

Version 10  
Dated: 30 April 2025



# **Occupational Health and Safety Management System Policy Manual**

## Document Review Sheet

The signatures below certify that this Occupational Health and Safety and Environmental Management System Policy Manual 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	Position	Date
Authored By	 S A Carpenter	Group Health, Safety and Environment Manager	29 April 2025
Reviewed by			
Checked By			
Approved By	 A Kime	Managing Director	30 April 2025

## Revision Policy

The OHS Policy Manual shall be revised to reflect any changes to Sui generis Occupational Health, Safety Management System (OHS). At the discretion of the Managing Director, affected paragraphs, shall be submitted to the Group Health Safety & Environment (HS&E) Manager for his review.

Reasons for document changes include the following.

- The addition of new commodities or product lines to the location;
- A change of manufacturing location for existing parts;
- The introduction of significant new equipment or process changes;
- Changes relative to safety, critical, or reliability characteristics;
- Changes in legislation;
- Significant changes in the organisational structure.

The Group Health, Safety and Environment Manager (HS&E Manager) is responsible for the maintenance of the OHS Policy Manual as described and for reviewing the manual annually.

The manual is maintained on the file server as a controlled copy. Printed versions are not controlled and should be checked against the server file version prior to use.

This OHS Policy Manual is reviewed annually to ensure relevance to the systems and processes that it defines. A record of contextual additions or omissions is kept in the Document Control Register.

## Contents

<b>1. Scope.....</b>	<b>5</b>
<b>2. Normative references .....</b>	<b>5</b>
<b>3. Terms and Definitions .....</b>	<b>5</b>
3.1. Terms related to Organization and Leadership.....	5
3.2. Terms related to Planning.....	8
3.3. Terms related to Support and Operation .....	11
3.4. Terms related to Performance evaluation and Improvement.....	12
<b>4. Context of Sui Generis Ltd .....</b>	<b>13</b>
4.1. Aims and objectives of Sui Generis Ltd .....	13
4.1.1. Core Activities.....	14
4.1.2. Those involved with Sui Generis .....	15
4.1.2.1. Internally.....	15
4.1.2.2. Externally.....	16
4.1.3. Laws, regulations, rules or standards that apply to Sui Generis .....	17
4.2. Understanding the needs and expectations of workers and other interested parties .....	18
4.3. Scope of this OH management system.....	18
4.4. OHS Management system.....	19
<b>5. Leadership and worker participation.....</b>	<b>19</b>
5.1. Leadership and commitment .....	19
5.2. Policy Statements .....	20
5.2.1. OHS Policy Statement .....	20
5.3. Organizational Roles, Responsibilities, Accountabilities and Authorities .....	21
5.3.1. The Managing Director .....	21
5.3.2. Group Health Safety and Environment Manager.....	22
5.3.3. Managers/Heads of Department .....	23
5.3.4. All Employees.....	24
5.4. Consultation and participation of workers.....	25
<b>6. Planning.....</b>	<b>26</b>
6.1. Actions to address risks and opportunities .....	26
6.1.1. General.....	26
6.1.2. Hazard identification and assessment of risks and opportunities.....	26
6.1.2.1. Hazard identification .....	26
6.1.2.2. Assessment of OHS risks and other risks to the OHS management system .....	27
6.1.2.3. Assessment of OHS and other opportunities.....	28
6.1.3. Determination of legal requirements and other requirements .....	29
6.1.4. Planning to take action .....	29
6.2. OHS Objectives and planning to achieve them .....	30
6.2.1. OHS Objectives .....	30
6.2.2. Planning to achieve OHS Objectives .....	30
<b>7. Support.....</b>	<b>31</b>
7.1. Resources.....	31

7.2.	Competence .....	32
7.3.	Awareness .....	33
7.4.	Communication .....	33
7.4.1.	General.....	33
7.4.2.	Internal Communication.....	34
7.4.3.	External Communication.....	34
7.5.	Documented Information.....	35
7.5.1.	General.....	35
7.5.2.	Creating and updating .....	35
7.5.3.	Control of Documented information.....	36
7.5.3.1.	Computer Records.....	36
<b>8.</b>	<b>Operation.....</b>	<b>37</b>
8.1.	Operational Planning and Control.....	37
8.1.1.	General.....	37
8.1.2.	Eliminating Hazards and reducing OHS risks.....	38
8.1.3.	Management of change .....	39
8.1.4.	Procurement.....	40
8.1.4.1.	General.....	40
8.1.4.2.	Contractors.....	40
8.1.4.3.	Outsourcing.....	41
8.2.	Emergency Preparedness and Response.....	41
<b>9.</b>	<b>Performance Evaluation .....</b>	<b>42</b>
9.1.	Monitoring, measurement, analysis and performance evaluation .....	42
9.1.1.	General.....	42
9.1.2.	Evaluation of Compliance .....	43
9.2.	Internal audit.....	43
9.2.1.	General.....	43
9.2.2.	Internal Audit programme .....	43
9.3.	Management Review.....	44
<b>10.</b>	<b>Improvement.....</b>	<b>46</b>
10.1.	General.....	46
10.2.	Incident, nonconformity and corrective action.....	46
10.3.	Continual improvement .....	47
<b>Appendix A</b>	<b>- List of Procedures .....</b>	<b>48</b>
<b>Appendix B</b>	<b>- List of Forms.....</b>	<b>49</b>
<b>Appendix C</b>	<b>- Sui Generis Organisation Chart.....</b>	<b>50</b>
<b>Appendix D</b>	<b>- Structure and Responsibility .....</b>	<b>51</b>
<b>Appendix E</b>	<b>- Understanding the needs and expectations of interested parties.....</b>	<b>53</b>
<b>Appendix F</b>	<b>- Risk Control Measures.....</b>	<b>55</b>

## 1. Scope

The Sui Generis OHS management system provides a mechanism for Occupational Health, Safety management throughout all departments for the **Design, Manufacture, Supply and Installation of Glass Fibre Reinforced Products**. The OHS management system is designed to cover Occupational Health, Safety aspects which Sui generis can control and directly manage, together with those it does not control or directly manage but can be expected to influence.

This manual defines the scope of the Sui Generis Ltd OHS system and provides a linkage of system documents to the various elements of the ISO 45001 standards.

The principal elements of the system described in this manual are:

1. Scope
2. Normative references
3. Terms and definitions
4. Context of the organization
5. Leadership
6. Planning
7. Support
8. Operation
9. Performance evaluation
10. Improvement

## 2. Normative references

There are no normative references

## 3. Terms and Definitions

### 3.1. Terms related to Organization and Leadership

#### Contractor

external organization providing services to the organization in accordance with agreed specifications, terms and conditions

NOTE 1- Services may include construction activities.

#### Interested party

Stakeholder, person, group or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity

NOTE 1- *Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part-time basis.*

NOTE 2- *Workers include top management, managerial and non-managerial persons*

NOTE 3- *The work or work-related activities performed under the control of the organization may be performed by workers employed by the organization, or other persons, including workers from external providers, contractors, individuals, and agency workers.*

### Management System

Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives.

NOTE 1- *A management system can address a single discipline or several disciplines.*

NOTE 2- *The system elements include the organization's structure, roles and responsibilities, planning, operation, performance evaluation and improvement.*

NOTE 3- *The scope of a management system may include the whole of the organization, specific and identified functions of the organization, specific and identified sections of the organization, or one or more functions across a group of organizations.*

### Occupational Health and Safety (OHS)

Conditions and factors that affect, or could affect the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors, or any other person in the workplace.

NOTE *Organisations can be subject to legal requirements for the health and safety of persons beyond the immediate workplace, or who are exposed to the workplace activities.*

### OHS management system

Management system or part of a management system used to achieve the OHS policy.

NOTE 1- *The intended outcomes of the OHS management system are to prevent injury and/or ill health to workers and to provide safe and healthy workplace(s).*

NOTE 2- *The terms "occupational health and safety" (OHS) and "occupational safety and health" (OSH) have the same meaning.*

### OHS Policy

policy to prevent work-related injury and/or ill health to worker(s) and to provide a safe and healthy workplace(s)

### Organization

Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives

NOTE 1- *The concept of organization includes, but is not limited to sole-trader, company, corporation, firm, enterprise, authority, partnership, charity or institution, or part or combination thereof, whether incorporated or not, public or private.*

NOTE 2- *For organizations with more than one operating unit, a single operating unit may be defined as an organization*

### Participation

involvement in decision-making

NOTE 1- *Participation includes engaging health and safety committees and workers' representatives, where they exist.*

### Policy

intentions and direction of an organization as formally expressed by its top management

### Supply chain

Sequence of activities or parties that provide or receive value in the form of products and services to the organization

*NOTE 1 In some instances, the term Supply chain is understood to be the same as value chain. However for the purpose of International Standards, supply chain is used as defined above.*

### Top management

Person or group of people who directs and controls an organization at the highest level

*NOTE 1- Top management has the power to delegate authority and provide resources within the organization. provided ultimate responsibility for the OHS management system is retained.*

*NOTE 2- If the scope of the management system covers only part of an organization then top management refers to those who direct and control that part of the organization.*

### Worker

A 'person performing work or work-related activities, regularly or temporarily, under the direct or indirect control of the organization'

### Workplace

Any physical location under the control of the Organization where a person needs to be or to go to by reason of work.

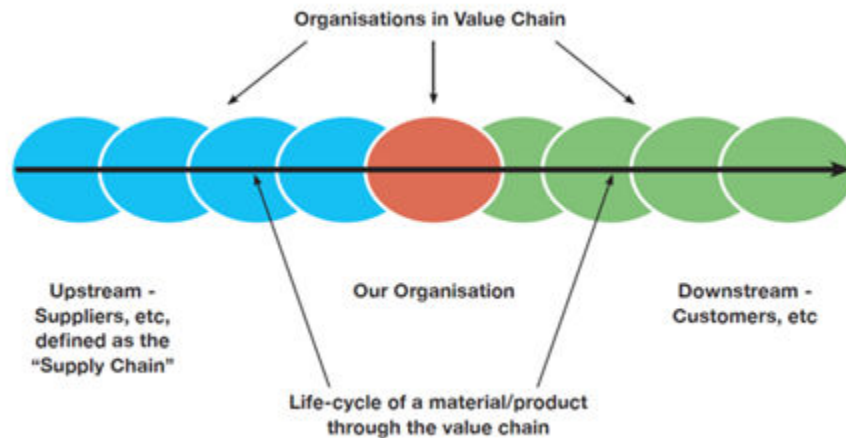
*NOTE 1- The organization's responsibilities under the OHS management system for the workplace depends on the degree of control over the workplace.*

### Value chain

entire sequence of activities or parties that provide or receive value in the form of products or services.

*NOTE 1 Parties that provide value include suppliers, outsourced workers, contractors and others.*

*NOTE 2 Parties that receive value include customers, consumers, clients, members and other users*



## 3.2. Terms related to Planning

### Acceptable risk

Risk that has been reduced to a level that can be tolerated by the organisation having regard to its legal obligations and its own OHS policy

### Compliance obligations

Legal requirements that an organization has to comply with or other requirements that an organization has to or chooses to comply with.

Note 1- *Compliance obligations are related to the OHS management system.*

Note 2- *Compliance obligations can arise from mandatory requirements, such as applicable laws and regulations, or voluntary commitments, such as organizational and industry standards, contractual relationships, codes of practice and agreements with community groups or non-governmental organizations.*

### Consultation

seeking views before making a decision

NOTE 1- *Consultation includes engaging health and safety committees and workers' representatives, where they exist.*

### Effectiveness

extent to which planned activities are realized and planned results achieved

### Environment

Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, human's and their interrelations.

