Safety, Health and Wellbeing Policy

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Document Control

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Policy Application: This policy applies to Sigma GRP Ltd and the following legal entities, collectively referred to throughout this policy as "Sigma": Gondola Pro Ltd; Sigma Fixtures Solutions Limited; Sigma M & E Ltd; Sigma Project Services Limited; and Sigma Retail Solutions **Ltd.**

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Introduction

This policy document has been prepared to define the way that Sigma GRP Ltd and the legal entities identified within the Policy Application section, collectively referred to as “Sigma”, intend to manage safety, health and wellbeing and meet the requirements of Section 2(3) of the Health and Safety at Work etc. Act 1974.This section of the act requires an employer to prepare a statement of general policy with respect to health and safety at work and the organisation and arrangements set up to carry out that policy.

The policy and its associated documents apply as defined to all colleagues employed or contracted to the Company as appropriate to the work being undertaken. It is the duty of all colleagues so involved to apply the requirements of these documents to their work.

General Safety, Health, and Wellbeing Policy Statement of Intent

Sigma GRP Ltd and the legal entities identified within the Policy Application section, collectively referred to as "Sigma", are committed to ensuring, so far as is reasonably practicable, the safety, health and wellbeing of colleagues and other persons who may be affected by their activities. Sigma is committed to providing safe, healthy and wellbeing working conditions for the prevention of work-related injury, ill and mental ill health. Our ultimate objective is to create a positive safety, health and wellbeing culture which is embedded in all areas of the business to ensure that all risks are adequately controlled. Sigma is committed to complying fully with the Health and Safety at Work etc. Act 1974 and the legislation made under it, including the Management of Health and Safety at Work Regulations 1999 and other requirements.

Effective safety, health and wellbeing management is an integral part of our company culture and is recognised as a key driver in respect to achieving success in our business objectives. Sigma conduct their activities with the following aims to achieve our policy objectives:

- Ensure that our business operations are undertaken in accordance with good practice procedures which reflect compliance with current statutory safety, health and wellbeing legislation and other requirements
- Meet our responsibilities as an employer to do all that is reasonably practicable to prevent work-related accidents, injury, ill and mental ill health
- Ensure that the necessary resources are provided in relation to safety, health and wellbeing, including finance, equipment, personnel and time
- Provide and maintain safe working environments that are, so far as reasonably practicable, without risks to safety, health, wellbeing and welfare
- Ensure that all colleagues play an active part in the safety, health and wellbeing of the Company by consulting with them and providing them with adequate information, instruction, training and supervision for them to understand their role within the Company and ensure they are competent to fulfil that role
- Prepare and record risk assessments for all significant risks within the business
- Ensure that all plant and equipment is provided and maintained in a safe condition and is subject to routine and statutory inspections and examinations

David Dignam is the Group CEO of Sigma and has overall responsibility for safety, health, wellbeing and welfare. This is underpinned by other Directors, Managers and colleagues who also have responsibilities in various areas of safety, health and wellbeing throughout the business. While the Directors and Managers of Sigma will do all that is within their powers to ensure the safety, health, wellbeing and welfare of its colleagues, it is recognised that safety, health and wellbeing at work is the responsibility of each and every individual associated with the Company. As a condition of our employment, we require our colleagues to co-operate with us to ensure we meet with our objectives. We require our colleagues to:

- Take reasonable care of their own and other people's safety, health, wellbeing and welfare and to report any situation which may pose a threat to the well-being of themselves or any other person
- Not intentionally or recklessly interfere with or misuse anything provided in the interests of safety, health, wellbeing and welfare

Sigma will communicate the Safety, Health and Wellbeing Policy to all colleagues, and it will be freely available to our stakeholders and the public. This policy will be reviewed and updated annually or more frequently, if necessary, particularly when changes in the scale and nature of our operations occur, or there are changes in health and safety legislation and other requirements.

Signed:

Name: David Dignam

Position: CEO Sigma Group

Date: 24th August 2026

Environmental Policy Statement

It is the policy of Sigma GRP Ltd, incorporating all its legal entities to ensure that we are totally committed to the care of the environment and that this goal is constantly achieved at all levels through the operation of our environmental management system, which is appropriate to the nature, scale and environmental impacts of our activities, products and services. Our Environmental Management System follows the criteria of the ISO 14001 international standard.

The CEO of Sigma GRP Ltd, incorporating all its legal entities is committed to complying with all the requirements of the international standard and its customers and to continually improve the effectiveness of the Environmental Management System and the prevention of pollution. To this end it continuously evaluates its performance in meeting the requirements of the standard and compliance with relevant environmental legislation and regulations and any other requirements to which the company subscribes.

In general terms the Environmental Management System will ensure that:

- All processes related to the maintenance of the Environmental Management System are determined throughout the organisation.
- The criteria and methods needed to ensure the operation and control of these processes are effective.
- All resources and information necessary for the operation, monitoring and control of these processes are available.
- All processes are monitored, measured, and analysed where there are impacts on the environment.
- All actions necessary to achieve planned results and continual improvement are implemented.
- Any outsourced processes that influence the environment will be fully controlled and defined.

Sigma management, employees and other personnel will comply with this policy and procedures, and at all times conduct themselves in a professional manner to minimise damage and risk to the environment at all time.

Signed

Name: David Dignam
Position: CEO Sigma Group
Date: 24th August 2026

Quality Policy Statement

Sigma, is a UK based company delivering retail fit out, construction, M&E, fixtures and a range of other specialist solutions

We constantly strive to improve our services' by being committed to the continuous improvement of quality across all areas of the business.

This quality policy is to be applied to all activities conducted within Sigma Group, with the aim of delivering 'Right First Time' and implementing best practice.

To implement this policy and to achieve our quality objectives we have developed processes and procedures that are contained within our management systems. These procedures and processes comply with the requirements of ISO9001 and are mandatory for all our staff.

This will ensure that Sigma:

- Regularly review policies and procedures for continuing suitability and effectiveness
- Identify areas of the business that requires documented procedures and instigate their development
- Effectively communicate changes and additions to procedures
- Establish quality objectives within our monthly SHEQ meetings and Annual systems' review
- Continue to monitor compliance through audit to drive improvement
- Maintain focus on driving Cost and Efficiency in every facet of our business
- Reinvigorate our strategy and incident reporting which supports the company approach to quality management
- Maintain our existing director intervention process to manage key risks facing the business
- Achieve recertification to ISO 9001, ISO 14001 and ISO 45001
- Develop existing quality audit questions to ensure we are capturing measurable audit data around quality performance

Every colleague and future appointee must ensure that Quality considerations are always given priority in the design, bidding, planning, procuring and executing the work stages.

We support the personal development of our employees to ensure that we reflect the above policy and instil best practice.

Signed

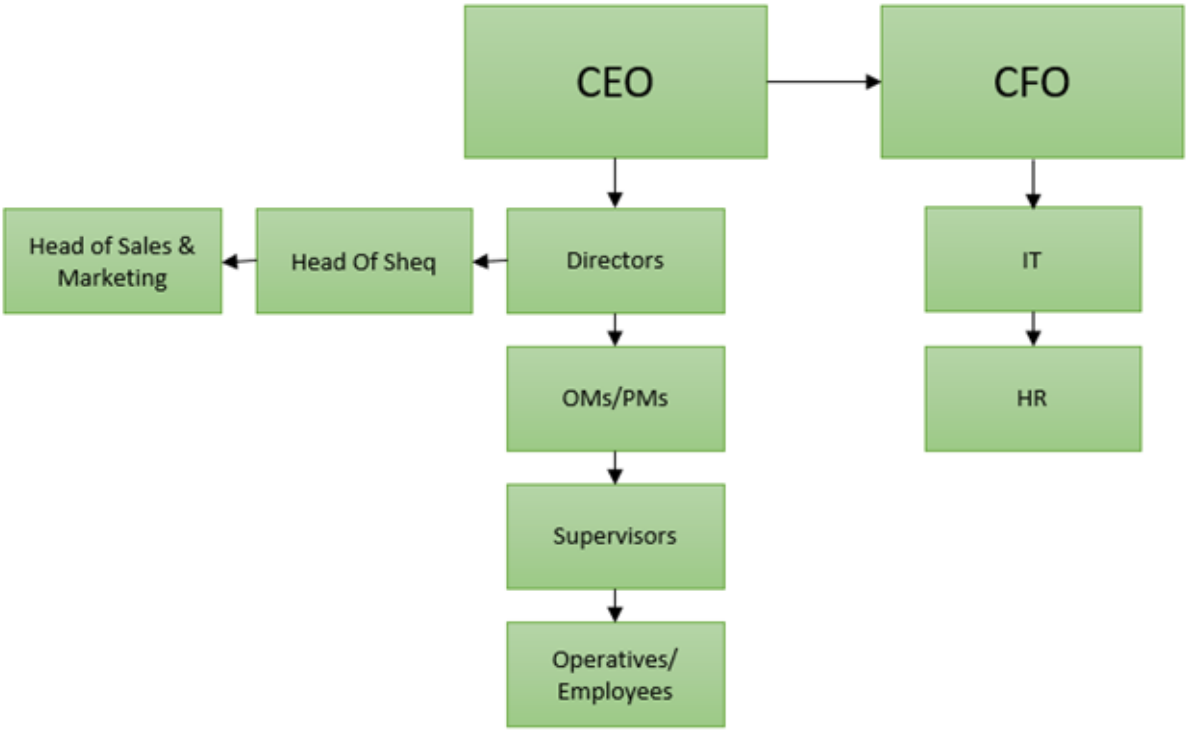
Name: David Dignam
Position: CEO Sigma Group
Date: 24th August 2026

1.0 Organisation

The person with overall and final responsibility for health and safety within Sigma is the CEO.

The management of Sigma will endeavour to communicate to colleagues their commitment to safety, health and wellbeing and to ensure that colleagues are familiar with the contents of the Company Safety, Health and Wellbeing Policy. Sigma communicates with its colleagues orally in the form of directions and statements from directors and managers; in writing in the form of directives and this policy statement; and by example.

1.1 Management Organogram



2.0 Responsibilities

The ultimate responsibility for safety, health and wellbeing within Sigma lies with the CEO.

Sigma recognise that safety, health, and wellbeing is the responsibility of everyone and is not just a function of management. All colleagues have specific duties and responsibilities to comply with the letter and spirit of the policy. Colleagues have a legal obligation to take reasonable care for themselves and others who may be affected by their activities, and to co-operate fully with the company. All colleagues are expected to co-operate with the management and are responsible for understanding and carrying out the responsibilities and duties as outlined below. Disciplinary action may be taken against any colleague who violates safety, health, and wellbeing rules or who fails to perform their duties under this policy.

2.1 CEO

To have overall responsibility for safety, health, and wellbeing within the company.

Review, sign, and date the Safety, Health and Wellbeing Policy Statement of Intent annually and ensure that necessary alterations are made to the policy to reflect changes in legislation, company developments and other requirements.

Appoint competent person(s) to manage safety, health, wellbeing, and the environment within the Company, and liaise with the competent person(s) when necessary to seek advice or additional resources.

Agree company objectives and KPIs in collaboration with the Board of Directors and monitor performance.

Ensure sufficient resources and facilities are made available to meet the requirements of the safety, health and wellbeing policy.

Set a personal example.

2.2 Head of Safety, Health, Environment and Quality (SHEQ)

Initiate and administer the Company's Safety, Health, and Wellbeing Policy, bring it to the attention of all colleagues and ensure that all levels of the management and colleagues understand the requirements placed upon them by this Policy.

Ensure that the objectives and KPIs are agreed with the board and align with the Safety, Health, and Wellbeing policy and that they are fully understood and observed by persons under their control.

Monitor the effective implementation of the Company's Safety, Health and Wellbeing Policy and Integrated Management System and periodically review the company's safety, health, and wellbeing performance. Report safety, health, and wellbeing performance to the Board on an agreed basis.

Annually review training needs and ensure adequate and appropriate training is provided and maintained in accordance with the training matrices.

