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#05.061 HEALTH AND SAFETY POLICY

THE HILL COMPANY

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The Hill Company

HEALTH AND SAFETY POLICY

1. DOCUMENT OWNER AND APPROVAL

The Quality Management Team is the owner of this document and is responsible for ensuring that this policy is reviewed in line with the requirements of the ISO45001:2018 Occupational Health and Safety Management System.

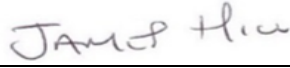
A current version of this document is available to all employees on request, it does not contain confidential information and can be released to relevant external parties. When any part of this policy is amended, a record is made in the Version History Log shown below and the Version No: and Issue Date is amended in the header of this document. The policy can be fully revised and re-issued at the discretion of the Quality Management Team.

This policy was approved by the Managing Director and is issued on a version-controlled basis under the signature of the Managing Director.

VERSION HISTORY

Version	Date	Detail	Author
001	01/06/2021	Health and Safety Policy first edition.	TH / SW
002	25/07/2023	Added a last reviewed section.	TH & SW
003	10/10/2023	Reviewed / Amalgamated the safe working environment with duty of The Hill Company section and added a policy monitoring and review section.	TH & SW

SIGN OFF AND REVIEW DATE

Sign Off		Name	James Hill
Position	Managing Director	Date	10/10/2023
Last Reviewed	10/10/2023	Name/s	Terry Hunt Simon Williams

2. RESPONSIBILITIES:

We have a responsibility to ensure that this policy is managed. Different employees have different roles in relation to this policy and these responsibilities are detailed below:

2.1 MANAGING DIRECTOR

- To ensure the Health and Safety Policy is current and has been reviewed.
- To ensure that all interested parties are adhering to the Health and Safety Policy.

2.2 DEPARTMENT MANAGERS

- Ensure this Health and Safety Policy is communicated to all employees.
- To ensure employees adhere to the Health and Safety Policy.

2.3 QUALITY MANAGEMENT TEAM

- To ensure the company is compliant with the requirements of the ISO 45001:2018 Health and Safety Management System.
- Ensure the Health and Safety Policy is reviewed and current.
- To carry out internal audits to ensure the controls are being implemented and compliance is maintained.
- To ensure Health and Safety awareness is maintained for employees.
- To ensure all employees have been allocated internal, external and online Health and Safety training.

2.4 EMPLOYEES

- To ensure this Health and Safety Policy is adhered to.

3. POLICY INTRODUCTION

The Hill Company is committed to providing a safe and healthy work environment (as far as is reasonably practicable) for all employees, contractors, visitors, and anyone affected by our operations. This Health and Safety Policy outlines our commitment to preventing accidents, injuries, and illnesses and ensuring compliance with applicable health and safety laws and regulations.

4. SCOPE

This policy applies to all employees, contractors, and suppliers of The Hill Company. It encompasses all aspects of our operations, including recruitment, employment, and supply chain management.

5. DUTY OF THE HILL COMPANY

The Hill Company will comply with its duty to ensure, as far as is reasonably practicable, the health, safety and welfare at work of its employees and of visitors to its premises and, will make working environments safe and without risks to health by.

- Take all reasonably practicable steps to safeguard the health, safety and welfare of all personnel on the premises.
- Provide adequate working conditions with proper facilities to safeguard the health and safety of personnel and to ensure that any work which is undertaken produces no unnecessary risk to health or safety.
- To consult with our employees on matters affecting their health and safety.
- To ensure safe handling and use of dangerous substances and to ensure they are stored safely.

- Take precautions against danger from flammable or explosive hazards, electrical equipment and noise.
- To comply with our legal requirements.
- Make available health and safety policies, procedures and action plans.
- To promote the continuous improvement of our health and safety management system.
- To maintain safe and healthy working conditions.
- Encourage persons on the premises to co-operate with The Hill Company in all safety matters, in the identification of hazards which may exist and in the reporting of any condition which may appear dangerous or unsatisfactory.
- Make sure that work equipment is suitable for its intended use as far as health and safety is concerned, and that it is properly maintained and used correctly.
- Ensure plant and machinery are safe and that safe systems of work are set, communicated and followed.
- Maintain safe arrangements for the use, handling, storage and transport of articles and substances.
- Provide sufficient information, instruction, training, and supervision to enable everyone to avoid hazards and contribute to their own safety and health.
- Provide specific information, instruction, training and supervision to personnel who have particular health and safety responsibilities. (e.g., Shred Vehicle Operators, Forklift Truck Operators, Fire Marshals, First Aiders)
- Assess and document the risks to health and safety of its employees and others affected by company activities.
- Make, as reasonably practicable, safe arrangements for protection against any risk to health and safety of the public or other persons that may arise from company activities.
- Make sure that the workplace satisfies health, safety and welfare requirements. (e.g., for ventilation, temperature, lighting and for sanitary, washing and rest facilities)
- Make suitable and sufficient assessment of the risks to the health and safety of employees and of persons not in the employment of THC, arising out of or in connection with company activities.
- Make arrangements for implementing the health and safety measures identified as necessary by the risk assessments.
- Record the significant findings of the risk assessment and the arrangements for health and safety measures.
- Provide free any personal protective equipment, where risks are not adequately controlled by other means.
- Make specific assessment of risks in respect of new or expectant mothers and young people under the age of eighteen.
- Provide information to employees of any risks to which they may be exposed.
- Report certain injuries, diseases and dangerous occurrences to the appropriate health and safety enforcing authority.
- Ensure that appropriate safety signs are provided and maintained.