NOTE 1 *Surroundings in this context extend from within the organization to the global system*

NOTE 2: *Surroundings can be described in terms of biodiversity, eco systems, climate or other characteristics.*



### Environmental condition

State or characteristic of the environment as determined at a certain point in time. State or Long-term environmental change(s) that can affect the organization's activities, products and services requiring adaption.

### Environmental impact

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, environmental aspects, products or services.

### Hazard

Source, situation, or act with a potential to cause injury and/or ill health.

NOTE 1- *Hazards can include sources with the potential to cause harm, hazardous situations and circumstances with the potential for exposure leading to injury or ill-health.*

### Hazard Identification

A process of recognizing that a hazard exists and defining its characteristics ill health identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation.

### Injury and/or ill health:

Adverse effect on the physical, mental or cognitive condition of a person

NOTE 1- *These adverse effects include occupational disease, illness and death.*

### Legal and other requirements

Legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with

NOTE 1- *For the purposes of this document, legal requirements and other requirements are those relevant to the OHS management system*

NOTE 2- *Legal requirements and other requirements may include the provisions in collective agreements.*

NOTE 3- *Legal requirements and other requirements include those that determine the persons who are workers' representatives in accordance with laws, regulations, collective agreements and practice.*

### Objective

Result to be achieved

NOTE 1- *An objective can be strategic, tactical, or operational.*

NOTE 2- *Objectives can relate to different disciplines (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product and process.)*

NOTE 3- *Objectives can be expressed in other ways, e.g. as an intended outcome, a purpose, an operational criterion, as an OHS objective, or by the use of other words with similar meaning (e.g. aim, goal or target.)*

### OHS objective

objective set by the organization to achieve specific results consistent with the OHS policy

### OHS opportunity

circumstance or set of circumstances that can lead to improvement of OHS performance

### OHS risk

combination of the likelihood of occurrence of a work-related hazardous event or exposure(s) and the severity of injury and/or ill health that can be caused by the event or exposure(s)

### Prevention of pollution

Use of processes, practices, techniques, materials, products services or energy to avoid, reduce or control(separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

*NOTE 1: Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recycling, reclamation and treatment.*

### Procedure/Process

Specified way to carry out an activity or a process.

*NOTE: procedures can be documented or not.*

### Record

Document stating results achieved or providing evidence of activities performed.

### Requirement

Need or expectation that is stated, generally implied or obligatory

*NOTE 1- "Generally implied" means that it is custom or common practice for the organization and interested parties that the need or expectation under consideration is implied.*

*NOTE 2- A specified requirement is one that is stated, for example in documented information.*

### Risk

Effect of uncertainty.

*NOTE 1- An effect is a deviation from the expected — positive or negative.*

*NOTE 2- Uncertainty is the state, even partial, of efficiency of information related to, understanding or knowledge of, an event, its consequence, or likelihood.*

*NOTE 3- Risk is often characterized by reference to potential events (ISO Guide 73, 3.5.1.3) and consequences (ISO Guide 73, 3.6.1.3), or a combination of these.*

*NOTE 4- Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood (ISO Guide 73, 3.6.1.1) of occurrence.*

NOTE 5- *In this document, where the terms risks and opportunities are used together this means OHS risks, OHS opportunities and other risks and opportunities to the management system*

#### **Risk Assessment**

Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable.

#### **Risks and opportunities**

Potential adverse effects (threats) and potential beneficial effects (opportunities)

### **3.3. Terms related to Support and Operation**

#### **Competence**

Ability to apply knowledge and skills to achieve intended results

#### **Documented information**

Information required to be controlled and maintained by an organization and the medium on which it is contained

NOTE 1- *Documented information can be in any format and media and from any source.*

NOTE 2- *Documented information can refer to:*

- *the management system, including related processes;*
- *information created in order for the organization to operate (documentation);*
- *evidence of results achieved (records).*

#### **Life cycle**

consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.

*Note 1: The life cycle stages include acquisition or raw materials, design, production, transportation/delivery, use, end-of-life treatment and final disposal.*

#### **Outsource (verb)**

make an arrangement where an external organization performs part of an organization's function or process

NOTE 1- *An external organization is outside the scope of the management system, although the outsourced function or process is within the scope.*

NOTE 2- *An outsourced process is considered a voluntary binding legal arrangement where an external organization performs part of the organization's function or process that is not performed by the organization itself.*

#### **Procedure / process**

set of interrelated or interacting activities, which transforms inputs into outputs.

*Note 1: A procedure/process can be documented or not*

#### Record

document stating results achieved or providing evidence of activities performed.

### 3.4. Terms related to Performance evaluation and Improvement

#### Audit

systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled

NOTE 1- *An audit can be an internal audit (first party) or an external audit (second party or third party), and it can be a combined audit (combining two or more disciplines).*

NOTE 2- *An internal audit is conducted by the organization itself, or by an external party on its behalf.*

NOTE 3- *“Audit evidence” consists of records, statements of fact or other information which are relevant to the audit criteria and are verifiable; “audit criteria” are the set policies, procedures or requirements used as a reference against which the audit evidence is compared, as defined in ISO 19011:2011*

#### Conformity

fulfilment of a requirement

#### Continual improvement

recurring activity to enhance performance

NOTE 1- *Enhancing performance relates to the use of the OHS management system in order to achieve improvements in overall OHS performance consistent with the OHS policy and OHS objectives.*

NOTE 2- *Continual does not mean continuous so the activity does not need to take place in all areas simultaneously.*

#### Corrective action

action to eliminate the cause(s) of a nonconformity or an incident and to prevent recurrence.

#### Effectiveness

extent to which planned activities are realized and planned results achieved

#### Incident

occurrence(s) arising out of, or in the course of, work that could or does result in injury and/or ill health

NOTE 1- *An incident where injury and/or ill health occurs is referred to by some as an “accident.”*

NOTE 2- *An incident where no injury and/or ill health occurs but has the potential to do so may be referred to as a “near-miss”, “near-hit”, “close call”.*

NOTE 3- *Although there can be one or more nonconformity related to an incident, an incident can also occur where there is no nonconformity.*

#### Indicator

Measurable representation of the condition of status of operations, management or conditions

#### Measurement

process to determine a value

### Monitoring

determining the status of a system, a process or an activity

NOTE 1- *To determine the status there may be a need to check, supervise or critically observe.*

### Nonconformity

non-fulfilment of a requirement

NOTE 1: *Nonconformity relates to requirements in this document and additional OHS management system requirements that an organization establishes for itself.*

### OHS Performance

performance related to the effectiveness of the prevention of injury and/or ill health to workers and the provision of safe and healthy workplace(s)

### Performance

Measurable results

NOTE 1- *Performance can relate either to quantitative or qualitative findings. Results can be determined and evaluated by qualitative or quantitative methods.*

NOTE 2- *Performance can relate to the management of activities, processes, products (including services), systems or organizations.*

### Preventive action

An action to eliminate the cause of a potential nonconformity or other undesirable potential situation.

NOTE 1- *There can be more than one cause for a potential nonconformity.*

NOTE 2- *Preventive action is taken to prevent occurrence whereas corrective action is taken to prevent recurrence.*


## 4. Context of Sui Generis Ltd

### 4.1. Aims and objectives of Sui Generis Ltd

Sui Ggeneris is one of the UK's leading manufacturers of high quality Glass Reinforced Products. With a trading history spanning over 25 years, we are dedicated to "helping our customers achieve success".

Sui Generis recognises that there are many external factors that can influence the success of the business and these include:

**Political:** These factors determine the extent to which a government may influence the economy or the Construction industry. Political factors include Tax policies, Fiscal policy, Government changes, Funding etc. that a government may levy around the fiscal year and it may affect the business environment (economic environment) to a great extent.

		Page 14 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

**Economic:** These factors are determinants of an economy's performance that directly impacts a company and have resonating long term effects. E.g., a rise in the inflation rate would affect the way company's price their products and services. Adding to that, it would affect the purchasing power of a consumer and change demand/supply models for that economy. Economic factors include Inflation rate, Interest rates, Foreign exchange rates, Economic growth patterns, Unemployment levels, Taxation changes to specific products/services etc.

**Social:** These factors scrutinize the social environment of the market, and gauge determinants like cultural trends, demographics, population analytics, working attitude of people etc.

**Technological:** These factors pertain to innovations in technology that may affect the operations of the industry and the market favourably or unfavourably. Technological factors affect marketing and management in three distinctive ways:

- New ways of producing goods and services
- New ways of distributing goods and services
- New ways of communicating with target markets

**Legal:** There are certain laws that affect the business environment: Employment Law, Health and Safety and Environmental legislation, Consumer protection, Industry specific regulations, Competitive regulations, Future legislation, Regulatory bodies and their processes.

**Environmental:** These factors include all those that influence or are determined by the surrounding environment. Factors include, but are not limited to climate, weather, geographical location, global changes in climate, stakeholder/investor values, environmental regulations, customer values etc.

#### **4.1.1.Core Activities:**

The Design, Manufacture, Supply and Installation of Glass Reinforced Plastic products and components to the Construction, Agricultural and Chemical Industries.

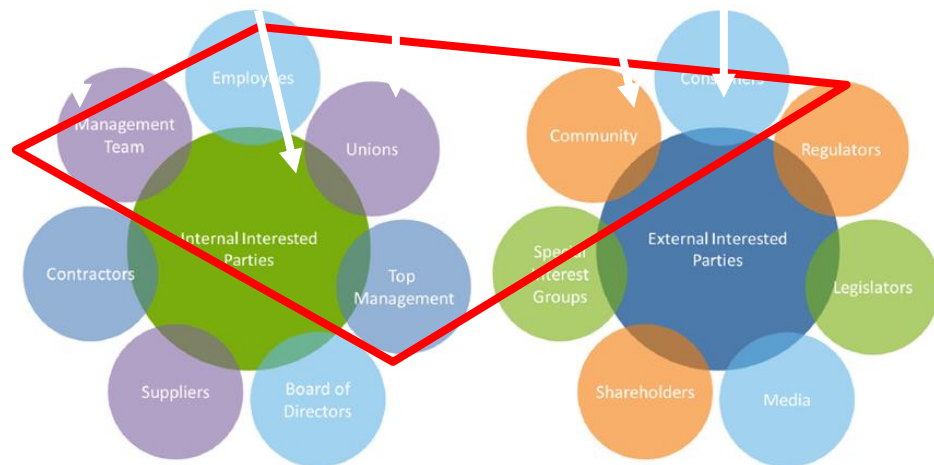
#### 4.1.1.1 Facilities

The facilities include:

- **Unit B Main office** building housing all the sales, design and administrative staff, a canteen and welfare facilities.
- **Unit A Production** Unit A manufactures “Safe Tread” flooring systems, resin and catalyst is hand laid on to flat rectangular beds and then fibreglass mat is laid on top. The soaked fibreglass is then sprinkled with stone chippings or grit of various colours and grades dependent on client specification. Where high visibility is required, tread strips and stair tread nosings can be painted in various colours.
- **Unit B Production** contains the main administration functions such as Sales, Finance, Design, Contracts and Production Management. The factory areas consist of large moulding production such as bunds, tanks and vehicle body panels. There is also a bespoke product R&D area. Due to the high quality finish of body panels there is a repair, polish and finish area as well
- **Yard stacking areas** for manufactured product

#### 4.1.2. Those involved with Sui Generis

Interested Parties can include:



##### 4.1.2.1. Internally

Sui Generis (The Operator) was established in 1996 specializing in bespoke fibreglass mouldings. However, at any early stage the versatility, robustness and consequent massive potential of fibreglass was realised. Gradual progression has seen the company become experts in a wide variety of fibreglass applications including Fibreglass Linings, Fibreglass Grating, Anti Slip Flooring Products, Vehicle Body Panels and Spill Containment products.