Monitor the necessary resources within their control and ensure that appropriate work equipment and PPE is available to all colleagues.

Institute proper reporting and investigation of injury, ill health, damage, and loss; promote action to prevent recurrence.

Ensure that appropriate insurance cover is provided and maintained for all liabilities.

Monitor all contractors and ensure they are assessed for competence prior to appointment.

Initiate disciplinary action against all colleagues/contractors who do not comply with the requirements as detailed in the policy documents.

Set a personal example.

2.3 Directors

Always familiarise themselves with the Company's Safety, Health and Wellbeing Policy and comply with it.

Ensure that the objectives outlined within the safety, health and wellbeing policy are fully understood and observed by persons under their control.

Ensure that any safety, health, wellbeing and environmental objectives/KPI's agreed are monitored and reviewed.

Ensure that all persons under their control are competent to fulfil their duties/roles, have received adequate and appropriate training, and are fully aware of any hazards that may affect them.

Monitor the allocation of the necessary resources within their control and ensure that appropriate equipment and PPE is available and correctly used by all persons under their control.

Ensure that all plant and equipment is maintained in good working order and safe condition and has the required certificates of inspection or examination where applicable.

Ensure a suitable and sufficient risk assessment is undertaken, and where applicable written instruction is provided in the form of a comprehensive method statement, for any work activity entailing significant risk. The purpose being, to establish working methods, to explain the sequence of operations, and outline potential hazards at each stage and identify the precautions to be adopted.

Ensure good standards of housekeeping are maintained within their departments.

Carry out periodic site visits as requested to ensure that once work has started that it is carried out as planned, good standards of housekeeping are being maintained, and that relevant legislation and site rules are observed on site.

Ensure that accidents, incidents and near misses are recorded, reported, and investigated in accordance with company procedures and statutory requirements, and all relevant records are kept.

Set a personal example.

2.3 Account Managers/Contracts Managers/Facilities Managers

Always familiarise themselves with the Company's Safety, Health and Wellbeing Policy and comply with it.

Ensure a suitable and sufficient risk assessment is undertaken, and where applicable written instruction is provided in the form of a comprehensive method statement/safe working procedure, for any work activity entailing significant risk. The purpose being to establish working methods, to explain the sequence of operations, and outline potential hazards at each stage and identify the precautions to be adopted. These risk assessments/method statements/safe working procedures should take into consideration the following:

- Pre-construction information from the Client.
- Access equipment needed for work at height, and any other tools and equipment required.
- Any workplace/site-specific hazards, for example asbestos or electrical hazards.
- Facilities for sanitation and welfare.
- The provision of basic fire precautions and firefighting arrangements.
- The necessary emergency arrangements, including first aid provision.
- Arrangements for management and supervision.

Ensure work programmes are realistic and achievable, and that tenders are budgeted to include adequate safety, health and wellbeing arrangements.

Ensure that all company activities within their control are carried out in accordance with the Company's Safety, Health and Wellbeing Policy.

Ensure that all persons in their team are competent to fulfil their duties/roles, have received adequate and appropriate training, and are fully aware of any hazards that may affect them.

Carry out periodic site/work area visits as requested to ensure that once work has started that it is carried out as planned, good standards of housekeeping are being maintained, and that relevant legislation and site rules are observed on site.

Ensure that all plant and equipment is maintained in good working order and safe condition and has the required certificates of inspection or examination where applicable.

Allocate the necessary resources within their control and ensure that appropriate equipment and PPE is available and correctly used by the persons under their control.

Ensure that all sub-contractors are assessed in accordance with company procedures before commencement of site operations.

Set a personal example.

2.4 Site Managers/Warehouse Managers

Always familiarise themselves with the Company's Safety, Health and Wellbeing Policy and comply with it.

Ensure that adequate supervision is always provided and maintained, and that young or inexperienced colleagues are not left to work unsupervised.

Ensure that all workers are familiar with the content of the risk assessment/method statement/safe working procedure, where applicable, and the safety, health, and wellbeing precautions to be taken before the start of each project.

Ensure that all Sigma workers undertake the necessary Sigma SHEQ Induction.

When acting as Principal Contractor, ensure that all Sigma colleagues and sub-contractors on site are inducted.

Ensure that all Sigma colleagues and sub-contractors on site attend site inductions as required by the Principal Contractor.

Allocate the necessary resources within their control and ensure that appropriate equipment and PPE is available and correctly used by operatives on site.

Ensure that all machinery and plant, including hand tools, are maintained in good working order and safe condition, and are only operated by trained and authorised personnel.

Ensure that any necessary permits are in place to enable high risk activities to be undertaken in accordance with a safe system of work.

Ensure that all hazardous materials are correctly marked, stored, handled, and used.

Ensure that good standards of housekeeping are maintained within their area(s) of responsibility, and that the site is left safe and secure at the end of each day.

Co-ordinate and co-operate with other contractors in all matters of safety, health, and wellbeing.

Ensure that all defects, hazards or any safety, health and wellbeing matters reported to them are promptly reported to the appropriate person and rectified.

Report any colleague contravening the requirements of safety, health, wellbeing and environmental legislation or the Company's Safety, Health and Wellbeing Policy to the appropriate person.

Ensure that details of any accident/incident/near miss reported to them are recorded and reported in accordance with company procedures.

Set a personal example.

2.5 Site/Warehouse Supervisors

Always familiarise themselves with the Company's Safety, Health and Wellbeing Policy and comply with it.

Ensure that adequate supervision is always provided and maintained, and that young or inexperienced colleagues are not left to work unsupervised.

Ensure all workers are familiar with the content of the risk assessment/method statement/safe working procedures, where applicable, and the safety, health, and wellbeing precautions to be taken before at the start of each job.

Ensure that all Sigma colleagues undertake the necessary Sigma SHEQ Induction.

Ensure all Sigma colleagues and sub-contractors on site attend site inductions as required by the Principal Contractor.

Allocate the necessary resources within their control and ensure that appropriate equipment and PPE is available and correctly used by operatives on site.

Ensure all machinery and plant, including hand tools, are maintained in good working order and safe condition, and are only operated by trained and authorised personnel.

Ensure any necessary permits are in place to enable high risk activities to be undertaken in accordance with a safe system of work.

Ensure all hazardous materials are correctly marked, stored, handled, and used.

Ensure that good standards of housekeeping are maintained within their area(s) of responsibility, and that the site is left safe and secure at the end of each day.

Co-ordinate and co-operate with other contractors in all matters of safety, health, and wellbeing.

Ensure that all defects, hazards or any safety, health and wellbeing matters reported to them are promptly reported to the appropriate person and rectified.

Report any colleague contravening the requirements of safety, health, wellbeing and environmental legislation or the Company's Safety, Health and Wellbeing Policy to the appropriate person.

Ensure details of any accident/incident/near miss reported to them are recorded and reported in accordance with company procedures.

Set a personal example.

2.6 Operatives/Employees:

Co-operate with the Company on all aspects of safety, health, wellbeing, and welfare.

Always familiarise themselves with the Company's Safety, Health and Wellbeing Policy and comply with it.

Always comply with any site induction procedures given, familiarise themselves with the content of any risk assessments or method statements, and work in accordance with the safe systems of work.

Use the correct tools and equipment for the job; only use work equipment as authorised, instructed, and trained.

Use safety equipment and PPE supplied, e.g., safety helmets, safety footwear, gloves, goggles etc.

Maintain all work equipment and PPE in good working order and safe condition.

Not intentionally or recklessly interfere with, or misuse anything provided in the interests of safety, health, wellbeing, or welfare.

Report any defects in plant or equipment, or any other matter which they consider to be a health and safety risk to themselves or others to their Supervisor/Foreman, or other responsible person.

Take reasonable care for the health and safety of themselves and others, and not carry out work in any way which may recklessly endanger themselves or anyone else who may be affected by their actions (or omissions). Avoid improvisation that entails unnecessary risk, refrain from horseplay, and keep the site tidy.

Be aware of and understand the emergency procedures in the event of a fire or an accident.

Attend toolbox talks as required.

Report all accidents, incidents and near misses to their supervisor/foreman or other responsible person.

Set a personal example.

2.7 Labour only Sub-contractors

Always familiarise themselves and comply with the Company's Safety, Health and Wellbeing Policy and comply with it.

Co-operate with the Company on all aspects of safety, health, wellbeing, and welfare.

Always comply with any site induction procedures given, familiarise themselves with the content of any risk assessments or method statements, and work in accordance with the safe systems of work.

Use the correct tools and equipment for the job; only use work equipment, as authorised, instructed, and trained.

No power tools or electrical equipment of greater voltage than 110 volts may be brought on to site. All transformers, generators, extension leads, plugs and sockets must be to latest British Standards for industrial use, and in good condition (PAT every 3 months).

Use safety equipment and PPE as required by the risk assessment and site rules.

Maintain all work equipment and PPE in good working order and safe condition.

Not to intentionally or recklessly interfere with, or misuse anything provided in the interests of safety, health, wellbeing, or welfare.

Report any defects in plant or equipment, or any other matter which they consider to be a health and safety risk to themselves or others to their Supervisor/Foreman, or other responsible person.

Take reasonable care for the health and safety of themselves and others, and not carry out work in any way which may recklessly endanger themselves or anyone else who may be affected by their actions (or inactions). Avoid improvisation that entails unnecessary risk, refrain from horseplay, and keep the site tidy.

Be aware of and understand the emergency procedures in the event of a fire or an accident.

Report all accidents, incidents and near misses to the supervisor/foreman or other responsible person.

Attend toolbox talks and induction procedures as required by the Principal Contractor.

Co-ordinate and co-operate with other contractors in all matters of safety, health, wellbeing, and environment.

Set a personal example.

2.8 Contractors

Contractors are to comply with all the requirements of this Safety, Health and Wellbeing Policy and are to provide copies of their safety, health and wellbeing policies and any other documentation appertaining to safety, health, wellbeing, and the environment that may be requested by the Company.

A detailed method statement must be provided where requested. The method statement must be agreed with our site management before work begins and copies made available on site so that compliance with the agreed method statement can be maintained and checked.

Ensure that all workers are familiar with the content of the risk assessment and method statement, where applicable, and the health and safety precautions to be taken before the start of each job.

Always comply with any company/site induction procedures given, familiarise themselves with the content of any risk assessments or method statements, and work in accordance with the safe systems of work, statutory requirements, and site rules.

Ensure that adequate supervision is always provided and maintained, and that young or inexperienced workers are not left to work unsupervised.

All plant or equipment brought on to any site by contractors must be maintained in good working order and safe condition, fitted with any necessary guards and safety devices, and have the required certificates of examination or inspection available for checking, where applicable.

Use the correct tools and equipment for the job; only use work equipment, as authorised, instructed, and trained.

No power tools or electrical equipment of greater voltage than 110 volts may be brought on to site. All transformers, generators, extension leads, plugs and sockets must be to latest British Standards for industrial use, and in good condition (PAT every 3 months).

Any injury sustained or damage caused by the contractor's employees must be reported immediately to this Company's site representative.

Contractor's employees must comply with any safety instructions given by the Company's site representative or the Principal Contractor.

Any materials or substance brought on site which has health, fire or explosion risks must be used and stored in accordance with Regulations and current recommendations and that information must be provided to any other person who may be affected on site. A risk assessment for any substance or process hazardous to health which will be used on the site must be provided to this Company before any such work commences on site.

Not to intentionally or recklessly interfere with, or misuse anything provided in the interests of health, safety, or welfare.

Report any defects in plant or equipment, or any other matter which they consider to be a health and safety risk to themselves or others to their Supervisor/Foreman, or other responsible person.

Take reasonable care for the safety, health and wellbeing of themselves and others, and not carry out work in any way which may recklessly endanger themselves or anyone else who may be affected by their actions (or inactions). Avoid improvisation that entails unnecessary risk, refrain from horseplay, and keep the site tidy.

Contractors shall attend site inductions, meetings and toolbox talks as required by the Principal Contractor.