6. STATUTORY DUTY OF THE EMPLOYEES

Employees also have legal duties, and The Hill Company requests all employees to observe these. They include the following:

- Take reasonable care for their own health and safety, and that of other persons who may be affected by what they do or do not do.
- Adhere to The Hill Company policies and procedures on health and safety.

- Use work items provided by The Hill Company correctly, including personal protective equipment, in accordance with training or instructions.
- Not to interfere with or misuse anything provided for health, safety, and welfare purposes.
- To report at the earliest opportunity injuries, accidents, or dangerous occurrences at work, including those that happen off site or involving the public or participants in activities organised by The Hill Company.
- All employees are requested to report to their manager any individual who is behaving in such a manner that places either themselves or others at risk of injury.

7. ARRANGEMENTS FOR HEALTH AND SAFETY

7.1 RISK ASSESSMENT

Without knowing what hazards and risks are presented from company activities, The Hill company will carry out hazard identification and risk assessments. The purpose of hazard identification is to systematically identify all of the hazards associated with a task, activity or process. Risk assessments are then carried out on each hazard to identify the risks and put appropriate controls in place to eliminate or reduce the risks associated with that task, activity or process as far as reasonably practicable. The Hill Company will:

- Complete hazard identification for each process carried out by company activities.
- Complete risk assessments for each hazard that has been identified and taking corrective actions when required.
- Review risk assessments when working procedures or conditions have changed and if there has been an accident or near miss reported.
- Risk assessments need to be carried out whenever a new activity is being implemented as part of the “Planning of Change” process.
- Provide employees with the correct personal protective equipment for the relevant tasks expected from them once all other options have been taken to reduce the risk of injury.

7.2 COMMUNICATION

Communication is key to having a successful Health and Safety Management System, The Hill Company communicate to both internal and external parties by:

- Site Health and Safety controls, procedures and action plans which are detailed in the “07:058 THC Health and Safety Information Manual” which is located in reception areas and is available to all employees and visitors.
- Employees Health and Safety rules are detailed in both the “04:003 THC Site Rules” and the “04:004 THC Handbook” both documents are available to all employees and are used as part of the induction process.
- Health and Safety policies and “04:003 THC Site Rules” are added to employees online e-learning programs, these require the employee to read and acknowledge each document by clicking a box to act as evidence that the documents have been read.
- Visitor controls are detailed within the “04:034 THC Visitor Requirements”, all visitors are required to read this as part of their induction to site.
- Awareness on safety controls is part of an awareness poster program, different posters are placed in reception which detail controls on different aspects of Health and Safety in the workplace.

7.3 TRAINING

Providing Health & Safety information and training helps The Hill Company to ensure employees are not injured or made ill by the tasks they are expected to do, The Hill Company will:

- Provide employees with the appropriate training for their job role and working responsibility.
- Provide specific information, instruction, training, and supervision to personnel who have particular health and safety responsibilities. (e.g., Shred Vehicle Operators, Forklift Truck Operators, Fire Marshals, First Aiders)
- Ensure suitable arrangements are in place for employees who work remotely.
- Provide all employees their own online e-learning dashboards that contain the required training courses for their job role. All e-learning training courses have a presentation on the subject matter, a competence test with a The Hill Company pass rate set at 85%. Each course includes internal policies and other documents related to the subject matter which need to be read and acknowledged.
- Provide practical Manual Handling Training with The Hill Company in-house trainer once the online Manual Handling course has been completed.
- Provide internal PowerPoint training for Safe Working Procedures (covering manual handling aids to changing the gas cylinder on the Forklift Truck) each PowerPoint has a declaration containing a competence test on the subject matter and an employee / trainer sign off.

7.4 CONSULTATION WITH EMPLOYEES

The Hill Company have a duty to consult with employees on Health and Safety matters as set out in the Health and Safety (Consultation with Employees) Regulations 1996.