Sui Generis employ around 57 wholly locally based people, many of which cycle to work.

Whilst manufacturing roots remain in Colchester Essex, lining technicians attend client sites throughout the UK to apply fibreglass linings to damaged or leaking structures such as storage tanks, concrete bunds and cooling towers. Much of the work carried out on site is done in order to help clients comply with environmental legislation and to complement this Sui Generis manufacture a wide range of spill containment solutions in the Colchester factory that can be despatched at short notice to any site within the UK.

Sui Generis' largest project to date was a 4 years refurbishment of the historic iron framework of St Pancras railway station. This involved removal of all the old lead paint and then application of a modern technology coating system. Recent comparable projects have included the design, manufacture and installation of the innovative composite FLOW bridge – a fully composite footbridge for live rail line crossings – installed at Craven Arms  
<https://www.networkrailmediacentre.co.uk/news/innovative-first-of-its-kind-railway-footbridge-replaces-one-of-the-uks-most-dangerous-level-crossings>.

Sui Generis are accredited to the ISO 9001 and ISO 14001 management systems for quality and environmental management. They hold a number of third party pre-qualification accreditations such as CHAS, Safe Contractor, and Constructionline.

#### 4.1.2.2. Externally

Sui Generis have many interactions with other parties during day-to-day operations In order to carry out its business, which includes:

**Investors:** Sui Generis carefully manage relationships with investors and bankers, as financial problems can detrimentally affect the long term success of the business.

**Suppliers and Sub Contractors:** Sui Generis maintains close supplier relationships as an effective way to remain competitive and to secure the resources needed.

Main raw materials compriseglass fibre matting, resins, gel coats and wood products.

Sub-contract Haulage is used to transport goods to Customer's sites.


**Clients:** Sui Generis attracts and retains customers by offering products services that meet the customer's needs along with providing excellent customer service. Many construction projects need to meet Health & Safety standards and their Subcontractor assessment rating systems require that suppliers have Occupational Health and Safety and Environmental Management systems.

**Competitors:** Sui Generis analyses and monitors Competitors to maintain or improve its position in the competitive market place.

**Media:** Sui Generis is aware that positive media attention (including the presence in social media,) can bring success to the organization by maintaining its reputational strength.

**Neighbouring businesses:** Hamblion Transport Ltd



		Page 17 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

**Local Councils:** Essex County Council, Colchester Borough Council

**Insurers:** Gallagher [Gallagher Insurance, Risk Management and Consulting | Gallagher \(ajg.com\)](#)

**Public bodies:** Environment Agency, Health and Safety Executive, Trading Standards

**Accreditation bodies:**

ISO9001 - BMTrada

ISO14001 - BMTrada

#### 4.1.3. Main Laws, regulations, rules or standards that apply to Sui Generis Ltd

**4.1.3.1. Health & Safety:**

Health & Safety at Work Act, Health & Safety Management Regulations etc.

**4.1.3.2. Environmental:**

Pollution Prevention Control Act 1999

Environmental Protection Act

Colchester Borough Council

**4.1.3.3. For additional and complete list of relevant laws and regulations for Sui Generis International Limited see 'Legal Compliance Register' the most up to date version of which is available within the documents section at [Conformance Manager | ISO9001 Group \(conformancemanagerapp.com\)](#).**

#### 4.1.4 Objectives 2023

**4.1.4.1 Growth.** Sui Generis aspires to grow its business operations in an ethically, morally, and socially responsible manner. This 'growth' is not necessarily in the economic sense, but more focused on improving the businesses Environmental, Social, and Governance (ESG) credentials. Our core aim is to develop our business ethos to be one of caring about what we do, how we do it, and the impact we have on our people and those within our community. We have invested in furthering our understanding of ESG and have a clear net zero plan and delivery strategy, the latest version of which can be found at [Conformance Manager | ISO9001 Group \(conformancemanagerapp.com\)](#).

**4.1.4.2 Harnessing Technology.** Sui Generis is committed to improving the workplace, together with the broader environment in which we operate. Central to this is exploring technological improvements to enhance our manufacturing processes with the main aims of reducing our carbon footprint, reducing injury and illness to our employees, and improving overall employee and consumer sentiment. Our objectives for 2023 are to further reduce our overall styrene VOC emissions by 20% through a proactive programme of improvement works, as detailed in our

environmental improvement plan. Exploring different technologies presents the greatest opportunities in this arena and we have already heavily invested in new equipment to deliver against this objective.

**4.1.4.3 Supporting Evolutionary Change.** FRP (Fibre Reinforced Plastics) are largely regarded as pollutant materials that cannot be recycled or disposed of in a friendly manner. Sui Generis has a clear plan to address these issues and will strive to join the voice of many currently promoting composite material usage as more sustainable options when compared with steel/concrete etc.

## 4.2. Understanding the needs and expectations of workers and other interested parties

Sui Generis has identified the interested parties who are relevant to the company and potentially may have an impact, either positively or negatively upon the company's ability to maintain all aspects of the QE Management System (QEMS). This includes the ability of the company to provide products and services that meet customer expectation and manage all aspects of the company's environmental impact.

The results are recorded in the Minutes of Management Review Meetings and the Schedule SG-QEP-RO-01 Schedule of Risks and Opportunities which will be updated regularly following these meetings.

## 4.3. Scope of this OHS management system

Sui Generis Occupational Health and Safety Policy (Policy OHS-P-1) which cover's all aspects of operations are endorsed by the Managing Director.

The OHS policy includes a commitment to to provide safe and healthy workplaces by preventing work-related injury and ill health, continual improvement of its OHS performance and a commitment to meet or exceed relevant Health and Safety legislation, regulations and other requirements.

The Management is committed to the continual improvement of its Occupational Health, Safety Management System and will use this OHS Manual as a framework for the setting and reviewing of Objectives and Targets.

The policies will be reviewed annually by the top management, communicated to all persons working on behalf of Sui Generis and made available to the public in accordance with the Occupational Health, Safety Management Communication procedure

Copies of the OHS Policy statements are held in prominent positions throughout the work place, and is available from the download section on the company's website, as well as [Conformance Manager | ISO9001 Group \(conformancemanagerapp.com\)](https://conformancemanagerapp.com)

#### 4.4. OHS Management system

Sui Generis has a robust, creditable and reliable management system based upon ISO 9001:14001 to provide a framework for managing OHS risks. The intended outcomes of this management system are:

1. to prevent injury and/or ill health to workers and to provide safe and healthy workplaces;
2. eliminate or minimize OHS risks by taking effective preventive and protective measures.

Sui Generis retains full authority, accountability and autonomy in deciding how it will fulfil the OHS management system requirements including the level of detail and extent to which OHS management system requirements are integrated into its various business functions, such as Design, Procurement, Operations, Human Resources, Sales and Marketing.

Sui will consider opportunities for integrating the OHS management system activities into its business processes, including:

- a) Management of Risks:- processes that could have significant risks or impacts are reviewed and evaluated, high risk activities or processes causing harm, are removed entirely or an alternative method or far less risky/harmful process chosen.
- b) Strategic planning and management of change processes include consideration of OHS conditions that may have on Sui Generis operations and that of other interested parties;
- c) Compliance with legal requirements and voluntary obligations and the capability to pro-actively demonstrate compliance status;
- d) Encouragement and push for continual improvement of the OHS management system, and the capability to proactively demonstrate and communicate the Occupational Health & Safety performance that is achieved;
- e) Communication and engagement with relevant interested parties, both within Sui Generis organisation, its supply chain and its clients. E.g. through integration with external communication processes such as newsletters and website.

### 5. Leadership and worker participation

#### 5.1. Leadership and commitment

Top Management (see Appendix D) has a full understanding of Sui Generis context in terms of risks, opportunities and stakeholder expectations and is accountable for the effectiveness of the OHS management system.

This Management team ensures that the OHS policy and objectives are compatible with the strategic direction of the organization and that OHS performance is incorporated into Sui Generis business processes including strategic planning.

Top management will ensure that the OHS management system achieves its intended outcomes by:

- a) taking overall responsibility and accountability for the prevention of work-related injury and/or ill health as well as the provision of a safe and healthy workplace(s) and activities;
- b) ensuring that the OHS& policy and related OHS objectives are established and are compatible with Sui Generis strategic direction;
- c) ensuring the integration of the OHS management system requirements into Sui Generis business processes;
- d) ensuring that the resources needed to establish, implement, maintain and improve the OHS management system are available;
- e) communicating the importance of effective OHS management and of conforming to the OHS management system requirements;
- f) ensuring that the OHS management system achieves its intended outcomes(s);
- g) directing and supporting persons to contribute to the effectiveness of the OHS management system;
- h) ensuring and promoting continual improvement;
- i) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.
- j) developing, leading and promoting a culture in the organization that supports the intended outcomes of the OHS management system;
- k) protecting workers from reprisals when reporting incidents, hazards, risks and opportunities;
- l) ensuring the organization establishes and implements a process(es) for consultation and participation of workers;
- m) considering the need to establish health and safety committees, together with providing support for their functioning.

## 5.2. Policy Statements

### 5.2.1. OHS Policy Statement

Sui Generis International Ltd

HEALTH & SAFETY at WORK etc. ACT 1974

***Health and Safety is an integral part of all our operations and is very important to the future and reputation of the Company.***

The Directors are committed to provide safe and healthy working conditions for the prevention of workrelated injury and ill health of our employees and those affected by our operations and to the continual improvement of the Health and Safety management, performance and culture of our business over time.

Sui Generis is committed to the continual improvement of its Health and Safety Management System and will use the OHS Manual as a framework for the setting and reviewing of Objectives and Targets

This will involve:

- Compliance with all relevant Health and Safety regulations and other legislative documents and/or requirements, codes of practice and protocols, as a minimum.
- Fully integrate health & safety considerations into all aspects of the company's undertakings to eliminate hazards, reduce OHS risks and minimise any adverse effects, as far as is reasonably practicable.

- Co-operating with our Clients with regards to all aspects that could or have an adverse effect on the health & safety and the protection of individuals, groups and property.
- Consult and encourage participation, of workers and workers representatives, in the implementation of this OHS Policy and provide suitable and sufficient training to enable employees and contractors to carry out their work activities without hazard and/or risk.
- This Health & Safety policy will be made known to all our employees, and to members of the public and interested parties upon request.

We are currently concentrating on controlling the highest risks in the business and reducing them significantly. We will continually monitor this process. Our goal is to have zero lost time accidents in the longer term.

The main responsibility for Health, Safety and Welfare rests with the **Sui Generis, Board of Directors**. They will set policy, monitor implementation of the policy and ensure sufficient resources are made available to successfully implement policy

**The Managers of each operational process are responsible for:**

- Implementing this policy with commitment and leadership
- Identifying Hazards and Assessing Risks
- Developing, Documenting, Implementing and Maintaining the Company's Safety Procedures
- Training all Employees on how to recognise and guard against foreseeable hazards and to meet the responsibilities placed on them.

**All Employees are responsible for both, their own, and their colleagues, Health and Safety and have a legal duty:**

- To work in a safe manner.
- To co-operate with their Employer in efforts to create safe working conditions.

**Disciplinary action** will be taken against any Employee found to be endangering the safety of themselves or others.

It is recognised that our businesses will change in nature and size; therefore this policy will be kept up to date by way of internal audit and annual review of the OHS management system to ensure that the system remains effective when new legislation and or new processes are introduced, and meets BS ISO 45001:2018 standards throughout the Company. Following this review, if necessary, this policy and the Company's Safety Procedures will be amended and re-issued.