To be aware of and understand the emergency procedures in the event of a fire or an accident.

Co-ordinate and co-operate with other contractors in all matters of safety, health, wellbeing, and the environment.

Set a personal example.

2.9 Drivers of Company Vehicles

Drivers to familiarize themselves with the Sigma Driving Policy.

All Drivers will be required to read the company driving risk assessment.

To ensure that the driver holds a full UK driving licence and that this this fully covers the vehicle being driven and that the driver has been authorised to use a company vehicle or own vehicle for company use.

To ensure that the relevant business car insurance is obtained for the use of any vehicle used for company use and that it covers the transfer of passengers and theft of company articles.

For non-company cars, to ensure that all required Road Tax, MOT's (if applicable) are in date and ready for inspection if so, requested by the company.

Carry out regular checks on their vehicles to ensure that they are safe and roadworthy, and check oil, water, tyre pressures, brake fluids etc. in accordance with manufacturer's instructions.

Always comply with road traffic regulations.

Ensure that the vehicle is periodically serviced in accordance with the manufacturer's instructions and maintained in a roadworthy condition.

Check all internal and external loads they are carrying to ensure that they are secure, and that the vehicle is not loaded more than the legal maximum weight permitted.

Report any defect on vehicles or any ancillary equipment and ensure any additional maintenance is carried out as and when required.

To only park in authorised designated parking areas.

Be responsible for paying any parking tickets or fixed penalty notices served on the vehicle whilst under their control and notify the company of all driving convictions/offences and accidents that occur whilst carrying out company business.

Provide information to the management of any legal impediment to their driving licence or any pending prosecutions.

Inform the management of any change to their state of health, either temporary or permanent, or medication which might affect their driving ability or their suitability to carry out any task or tasks.

Not drive any company vehicle whilst under the influence of alcohol or any controlled substance (controlled drugs are as detailed in the Misuse of Drugs Act 1971).

2.10 First Aiders

Give immediate assistance for the emergency treatment of injuries or illness without endangering themselves.

Arrange for emergency services to be called, and/or prompt and appropriate referral of casualties to medical aid as required.

Provide treatment for minor injuries which do not require referral to a medical practitioner.

Maintain first aid facilities, including first aid equipment (to BS 8599:2011), and periodically check and restock first aid kits.

Make records of all cases treated, including the name of the person injured, date and time of the accident, circumstances and injuries and treatment given.

Record and report all injuries in accordance with Sigma accident/incident reporting.

2.11 Responsible Person (RRFSO 2005)

The responsible person will:

- Carry out a fire risk assessment and identify possible dangers and risks
- Think about who might be particularly at risk - for example disabled employees, or people who work with hazardous chemicals
- Remove or reduce the risk from fire, as far as reasonably possible
- Put in place fire precautions to deal with any risks that remain
- Make sure there is protection for any flammable or explosive materials used or stored on or near the premises.
- Prepare a fire management plan to deal with emergencies including evacuation procedures, and appoint a suitable number of competent persons to help implement it
- Record their findings and review them regularly

3.0 Arrangements

The general details of Sigma's arrangements for the management of safety, health, wellbeing, and welfare are provided within this section.

3.1 Abrasive wheels and cut-off discs

Abrasive wheels and cutting discs are at risk of bursting if they are operated outside the specified maximum rotation speed. To avoid bursting, the correct wheel must be used regarding its type, size, specification, and the maximum operating speed of the wheel. Every abrasive wheel and cut off disc, which is large enough (above 80 mm in diameter), must be clearly marked with its maximum operating speed. The machine must also be clearly marked with the (RPM) of the power-driven spindle. Lower speed rated wheels must not be mounted on a faster speed rated spindle. For smaller grinding wheels (below 80 mm in diameter), the maximum operating speed is provided on a separate notice which must be stored alongside the wheel. These markings must conform to BS EN 12413 and BS ISO 525.

Employees and other workers who use abrasive wheels and cut off discs must be provided with adequate information, instruction and training in their correct handling and mounting (including pre-mounting and storage procedures) and be certified to demonstrate proof of training. This should be renewed every three years.

Employees and other workers operating an abrasive or cut off disc machine must wear the recommended form of protection, as determined by the risk assessment and depending upon the circumstances, as well as box goggles or face-shield (to BS EN 166, 167 & 168) with Grade B impact resistance together with suitable hearing protection.

3.2 Accident Investigation and Incident Reporting

All accidents, cases of industrial ill-health, and dangerous occurrences will be investigated to identify the origins and underlying causes and record, report and document any failures in the health and safety management system with a view to improving safety, health, and wellbeing and to be able to manage potential legal action.

All colleagues and other workers on our premises and other work sites must report accidents, incidents and near misses whilst carrying out work activities on behalf of Sigma. The four most important steps are to:

- Make sure that all the relevant details are reported as soon as possible, in accordance with Sigma's procedures.
- Remove residual hazards that may pose a risk for other people in the area.
- Notify management of any injury or damage resulting from a work activity.
- Review existing systems of work to prevent a recurrence.

3.2.1 Procedure to be followed in the event of an accident:

The following procedures must be followed for all accidents, incidents and near misses:

Accident Recording Form SI-SHEQ-F-4-34-V2-R1 Accident Incident Report - Project Accident Incident Record (PAIR) (when on-site) must be completed for ALL injuries, no matter how minor.

The accident/incident should be reported to the management and investigated.

The CEO, Managing Director and/or Head of SHEQ must be informed by telephone of all RIDDOR reportable injuries and incidents.

For incidents that are RIDDOR reportable, an investigation will be carried out by the Head of SHEQ, or a member of the SHEQ department using SI-SHEQ-F-4-34-V2-R1 Accident Incident Report Incident Investigation Form.

The Incident Reporting Flow Chart (SIMP-12_Accident Investigation / SIMP-18 Incident Escalation Procedure (Facilities – Warehousing and Offices)/SIMP-18a Incident Escalation Procedure (Projects – Site Works) outlines the procedure to be followed if an accident/incident occurs.

3.2.2 Reporting under RIDDOR

Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013, Sigma via the Head of SHEQ/Health and Safety Manager must report serious injuries, incidents, or diseases to the Enforcing Authority in the following circumstances:

- Any person dies as a result of or in connection with work.
- Any person suffers a major injury or disease, as specified in the schedules of the RIDDOR Regulations, as a result of or in connection with a work activity.
- A person is incapacitated for work for more than 7 consecutive days due to an accident as a result of or in connection with a work activity.
- Any person not at work (visitor, member of public, etc.) who is injured as a result of an accident at a workplace and is taken straight from the scene for treatment at a hospital.

The procedure for reporting major injuries and fatalities is for the Head of SHEQ/Health and Safety Manager to contact the Incident Contact Centre by any of the following means:

- Telephone the RIDDOR National ICC Reporting Line on 0845 300 9923 (8.30am - 5.00pm Monday Friday).

All other reportable injuries should be reported via the HSE's online reporting system:

- Once contacted the ICC will pass the details that you have given regarding the incident to the relevant enforcing authority (HSE or Local Authority Environmental Health Department).
- Reports or online submissions should be made within 10 days of the date of the accident for all reportable accidents and dangerous occurrences other than Over 7 Day accidents which must be reported within 15 days.

All other reportable work-related injuries should be reported using the online system found on the HSE's website: www.hse.gov.uk

We will record and store accident information for any employee who is not able to perform their normal duties for over 3 days, but less than 7 days due to an accident at work. These types of accident are not reportable under RIDDOR 2013, but we have a duty to record these types of accident.

3.2.3 Accident investigation procedure

Sigma view accident investigation as a valuable tool in the prevention of future incidents. The investigation procedure should begin at the earliest opportunity, if necessary, with assistance from the Health and Safety Team. SIM Form 4 – Accident Investigation Report should be completed.

The prime purpose of an incident investigation is to establish the causes of the hazard or incident to identify actions necessary to prevent a recurrence.

The investigation should begin as soon as possible after the hazard, or incident is reported and the medical needs of any injured people have been met. For this to happen, incidents must be reported as soon as possible after they occur.

Nothing at the accident site should be disturbed until after the completion of the investigation, other than what is necessary to prevent further injury, loss, or contamination, until the investigating officer has authorised clearing away.

Where necessary, photographs or video footage should be taken, and equipment held for subsequent examination or test.

It is desirable to take statements from witnesses as soon as possible after the incident. Witnesses should be interviewed separately so that facts and opinions are not confused.

It should be emphasised that the purpose of investigation is not to assign blame for the incident but to establish the causes to identify actions necessary to prevent a recurrence.

The investigation should be sufficiently broad to identify the immediate and underlying causes and should include an assessment of the full range of technical, human, and administrative factors involved in the hazard or incident.

Following an incident, it is the responsibility of senior management to take steps to prevent a recurrence. This will generally be achieved by implementing the recommendations arising out of the investigation.

3.3 Alcohol and Drug Abuse

Alcohol or drug abuse by employees and contractors can adversely affect the safety, health and wellbeing of themselves or others in the workplace due to impaired co-ordination, judgement and decision making. Particularly where plant, equipment and machinery are concerned, this impairment could easily lead to serious accidents.

Therefore, it is the policy of Sigma that alcohol or drugs are prohibited in the workplace. All colleagues are informed of the Company policy on alcohol and drug abuse during induction - no colleague, agent or sub-contractor may enter any Company vehicle or site or perform any service for Sigma while under the influence of alcohol or any controlled substance. (Controlled drugs - as detailed within the Misuse of Drugs Act 1971). Consequently, anyone considered to be under the influence of alcohol or illegal substances whilst at work, whether consumed during working hours or not, will be subject to disciplinary proceedings.

If Sigma reasonably believes that anyone is under the influence of drugs or alcohol at work as a result of a drug abuse or drinking problem, then the outcome of any disciplinary procedure will generally include suggesting that the person seek professional help. As part of the disciplinary proceedings Sigma will consider the extent to which the individual has sought such professional help or declared their dependency.

All operatives are required to notify their supervisor or line manager of any prescription or other legally available drugs they are taking which may affect their capacity to carry out their day-to-day work activities, for example antibiotics or strong painkillers which may cause drowsiness and affect your ability to drive or operate machinery safely.

3.4 Asbestos

Sigma will comply with the Control of Asbestos Regulations 2012 to manage the risks from asbestos in its activities. It is Sigma's policy to prevent the risk of exposure to asbestos or to reduce it to as low as is reasonably practicable in its activities. All work in the premises of customers/clients will be suitably assessed for the risk of asbestos. A copy of the asbestos survey/register will be requested from the client to ensure that our employees are not at risk. If parts of the building are identified in the asbestos management survey as either having or strongly suspected of having asbestos containing materials (ACMs) and these areas are likely to be disturbed within the scope of the proposed construction works, then Sigma will NOT allow colleagues to repair, remove or disturb asbestos or products likely to contain asbestos and will request a refurbishment and demolition asbestos Survey from the client.

Any operatives who are likely to disturb ACMs during their normal work will be trained to such a level as to understand the typical locations in which asbestos materials are likely to be found and the detrimental health effects associated with the inhalation of airborne fibres. They will be made aware of the visual characteristics of asbestos containing materials and the actions to be taken in the event of suspect materials being discovered through annual asbestos awareness training.

Should suspected ACMs be discovered during works then all works will be stopped. The works will only be resumed following sampling and analysis by an accredited laboratory, on behalf of the client, which returns a negative result, or on receipt of a suitable certificate of reoccupation following specialist removal.

3.41 Action In The Event Of Discovery Of A Suspected Asbestos Containing Material

All colleagues and contractors carrying out work on our construction sites have responsibility for the health and safety of themselves and others who may be affected by their activities. In the event of known or suspected ACMs being disturbed:

- **STOP work!**
- **Vacate and secure the immediate area against the spread of the material.**
- **Inform the Site Manager**
- **Do not attempt to clear up suspect material or collect samples.**
- **Do not re-enter the area to collect tools, documents etc.**

Sigma will not carry out any licensed work with asbestos containing materials. Sigma may undertake Notifiable Non-Licensed Work (NNLW) at our clients or our own premises* or sites. All such work will be completed on Sigma's behalf by suitably trained and competent colleagues.

