shall be quickly checked by the user each day before they are plugged in; this takes just a few seconds. Points to check include:

- Make sure the appliance is not wet or contaminated
- Make sure there are no cracks in the appliance casing
- Look for wear to the cable
- Make sure the plug is intact and not cracked
- No uninsulated wires and no metal wires shall be visible
- The cord grip on the plug must be retaining the outer sheath of the mains cable
- The portable equipment testing label confirms that the appliance is "in date" and not due for another full safety check.

When using portable electrical equipment:

- Always operate tools with care and in a safe manner
- Do not carry tools by their cables
- Isolate tools from the mains when not in use
- Store tools in safe places
- When using extension cables do not trail over gangways without warning signs displayed
- Report any defective equipment to your manager

Unless all these points are satisfactory, the electrical appliance shall not be used, and the problem shall be reported to the appropriate manager.

Employees shall not bring their own electrical appliances to work without permission from management.

## **2.8. Hazardous substances procedure**

Any solvents or cleaning substances used should be environmentally friendly in that they may not contain CFCs, be bio-degradable and must be phosphate free.

The use of any substances that are marked with hazard symbols shall be avoided wherever possible. If their use is unavoidable, you must ensure that you are fully aware of any hazards associated with them and follow proper safety procedures resulting from the CoSHH Assessment.

If no material safety data sheet is available, please see your manager, who will arrange for it to be provided so that a CoSHH Assessment can be carried out.

## **2.9. Highly flammable liquids procedure**

A small quantity of petrol is kept in the generator as part of our disaster recovery plan. The generator is securely stored in the warehouse.

Small quantities of solvents are used for cleaning product and are kept under control in the fireproof COSHH cupboard.

## **2.10. Work equipment procedure**

The Provision and Use of Work Equipment Regulations, (PUWER), cover the safe use of all equipment at work including all tools, machines, apparatus and installations used at work, whether in existing use, bought new or second hand.

Compliance with these regulations requires a risk assessment to be carried out on each type of work equipment where the risks are not trivial. These risk assessments are to be carried out by or for the responsible manager or supervisor under whose control the work equipment is used. The safety officer will assist if required.



The risk assessment required takes you step by step through the considerations covered by PUWER.

The risk assessments must be completed prior to the work equipment coming into use.

### **Soldering equipment**

- Soldering equipment is to be used by authorised personnel only
- Soldering shall be carried out in the designated areas where there is proper fume extraction
- Keep trailing leads from soldering equipment tidy
- Always use the correct PPE as provided by the company
- Isolate the equipment when not in use
- Store the equipment in a tidy and safe condition
- Ensure no flammable materials are at risk from soldering splatter

### **Printers and photocopiers**

All employees must take care when changing cartridges, loading paper and clearing blockages ensuring no clothing such as a tie is dangling into the machine and tie your hair back if it is long. These machines have moving rollers, which can catch and draw in any loose material.

For other office equipment, particularly paper shredders, the point made above about trailing clothes and hair will apply. Be careful in positioning any appliance with a lead, so as not to cause tripping hazards.

### **Display screen equipment**

Safety in the use of computers is covered by the set of regulations called the Display Screen Equipment Regulations. Compliance with these regulations is covered separately in the guidance note on computers.

In compliance with the Display Screen Equipment Regulations, you must have a certain amount of desk area to house your screen, mouse and keyboard. If that desk area is full of papers, you will be forced to work in awkward positions, possibly giving rise to the sort of injuries the DSE Regulations aim to prevent.

### **Guarded equipment**

Use the guards provided when operating powered equipment.

### **Forklift truck**

Only authorised drivers are allowed to drive the forklift truck. Authorisation will be given by GTK following a training course given by an approved training company, or on-site instructor.

No person, other than the driver, may be carried on a forklift truck. No one must stand on pallet trucks as passengers.

Stacked materials must be rigid and safe. Any leaning stacks must be dismantled. Stack height must not be closer than 18 inches to any lights due to the risk to the lights and the risk of fire.

All employees must maintain an awareness of the forklift truck operating in the warehouse areas throughout the day. Great care must be taken when working in the proximity of forklift operations.

The forklift truck must be maintained in good condition. Servicing and maintenance of vehicles is the overall responsibility of the operations manager. Each week, the first driver to use any forklift truck must be responsible for inspecting the vehicle and signing the check-list kept with the vehicle.

The seat belt must be worn when operating the forklift truck.

### **2.11. Working at height procedure**

Great care must be taken when using working platforms (with fixed hand rails); step ladders are not permitted.

- Do not carry heavy or awkward items up or down the steps
- Ask for assistance where heavy items are involved

### **2.12. Manual handling storage procedure**

You must not attempt to move heavy items of office equipment. Special training is needed to lift and carry heavy objects safely. If you have not had such training, then do not make the attempt. Never lift any object if a gentle testing of the weight leaves you uncertain about your ability to manage it safely.