**Andrew Kime**

Managing Director 30th April 2025

## 5.3. Organizational Roles, Responsibilities, Accountabilities and Authorities

### 5.3.1. The Managing Director

The Managing Director is responsible for the overall arrangements and for ensuring that the Sui Generis operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

In particular the Managing Director will:

1. Ensure there is an effective company policy for health and safety and that all employees, contractors and temporary workers are made aware of their individual responsibility.
2. To understand and ensure, through the appointment of competent persons, that Sui Generis responsibilities as employers under the Health and Safety at Work etc. Act 1974 and any relevant Acts of Parliament and Statutory Instruments are met.

3. The Managing Director has overall responsible for safety.
4. To ensure that all Directors and Managers understand and fulfill their responsibilities with regard to health and safety.
5. Arrange for funds and facilities to meet the requirements of company policy and legislation.
6. Make provision for adequate and appropriate training to be given to all employees.
7. To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.
8. Ensure that Workers are able to report concerns about hazardous situations to responsible authorities as required, so that action can be taken, without the threat of dismissal, disciplinary action or other such reprisals
9. Set a personal example on all matters of health and safety.

### 5.3.2. Group Health Safety and Environment Manager

The primary role of the HS&E Manager is to advise the Directors and Managers on all safety, health, welfare matters to ensure the Company complies with its statutory obligations and BS 45001:2018

The HS&E Manager is designated by the Managing Director with the responsibility to control and update this OHS Policy Manual and to ensure that all Departments operate to the procedures and instructions set out in it:-

In particular the Health Safety and Environment Manager will:

1. Understand the application of the Health and Safety at Work, etc. Act 1974 and other legislation relevant to the Companies business.
2. Keep up to date with changes in current legislation and to bring to the attention of the Director responsible for Health and Safety any relevant new legislation.
3. Attend such courses/seminars run by external sources to enable accurate interpretation of legislation to enable implementation within the organisation.
4. Ensure that all "assessments" as required by legislation are conducted and reviewed at relevant intervals and to maintain records of the same.

5. To recommend control measures and advise on the standard of P.P.E. issued to employees.
6. Conduct health and safety inspections and prepare reports of all the company's operations.
7. Immediately contact the Director responsible for health and safety if situations are found, that in the opinion of the Safety Manager, require immediate rectification or the stopping of any operation.
8. To notify the Director responsible for health and safety if the corrective action agreed after any workplace inspection is not implemented by the arranged date.
9. To carry out investigations into all accidents and near-miss incidents and to record the findings on the relevant forms.
10. Advise the Managing Director of all incidents reportable under R.I.D.D.O.R.
11. To arrange Health surveillance as instructed.
12. To highlight areas where training/certification is required to meet the standards imposed by Legislation, Approved Codes of Practice, or H.S.E. guidance.
13. To bring new techniques for improving health, safety and welfare to the attention of the Managing Director.
14. To set a personal example by wearing appropriate personal protective clothing/equipment and observing all safety requirements/procedures.

### 5.3.3. Managers/Heads of Department

Each Manager/Department Head is responsible for his personal safety and that of all personnel under his or her authority, including others who may be affected by the company's activities.

In particular they will:

1. Understand and implement the company safety policy.
2. Appreciate the responsibilities of personnel under their authority and ensure that each employee knows his/her responsibility and are equipped to play their part.

3. Conduct Risk Assessments on activities within their department ensuring that the methods and systems of work are safe. Also that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied.
4. Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with.
5. Ensure accident and near-miss reporting procedures are understood and complied with, and assist with accident investigations where appropriate.
6. Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate.
7. Ensure the Statutory Notices, the Safety Policy, Insurance Certificate and the names of Appointed First Aiders are displayed and maintained in prominent locations.
8. Ensure that all new employees in the company are provided with a copy of the policy statement, receive such induction training as may be laid down in procedures, are issued with personal protective equipment as required and their personal responsibilities as set out in this manual.
9. Reprimand any employee for failing to discharge their health and safety responsibilities.
10. Set a personal example with regard to health and safety matters.

#### 5.3.4. All Employees

The Management of Health and Safety at Work Regulations 1992 (M.H.S.W.R.) re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and employees alike. In this connection, the Company reminds employees of their duties under Section 7 of the act: to take care for their own health and safety and that of others who may be affected by their acts or omissions. Additionally, employees must also co-operate with the company to enable it to discharge its own responsibilities successfully.

Furthermore, all employees are expected to:-

1. Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures, regulations and codes of practice.
2. If aware of any unsafe practice or condition, or if in any doubt about the safety of any situation, consult their supervisor.



3. Obtain and use the correct tools/equipment for the work and not to use any that are unsafe or damaged. All tools, equipment and personal protective equipment must be stored in the approved place after use.
4. Ensure that all guards are securely fixed and that all safety equipment and personal protective clothing/equipment provided are used.
5. Not to operate any plant or equipment unless authorised.
6. To report any accident, near-miss, dangerous occurrence or dangerous condition to their line management.
7. To switch off and secure unattended plant or equipment.
8. To avoid improvised arrangements and suggest safe ways of eliminating hazards.
9. Not to participate in horseplay or place fellow employees in danger by their actions.

Documentation, which describes various positions, is included in Appendix D.

## 5.4. Consultation and participation of workers

Sui Generis has established, implements and maintains processes for:


- a) The consultation and participation of managers and non-managerial workers by their:
  - Appropriate involvement in hazard identification, risk assessments and determination of controls;
  - Appropriate involvement in incident investigation.
  - Involvement in the development and review of OHS policies and objectives;
  - Consultation where there are any changes that affect their OHS;
  - Representation on OHS matters.

Workers are informed about their participation arrangements, including who is their representative(s) on OHS matters.

A Health and Safety Committee meets every 3 months to discuss the following topics:

- Accident, injury and near miss data since last meeting.
- Company performance graphs
- H&S projects and initiatives
- Representatives reports
- General discussion

(Minutes of the Safety Meetings are available on: Notice Boards)

		Page 26 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

- b) Consultation with contractors where there are changes that affect their OHS.
- c) Sui Generis will determine and remove obstacles or barriers to participation (e.g. literacy or language barriers, reprisals or threats of reprisals and policies or practices that discourage or penalize worker participation.) and minimize those that cannot be removed.
- d) Sui Generis ensures that, when appropriate, relevant external interested parties are consulted about pertinent OHS matters. **Applicable Procedures**  
OHS-P-10.001 Internal Communication, Reporting Safety Issues

## 6. Planning

### 6.1. Actions to address risks and opportunities

#### 6.1.1.General

Sui Generis has established, implements and maintains processes for considering the needs of interested parties, determining risks and opportunities that need to be addressed, ensuring that the OHS management system can achieve its intended outcomes, preventing or reducing undesired effects and achieving continual improvement.

In addressing “risks and opportunities”, Sui Generis takes into account OHS risks, OHS opportunities and other risks and opportunities to the OHS management system.

When determining the risks and opportunities that need to be addressed, Sui Generis takes into account:

- hazards, risks and opportunities;
- legal requirements and other requirements (see 6.1.3);
- risks (see 6.1.2.2) and opportunities (see 6.1.2.3) related to the operation of the OHS management system that can affect the achievement of the intended outcomes.

In carrying out its planning process(es), Sui Generis assesses the risks and determines the opportunities that are relevant to the intended outcome of the OHS management system associated with changes in its organization, its processes, or the OHS management system. In the case of planned changes, permanent or temporary, this assessment shall be undertaken before the change is implemented (see 8.1.3).

Sui Generis maintains documented information on: OHS risks and opportunities; the process(es) and actions needed to determine and address its risks and opportunities (see 6.1.2 to 6.1.4), to the extent necessary to have confidence that they are carried out as planned.

#### 6.1.2.Hazard identification and assessment of risks and opportunities

##### 6.1.2.1. Hazard identification

The Health and Safety Manager together with Departmental Managers, see Appendix E, will maintain process(es) for ongoing, proactive hazard identification, risk assessment and determination of necessary controls.

The process(es) takes into account, but is not limited to:

- a) how work is organized, social factors (including workload, work hours, victimization, harassment and bullying), leadership and Sui Generis's culture;
- b) routine and non-routine activities and situations, including consideration of:
  - 1) infrastructure, equipment, materials, substances and the physical conditions of the workplace;
  - 2) product and service design, research, development, testing, production, assembly, construction, service delivery, maintenance or disposal;
  - 3) human factors;
  - 4) how the work is actually done;
- c) past relevant incidents, internal or external to Sui Generis's operations, including emergencies, and their causes;
- d) potential emergency situations;
- e) people, including consideration of:
  - 1) those with access to the workplace and their activities, including workers, contractors, visitors and other persons;
  - 2) those in the vicinity of the workplace who can be affected by Sui Generis's activities;
  - 3) workers at a location not under Sui Generis's direct control;
- f) other issues, including consideration of:
  - 1) the design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to the needs and capabilities of the workers involved;
  - 2) situations occurring in the vicinity of the workplace caused by work-related activities under Sui Generis control;
  - 3) situations not controlled by Sui Generis and occurring in the vicinity of the workplace that can cause injury and/or ill health to persons in the workplace;
- g) actual or proposed changes in the organization, its operations, processes, activities and OHS management system (see 8.1.3);
- h) changes in knowledge of, and information about, hazards.

#### 6.1.2.2. Assessment of OHS risks and other risks to the OHS management system

Sui Generis has established, implements and maintains process(es) to:

- a) assess OHS risks and environmental aspects from the identified hazards, while taking into account legal requirements and other requirements and the effectiveness of existing controls;

- b) identify and assess the risks related to the establishment, implementation, operation and maintenance of the OHS management system that can occur from the issues identified in 4.1 and the needs and expectations identified in 4.2.

Sui Generis methodology(ies) and criteria for the assessment of OHS risks are defined with respect to their scope, nature and timing, to ensure they are proactive rather than reactive and are used in a systematic way.

Safety Risk Management is an ongoing process that involves constant re-evaluation of the significant risks that need to be managed in a given period by allocating sufficient resources to implement effective risk control measures as risks are either eliminated or 'managed-down'.



#### **The Risk Management Process**

Documented information is maintained and retained on the methodology(ies) and criteria.

#### **Reference Materials**

BS ISO 45001:2018 Standard (6.1.2)

#### **Applicable Procedures**

OHS-P-05.001 Hazard Identification, Risk assessment and determination of controls  
 OHS-P-05.002 Construction Site Hazards Risk Assessment  
 OHS-P-05.003 Vulnerable Personnel Risk Assessments  
 OHS-P-05.004 CoSHH Assessments  
 OHS-P-05.005 Asbestos  
 OHS-P-05.006 Environmental Aspects, Objectives, Targets Planning Actions  
 OHS-P-05.007 Environmental Review of Projects

#### **6.1.2.3. Assessment of OHS and other opportunities**

Sui Generis has established, implements and maintains process(es) to assess:

- a) opportunities to enhance OHS performance, while taking into account planned changes to the organization, its policies, its processes or its activities and:
- 1) opportunities to adapt work, work organization and work environment to workers;
  - 2) opportunities to eliminate hazards and reduce OHS risks;
- b) other opportunities for improving the OHS management system.

### 6.1.3.Determination of legal requirements and other requirements

Sui Generis has established a procedure for the purpose of:

- a) determine and have access to up-to-date legal requirements and other requirements that are applicable to its hazards, OHS risks and OHS management system; determining how they apply to its hazards, OHS risks and the OHS management system;
- b) determine how these legal requirements and other requirements apply to the organization and what needs to be communicated;
- c) taking these legal requirements and other requirements into account when establishing, implementing, maintaining and continually improving its OHS management system.