3.5 Changes to Legislation

Colleagues will be kept up to date on changes in legislation and other health and safety issues by Monthly Bulletins from our SHEQ team. Issues which relate to the business operations will be brought to the attention of all colleagues via their line management/SHEQ updates (notice board/electronic) and appropriate actions will be implemented. Other sources may be used at appropriate times such as seminars and the internet. Copies of all materials used to make interim updates to the policies will be kept on file until such time as the annual policy review incorporates any necessary changes.

3.6 Communication and consultation

Sigma undertakes to consult with colleagues over issues related to safety, health, wellbeing, and welfare and to provide the information colleagues require, for them to carry out their duties. Constructive suggestions to improve safety, health, wellbeing, welfare, and environmental awareness in Sigma are welcomed from any colleague.

Open communication systems will encourage comments and ideas from individuals in the workplace, and will include:

- Any proposed change which may substantially affect their safety, health, and wellbeing at work e.g., changing a work procedure, equipment, or way of working.
- When introducing new technology, tools or working processes.
- Informing colleagues of the likely risks and dangers arising from their work, measures to remove or reduce these risks and what they should do if they must deal with a risk or danger.

The following information will be displayed:

- Health and Safety Policy Statement of Intent.
- HSE Law poster.
- Employer's Liability Insurance Certificate.
- Fire safety instructions.
- Names of Fire Wardens and First Aiders (including mental health first aiders).
- Relevant health, safety, and environmental updates.

Sigma will use various methods to communicate the safety, health, and wellbeing message to colleagues, including but not limited to the following:

- All colleagues will be asked to read a copy of Sigma's Safety, Health and Wellbeing Policy and Colleague Handbook and confirm that they have read the policy and understand the Company's and their own responsibilities with respect to safety, health, wellbeing, welfare, and the environment.
- Safety, health, and wellbeing will be on the agenda of all management meetings, and all persons attending are invited to put forward any ideas, concerns, or observations. In addition, SHEQ meetings representing all areas of the business will be held on a regular basis. Items on the agenda may include:
    - Review of accidents, near misses and unsafe acts that have occurred since the last meeting and any control measures taken.
    - New hazards (these may have just been noticed or may be due to a change in work method, location, or new equipment) and actions to be taken to reduce the risk associated with the hazard.
    - Progress on action items from previous meetings.
    - Current SHEQ issues; new regulations, SHEQ standards or operator requirements.
    - Safety objectives for the next period.
    - Any other matters relating to SHEQ.

These meetings will be minuted and include a rolling plan of actions which are to be prioritised and delegated accordingly. Everyone with responsibilities for SHEQ will receive a copy of these minutes and a summary will be communicated through methods such as the workplace notice board, TV screens, newsletters, emailers, intranet and bulletins.

Information on specific topics or general issues via ongoing dialogue, inductions, briefings, toolbox talks, posters, notice boards, bulletin boards, memos, emails, information notices, formal letters, risk assessments, fire drills, and any other means as appropriate.

3.7 Confined Spaces

The Confined Spaces Regulations 1997 cover work associated with confined spaces. For the purpose of safety, the term 'confined spaces' covers a great variety of workplaces which, because of their enclosed nature, have associated reasonably foreseeable 'specified risks' to a worker, including:

- Serious injury due to a fire or explosion.
- Loss of consciousness due to excessive heat.
- Loss of consciousness because of exposure to gas, fumes, vapour, or lack of oxygen.
- Drowning because of an increase in the level of liquid.
- Asphyxiation because of the presence of a free flowing solid.

Where reasonably practicable to do so, entry into a confined space will be avoided. Where entry into a confined space is unavoidable, a risk assessment will be carried out to identify a safe working method that eliminates or reduces the risks to an acceptable level. The control measures will include arrangements for emergencies and rescue and may include atmospheric testing and monitoring. The work will be controlled via a permit to work system.

3.8 Compliance with CDM Regulations 2015

Sigma shall comply, so far as reasonably practicable, with the general health and safety duties of Part 3 of The Construction (Design and Management) (CDM) Regulations 2015.

Sigma will ensure that they comply with the requirements of the CDM 2015 Regulations dependant on what role they are undertaking in pursuance of their activities:

General Management Duties:

All Duty holders under the regulations shall ensure that:

- They and all personnel appointed have the skills, knowledge, attitude, training, and experience, and if they are an organisation, the organisational capability, necessary to fulfil the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project.
- Effective cooperation is both sought and given to all parties involved in construction work and all matters likely to affect the health and safety of all involved.
- The 'General Principles of Prevention' i.e., elimination, reduction and control are considered for all duties during all stages of the project.
- If Sigma takes on the role of any of the duty holders below, they will ensure that they comply with the duties placed on them as specified in the regulations.

Principal Contractor Duties:

We will plan, manage, monitor, and coordinate matters relating to the construction phase in liaison with all contractors.

We will prepare, develop, and implement a written construction phase plan and set site rules before any construction works commences.

We will ensure that contractors are provided with the relevant parts of the plan to enable them to plan and coordinate their works.

- We will ensure that adequate welfare arrangements are in place throughout the project.
- We will ensure that we check the competence of all contractors on the project.

- Ensure that site inductions are carried out for all workers and provide them with any further information needed for their work. We will also consult and engage with them on matters of health and safety.
- We will ensure that the site is secured.
- Ensure all information relative to the projects is passed to the Principal Designer for inclusion in the Health and Safety File.

Principal Designer Duties:

We will plan, manage, monitor, and coordinate the pre-construction phase and coordinate matters relating to health and safety during the pre-construction phase to ensure that, so far as is reasonably practicable, the project is carried out without risks to health and safety.

Consider the general principles of prevention and where relevant, the content of any construction phase plan and health and safety file.

Identify, eliminate, or control foreseeable risks to the health and safety of any person.

Ensure that all designers comply with their duties in regulation 9.

Ensure coordination and cooperation.

Assist the client in the provision of pre-construction information.

Liaise with the principal contractor for the duration of their appointment.

Designers Duties:

- To ensure before they commence work that the Client is aware of his duties under the Regulations.
- When preparing or modifying a design to take account of the general principles of prevention and any pre-construction information to eliminate so far as is reasonably practicable foreseeable risks to the health and safety of any person during construction work, cleaning, maintenance, or use of a structure designed as a workplace.
- To eliminate hazards which may give rise to risk or reduce risks from any residual hazards to the lowest level reasonably practicable and pass any relevant information regarding significant residual risks to the Principal Designer.
- To provide design information in relation to the design, construction, and maintenance of the structure to adequately assist the Client, other Designers and Contractors to comply with their duties under the Regulations.
- To provide information in relation to the design to the Principal Designer for inclusion in the Health & Safety File.

Notifiable Projects:

Where the project is notifiable, as a Principal Contractor, Principal Designer, Contractor or Designer we will:

- Not commence work (other than initial design work) unless the project has been notified to the HSE.

Contractor Duties:

- We will not commence construction work until we are satisfied that the Client is aware of their duties under the Regulations.
- We will manage and monitor construction work under our control, without risks to health and safety, so far as is reasonably practicable.

- We will ensure that any worker under our control is provided with any information and training required to enable them to complete their works safely.
- We will ensure that welfare arrangements are provided in compliance with Schedule 2.

Projects where there is more than one contractor:

Where the project has (or is reasonably expected to have) more than one contractor we will:

- Not undertake any construction work until we have been provided with the names of the Principal Designer and Principal Contractor for the project and have been given access to information from the client or such parts of the Pre-construction Information/Construction Phase Plan (CPP) as is relevant to our works.
- When acting as a Principal Contractor Sigma will ensure that a full Construction Phase Plan is produced and that adequate arrangements are put in place to plan, manage, and monitor the project.
- On all notifiable construction projects for which Sigma are not the Principal Contractor but have been appointed as a sub-contractor, we will:
- Co-operate and liaise with the Principal Contractor and other duty holders.
- Ensure that any defects or risks not addressed by the health and safety plan are brought to the attention of the Principal Contractor.
- Monitor the day-to-day on-site Sigma work activities.
- Provide information for the health and safety plan as necessary (this will probably involve risk assessments and method statements).
- Provide information for the health and safety file as necessary (this will probably involve as built drawing and operation and maintenance manuals).
- Ensure compliance with the health and safety plan, any site rules, and relevant health and safety legislation.
- Notify any sub-contractors appointed to the Principal Contractor.
- Comply with any directions issued by the Principal Contractor including site rules.
- Provide accident and incident information to the Principal Contractor in accordance with Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013.
- Carry out works in accordance with the CPP, if this is not possible then notify the Principal Contractor to enable the plan to be altered.

CDM Part 4 - Duties relating to Health and Safety on Construction Sites

Where Sigma are the Principal Contractor, they will ensure that the requirements of Part 4 are being complied with regarding matters under their control. Where Sigma are not the Principal Contractor, they will liaise with the Principal Contractor to ensure that the requirements of Part 4 are complied with regarding matters under their control, as appropriate to the work activities undertaken by Sigma:

It is the duty of all persons at work on the site to report any defect that may endanger the health and safety of themselves or others.

3.9 Display Screen Equipment

We will implement arrangements and procedures for the assessment of risks from the use of Display Screen Equipment in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992. Workstations will be set up using appropriate ergonomic principles and equipment, and we will encourage staff using screen and keyboard equipment to adopt good practice in relation to work posture.

We will ensure that the following arrangements are carried out in connection with the use of DSE equipment:

- Identify the equipment which is classed as a workstation and provide a DSE Self-Assessment Document for completion by the user (a 'user' as defined in the DSE Regulations means an Employee who habitually uses DSE as a significant part of their normal work). Where this identifies any issues related to DSE or the Workstation review these in conjunction with the SHEQ/HR Department and produce an action plan where necessary to resolve the issues. Further advice may be sought by a competent Occupation Health provider where necessary.
- Plan work activities so that, where possible, short breaks away from the display screen are a regular feature. If this is not possible then deliberate breaks or pauses must be introduced.
- Arrange for relevant health and safety training of users and provide adequate information regarding these aspects.
- Instruction will be provided for those persons defined as users of display screen equipment and will cover the health and safety aspects associated with the equipment, including recognition of risks, and their causes, adjustment of seating and equipment positions, cleaning and maintenance, use of breaks, consultation arrangements, eye test arrangements.

Eyesight tests will be available to all users or potential users at the expense of the Company, as required by law. Eyesight tests will be repeated at a frequency recommended by the optician/optometrist (usually every 2 or 3 years). We will reimburse the DSE user for the eyesight test and for any corrective appliances where solely required for DSE use, as follows:

- The cost of spectacles with corrective lenses solely for DSE use is limited to the basic cost of prescription spectacles and lenses (the cost of tinted lenses, special coatings or designer frames will not be reimbursed).
- Users who already wear spectacles for normal use, and who need additional special spectacles solely for DSE use may opt to combine the two requirements (e.g., by purchasing variable focal type lenses) but will only be entitled to claim the cost of a basic pair of spectacles which would otherwise have been necessary. Such claimants will be required to produce evidence of what the lenses and frames solely for DSE use would have cost had they been purchased as a separate pair of spectacles.

3.10 Driving

Sigma recognises the potentially fatal risks to drivers when at work. Sigma's policy is that all drivers must always be in full control of their vehicle. This means no electronic devices are to be used even for the shortest period when in control of a vehicle. Mobile telephones or other means of communication are only to be used if the vehicle has stopped in a safe place and the hand brake is applied unless a hands-free kit is fitted to the car to enable the phone to be used safely and in accordance with current legislation.

All drivers are to be fit to drive. Any colleague who is under the influence of drugs, alcohol, or any substance likely to cause a danger to themselves or others is forbidden to drive. All colleagues must inform their line manager immediately of any change to their state of health and wellbeing, either temporary or permanent, or any medication they are taking, which might affect their driving ability.