When storing goods please ensure:

- Storage racks are loaded with heavy items on the lower shelves
- Long parts must not protrude into passageways
- Keep floor areas clean and clear of obstructions
- Opened packing cases may not be left with exposed nails or splinters
- Excess packaging materials must not be allowed to fall to the floor or block passageways and fire exits. Waste materials are to be disposed of in the bins provided
- If assistance is not available for heavy loads, report to your manager and wait until assistance is available
- Gloves are provided and these should be used when handling heavy or other rough packages
- Extreme care shall be taken when handling bladed instruments. Fixed blade knives shall not be used. Only knives issued by GTK may be used. Retractable blade knives only may be used for general packaging operations. Sharp instruments such as scissors must not be carried in pockets, to prevent accidents during falls.

### **2.13. Company travel procedure**

Staff may visit customers' premises where there will be a variety of local safety requirements. All local safety procedures must be followed and all safety signs on customer's premises must be noted and due regard taken of them.

When visiting customer's premises, staff shall assess the risk of possible personal injury to themselves and must ensure that they do not expose themselves to any risk of injury.

GTK has a driving policy for company travel (see the employment booklet).

### **2.14. Managing stress procedure**

Stress is part of modern life and you have probably experienced it, at work or in your personal life. The symptoms of stress can be many and various and you are probably the best judge of whether you are excessively stressed. Stress arising at work shall be reported to line manager; there may be many things management can do to ease a stress burden, but they must be aware of the problem.

Counselling or other support may help you to cope through stressful periods, and there are many sources of such help available, including GTK's employee assistance programme. Don't leave it until stress makes you really ill and you have to take time off work.

## **2.15. Pregnancy at work procedure**

There are certain special risks in being at work whilst pregnant and there are particular legal requirements for the protection of mother and child during and following pregnancy.

As soon as they are aware of being pregnant an employee must make GTK aware. Many of the most serious risks apply in the very early weeks of pregnancy so action to protect both mother and unborn child may have to be taken quickly. Tell the health and safety officer or advise a member of the management team.

Once they are aware of the employee being pregnant, the management will make a risk assessment of their work in relation to pregnancy. Following this, changes may be needed eg, they will not be allowed to lift heavy weights, their workstation may need to be altered, and they will be carefully protected from chemicals and fumes.

The risk assessment will identify and put right any parts of the employee's job that might cause problems in pregnancy. However, should the employee have difficulties or suffer any discomfort, they should report this immediately.

## Appendix A – Accident reporting definitions

**Accident** - an accident is an unplanned, uncontrolled event which led to, or could have led to, injury to persons, damage to plant/environment or some other loss to the company.

**Lost Time Accident** - any incident which causes injury to a person where the time lost is more than 1 day but excluding the day on which the injury occurs.

**Serious Incidents** can be categorised into 1 of 3 categories:

**Category 1** - An accident that results in a major injury

- A fracture other than to fingers, thumbs or toes
- Any amputation or dislocation
- Any incident resulting in the loss of sight (temporary or permanent)
- Any eye injuries requiring hospital treatment
- Any injury resulting from electric shock or an electric burn which is serious enough to cause unconsciousness; or resuscitation; or hospitalisation for more than 24 hours
- Unconsciousness caused by asphyxia or an exposure to a harmful substance or a biological agent
- Any acute illness that requires medical treatment, or a loss of consciousness arising from the absorption of any substance by inhalation, ingestion or through the skin

**Category 2** – a high potential severity incident - an incident which could have caused *major injuries or fatalities including:*

- A collapse, overturning or failure of load-bearing parts of lifts and or lifting equipment like cranes, fork lift trucks
- Any explosion, collapse or bursting of any closed or pressured vessel or associated pipework
- Any accidental exposure to workplace lasers whilst under power
- Any collapse or partial collapse of warehouse racking or other storage systems
- Any failure of any freight container / trailer in any of its load-bearing parts
- Any occurrence when plant or equipment makes contact with overhead power lines
- Any electrical short circuit or overload causing fire or explosion
- Any accidental release of a biological agent likely to cause severe human illness
- Any collapse or partial collapse of a scaffold over 5 metres high, or any structure near water where there could be a risk of drowning after a fall
- Any unintended collapse of: any building or structure under construction; a wall or floor in a place of work; any false-work
- An explosion or fire causing suspension of normal work for over 24 hours
- An accidental release of any substance which may cause damage to health

**Category 3** – a major adverse publicity incident - any incident which may attract adverse publicity or media interest involving injury to a member of the public, contractor or visitor; major road traffic accident; vehicle rollover