At least annually, the Health, Safety & Environment Manager will review the most current national and local legal and other requirements as applicable to Sui Generis operations.

#### Reference Materials

ISO 45001:2018 Standard (6.1.3)

Health & Safety Executive [www.hse.gov.uk](http://www.hse.gov.uk)

Cedrec Monthly Safety Bulletins [www.cedrec.com](http://www.cedrec.com)

#### Applicable Procedures

OHS-P-06.001 Determination of Legal and Other Requirements

OHS-P-06.002 Dealing with Enforcement Authorities

OHS-P-13.004 Contractors and Visitors

OHS-P-13.019 Emission Limits

### 6.1.4.Planning to take action

Sui Generis Management teams will:

- a) plan actions to:
  - 1) address these risks and opportunities (see 6.1.2.2 and 6.1.2.3);
  - 2) address legal requirements and other requirements (see 6.1.3);
  - 3) prepare for and respond to emergency situations (see 8.2);
- b) devise procedures / processes to:
  - 1) integrate and implement the actions into this OHS management system processes or other business processes;
  - 2) evaluate the effectiveness of these actions.

Sui Generis will take into account the hierarchy of controls (see 8.1.2) and outputs from the OHS management system when planning to take action.

When planning these actions, Sui Generis will consider best practices, technological options, financial, operational and business requirements.

## 6.2. OHS Objectives and planning to achieve them

### 6.2.1. OHS Objectives

The Health, Safety Management Team (HSMT) has developed objectives at relevant functions and levels in order to maintain and improve the OHS management system and to achieve continual improvement in OHS performance.

These objectives shall:

- a) be consistent with the OHS policy;
- b) be measurable (if practicable) or capable of performance evaluation;
- c) take into account:
  - i. applicable requirements
  - ii. the results of the assessment of risks and opportunities (see 6.1.2.2 and 6.1.2.3);
  - iii. the result of consultation with workers (see 5.4), and where they exist, workers' representatives;
- d) be monitored;
- e) be communicated;
- f) be updated as appropriate.

#### Reference Material

BS ISO 45001:2018 Standard (6.2.1)

### 6.2.2. Planning to achieve OHS Objectives

The HSEMT shall establish, implement and maintain documented OHS objectives and programmes.

These objectives, which are measurable where practicable, and consistent with the OHS policy are committed to the prevention of injury and ill health, are compliant with applicable legal and other requirements and are within the objective of continual improvement.

When establishing and reviewing the objectives, Sui Generis management team will take into account legal and other requirements, the OHS risks, together with consideration of technological options, financial and business requirements and the views of relevant interested parties.

The programmes shall be reviewed at regular intervals (weekly management meetings,) and adjusted as necessary to ensure that the objectives are achieved.

#### Reference Material

BS ISO 45001:2018 Standard (6.2.2)

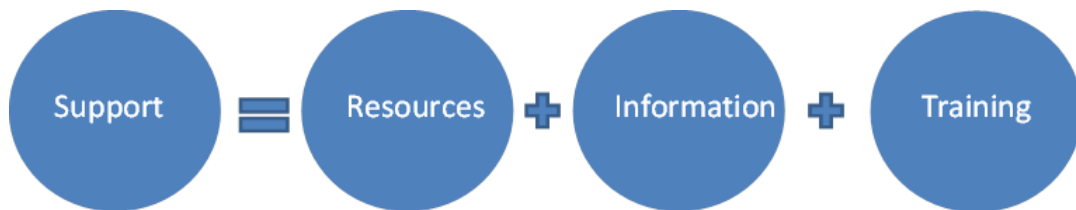
#### Applicable Procedures

OHS-P-13.004 Contractors and Visitors.  
OHS-P-13.015 Agency Approvals.

sui generis		Page 31 of 55	
OHS Policy Manual	Version: 10	April 2025	Effective: 30th April 2025

OHS-P-13.020 Management of change

## 7. Support



### 7.1. Resources

Top management ensures that the resources essential to the implementation and control of the the OHS management system are available, including:


- Training;
- Human Resources;
- Speciality Services;
- Financial Resources;
- Technical Services;
- Informational Services.
- Buildings, plant and equipment
- Information technology and communication systems

Sui Generis top management has appointed specific management representative(s) who, irrespective of other responsibilities, have defined roles, responsibilities and authority for:

- Ensuring the OHS requirements are established, implemented and maintained in accordance with the relevant international standards;
- Reporting on the performance of the OHS management systems to top management for review and as a basis for improvement of the OHS management system.

The HSEMT provides routine OHS support, and reports directly to the HS&E Manager Documentation, which describes various positions, is in included in Appendix D.

### Reference Material

		Page 32 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

BS ISO 45001:2018 Standard (7.1)  
Appendix D

## 7.2. Competence

The competence of workers includes the knowledge and skills needed to appropriately address the hazards and OHS risks associated with their work and workplace.

In determining the competence and identify training needs associated with for each role, Sui Generis take into account such things as:

- a) the education, training, qualification and experience necessary to undertake the role and the retraining necessary to maintain competence;
- b) the work environment;
- c) the preventive and control measures resulting from the risk assessment process(es);
- d) the requirements applicable to the OHS management system;
- e) legal requirements and other requirements;
- f) the OHS policy;
- g) the potential consequences of compliance and noncompliance, including the impact on the environment and/or the worker's health and safety;
- h) the value of participation of workers in the OH management system based on their knowledge and skill;
- i) the value of participation of workers in the OHS management system based on their knowledge and skill;
- i) the duties and responsibilities associated with the roles;
- j) individual capabilities, including experience, language skills, literacy and diversity;
- k) the relevant updating of the competencies made necessary by context or work changes.

It is recognised that Workers can assist Sui Generis management in determining competencies needed for roles. Workers should have the necessary competency to remove themselves from situations of imminent and serious danger. For this purpose, it is important that workers are provided sufficient training on hazards and risks associated with their work.

As appropriate, Sui Generis ensures that all workers receive the training required to enable them to effectively carry out their representative functions for occupational health and safety.

Sui Generis identify training needs associated with its OHS risks and the OHS management system, provides training or other action to meet these needs, evaluates the effectiveness of the training / action taken and keeps associated records.

### Reference Material

BS ISO 45001:2018 Standard (7.2)



### 7.3. Awareness

Procedures are in place, implemented and maintained to ensure that Contractors and visitors, etc., as well as persons working under Sui Generis's control, (especially temporary workers), should be aware of the OHS risks to which they are exposed.

These include:

- a) The OHS consequences, actual or potential, of their work activities, their behavior and the OHS benefits of improved personal performance.
- b) Their roles and responsibilities and the importance in achieving conformity to the OHS policy and procedures and to the requirements of the OHS management system, including emergency preparedness and response requirements.
- c) the implications and potential consequences of not conforming to the OHS management system requirements;
- d) incidents and the outcomes of investigations that are relevant to them;
- e) hazards, OHS risks and actions determined that are relevant to them;
- f) the ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health, as well as the arrangements for protecting them from undue consequences for doing so.

Training procedures take into account differing levels of:

- a. responsibility, ability, language skills and literacy
- b. risk.

The HS Manager is responsible for maintaining training records. Appropriate records are monitored and reviewed on a scheduled basis.

#### Reference Material

BS ISO 45001:2018 Standard (7.3)

#### Applicable Procedures

OHS-P-09.001 Competence, Training and Awareness

OHS-P-09.002 New Employee Induction

### 7.4. Communication

#### **7.4.1.General**

With regard to its OHS hazards, OHS Management System, Sui Generis has established, implements and maintains processes for both the gathering, updating and the dissemination of information. It ensures that relevant information is provided, received and is understandable to all relevant workers and interested parties.

#### 7.4.2. Internal Communication

Internal communication among the various levels and functions of the organisation;

- a. Weekly management meetings are held at which operational Health and Safety issues are discussed and recorded.
- b. Group HS&E Manager's monthly report for inclusion at the Directors Board Meeting.
- c. A Health, Safety & Environmental Committee meets every 3 months to discuss the following topics:
  - i. Accident, injury and near miss data since last meeting.
  - ii. Company performance graphs
  - iii. H&S projects and initiatives
  - iv. Representatives reports
  - v. Environment
  - vi. General discussion
- d. Sui Generis operates a Works Council whereby employees can raise issues that concern them such as Health and Safety, Welfare and Working Conditions. This forum also allows employees to be kept informed of the Company's short and long term plans. Attendance is not restricted to council members, any individual has the right to attend a meeting if they wish to personally voice their opinions or concerns. Minutes of these meetings are issued to all employees to keep them informed.
- e. Staff Newsletters
- f. Notice Boards
- g. Communication with contractors and other visitors to the workplace;

#### 7.4.3. External Communication

Sui Generis will externally communicate information relevant to the OHS management system, as established by the organization's communication process(es) and taking into account its legal requirements and other requirements.

#### Reference Material

BS ISO 45001:2018 Standard (7.4)

#### Applicable Procedures

OHS-P-10.001 Communication

OHS-P-10.002 Internal Communication Reporting Safety Issues

## 7.5. Documented Information

### 7.5.1.General

The Company's OHS management system incorporates this manual, procedures and other documentation necessary to ensure that the system is managed in a controlled manner and that the OHS Policy is followed.

This manual identifies all documents determined by Sui Generis to be necessary for the effectiveness of the OHS management system. A copy of OHS documents, other than visual aids and records, can be obtained from the HS&E Manager or designee.

The control of this manual is in accordance with OHS procedure (OHS-P-12.001 Control of Documents.) Printed copies of this manual are uncontrolled and should be checked against the file server version prior to use.

### 7.5.2.Creating and updating

When creating and updating documented information Sui Generis ensures appropriate:

- a) identification and description (e.g. a title, date, author, or reference number);
- b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic);
- c) review and approval for suitability and adequacy.

**Procedures** outline how various policies are to be implemented, listing responsibilities, forms to be used, relevant reference documentation and definitions. (Procedures are listed on OHS-F-12.001)

**Forms** are used for general recording purposes. (Forms are listed on OHS-F-12.002)

**CoSHH Assessments** are listed numerically with reference to which departments, (as listed above,) that they apply to. (CoSHH are listed on OHS-F-12.006)


**Product information sheets**, Safety data sheets and Technical Data sheets are saved on the server in a COSHH folder

OHS Procedures, Forms, Risk Assessments and SSoW are located on the file server:

System procedures and forms are provided in Appendix B – List of documents

OHS documentation includes:

- Occupational Health and Safety policies (this manual);
- Objectives and targets (OHS-P-05.001);
- Description of scope of Occupational Health, Safety management system (this manual);
- Main elements of OHS and associated documents (this manual);

		Page 36 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

- All documents, including records, required by BS ISO 45001:2018, and the OHS management system (Appendix A + B – List of documents).

The HSE manager or appointee will periodically review documentation for suitability and adequacy.

#### **Reference Material**

BS ISO 45001:2018 Standard (7.5.2)

#### **Applicable Procedures**

OHS-P-12.001 Creating and Updating Documents

### **7.5.3.Control of Documented information**

Sui Generis has established a procedure for controlling all documents related to the OHS management system. This procedure describes where documents can be located and how and when they are reviewed.

The procedure provides for:

- Approval for adequacy prior to release;
- Review and updating as required and re-approval;
- Changes are recorded;
- Current versions are available and that obsolete documents are promptly removed from use or are suitably identified;
- Documents are available at point of use and they remain legible and readily identifiable;
- Ensures that documents from external origin that are determined by the organisation to be required for the planning and operation of the OHS are identified and their distribution is controlled;
- Prevents the unintended use of obsolete documents and have suitable identification to them if they are retained for any purpose.