Only those colleagues who hold a current valid driving licence and appropriate insurance for business use of the vehicle type they plan to drive are permitted to do so.

Only authorised drivers are permitted to drive company vehicles. A copy of the full UK driving licence will be held on file for all authorised drivers, and a copy of all convictions/offences will be requested.

Drivers will be made aware of their responsibilities under the "Responsibilities" section of this Policy and will be required to familiarise themselves with the company driving policy and drivers risk assessment.

Road tax and MOT's (if applicable) will be maintained in date for all company vehicles and a register kept and held on file.

All company vehicles will be periodically serviced in accordance with the manufacturer's instructions and maintained a roadworthy condition. Suitable provisions will be made for times when vehicles are off the road due to repairs, breakdowns etc.

3.11 Electrical Safety

Any fixed electrical installations will be inspected and tested in accordance with BS7671 (the IEE "Wiring Regs") every 5 years. Office based portable electrical appliances will be PAT tested at appropriate frequencies (see below for further details).

Temporary accommodation units on site will be inspected and tested on installation and then at 12-month intervals.

Only qualified Sigma electricians will undertake work on or in the vicinity of live electrics. Managers and Supervisors are responsible for obtaining certification to ensure that any permanent electrics have been disconnected or isolated before allowing work on the system to commence. Permit may be required dependent of level of works.

Only battery operated or 110V equipment (or less) will be used on site for power tools.

Inspection and PAT testing of portable and transportable equipment will be undertaken at appropriate intervals and records maintained. The frequency will depend on the environment in which the equipment is used and the conditions of usage but will not normally exceed every 3 months for equipment used on site and every 24 months for equipment used in an office environment.

All colleagues are responsible for carrying out a pre-use visual inspection of any electrical equipment prior to its use, as detailed below:

Portable Electrical Appliances

Portable electrical equipment is defined as any item of electrical equipment that is not fixed in position and is not permanently connected to the hard wiring of the electrical system. Full records of Portable Appliance Testing will be held by Sigma either centrally or on site.

Inspection and testing of portable and transportable equipment will be undertaken at appropriate intervals by Sigma M&E and recorded on the Portable Appliance Testing Certificate. The table below gives guidance on suggested frequencies of user checks, planned formal visual inspections, and combined visual inspection and testing (PAT testing) of portable electrical equipment:

Employee/User pre-use check:

- Bare wires are not visible, the cable covering is not damaged and there are no taped or other non-standard joints in the cable.
- The plug is in good condition and the cable covering is gripped where it enters the plug or equipment.
- The outer casing of the equipment is not damaged or loose.

- There are no signs of overheating on the plug, cable, or equipment.
- Residual Current Devices (RCDs) are working correctly (the test button should be pressed daily)

Equipment/application	Voltage	User check	Formal visual inspection	Combined inspection and test
Battery operated power tools and torches	Less than 25v	No check	No check	No
25v Portable hand lamps (confined or damp situations)	25v Secondary winding from transformer	No check	No check	No
50v Portable hand lamps	Secondary winding centre tapped to earth (25v)	No check	No check	Yearly
110v Portable and hand-held tools, extension leads, site lighting, moveable wiring systems and associated switchgear	Secondary winding centre tapped to earth (25v)	Weekly	Monthly	Before first use on site and then 3-monthly
230v Portable and hand-held tools, extension leads and portable floodlighting	230v mains supply through 30mA RCD	Daily/every shift	Weekly	Before first use on site and then monthly
230v Equipment such as lifts, hoists and fixed floodlighting	230v Supply fuses or MCB's	Weekly	Monthly	Before first use on site and then 3-monthly
RCD's	Fixed**	Daily/every shift	Weekly	*Before first use on site and then 3-monthly
Equipment in site offices	230v office equipment	Monthly	6-monthly	Before first use on site and then annually
* **Note:** Residual Current Devices (RCDs) need a different range of tests to other portable equipment and equipment designed to carry out appropriate tests on RCDs will need to be used.				

3.12 Emergency Procedures

Written emergency procedures for reasonably foreseeable incidents will be assessed at all workplaces. All colleagues will be informed, instructed and where necessary, trained in the emergency procedures. These procedures will be practiced regularly, and records will be maintained. Appointed persons will be identified to take control in the event of an emergency incident.

3.13 Fire Precautions

Sigma accept that as an employer we have a duty under the Regulatory Reform (Fire Safety) Order 2005 (RRO) for the safety of all our colleagues and visitors to our premises – this includes mitigating the risk of fire. We will do this by training our colleagues and ensuring that suitable fire safety measures are in place to reduce the risk and spread of fire on the premises.

These measures include ensuring that:

- The means for detecting fire and giving warning in case of fire on the premises are in place.
- The means of escape can always be safely and effectively used.
- Appropriate fire-fighting equipment is always available for use.
- The arrangements for action to be taken in the event of fire on the premises including instruction and training of employees and measures to mitigate the effects of fire are in place.

The building's fire safety measures will be checked regularly to ensure that they remain in full working order.

If a fire breaks out, Sigma has put in place procedures to ensure that all risks are minimised, and the premises can be evacuated quickly.

The RRO is the statutory instrument for the control of fire safety in our premises and as such it is designed to ensure the provision of adequate fire precautions by undertaking suitable and sufficient Fire Risk Assessment (s). Sigma will strive to ensure that all colleagues are made aware of their duties and responsibilities and the contents of any risk assessment undertaken in the workplace.

This policy together with other relevant fire safety information such as the fire risk assessment and evacuation procedures, will be regularly monitored to ensure that the objectives are achieved. It will be reviewed and if necessary revised in view of any legislative or organisational changes.

The main legislation relating specifically to fire safety is the Regulatory Reform (Fire Safety) Order 2005. Under the Order, a nominated 'Responsible Person' will carry out a Fire Risk Assessment and implement and maintain a fire management plan, to include the following:

Workplace

In the event of fire, the first-person noticing smoke or flames should:

- Activate the alarm by breaking the nearest fire break glass point.
- All employees and visitors should leave the building by the nearest safe exit.
- Assemble at the Fire Assembly Point (location listed in the Evacuation Plan on each site.
- The Fire Marshal at the site will call the Emergency Services and take a roll call.
- The Fire Marshal at the site should work with the Emergency Services to ensure that the evacuation and any clearance and re-admission procedures advised by the Emergency Services are effectively implemented.
- Re-admission into the building must only take place once the Fire Marshal has obtained clearance from the Emergency Services.

- Employees will be verbally informed to re-enter the building.

All Fire evacuations, including false alarms, will be recorded in a Fire Logbook.

On Site

- All employees and contractors of Sigma will be given a site induction on first arrival to any site.
- Information on fire evacuation procedure, assembly points and any other fire safety information will be communicated to all personnel.
- All colleagues and contractors will be required to inform of their presence on a construction site via a signing in book or other means of communication.
- When Sigma are the Principal Contractor on site, the Project Manager will ensure that a suitable Site emergency procedure is drawn up and implemented which will include, where required, a Fire Plan depicting the location of the fire-fighting equipment.

3.14 First Aid

Sigma will endeavour to provide an appropriate number of qualified First Aiders and First Aid equipment at each workplace, taking into consideration the nature of the hazards and the number of employees at that workplace.

It is the Company's intent to provide at least one person trained in first aid at each workplace or site operated by Sigma. On sites for which there is a Principal Contractor, by prior arrangement we may agree that it is their responsibility to provide adequate first aid provision for that site.

Adequate first aid kit will be provided at all workplaces and in company vehicles under the control of the First Aider, to include:

- First aid kits (in compliance with BS8599-1:2019).
- Eyewash stations.

The names of First Aid personnel will be communicated to all Sigma colleagues and displayed on the SHEQ Notice Boards. On-site the name of the First Aider will be given during the site induction and the details will be posted on the site notices. The First Aid kit will be kept under the control of the appointed First Aider who will examine any injury to colleagues/operatives, however slight, and decide on any appropriate treatment administered. Details of any treatment will be recorded using SMF-27 – Accident Report Form.

- No person other than the First Aider will administer First Aid.
- No person, including the First Aider, will administer analgesics or other medical preparations.
- Such preparations must not be kept in the First Aid box.
- The First Aider will check the contents of the First Aid box at least once a month and replenish it to the required standard. (ALP-Form03 – First Aid Kit Checklist).
- Rapid or unexpected depletion of the contents should, however, be replenished forthwith.

The selection of personnel to undergo first aid training will consider their willingness for the role, capacity to deal with injury and illness and ability to act calmly in an emergency.

Training will be provided by a suitably trained and qualified training organisation. Records of training will be carefully maintained, and refresher training will be arranged, as necessary.

In addition, records of all cases treated will be kept for a minimum of 3 years, including information such as the name of person injured, date and time of the accident, circumstances and injuries and treatment given. (SIM-Form04)

3.15 Gas Safety

It is our policy to ensure that all gas appliances are maintained and serviced at appropriate intervals by a competent person (it is good practice to ensure a gas boiler is serviced at least every 5 years).

All colleagues should ensure that no combustible materials are stored within the vicinity of the incoming gas main and meter.

If you smell gas or suspect, there may be a gas leak:

- Switch off the gas supply at the main valve.
- If working with or operating machinery or equipment that could cause a fire or explosion in a gas rich atmosphere, switch off/make safe that piece of machinery or equipment.
- Open windows.
- Do not search for the leak using a naked flame.
- Do not switch on electric lights or operate electrical switches.
- Telephone the gas emergency service Transco on 0800 111 999.
- Get everyone to leave the affected area, ensuring that equipment/processes have been left in a safe condition.
- Meet the gas emergency services and fully brief them on the events and any hazards on site that could affect their health and safety

3.16 Hand Arm Vibration Syndrome (HAVS)

The regular and prolonged use of vibrating tools can cause the users to suffer damage to the blood vessels or blood supply, causing a condition known as 'hand-arm vibration syndrome' (HAVS). The most common form of damage caused is vibration white finger. This causes damage to the nerves of the finger causing permanent loss of feeling and other damage to muscles and bone may also contribute to pain and stiffness in the hands and wrists.

It is not envisaged that Sigma's colleagues are likely to carry out tasks where they will be exposed above the daily exposure action value (EAV) (2.5 m/s^2 A(8)) of the Control of Vibration at Work Regulations 2005. If it is assessed that they are likely to be subject to levels greater than this, then a risk assessment will be undertaken, and control measures will be implemented to reduce likely exposures to below the daily exposure action value. Colleagues will not be exposed to vibration above the daily Exposure Limit Value (ELV).

When selecting and purchasing power tools and equipment, consideration will be given to the procurement of equipment which is the least harmful in terms of the vibration generated. In addition, colleagues will receive information and instruction on the correct use of vibrating tools, the recognition of vibration symptoms and the need to report them to their supervisor.

All Sigma colleagues who are likely to be exposed to vibrating tools will be required to complete the Company Medical Questionnaire, and to promptly report any work-related health conditions. Any person who is medically confirmed as suffering from HAVS must not be permitted to use power tools which have damaging vibration emissions.

3.17 Health Surveillance

It is the policy of Sigma to avoid and control the exposure of colleagues to hazardous agents to preclude the necessity for statutory health surveillance. For example, exposure to noise and vibration will be controlled so that personal exposures are not likely to be above the first action level of the Control of Noise at Work Regulations or the exposure action value of the Control of Vibration at Work Regulations.

Similarly, it is our policy that the exposure of colleagues to hazardous substances is avoided where practicable, or minimised and adequately controlled in all other cases. Where colleagues may be exposed to chemicals or wet products which may cause dermatitis then it is the Company's policy that suitable personal protective gloves be worn, and to encourage the use of skin care creams if necessary to reduce the risk of dermatitis to the lowest level reasonably practicable.

The Company's COSHH and risk assessments should identify where additional health surveillance may become necessary and what type should be implemented. Health surveillance records should be kept for 40 years. Some hazardous substances, as referred to in the HSE's EH40 Workplace Exposure Limits and other guidance, will require health surveillance as a condition of use.