The Hill Company will:

- Consult with employees regularly on Health and Safety matters as they arise. Employees are also included and consulted when carrying out or reviewing departmental hazard identification, risk assessments and when carrying out site Health and Safety checklists.
- Encourage employees to suggest any improvements or ideas to the Quality Management Team, Safety Officer, their manager or their site representative if they are unable or do not wish to attend any scheduled site meetings. Employees can also submit ideas via the "Feedback QR Code" which is located in site reception.
- Consult directly with employees over Health and Safety matters or their site representative.

The Hill Company will consult with employees about the following:

- The introduction of any new measures which may substantially affect their health and safety at work, such as the introduction of new equipment or new systems of work.
- Arrangements for getting competent people to help them comply with health and safety laws.
- Information for employees on the risks and dangers arising from their work, measures to reduce or eliminate these risks and what employees should do if they are exposed to a risk.
- The planning and organisation of health and safety training.
- The health and safety consequences of introducing new technology.

For more information on this see "05:044 Consultation and Participation of Employees".

7.5 SAFETY OFFICER

The Hill Company has appointed a Safety Officer and a Quality Management Team to ensure that we are aware of and fully comply with our obligations under Health and Safety law.

All accidents and near misses irrespective of triviality must be reported to the Safety Officer and or Quality Management Team who will ensure that any necessary preventative measures are introduced.

7.6 FIRST AID

The Hill Company carry out an assessment of first-aid needs. This involves the consideration of workplace hazards and risks, the activities carried out and a review of previous years accidents.

From this information The Hill Company can determine what first-aid equipment, facilities and personnel are required.

To ensure this assessment can be conducted correctly all employees are instructed to:

- Report all accidents which must then be recorded in the accident book.
- Report all near misses or hazards that occur, these will be documented and reviewed to see if any actions are required to prevent a future accident occurring.

If anyone becomes ill while at work and requires medical attention The Hill Company have:

- Details of site First Aiders displayed in site receptions.
- An induction process which includes who are the site First Aiders.
- Details of local walk-in centres and hospitals are displayed in site reception areas.
- Arrangements in place to call a family member, doctor or emergency service and if required will take the employee to Accident & Emergency at the nearest hospital or to the local walk-in centre.

7.7 HAZARDS AND SAFETY RISKS

All employees and visitors to site have a responsibility to report any potential Health or Safety hazards including infectious or other diseases, accidents or injuries associated with the workplace. Examples are as follows:

- Fire risks, such as accumulation of combustible waste, blocking or obstruction of fire doors, corridors, or smoking in non-smoking areas.
- Electrical problems, such as worn cables, loose connections, multiple connectors to power sockets, faulty wiring, or trailing cables.
- Defective equipment or defective flooring such as worn or frayed carpets, uneven or slippery surfaces.
- Unsuitable loading or stacking.
- Broken glass.
- Carelessness by an employee or other person on the premises, such as attempting to repair equipment without proper training.
- Corridors and doorways that are not free of obstructions or properly lit.

7.8 EQUIPMENT, VEHICLES AND APPLIANCES

- No equipment or appliances may be used unless provided by or authorised by The Hill Company.
- Any equipment or appliances must be used correctly, and any instructions must be followed precisely.
- Maintenance schedule is in place to ensure buildings, equipment and vehicles are fit for use.
- Any vehicle defects reported are logged and actioned. Each week the reported vehicle defects are placed on the notice board, so employees are aware of what actions have been taken.
- Defective equipment, furniture and structures must be reported without delay.
- Monthly checks on manual handling aids are carried out and documented to ensure equipment is fit for purpose.
- Daily pre use checks are carried out on Forklift Trucks and the Shredding Vehicle.
- Training on how to use the equipment is given to employees.

To reduce the risks of an accident while using a manual handling aid, employees are instructed to:

- Always carry out a pre use visual check before using the equipment.
- Return all equipment back to the designated areas when finished with.
- Under no circumstances should they be used as scooters or similar.
- Not to carry excessive weights on the working equipment.

7.9 DISPLAY SCREEN EQUIPMENT (DSE)

We have particular obligations where employees who use display screen equipment as a significant part of their normal working day.

- Workstations and work routines are regularly reviewed to ensure that they comply with regulations and to ensure that the employees have adequate workstations.
- Employees are instructed to conduct regular self-assessments of their own workstations, any issues raised are documented and actioned where appropriate.
- Regular training will be given to minimise Health and Safety problems.
- Free eyesight tests are available for those appointed to use display screen equipment and for those who currently use this equipment at regular intervals.
- The Hill Company will pay for glasses prescribed for the use of an employee when operating display screen equipment.