Controlled documents are obtainable from HS&E Manager or designee.

A list of controlled documents is provided in Appendix B – List of documents

#### **7.5.3.1. Computer Records**

All PCs are connected via a local area network and business critical data is automatically stored on a central file server. All data stored on the file server is backed up daily to a SDLT tape backup unit. Backup tapes are stored off site in another building and are rotated bi-weekly. Data is backed up on to tape and removed from site for security reasons

#### **Reference Material**

BS ISO 45001:2018 Standard (7.5.3)

### **Applicable Procedures**

OHS-P-12.001 Creating and Updating Documents  
OHS-P-12.002 Control of Documented Information  
OHS-P-12.003 OHS Records

## **8. Operation**

### **8.1. Operational Planning and Control**

#### **8.1.1.General**

Sui Generis plans, implements, controls and maintains the processes as necessary to enhance occupational

health and safety, eliminate hazards and significant environmental aspects, or, if impossible, to reduce the OHS risks to levels as low as reasonably practicable for operational areas and activities.

Examples of operational controls are:

- a) the use of procedures and systems of work;
- b) ensuring the competency of workers;
- c) establishing preventive or predictive maintenance and inspection programmes;
- d) providing specifications for the procurement of goods and services;
- e) application of legal requirements and other requirements, or manufacturers' instructions for equipment;
- f) engineering and administrative controls;
- g) adapt work to workers, for example, by:
  - 1) defining, or redefining, how the work is organized;
  - 2) the induction of new workers;
  - 3) defining, or redefining, processes and working environments;
  - 4) using ergonomic approaches when designing new, or modifying, workplaces, equipment, etc.

When working at multi-employer workplaces, the Sui Generis coordinates the relevant parts of the OHS management system with the other organizations.

Sui Generis will implement and maintain:

- a. Operational controls as applicable to Sui Generis organization and activities; Sui Generis will integrate those operational controls into its overall Occupational Health, Safety Management System.

- b. Controls related to purchased goods, equipment and services.
- c. Controls related to contractors and other visitors to the workplace.
- d. Documented procedures, to cover situations where their absence could lead to deviations from the OHS policies and the objectives.
- e. Stipulated operating criteria where their absence could lead to deviations from the OHS policies and objectives.
- f. Provide information about potential significant environmental impacts associated with the transportation, delivery, use end of life treatment and final disposal of our goods and services.

These documents define the mechanisms for the establishment, implementation and maintenance of the OHSMS. They ensure that the system is maintained in accordance with the OHS Policies, objectives and targets which are communicated to employees, suppliers and contractors.

#### **Reference Material**

BS ISO 45001:2018 Standard (8)

#### **8.1.2. Eliminating Hazards and reducing OHS risks**

When determining prevention and control measures, or considering changes to existing controls, consideration shall be given to reducing the risks according to the following hierarchy:

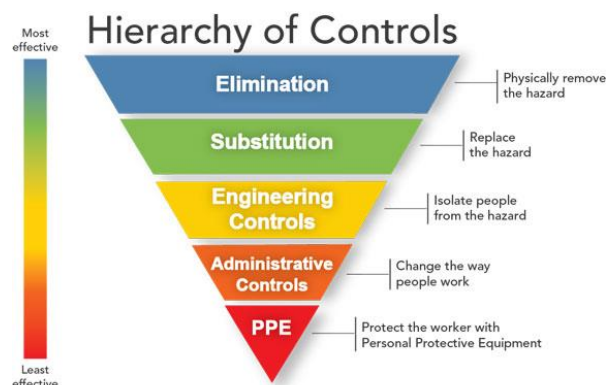
##### **1. Eliminate the hazard:**

avoiding risks, adapting work to workers, integrate health and safety and ergonomics when planning new work places, eliminating monotonous work or work that causes negative stress; create physical separation of traffic between pedestrians and vehicles.

##### **2. Substitution:**

Replacing the dangerous by non-dangerous or less hazardous materials, processes, operations or equipment; combating the OHS risks at source; adapting to technical progress. (e.g. replacing solvent-based paint by water-based paint; changing slippery floor material; lowering voltage requirements for equipment).

##### **3. Engineering controls/reorganisation of work:**



Implement collective protective measures, isolating people from hazard; implementing collective protective measures (e.g. isolation, machine guarding, ventilation systems); addressing mechanical handling; reducing noise; protecting against falls from height by using guard rails; reorganizing work to avoid people working alone, unhealthy work hours and workload, or to prevent victimization.

#### 4. **Administrative controls including training:**

Conducting periodic safety equipment inspections; conducting training to prevent bullying and harassment; managing health and safety coordination with subcontractors' activities; conducting induction training; administering forklift driving licences; providing instructions on how to report incidents, nonconformities and victimization without fear of retribution; changing the work patterns (e.g. shifts) of workers; managing a health or medical surveillance programme for workers who have been identified as at risk (e.g. related to hearing, hand-arm vibration, respiratory disorders, skin disorders or exposure); giving appropriate instructions to workers (e.g. entry control processes).

#### 5. **Personal protective equipment (PPE):**

Provide PPE and instructions for PPE utilization / maintenance, i.e. safety shoes, safety glasses, hearing protection, chemical and liquid resistant gloves etc.

### 8.1.3. **Management of change**

Sui Generis has established structured processes for the implementation and control of planned temporary and permanent changes that impact OHS performance including:

- a) new products, services and processes, or changes to existing products, services and processes, including:
  - workplace locations and surroundings;
  - work organization;
  - working conditions;
  - equipment;
  - work force;
- b) changes to legal requirements and other requirements;
- c) changes in knowledge or information about hazards and related OHS risks;
- d) developments in knowledge and technology.

Hazards and Risks associated with the changes (Materials, Processes, Products or change in the Organisation,) are identified and addressed, prior to the introduction of such changes.

Sui Generis reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

NOTE Changes can result in potential OHS opportunities.

### **Reference Material**

BS ISO 45001:2018 Standard (8.1)

### **Applicable Procedures**

OHS-P-13.001 Display Screen Equipment  
OHS-P-13.002 Manual Handling  
OHS-P-13.003 Developing Safe Systems of Work  
OHS-P-13.004 Contractors and Visitors  
OHS-P-13.005 Vibration at Work  
OHS-P-13.006 PPE  
OHS-P-13.007 Drawing Office CDM Requirements  
OHS-P-13.008 Maintenance of Work Equipment  
OHS-P-13.009 Working at Heights  
OHS-P-13.010 Noise at Work  
OHS-P-13.011 Electricity at Work  
OHS-P-13.012 Work in Confined Spaces  
OHS-P-13.013 Dangerous Substances and Explosive atmospheres  
OHS-P-13.014 Permits to Work  
OHS-P-13.015 Agency Approvals  
OHS-P-13.019 Emission Limits  
OHS-P-13.020 Management of Change

## **8.1.4. Procurement**

### **8.1.4.1. General**

Sui Generis has established controls to ensure that the procurement of goods and services conform to its OHS management system requirements.

Prior to procuring goods or services, Sui Generis identifies procurement controls that:

- Identify and evaluate potential OHS risks associated with products, materials, equipment or service.
- Requirements for product, materials, equipment or services to conform to OHS objectives
- Need for information, participation and communication
- Before using, verify that equipment, installations and materials are adequate before being released for use by workers
- Delivered to specifications and are tested to ensure works as intended
- Usage requirements, precautions or other protective measures are communicated and made available.

### **8.1.4.2. Contractors**

Sui Generis has established a process(es), in coordination with its contractor(s), for hazard identification and to assess and control the OHS risks, arising from the:

- a. contractors' activities and operations that impact the organization;
- b. organization's activities and operations that impact contractors' workers;
- c. contractors' activities and operations that impact other interested parties in the workplace.



Sui Generis has established and maintains a process(es) to ensure that the requirements of the OHS management system are met by contractors and their workers. This process(es) shall define and apply occupational health and safety criteria for the selection of contractors.

NOTE It can be helpful to include the occupational health and safety criteria for the selection of contractors in the contractual documents.

**Reference Material**

BS ISO 45001:2018 Standard (8.1.4.2)

**Applicable Procedures**

OHS-P-13.004 Contractors and Visitors

**8.1.4.3. Outsourcing**

Sui Generis ensures that outsourced processes affecting the OHS management system are controlled.

An Outsourced process is one that:

- Is within the scope of the OHS management system
- Is integral to Sui Generis functioning
- Is needed for OHS management system to achieve its intended outcome
- Liability for conforming to requirements is retained by Sui Generis
- Sui Generis and the external provider have a relationship where the process is perceived by interested parties as being carried out by Sui Generis.

**8.2. Emergency Preparedness and Response**

The Company has established procedures for the identification and response, including the provision of first aid, to potential emergency situations, including both natural, technical, and man-made events, that can occur inside and outside normal working hours. These procedures will be reviewed annually.

The Company provides training for the planned response taking into account the needs and capabilities of all relevant interested parties and ensuring their involvement, as appropriate, in the development of the planned response. These planned responses are periodically tested to establish that the emergency procedures are practicable and effective.



After an emergency situation, an accident or a near miss, the Company will, if necessary, review and revise the response procedure and emergency preparedness in light of the incident.

Emergency methods are reviewed by the HS&E Manager on an annual basis and after the occurrence of accidents or emergency situations.

Documented information on emergency response is retained in the ISO14001 environmental management system on the server.

#### **Reference Material**

BS ISO 45001:2018 Standard (8.2)

#### **Applicable Procedures**

OHS-P-14.002 Accident Reporting

OHS-P-14.003 First Aid

## **9. Performance Evaluation**

### **9.1. Monitoring, measurement, analysis and performance evaluation**

#### **9.1.1.General**


The Company has established, implements and maintains procedure(s) to monitor and measure OHS performance on a regular basis.

This process provides for both qualitative and quantitative measures, appropriate to Sui Generis needs:

- a. What needs to be monitored and measured, including:
  - 1) the extent to which legal requirements and other requirements are fulfilled;
  - 2) activities and operations related to identified hazards, risks and opportunities;
  - 3) progress towards achievement of OHS objectives;
  - 4) effectiveness of operational and other controls;
- b. the methods for monitoring, measurement, analysis and performance evaluation, as applicable, to ensure valid results;
- c. the criteria against which Sui Generis will evaluate its OHS performance;
- d. when the monitoring and measuring shall be performed;
- e. when the results from monitoring and measurement shall be analyzed, evaluated and communicated.

If monitoring equipment is required for performance measurement and monitoring, the Sui Generis has established and maintains procedures for the calibration and maintenance of such equipment, as appropriate. Records of calibration and maintenance activities and results are retained.

Monitoring is to be conducted, where necessary, in accordance with regulatory requirements, and to national standards to ensure all legislative obligations are fulfilled.

		Page 43 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

Sui Generis has established an OHS Regulatory Compliance programme. Procedure OHS-P-19.001 outlines the requirements of the programme to periodically review regulatory compliance and report results to management on a yearly basis.

#### **Reference Material**

BS ISO 45001:2018 Standard (9.1)

### **9.1.2.Evaluation of Compliance**

The HSE Manager or designee will carry out annual investigations to assess compliance with legal and any other requirement to which Sui Generis subscribes as necessary.

Sui Generis will:

- a) take action if needed;
- b) maintain knowledge and understanding of its compliance status with legal requirements and other requirements;
- c) retain documented information of the compliance evaluation result(s).
- d) Records of the results of periodic evaluations will be kept and treated as OHS documentation.