Associated Hazards which may require health surveillance are:

- Noise
- Whole body or hand-arm vibration
- Hazardous substances
- Dermatitis
- Asthma
- Asbestos, lead, or work in compressed air
- Ionising radiation
- Display screen equipment

All colleagues are required to complete the Company Medical Health Questionnaire and should advise HR, their supervisor or line manager if they have any work-related health issues, or any concerns related to their health which may affect or be affected by any work activity. Sigma will, where necessary seek colleague's permission where a referral to Occupational Health is required.

Sigma will

- Carry out a risk assessment to identify the health hazards within the workplace and communicate the findings to the colleagues
- Take any necessary measures to remedy any risks found because of the findings
- Ensure that new colleagues are included in health surveillance programmes
- Ensure that colleagues transferring to different work activities are included in the health surveillance programme if required
- Provide colleagues with the relevant information and training
- Communicate the results of health surveillance to relevant colleagues
- Ensure that colleagues and their representatives are consulted on the need and procedure for health surveillance
- Ensure that personnel files are kept up to date and secure. Records to be retained for 40 years

- Ensure that colleagues attend the health surveillance programme
- Ensure that sickness absence is monitored, and colleagues are referred to the management if the reason for absence is thought to be work-related
- Provide personal protective equipment where required
- Monitor and review the effectiveness of the arrangements

Employees will

- Co-operate with their employer on matters of safety, health, and wellbeing. This extends to health surveillance where it has been identified as a necessary control measure or where there is a specific statutory requirement
- If any colleague has a concern about their safety, health, and wellbeing, that of others affected by their work or encounters symptoms of ill health, they must inform their line manager and SHEQ/HR immediately

3.18 Housekeeping

It is the responsibility of all persons to maintain their working area in a tidy and safe condition, and to report any unsafe conditions which may endanger themselves or others.

Periodic inspections of housekeeping will be carried out as part of the overall SHEQ inspections of Sigma operational areas and temporary sites. All identified unsatisfactory conditions shall be recorded, reported, and remedial actions taken where appropriate. A formal record of these Inspections will be maintained.

3.19 Hazardous Substances

Sigma will ensure that the exposure of workers to hazardous substances is avoided or minimised, and adequately controlled in all cases. So far as reasonably practicable the use of hazardous substances will be eliminated or substituted with less harmful alternatives.

A risk assessment will be conducted of all work involving exposure to hazardous substances using SIM-Form23 – COSHH Assessment Form. The assessment will be undertaken by a member of the SHEQ/Management Team and will be based on manufacturers and suppliers' health and safety guidance and our own knowledge of the work process.

Hazardous substances will only be released to site on completion of this COSHH assessment, which should identify the safe working practices, any control measures required, and the appropriate personal protective equipment (PPE).

All colleagues who will encounter hazardous substances will receive appropriate training and information on the health and safety issues relating to that type of work before the work commences.

Assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

3.20 Legionella

Legionella bacteria are common and can be found naturally, in low numbers, in water sources such as lakes, rivers, and reservoirs. Under favourable conditions where water temperatures are between 20ºC and 45ºC and in the presence of other micro-organisms/sludge/scale/biofilms that provide nutrients, legionella bacteria can multiply to give concentrations high enough to present a risk to health. If water droplets containing the bacteria are generated from shower heads, cooling towers etc. they may be breathed in and cause illness. Approximately 1% of people exposed to water droplets containing Legionella pneumophilla contract Legionnaire's disease. Particularly at risk are those over 45 years of age, smokers, alcoholics, or people with cancer, chronic respiratory or kidney disease. The incubation period is between 2-10 days.

The risk from Legionella is not thought to be significant at Sigma as there are no dead legs within the water management system, and only one shower head (which is regularly checked and flushed as part of weekly inspections) with means of generating water droplets/spray. As a general precaution quarterly checks are carried out to ensure that the hot water temperature is not between 20ºC and 45ºC.

3.21 Lifting Equipment and Lifting Operations

There are many different types of lifting appliances, for example, tower cranes, telescopic jib, mobile cranes, hoists, forklifts, gin wheels and pulley blocks, etc. all of which fall under the term Lifting Equipment.

Lifting equipment must be suitable for the task (including consideration of environmental conditions), and adequate information should be obtained from the installer on the safe and proper use of the equipment. Careful consideration must be given when selecting suitable lifting appliances, including the weight and nature of the items to be lifted, ground conditions, potential obstructions, and weather conditions. All lifting appliances must conform to all current Regulations, Approved Codes of Practices and British Standards.

All lifting operations will be suitably planned, managed, and supervised and a suitable risk assessment undertaken.

Operation of lifting equipment and slinging of loads should only be carried out by trained and competent persons.

There are occasions where operatives may use lifting equipment on site for moving materials, erection of structures and access. If this is the case then the lifting operation will be covered by the risk assessment and/or method statement, and the lifting equipment will be subject to statutory test and examination. Certificates must be provided by the hire company for lifting appliances and lifting gear which they have supplied to customers. This equipment will normally fall into the category of Mobile Elevating Work Platforms (MEWP's), typically these will be cherry pickers/scissor lifts.

MEWPs must only be operated by competent employees holding a competency (IPAF) card and have undergone familiarisation training by the machine supplier.

When Cherry Picker type MEWPs are used, employees will be attached to the proprietary fixing point by a harness and fixed length restraint lanyard. Fall Arrest lanyards are not to be used.

Whilst operating Scissor Lift type MEWPs, harnesses should be fixed to the attachment point whilst operating the machine over rough ground to prevent being thrown out. There is no requirement to be harnessed to the Scissor Lift whilst working within the confines of the basket.

Adequate pre-use checks, maintenance, examinations, and tests of lifting equipment should be carried out at appropriate intervals, in accordance with statutory requirements and the manufacturer's instructions. Suitable records must be kept.

The safe working load of any lifting equipment must not be exceeded, and the equipment must not be used in a way or for a purpose for which it is not intended.

3.22 Lone Working

It is the policy of Sigma for lone working to be the exception rather than the norm. If lone working is required, then Sigma will carry out a specific risk assessment and put control measures in place prior to work commencing to avoid or control those risks identified. Any significant findings of the risk assessment will be recorded.

In certain cases, the risk assessment may identify that more than one person should be involved in the operations or activity and that lone working is not permissible. Young persons and persons undergoing training must always be supervised and should not work alone.

3.23 Management of Sub-Contractors

As part of Sigma's operations, it is necessary to use sub-contractors to undertake works. Before sub-contractors are appointed, Sigma will undertake a competency check using a pre-qualification health and safety questionnaire to assess them on their health and safety competence. This will be reviewed annually. Additionally, prior to starting work on site, all sub-contractors will be required to attend a pre-start meeting to discuss SHEQ issues and assess whether a contractor has allocated adequate resource to fulfil his SHEQ obligations in terms of SHEQ law before the commencement of any contract. The responses obtained from the contractor and thorough evaluation of the contractor's responses will also serve to gauge their commitment to SHEQ and adherence to recognised standards of competence

Once appointed, the ongoing performance of Sigma sub-contractors on site shall be monitored by the manager responsible to ensure that all works are carried out in accordance with the statutory requirements and best practice and any unsafe acts or unsafe conditions caused or created by the sub-contractor shall be formally brought to the sub contractor's attention.

3.24 Manual Handling Operations

It is the Company's policy to prevent injury and ill-health to the workforce engaged in manual handling and it is important that the management and colleagues take reasonably practicable precautions to prevent manual handling injuries from occurring.

Manual handling operations will be avoided, so far as is reasonably practicable, where there is a risk of injury. All possible steps will be taken to reduce the risk of injury to the lowest level possible.

Generic Risk assessments will be undertaken for general manual handling activities where there is no significant risk or suitable controls can be put in place to reduce risk.

Training will be given to all employees involved in manual handling. The co-operation and assistance of all colleagues of the utmost importance and the recommendations of colleagues undertaking the tasks form an important part of the assessments.

For lifting activities not covered by the generic assessments, a specific Manual Handling Risk Assessment will be undertaken. If the assessment identifies medium/high risk of injury then further consideration should be given as to whether the operation can be avoided, or how the risk can be reduced to the lowest level reasonably practicable, for example by:

- Redesigning the task to eliminate manual handling.
- Provision of mechanical aids, (trolleys, hoists, etc).
- Provision of proper handles, handholds.
- Secure items, to prevent load shifting.
- Breaking down of the load into smaller components to reduce the size of load to be lifted.
- Provision of manual handling training.
- Provision of sufficient persons to undertake a team lift.

Colleagues must notify their manager immediately should they suffer any acute injury or develop health problems related to manual handling operations.

3.25 Monitoring and Review of Safety Performance

The Head of SHEQ has a specific responsibility to monitor the implementation of the Company's Safety, Health and Wellbeing Policy and to review the company's performance. Monitoring will include both proactive and reactive monitoring, and will provide:

- Feedback on SHEQ performance. (Including leading and lagging indicators)
- Information to determine whether the day-to-day arrangements for hazard and risk identification, prevention and control are in place and operating effectively
- The basis for decisions about improvement in hazard identification and risk control, and the SHEQ Integrated Management System (IMS)

The SHEQ Team will undertake audits of Sigma operational areas including site and premises operations at a frequency and scope according to our needs and conditions; this will generally be monthly.

Proactive monitoring will be undertaken by Managers and may include:

- Periodic inspection of work systems, premises, plant, and equipment undertaken at agreed intervals. All identified unsatisfactory conditions shall be recorded, reported, and remedial actions taken where appropriate. A formal record of these Inspections will be maintained
- Day to day supervision and surveillance to ensure a safe working environment and safe systems of work are provided and maintained
- Site Managers will undertake on-site health and safety inspections. Senior Management will undertake periodic audits of site operations and the SHEQ Team will review these audits to ensure that work is being carried out as planned and that relevant legislation and site rules are observed on site
- Measurement against any safety objectives which may be set at periodic management meetings and annual SHEQ review meetings

Reactive monitoring will include the identification, reporting, investigation, and trend analysis for:

- Work-related injuries, ill health (including monitoring of aggregate sickness absence records), diseases and incidents
- Other losses, such as insurance claims or damage to property
- Any deficiencies in SHEQ performance, and SHEQ IMS failures

Periodic reviews of the SHEQ IMS will be carried out at a frequency and scope according to our needs and conditions; this will generally be annually, or more frequently if required due to changes in legislation, and will generally cover the following:

- The overall strategy of the SHEQ IMS to determine whether it meets planned performance objectives
- Evaluation of the SHEQ IMS's ability to meet the overall needs of the Company and its stakeholders, including its workers and the regulatory authorities
- Identify what action is necessary to remedy any deficiencies in a timely manner
- The results of work-related injuries, ill health, diseases and incident investigations and trend analysis; performance monitoring and measurement
- Review of any new legislation, guidance notes, HSE initiatives, or other internal or external inputs which may affect the health and safety management system

- Review the SHEQ IMS, working procedures and training requirements, as appropriate.
- Any changes will be communicated to all colleagues

3.26 New and Expectant Mothers

We will endeavour to ensure that women of childbearing age are not put at any risk and that new or expectant mothers' needs are taken into consideration with respect to their working conditions, the type of work in which they are involved and their working environment conditions. An individual risk assessment will be undertaken for any pregnant and breastfeeding workers and determine what control measures need to be put in place to provide adequate protection. Where significant risks are present, we will alter working conditions, or introduce control measures. So far as practicable we will ensure that adequate rest facilities are provided for pregnant workers and new mothers.

3.27 Noise

Damage to a person's hearing can occur when that person is constantly subjected to a noisy environment. All work tasks where employees are likely to be exposed above the first action value (80dB(A)) of the Control of Noise at Work Regulations 2005 will be subject to a risk assessment process and all reasonably practicable control measures will be implemented to reduce likely exposures to below the first action value. Where the daily noise dose reaches the second action value of 85 dB(A) ear protection becomes compulsory, and it is the responsibility of the supervisor to ensure that colleagues make use of it within designated ear protection zones. Sigma will do everything that is reasonably practicable to lower the daily noise dose to below 85 dB(A).