7.10 FIRE PREVENTION AND FIRE SAFETY:

All The Hill Company records centres benefit from the latest fire protection systems which include:

- VESDA (very early smoke detection apparatus). This system constantly samples the air conditions within the warehouse units. Should any changes occur it sends a warning to the fire alarm panel with a zonal reference for any potential concern.
- Zonal monitoring systems linked to Redcare so if an alarm is raised it will automatically alert the relevant emergency service.
- Zonal Sprinkler System so if the sprinkler system be required, it would only be activated in the area of the fire. This avoids jeopardising the entire archive facility.
- Gas Protected Areas. Gas is used in our Durasteel vaults. These vaults are a sealed environment and are used for business-critical documents such as Deeds, Wills and Digital Media. Should a fire ignite within the vault the gas is released and reduces oxygen levels to eliminate the fire.
- Fire extinguishers are placed at various locations throughout the offices and document storage facility.
- Fire marshals on site that have been trained in the use of fire extinguishers.
- Smoking and vaping is prohibited at The Hill Company's facilities.

The Hill Company also ensures that:

- A Fire Risk Assessment has been conducted by a third party.
- Hot work permits are completed and have the correct controls in place before any hot works are carried out.
- Emergency lighting is in place and is maintained.
- Fire action plans are displayed around site.
- Escape routes and exit doors are clearly sign-posted and exit routes kept clear.
- Fire doors, fire extinguishers and fire panels are checked internally as part of the site checklist program.
- Weekly tests are conducted to ensure sprinkler systems and fire call points are working correctly.
- Anyone who discovers a fire should immediately sound the fire alarm and notify the senior member of staff.

To ensure a good standard of fire safety in the workplace employees are instructed to:

- Close fire doors.
- Empty waste bins and clear rubbish off the floors.
- Report any faulty fire safety equipment.
- Never misuse fire safety equipment.
- Do not relocate fire extinguishers as they have been correctly positioned around site.
- Ensure everything is turned off when you leave. (Where possible)

7.11 EVACUATION

Testing evacuation plans ensures that they remain fit-for-purpose and it can also help to identify any potential shortfalls. Evacuation drills help to highlight everyone's roles and responsibilities, ensuring that employees are fully prepared in the event of a real emergency.

The Hill Company will:

- Ensure escape routes are always well signed and kept clear.
- Employees are instructed to be familiar with the evacuation procedures, details of which are displayed around the premises.
- Ensure that evacuation testing is carried out at least twice a year at each site and each test is documented and reviewed to ensure any shortfalls are acted on.

7.12 COMPLIANCE

To help The Hill Company operate with a strong health and safety culture which in return will reduce risks of accidents, help boost employee morale and productivity and lead to a safer workplace with improved employee retention. The Hill Company have assigned the Quality and Compliance Team to ensure the controls set out from the risk assessments are being adhered to, this is done by:

- Carrying out Health and Safety inspections and checklists of each premises. Results are documented and reported in management meetings.
- Each checklist is given a score so the site performance can be benchmarked against itself and other sites and trends in improvements or declines are highlighted, and actions can be taken where reasonable and practicable.
- Carrying out internal audits to ensure the controls within this policy are adhered too. Internal audit findings are documented and reviewed by company directors and any non-conformities raised or opportunities for improvements highlighted will be discussed at management meetings.

7.13 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

COSHH regulations come with the purpose of minimising the risks associated with substances that could be potentially hazardous to the health to employees and visitors. The Hill Company have the following controls in place:

- COSHH risk assessments are carried out using the products Safety Data Sheets.
- All COSHH products are controlled and locked away from visitors and unauthorised users.
- Spill kits are available and the stock is checked to ensure they are ready to be used when required.
- Employees who come in contact with COSHH will be trained and have sufficient information to carry out their job role safely.
- First Aiders are shown how to use the Safety Data Sheets to deal with an accident or incident involving COSHH.
- Correct PPE will be provided when required.

7.14 HYGIENE AND WASTE DISPOSAL

- Facilities for the disposal of waste materials must be kept in a clean and hygienic condition.
- Waste must be disposed of in an appropriate manner and in accordance with any special instructions relating to the material concerned.

8. POLICY MONITORING AND REVIEW

Ongoing monitoring of compliance with this policy will be undertaken on a regular basis by the Quality Management Team. This policy will be reviewed annually in line with scheduled date listed within The Hill Companies "Document Log". Unscheduled reviews will take place in the event of significant change or failure to a procedure.

Internal Audits are carried out by the Quality Management Team to ensure this policy is being adhered too.

9. ENFORCEMENT

The Hill Company will take appropriate measures to remedy any breach of this Policy through the relevant framework in place. In the case of an employee, then the matter may be dealt with, under The Hill Company's disciplinary process. In the case of a visitor flouting any of the above rules they will be escorted from the premises with immediate effect.

If The Hill Company feel that a supplier or contractor have breached their obligations to the Health and Safety Policy, they will be contacted with The Hill Company's concerns, if the concerns are not rectified, then appropriate actions will be carried out which could include termination of the contract.

This document forms part of The Hill Company's Health and Safety Management System and as such, must be fully complied with.