#### **Reference Material**

BS ISO 45001:2018 Standard (9.1)  
[www.hse.gov.uk/guidance/index.htm](http://www.hse.gov.uk/guidance/index.htm)  
[www.cedrec.com/home/index.htm](http://www.cedrec.com/home/index.htm)

#### **Applicable Procedures**

OHS-P-15.001 Monitoring, Measurement and Performance Evaluation  
OHS-P-15.002 Occupational Health Surveillance

## **9.2. Internal audit**

### **9.2.1.General**

Sui Generis conducts internal audits at planned intervals to provide information on whether the OHS management system:

- a) conforms to:
  - 1) Sui Generis own requirements for its OHS management system, including the OHS policy and OHS objectives;
  - 2) the requirements of the BS ISO 45001 Standard documents;
- b) is effectively implemented and maintained

### **9.2.2.Internal Audit programme**

Internal audits are scheduled at planned intervals, based on the results of risk assessments and environmental aspects of activities, and the result of previous audits, by the Health and Safety Manager to:

- a. Determine whether the OHS management system:
  - Conforms to planned arrangements for OHS Management including the requirements of the OHS standards; and
  - Has been properly implemented and is maintained; and
  - Is effective in meeting the organisation's policy and objectives;
- b. Provide information on the results of audits to management.

Sui Generis have Procedures which cover:

- Assignment of responsibilities and requirements for planning and conducting audits;
- Determination of audit criteria, scope and frequency and methods.
- Analysis of results of audits and retaining records;
- Take action to address nonconformities and continually improve its OHS performance

The selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process and auditors are trained and records are kept with the HSE Manager.

The results of these audits will be reported to relevant managers and discussed at the management review meetings. Relevant audit results are communicated to workers and other relevant interested parties.

#### **Reference Material**

BS ISO 45001:2018 Standard (9.2)

#### **Applicable Procedures**

OHS-P-15.003 Management System and Regulatory Compliance Audits

### **9.3. Management Review**

The Health and Safety Manager, together with the Managing Director reviews all elements of the OHS Management System annually to ensure its continuing suitability, adequacy and effectiveness.

Reviews include assessing opportunities for improvement and the need for changes to the OHS Management System, including the OHS policy and OHS objectives.

Meeting minutes recording these management reviews are taken and are kept by the Health and Safety Manager or designee.

Input to management reviews include:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the OHS management system including:
  - 1) the needs and expectations of interested parties;
  - 2) legal requirements and other requirements;
  - 3) the organization's risks and opportunities;
- c) the extent to which the OHS policy and the OHS objectives have been met;
- d) information on the OHS performance, including trends in:
  - 1) incidents, nonconformities, corrective actions and continual improvement;
  - 2) monitoring and measurement results;
  - 3) results of evaluation of compliance with legal requirements and other requirements;
  - 4) audit results;
  - 5) consultation and participation of workers;
  - 6) risks and opportunities;
- e) adequacy of resources for maintaining an effective OHS management system;
- f) relevant communication(s) with interested parties;
- g) opportunities for continual improvement.

The outputs of the management review shall include decisions related to:

- continuing suitability, adequacy and effectiveness of the OHS management system in achieving its intended outcomes;
- continual improvement opportunities;
- any need for changes to the OHS management system,
- resources needed;
- actions if needed;
- opportunities to improve integration of the OHS management system with other business processes;
- any implications for the strategic direction of the organization.

Top management shall communicate the relevant outputs of management reviews to its workers, and where they exist, workers' representatives.

The HS&E Manager will retain documented information as evidence of the results of management reviews.

#### **Reference Material**

BS ISO 45001:2018 Standard (9.3)

#### **Applicable Procedures**

OHS-P-20.001 Management System Review

## 10. Improvement

### 10.1. General

Sui Generis will determine opportunities for improvement and implement necessary actions to achieve the intended outcomes of its OHS management system.

### 10.2. Incident, nonconformity and corrective action

The HSE Manager and Department Managers will, in accordance with established procedures report, investigate and take action, to determine and manage incidents and non-conformities.

When an incident or a nonconformity occurs, the HSE Manager and Department Managers will:


- a) react in a timely manner to the incident or nonconformity, and, as applicable:
  - 1) take action to control and correct it;
  - 2) deal with the consequences;
- b) evaluate, with the participation of workers and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause(s) of the incident or nonconformity, in order that it does not recur or occur elsewhere, by:
  - 1) investigating the incident or reviewing the nonconformity;
  - 2) determining the cause(s) of the incident or nonconformity;
  - 3) determining if similar incidents have occurred, nonconformities exist, or if either could potentially occur;
- c) review existing assessments of OHS risks and other risks, as appropriate;
- d) determine and implement any action needed, including corrective action, in accordance with the hierarchy of controls and the management of change;
- e) assess OHS risks prior to taking action that can result in new or changed hazards;
- f) review the effectiveness of any action taken, including corrective action;
- g) make changes to the OHS management system, if necessary.

Corrective actions shall be appropriate to the effects or potential effects of the incidents or nonconformities encountered, including the environmental impact(s).

Sui Generis will retain documented information as evidence of:

- the nature of the incidents or nonconformities and any subsequent actions taken;
- the results of any action and corrective action, including their effectiveness.

Sui Generis will communicate this documented information to relevant workers, and where they exist, workers' representatives, and relevant interested parties.

		Page 47 of 55
OHS Policy Manual	Version: 10 April 2025	Effective: 30th April 2025

NOTE The reporting and investigation of incidents without undue delay can enable hazards to be eliminated and associated OHS risks to be minimized as soon as possible.

**Reference Material**

BS ISO 45001:2018 Standard (10.2)

**Applicable Procedures**

OHS-P-18.001 Incident, Nonconformity and Corrective Actions  
OHS-P-18.002 Incident Investigation

### 10.3. Continual improvement

Sui Generis is committed to continually improving the suitability, adequacy and effectiveness of this OHS management system by:

- a. enhancing OHS performance;
- b. promoting a culture that supports the OHS management system;
- c. promoting the participation of workers in the implementation of actions for continual improvement of the OHS management system;
- d. communicating the relevant results of continual improvement to workers, and where they exist, workers' representatives issues;
- e. maintaining and retaining documented information as evidence of the results of continual improvement.;

**Reference Material**

BS ISO 45001:2018 Standard (10.3)

## Appendix A - List of Procedures

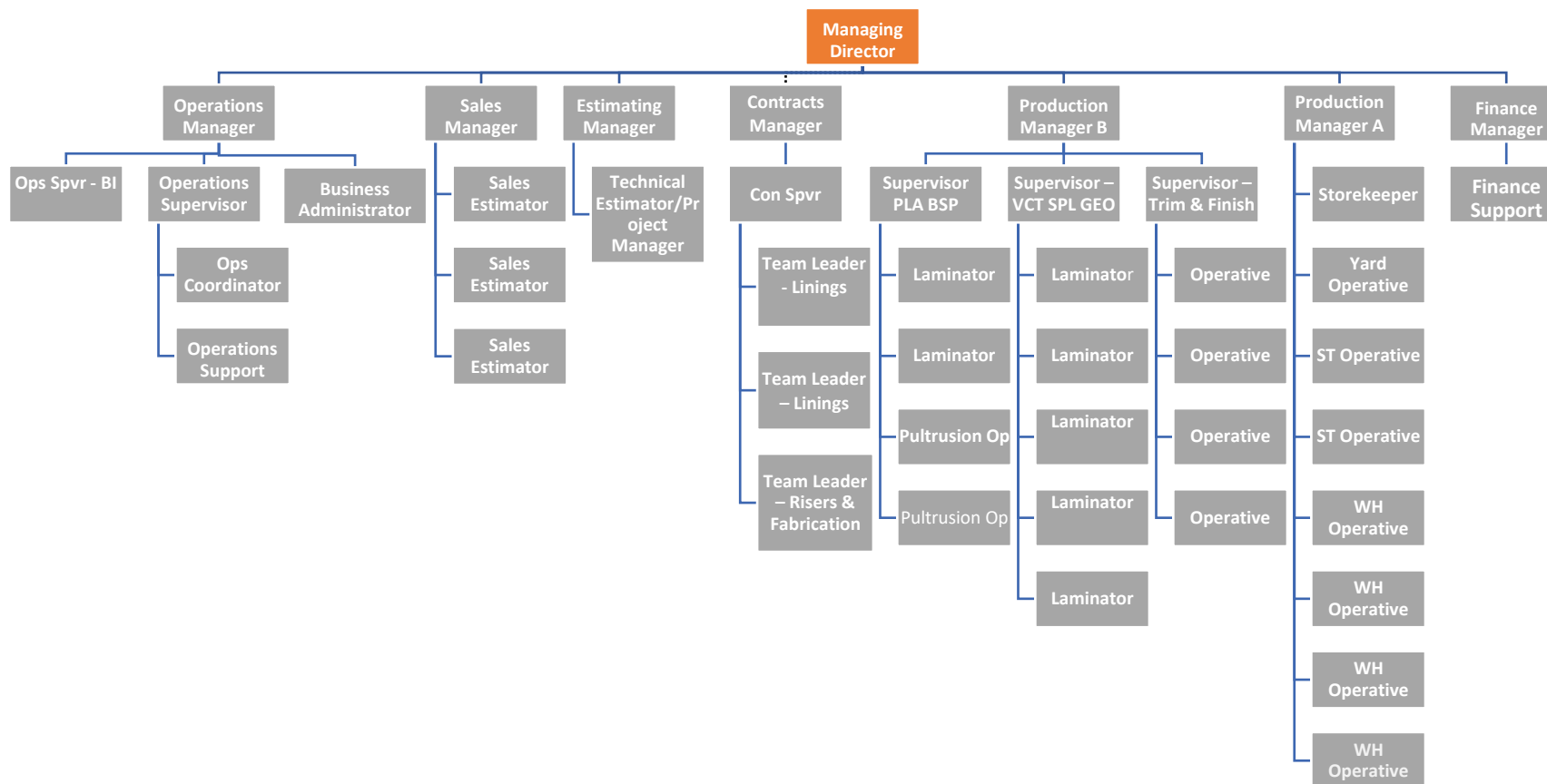
Ref	Procedure Title	Rev	ISO 45001:2018 Element Ref
OHS-P-05.001	Hazard identification, Risk Assessment and determination of controls	V1	6.1.2
OHS-P-05.002	Construction Site Hazard and risk assessment	V1	6.1.2
OHS-P-05.003	Vulnerable Personnel Risk Assessments	V1	6.1.2
OHS-P-05.004	COSHH Assessments	V1	6.1.2
OHS-P-05.005	Asbestos	V1	6.1.2
OHS-P-06.001	Determination of Legal and Other Requirements	V4	6.1.3
OHS-P-06.002	Dealing with Enforcement Authorities	V3	6.1.3
OHS-P-09.001	Competence Training and awareness	V3	7.2, 7.3
OHS-P-09.002	New Employee Induction	V4	7.2, 7.3
OHS-P-10.001	Communication	V4	7.4
OHS-P-10.002	Internal Communication Reporting Safety Issues	V4	7.4.1
OHS-P-12.001	Creating and Updating Documents	V3	7.5.2
OHS-P-12.002	Control of Documented information	V3	7.5.3
OHS-P-12.003	Control of HS&E Records	V3	7.5.3
OHS-P-13.001	Display Screen Equipment	V3	8.1
OHS-P-13.002	Manual Handling	V3	8.1
OHS-P-13.003	Developing Safe Systems of Work	V4	8.1
OHS-P-13.004	Contractors and Visitors	V4	8.1
OHS-P-13.005	Vibration at Work	V3	8.1
OHS-P-13.006	PPE	V4	8.1
OHS-P-13.007	Drawing Office CDM Requirements	V5	8.1
OHS-P-13.008	Maintenance of Work Equipment	V4	8.1
OHS-P-13.009	Working at Heights	V3	8.1
OHS-P-13.010	Noise at Work	V3	8.1
OHS-P-13.011	Electricity at Work	V3	8.1
OHS-P-13.012	Work in Confined Spaces	V3	8.1
OHS-P-13.013	Dangerous Substances and Explosive atmospheres	V3	8.1
OHS-P-13.014	Permits to Work	V3	8.1
OHS-P-14.001	Fire Emergency Procedures	V4	8.2
OHS-P-14.002	Accident Reporting	V3	8.2
OHS-P-14.003	First Aid	V4	8.2
OSH-P-14.006	Emergency Preparedness and Response Pandemics (Based on COVID-19)	V1	8.2
OHS-P-15.001	Monitoring, measurement, analysis and performance evaluation	V3	9.1
OHS-P-15.002	Occupational Health Surveillance	V3	9.1
OHS-P-15.003	HS&E Management System and Regulatory Compliance Audits	V3	9.2
OHS-P-18.001	Incident, Non Conformance, Corrective and Preventative Action	V2	10.2
OHS-P-18.002	Incident Investigation	V2	10.2
OHS-P-20.001	Management Review	V3	9.3