When selecting and purchasing power tools and equipment, consideration must be given to the procurement of equipment which is the least harmful in terms of noise generated. In addition, colleagues will receive information and instruction on the damage caused by noise, and how to use and maintain hearing protection.

All colleagues, contractors and visitors will obey any site instructions and warning notices about the wearing of hearing protection in designated areas.

Plant and equipment will be selected and maintained to minimise noise levels and colleagues will be instructed in their safe and efficient use to minimise noise levels.

All Sigma colleagues will be required to complete the Company Medical Questionnaire, and to promptly report any work-related health conditions. Any person who is medically confirmed as suffering from noise induced hearing loss may not be permitted to use power tools which cause damaging noise exposures.

3.28 Non-English-Speaking Operatives and right to work

Sigma will ensure that all colleagues employed are legally allowed to work within the UK and if necessary, use the Home Office "right to work checklist". If agency staff are used, then the Agency will be responsible for undertaking these checks.

If employed by Sigma, colleagues who do not have a good understanding of, or are unable to speak English will be identified at job interview/induction stage and the following additional measures taken:

- A specific risk assessment for that individual will be prepared
- All safe systems of work are to be briefed by an interpreter
- Safety signage will be provided in the first language of the operative
- An English-speaking interpreter will be provided for every 5 operatives employed

3.29 Office Safety/Safe Place of Work

Sigma will ensure that all offices are maintained in a clean, orderly and safe condition, in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992, and are laid out and maintained to minimise slip and trip hazards. A safe means of access and egress from all workplaces will be provided and maintained, so far as reasonably practicable. All workplaces will have appropriate arrangements for the storage and use of hazardous substances, without risk to health. All temporary working sites will comply with Schedule 2 of the CDM 2015 regulations in relation to the requirements for site welfare.

3.30 Permit to Work Systems

A Safe System of Work will be instigated where a risk assessment identifies a hazard that cannot, so far as is reasonably practicable, be eliminated. For high-risk or non-routine works, or entry into a hazardous area, a Permit to Work system may be established and implemented to control the health, safety, and environmental hazards.

Activities for which implementation of a Permit to Work system should be considered to ensure that the necessary controls are in place include:

- Hot Works
- Confined Space
- Live Electrical Work
- Permit to Dig
- General Hazards - overhead cables, fragile roof lights etc.
- Roof work
- Crane Lift
- Use of steps
- Work at Height

3.31 Personal Protective Equipment (PPE)

Sigma shall ensure that suitable personal protective equipment is provided to our colleagues who may be exposed to a risk to their safety, health, or wellbeing whilst at work.

While acting as Principal Contractor on construction sites Sigma will ensure that all site operatives wear suitable PPE in line with their risk assessment/site rules or legislation.

All colleagues who may be exposed to a risk to their safety, health, and wellbeing whilst at work will be provided with suitable, properly fitting, and compatible personal protective equipment, except where such risks have been adequately controlled by other means that are equally or more effective. We will consider personal protective equipment as a last resort or as an interim solution to a risk of exposure, pending control by engineering or other means.

All personal protective equipment provided by Sigma will be properly assessed prior to its provision, and all colleagues will be provided with appropriate information, instruction and training on the correct use and maintenance of PPE. This must be worn correctly when the applicable risk assessment identifies that it is required.

Individuals will be asked to sign a declaration to confirm that they understand the need for PPE and agree to use it correctly in accordance with the training/instruction they have been given, and to report any defects or losses.

All management, supervisors, colleagues, contractors, and visitors shall wear appropriate PPE whilst on site, including safety helmets, high visibility jackets/waistcoats, safety footwear and other PPE as directed or required by site rules. The wearing of shorts is prohibited on site.

Operatives must inform their foreman/supervisor/person in charge immediately of any loss of or damage to their PPE and obtain replacements.

3.32 Protection of the Public

Arrangements shall be made to ensure, so far as is reasonably practicable, that no member of the public will be exposed to significant risks to their safety, health, and wellbeing as a result of Sigma activities.

General public areas must be kept free from any unsafe obstructions and activities that could be a hazard. Where necessary temporary safeguards must be provided, and adequate control measures put in place to keep members of the public away from hazardous work activities.

Every reasonable precaution must be taken to keep unauthorised persons, especially children, out of Company premises and sites. Considerations must be given to safeguard trespassers should they gain entry, plant and equipment should be left immobilised (disconnected/locked off) and in a safe condition.

Where third parties or visitors are allowed onto Company Premises or site locations, they should be made aware of the safety standards and any special hazards. They should be accompanied by a responsible person and provided with protective clothing/equipment where appropriate.

Sigma will comply with the provisions of HSE Guidance document Protecting the Public Your Next Move HS (G) 151.

3.32.1 Work in Occupied Buildings

Where Sigma GRP Ltd undertakes work in an occupied or partially occupied building, the health, safety and wellbeing of occupants, residents, visitors, client employees, first responders, neighbouring businesses and other persons in or around the building shall be considered during planning, risk assessment and delivery of the work.

Before work starts, Sigma shall liaise and cooperate with the client, Principal Contractor, building manager or other responsible person to establish the building's occupancy, operating requirements, vulnerable persons, access restrictions, emergency arrangements and any activities that could interact with the proposed work.

Suitable and sufficient risk assessments and safe systems of work shall address, where applicable:

- Segregation of occupants from work areas using suitable barriers, signage and controlled access.
- Protection from noise, dust, fumes, vibration, falling objects and other construction hazards.
- Maintenance of safe pedestrian and vehicle routes.
- Protection of fire escape routes, fire doors, alarms, firefighting equipment and emergency-service access.
- Arrangements for residents, disabled persons and other vulnerable occupants.
- Restrictions on isolating fire alarms, utilities, security systems and life-safety systems.
- Coordination of noisy, disruptive or higher-risk work with the building's activities.
- Communication of significant risks, restrictions and emergency arrangements to occupants and other affected parties.
- Daily inspection of barriers, access routes, housekeeping and fire precautions.

Emergency routes, assembly points, firefighting facilities and access for first responders shall be maintained unless an authorised alternative arrangement has been agreed and communicated. Work shall stop where site conditions change or the safety of occupants or others can no longer be assured.

3.33 Risk Assessments and Method Statements

Risk assessments are a key part of the arrangements for SHEQ and wellbeing. Colleagues will be actively encouraged to participate in the risk assessment process. Management and supervisors are required to ensure that risk assessments are carried out for all work activities which entail a significant risk to health and safety. Significant findings will be recorded, and where applicable the risk assessments will be used to inform written instructions in the form of safety method statements.

These documents are a key part of the health and safety management system, the purpose being to ensure hazards are identified and eliminated or reduced to the lowest level reasonably practicable by implementing appropriate control measures and safe systems of work. The method statement should outline working methods, explain the sequence of operations, and identify the precautions to be adopted. These risk assessments/method statements should take into consideration the following:

- Pre-construction information from the Client
- Competency and training requirements
- Access equipment needed for work at height, and any other tools and equipment required
- Any site-specific hazards, for example asbestos or electrical hazards
- The provision of basic fire precautions and fire-fighting arrangements
- The necessary emergency arrangements, including first aid provision
- Arrangements for management and supervision

A copy of the risk assessments and method statements will be available at the workplace, and the findings will be brought to the attention of all colleagues and visitors affected by them, this will be undertaken by way of site briefings by supervisors, so that those undertaking the activities understand what they have to do and the control measures to be implemented.

Any significant changes to the safe system of work which deviate from either the risk assessment or method statement should be recorded by the named responsible person(s) and the changes communicated to all colleagues and others affected.

For potentially hazardous tasks, (e.g., hot works, entry into a confined space) a Permit to Work system may be established and implemented.

3.34 Smoking

Smoking is always prohibited in all enclosed and substantially enclosed public or private areas in the workplace. Colleagues are only permitted to smoke whilst off duty (in official break times only) and in unenclosed designated areas.

Smoking is prohibited in vehicles belonging to or leased by the company and in colleague private vehicles if ever used to transport colleagues or members of the public whilst carrying out their duties as a colleague.

Any colleague who does not comply with this policy shall be liable to disciplinary action in accordance with the Company's Disciplinary Procedure.

3.35 Stress/Mental Health

It is not envisaged that colleagues of Sigma are likely to be adversely affected by stress due to work related factors, such as workload or excessive working hours. However, we recognise our responsibility to control the health, safety, wellbeing, and welfare of our colleagues and this includes reviewing the impact of stress at work.

The Health and Safety Executive define stress as “the adverse reaction people have to excessive pressure or other types of demand placed on them”. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress that can be detrimental to safety, health, wellbeing, and welfare.

All colleagues are encouraged to report any concerns they may have regarding the impact or effect of work-related stress or other mental health issues. Any persons known to be, or strongly suspected of being, affected by stress should be referred to the appropriate Manager who will arrange for appropriate measures to be taken in collaboration with the SHEQ/HR Department, including reviewing their workload and encouraging them to visit their G.P.

To support Sigma who meeting its statutory and good practice obligations we have trained several of our colleagues in mental health first aid, our line managers in managing mental health in the workplace and our colleagues in mental health awareness. We have signed up to the Time to Change Employer Pledge and are committed to supporting the charter.

3.35.1 Occupational Health, Mental Health, Fatigue and Employee Wellbeing

Sigma GRP Ltd and all its legal entities are committed to protecting and promoting the physical and mental health and wellbeing of all colleagues.

Occupational health risks will be identified through workplace, task and individual risk assessments, medical health questionnaires, health surveillance, sickness-absence monitoring and, where appropriate, referral to a competent occupational health provider. Reasonable adjustments and suitable support will be considered where a health condition may affect, or be affected by, an individual’s work.

Sigma recognises that workplace factors, including workload, working hours, shift patterns, night work, travel, insufficient rest and personal circumstances, may contribute to fatigue. Managers shall ensure that work is appropriately planned, staffing and working hours are reasonable, suitable breaks and rest periods are provided, and foreseeable fatigue risks are considered when allocating work, particularly for night work, driving, safety-critical activities and extended working periods.

Colleagues must report when they believe fatigue, stress, mental ill health or another health condition may affect their ability to work safely. No colleague will be expected to undertake work where they are not fit to do so safely. Managers shall respond sensitively and, where necessary, review duties, workload, working arrangements or working hours and seek advice from HR, SHEQ or occupational health.

Sigma supports employee wellbeing through appropriate information, instruction and training, access to trained Mental Health First Aiders, mental-health awareness training, and confidential management support routes for raising concerns.

Where an Employee Assistance Programme or other confidential support service is available, its contact details will be communicated to colleagues.

The effectiveness of these arrangements will be monitored through consultation, sickness-absence trends, occupational-health recommendations, health-surveillance outcomes, incident information and management review.

3.36 Temporary Works

“Temporary Works” is a widely used expression in the construction industry for an “engineered solution” used to support or protect an existing structure or the permanent works during construction, or to support an item of plant or equipment, or the vertical sides or side-slopes of an excavation, or to provide access. The construction of most types of permanent works will require the use of some form of temporary works.

As a responsible company we have interpreted BS5975 and will ensure that Temporary Works Co-Ordinator's (TWC) and Temporary works Managers (TWM) are formally appointed for each project. Sigma will ensure compliance with BS5975 by ensuring that all colleagues have the required competencies and have been briefed on company procedures and documents relating to Temporary Works:

- Temporary Works Procedures Flowchart
- TWC Appointment Letter
- Temporary Works Schedule
- Temporary Works Register
- Temporary Works Design Brief
- Permit to Load / Strike

Examples of Temporary Works include, but are not limited to:

- Earthworks - trenches, excavations, temporary slopes, and stockpiles
- Structures - formwork, false-work, propping, façade retention, needling, shoring, edge protection, scaffolding, temporary bridges, site hoarding and signage, site fencing, cofferdams
- Equipment/plant foundations - tower crane bases, supports, anchors and ties for construction hoists and mast climbing work platforms (MCWPs), groundworks to provide suitable locations for plant erection, e.g. mobile cranes, and piling rigs.