## Appendix B - List of Forms

Ref	Forms Title	Rev	ISO 45001:2018 / ISO 14001:2015 Element Ref
OHS-F-05.001	Risk Assessment Record Form	v1	6.1.2
OHS-F-05.003	DSE Workstation Self-Assessment	v3	6.1.2
OHS-P-13.009	Working at height	V3	8.1
OHS-P-05.003	Vulnerable Personnel Risk Assessment	v1	7.3
OHS-F-09.001	Site Work Training Matrix	v2	7.2, 7.3
OHS-F-09.002	Factory Training Matrix	v2	7.2, 7.3
OHS-F-10.001	Safety Committee Meeting Minutes	v2	7.4
OHS-F-12.001	List of Procedures	v1	7.5.3
OHS-F-12.002	List of Forms	v1	7.5.3
OHS-F-12.004	List of Risk Assessments	v1	7.5.3
OHS-F-12.006	List of CoSHH assessments	v1	7.5.3
OHS-F-12.007	List of CoSHH Data Sheets	v1	7.5.3
OSH-F-13.002	List of Safe Systems of Work	v1	7.5.3
OHS-F-13.006	Overview of Specific Hazards and Control Measures	v3	8.1
OHS-P-09.002	New Employee Induction	v4	7.3
OHS-F-13.007A	New Employee Induction Office	v2	8.1
OHS-F-13.007B	New Employee Induction Factory	v2	8.1
OHS-F-13.012	PPE Issue Record	v2	8.1
OHS-F-13.016	Remedial Works Self-assessment	v3	8.1.2
OHS-P-18.002	Incident investigation	v3	10.2
OHS-F-14.002	Fire Drill Record Sheet	v3	8.2
OHS-F-14.003	Fire Plan	v3	8.2
OHS-F-14.004	List of Fire Marshalls and First Aiders	v4	8.2
OHS-F-14.005	Main Offices Fire Plan	v3	8.2
OHS-F-14.006	First Aid Box Locations	v2	8.2
OHS-F-14.007	First Aid Box contents checksheet	v2	8.2
OHS-F-14.008	Fire Risk Assessment Office	v2	8.2
OHS-F-14.009	Fire Risk Assessment Factories	v2	8.2
OHS-F-20.003	Factory Inspection and Monitoring	v4	9.2

## Appendix C - Sui Generis Organisation Chart



## Appendix D - Structure and Responsibility

### The Management Teams

The following "Teams" used in this manual are defined below:

Top Management Team	
Job Title	Name
Managing Director	Andrew Kime
Group HS&E Manager	Steve Carpenter

Health, Safety Management Team (HSMT)	
Job Title	Name
Managing Director	Andrew Kime
Group HS&E Manager	Steve Carpenter
Operations Manager	Elliott Gregoire
Contracts Manager	Mat Berry
Production Manager	Jon Derrick

### Safety Committee:

Department	Representative
Offices	Roy Wood
Production	Shawn Nunn
Production	Tope Ayandokun
Production	Keaton Elliott
Yard	Alex Galazzi

45001:2018 14001:2015 Element Ref	Activity	Responsibility
5.2	Overall responsibility for the development and implementation of the HS&E policies	Managing Director
6.1.2	Overall responsibility for the determination of OHS Hazards, Risk assessments and determination of Controls.	HS&E Manager, Departmental Managers / Site Supervisors
6.1.3	Overall responsibility for identification of legal and other requirements.	HS&E Manager / Technical Consultant
6.1.4	Assure technological and technical options reviewed and considered in establishing objectives and targets.	HS&E Manager / Technical Consultant
6.2.1	Overall responsibility for setting and monitoring the results of Occupational Health, objectives and targets.	Managing Director
6.2.1	Develop and implement procedures and/or work instructions to assure that necessary permit, license and other regulatory approvals are identified during project development.	Technical Consultant / HSE Manager
6.2.1	Overall responsibility for setting and monitoring of HS management programs.	Technical Consultant / HSE Manager
7.1	Overall responsibility for documentation, communication and resources for roles, responsibilities and authorities required in order to facilitate effective OHS management system.	HS&E Manager / Technical Consultant
7.1	Overall responsibility selection of OHS management Team.	All Department Managers
7.2, 7.3	Overall responsibility for the identification of training needs.	Departmental Managers
7.2, 7.3	Overall responsibility for the creation of training resources.	Managing Director
7.2, 7.3	Overall responsibility for the training of employees.	HS&E Manager
7.4	Overall responsibility for coordinating communication with interested parties.	Technical Consultant / HSE Manager
7.4	Facilitating Health, Safety Management Team meetings.	HS&E Manager
7.5.2	Overall responsibility for the establishment and maintenance of the Health, Safety management system documentation.	Technical Consultant
7.5.3	Overall responsibility for the control of the Health, Safety management system documents.	Technical Consultant
7.5.2	Overall responsibility for the maintenance of Health, Safety records.	HS&E Manager
8.1.1	Overall responsibility communication with contractors concerning Health, Safety expectations.	HS&E Manager
8.1.1	Develop and implement procedures and/or work instructions	HS&E Manager / Departmental Managers
8.1.1	Develop procedures and/or work instruction for start-up, shut-down and other non-routine operating conditions	HS&E Manager / Departmental Managers
8.2	Overall responsibility for the identification of potential emergency situations, implementation of mitigating strategies, management of accidents / emergency situations.	Departmental Managers
9.1	Overall responsibility for the monitoring and measurement of key characteristics of its operational and activities that can have a significant HS impact. Including recording data and tracking performance to objectives and targets.	HS&E Manager
9.1	Overall responsibility for the calibration of monitoring and measurement equipment.	Departmental Managers
9.1	Develop and implement procedures and/or work instructions to assure proper calibration of control and monitoring instrumentation.	Technical Consultant / HS&E Manager
9.2	Overall responsibility for conducting management system audits.	Technical Consultant / HS&E Manager
9.3	Overall responsibility for conducting management system reviews.	Managing Director
10.2	Overall responsibility for investigating non-conformances, initiating and completing corrective action.	HS&E Manager / Departmental Managers

## Appendix E - Understanding the needs and expectations of interested parties

Event	Effect	Top Management	Employees / Workers	Public Bodies	Investors	Insurers	Customers	Media	Local Councils	Neighbours	Suppliers	Competitors
Major Fire or destruction of production facility	Loss of Offices or Production Facility	Need to source alternative facilities  Outsource product from competitors at reduced margins.  Costs associated with delays to contracts	Reduced Wages / Potential lay offs until new facilities are online	Fire Brigade investigation	Loss of profit  Additional investment required	Insurance Claims  Increase in premiums	Delays to Projects  May seek alternative suppliers	Adverse publicity	Planning Applications	Disruption during hiatus	Loss of business during hiatus	Reduction in market capacity.  Supply of products to Clients
Pollution event	Contamination of nearby waterways	Emergency Response action		Environment Agency investigation prosecution	Loss of profit	Insurance Claims  Increase in premiums	May seek alternative suppliers (unlikely)	Adverse publicity		Disruption to surrounding houses and companies		
Product Failure	Structural failure on Client's Site	Remedial action  Costs associated with delays to contracts  HSE Fines	Injury / Death	Health & Safety Executive investigation prosecution	Loss of profit	Insurance Claims  Increase in premiums	Injury / Death Delays to Projects  May seek alternative suppliers	Adverse publicity				Supply to Clients
IT System Failure	Inability to process or manage orders.	Remedial action  Replace equipment / systems	Reduced Wages / Potential lay offs until equipment repaired / new equipment sourced		Loss of profit  Additional investment required		Delays to Projects  May seek alternative suppliers					Supply of products to Clients
Production equipment failure	Inability to manufacture products	Outsource product from competitors at reduced margins.  Costs associated with	Reduced Wages / Potential lay offs until equipment repaired / new equipment sourced		Loss of profit  Additional investment required		Delays to Projects  May seek alternative suppliers					Reduction in market capacity.  Supply of products to Clients

Event	Effect	Top Management	Employees / Workers	Public Bodies	Investors	Insurers	Customers	Media	Local Councils	Neighbours	Suppliers	Competitors
		delays to contracts										
Poor Supplier performance	Delays in manufacture of products	Need to source alternatives	Reduced Wages until equipment new Supplier sourced		Loss of profit						Existing: Loss of Profit New: Additional business	
H&S Legislation breach	Prohibition Notice	Remedial Action Fines	Injury / Death	Health & Safety Executive investigation prosecution	Loss of profit	Insurance Claims Increase in premiums	May affect approval as their Supplier	Adverse publicity				Supply of products to Clients

## Appendix F - Risk Control Measures

This spreadsheet is completed with the following notation **Pro**: Probability (score 1 to 3)

**E**: Effect (score 1 to 3)

**T**: Total = Pro x E

Event	Situation	Process Issue	Control	Pro	x E	= T	Legislation	Opportunities
Major Fire or destruction of production facility	Loss of Offices	Operational control Competance and awareness	Regular testing of Smoke Alarms, Fire Alarms. Fire Drills	2	3	6	Fire Precautions (Workplace) Regulations	Updated fire prevention equipment maintained and implemented.
Pollution event	Contamination of nearby waterways	Operational control	Training in Emergency Response	1	2	2	Pollution Prevention Control Act 1999:	Continuous improvement in handling and storage of such substances.
Environmental Legislation breach	Air emissions Discharge	Competance and awareness	Maintenance of extraction systems				Council Permit	
IT System Failure	Inability to process or manage orders	Regular IT sysytem maintenance.	Business critical data is automatically stored on a central file server.  Server backed up daily and backup tapes are stored off site in another building.	2	3	6		Cloud based systems to be explored as processes/structures are updated.
Production equipment failure	Delays in manufacture of products	Operational control Competance and awareness	Regular Maintenance	1	3	3	Provision and Use of Work Equipment Regulations	Automation and temperature control.
Poor Supplier performance	Delays in manufacture of products	Communication	Weekly Management Meetings	1	2	2		Diversify suppliers, due diligence, and optimise stock holdings.
H&S Legislation breach	Injury / Death Prohibition Notice	Operational control Competance and awareness	Risk Assessments, Safe Systems of Work. PPE Training	2	3	6	Health & Safety at Work Act, Health & Safety Management Regulations etc	Continuous improvement plans and employee engagement.