3.37 Training

Safety, health, and wellbeing training is regarded as an indispensable ingredient of an effective SHEQ programme. It is essential that every colleague in the organisation be trained to perform his or her job effectively and safely.

Sigma will carry out an annual review of SHEQ training needs and will produce an annual training programme for all levels of colleague. In carrying out the review attention will be given to persons whose role has changed, possibly due to a change in their scope of work, or possibly due to legislation. We recognise that employees taking on board additional responsibility may need additional training.

Records of training provided will be maintained. The training needs will be agreed by the management team and budgets allocated. The Departmental Training Coordinators will monitor that the training is carried out and maintained in accordance with the training schedule.

Each new colleague will receive a SHEQ Induction at the start of their employment, where any additional training needs may be identified. The induction will cover:

- The Company Health and Safety Policy and Company Handbook, and general health and safety policies, rules, and procedures
- Emergency procedures including action to take in the event of a fire, and first aid arrangements
- The significant risks, safe systems of work, and precautions to be taken. Method statements and risk assessments where applicable
- The PPE requirements. Where/how to obtain additional PPE as required
- Procedures for reporting accidents, injuries, and property damage

Further training needs may also be identified via other means, such as via site inspections or management meetings or annual SHEQ review. Ongoing and informal training and supervision will also be provided by all managers and team leaders within the business.

Plant and machinery must only be operated by trained and authorised personnel, in accordance with the written safe operating procedures.

3.37.1 Site Induction Training

Where Sigma is the Principal Contractor, all colleagues, contractors, and visitors will be required to undertake a site induction. Records of induction will be maintained on site and filed securely to meet the requirements of GDPR. Additionally, all Contractor Supervisors will be required to ensure that all their operatives are aware of the content of their method statement and risk assessment and formal signed records kept evidencing the same.

Where Sigma are not the Principal Contractor, all Sigma colleagues must comply with the site induction procedures as required by the Principal Contractor. In addition, the Company site supervisor must ensure that all operatives are aware of the content of any relevant method statements and risk assessments etc, site specific rules, specific hazards related to their working area, and emergency arrangements. No operative will be permitted to work on site without attending an induction.

Where appropriate a Sigma representative shall attend site meetings as necessary to ensure that any relevant information discussed in the meeting that may have an effect on health and safety of the site personnel can be passed on to the workforce.

3.38 Vulnerable persons

The Company has an obligation to take extra precautions for vulnerable persons in our employment, if the risk of injury to individuals is greater than other individuals who are not at the same risk. Accordingly, additional risk assessments will be carried out for the following persons:

- Lone workers
- New and expectant mothers
- Existing medical conditions or health issues
- Young persons

3.39 Welfare Facilities

Suitable and sufficient welfare facilities will be provided at all offices and warehouses under the control of Sigma in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992.

Additionally, adequate welfare will be provided for all construction projects for all colleagues, contractors, and visitors, including:

- Toilet facilities, including separate facilities for men and women, and special facilities for the disabled where reasonably practicable
- Washing facilities, including sink(s) large enough to get forearms in, a supply or warm or hot running water, soap and towels or other means of drying hands
- Accommodation for clothing, with drying facilities if necessary
- Facilities for rest and to eat meals where necessary
- Drinking water

All facilities will be maintained to a satisfactory standard, regarding accessibility, ventilation, lighting, and cleanliness/hygiene.

The Welfare Facilities for a construction site will be detailed in the Health and Safety Plan and be compliant with Schedule 2 of CDM 2015.

3.40 Work at Height

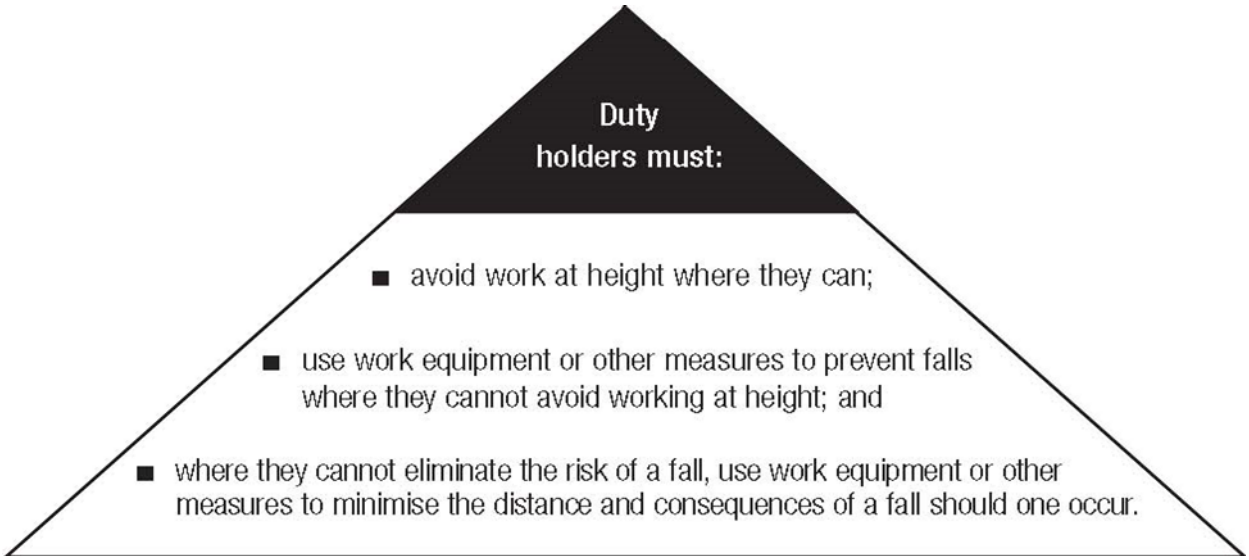
As working at height access equipment is used every day by our colleagues, this is an area which we take very seriously. Sigma will make sure that all work at height is planned and carried out in accordance with the relevant risk assessment and the Work at Height Regulations 2005.

The most suitable access equipment will be provided for the work activity, giving priority to collective measures (e.g., guard rails) over personal measures (e.g. harnesses). Regular inspection of all equipment required for working at height, will be carried out, particularly where there is a statutory requirement to do so.

Colleagues must inspect any work at height access equipment immediately prior to use and ensure that any defective equipment is exchanged or repaired before use.

Sigma will ensure that all working at height operations follow the hierarchy as shown below, and ensure the following:

- All work at height is properly planned and organised
- All work at height takes account of weather conditions that could endanger health and safety
- Those involved in work at height are trained and competent (or, if being trained, is supervised by a competent person)
- Equipment for work at height is appropriately inspected
- The risks from fragile surfaces are properly controlled
- The risks from falling objects are properly controlled



Ladders and Stepladders

Ladders owned by the Company are included in a Work at Height Equipment Register and inspected at agreed intervals. All colleagues and supervisors are trained in the safe use and inspection of ladders. As such they understand that they must carry out a visual inspection before use and report any faults or defects in the equipment immediately.

Ladders, steps, and trestles are not to be used on clients' premises unless it has been agreed that there is no other alternative but to use this type of equipment to complete the job.

Ladders, steps, and trestles are not to be used:

- If they are found to be defective in any way

- On sloping ground
- On top of moveable objects
- In front of a door which may be opened
- Against a slippery or unstable surface
- At a shallow angle or used horizontally as a plank
- At too steep an angle
- Leaning to one side

Scaffolding and Mobile Towers

All reasonable steps will be taken by Sigma to provide a safe working environment for colleagues required to use scaffolding and mobile scaffold towers during their working day.

The Company will liaise with any other persons involved in the work activity. The Site Manager will obtain a handover certificate confirming that the scaffold has been erected by a competent person in accordance with a generally recognised scaffolding standard, and that it has been inspected by a competent person within the last 7 days before using it.

Mobile tower scaffolds will only be erected or dismantled by or under the direct supervision of a suitably trained and competent person. All operatives and supervisors involved in the erection of mobile tower scaffolds are required to attend a training course (PASMA) on the erection of prefabricated aluminium scaffolding.

All equipment will be clearly identified, registered, and inspected at regular intervals. As with all work at height access equipment, the user is responsible for carrying out a visual inspection of the equipment prior to use and must inform the relevant supervisor about any item of scaffold equipment that is found faulty when used on site.

In addition, all users of mobile towers and supervisors are to ensure that:

Outriggers and stabilisers are used when required

- All bracing members, guardrails and toe boards are fitted in accordance with the instructions
- The castors are locked, before anyone works from the platform
- The tower is clear of overhead obstructions, before moving
- Access to the working platform is gained in the correct manner
- Personnel do not to remain on the platform whilst the tower is moved

Mobile Elevating Work Platforms (MEWPS)

There are occasions where operatives may use lifting equipment on site. If this is the case then the lifting operation will be covered by the risk assessment and/or method statement, and the lifting equipment will be subject to statutory test and examination. Certificates must be provided by the hire company for lifting appliances and lifting gear which they have supplied to customers. This equipment will normally fall into the category of MEWPS. Typically, these will be cherry pickers/scissor lifts.

MEWPs must only be operated by competent employees holding a competency (IPAF) card and have undergone familiarisation training by the machine supplier. When “Cherry Picker” type MEWPs are used, operatives will be attached to the proprietary fixing point by a harness and fixed length restraint lanyard. Fall Arrest lanyards are not to be used.

Whilst operating Scissor Lift type MEWPs, harnesses should be fixed to the attachment point whilst operating the machine over rough ground to prevent being thrown out. There is no requirement to be harnessed to the Scissor Lift whilst working within the confines of the basket.

Adequate pre-use checks, maintenance, examinations, and tests of lifting equipment should be carried out at appropriate intervals, in accordance with statutory requirements and the manufacturer's instructions. Suitable records must be kept. A rescue plan has been developed for work in MEWPS to ensure that casualties can be recovered from ground level.

In selecting the equipment, consideration will be given to the risk from entrapment or crushing whilst operating the equipment.

3.41 Work Equipment

Sigma will endeavour to ensure that all equipment used in the workplace is safe and suitable for the purpose for which it is used and is maintained in good working order and safe condition in accordance with the Provision and Use of Work Equipment Regulations 1998 and the manufacturers' instructions.

All operatives will be provided with adequate information, instruction and training, and appropriate personal protective equipment, to enable them to use work equipment safely.

The use of any work equipment, which could pose a risk to the well-being of persons in or around the workplace, will be restricted to authorised persons.

It is the responsibility of all persons using work equipment to use the correct tools and equipment for the job, and to carry out a visual check before use to ensure that it is in a safe condition. Anything which they find to be defective must be immediately taken out of use and reported to the supervisor or other relevant person for the appropriate action to be taken. In addition, users must not use unsafe defective equipment until it has been put back in good safe condition and must not attempt to repair or maintain equipment unless they have been properly trained to do so, particularly when it may involve the removal of safety guards or live electrics.

Any safety critical work equipment which may be subject to conditions likely to cause deterioration over time will be subject to formal monthly safety inspections which will be recorded. Suitable records of maintenance and test will be kept.

All reasonable steps will be taken to secure the safety, health and wellbeing of colleagues who use, operate, or maintain plant, machinery, and equipment.

3.42 Young Persons

It is the policy of Sigma that no person under the age of 18 shall work unsupervised on site, whether our own colleague or that of a sub-contractor.

Where young persons are employed, a young person's risk assessment will be undertaken in accordance with the Management of Health and Safety at Work Regulations 1999. This will ensure that appropriate assessment has been given regarding a young persons' lack of awareness, inexperience, and immaturity.

Regular assessments will also be made on a young person's progress relative to their learning, understanding, and maintaining the principles of health and safety at work through work experience. Copies of the risk assessments and control measures taken, for young persons under 18 years of age, will be sent to their parents or guardians.

Appendix 1 – Benzine Awareness

This safety guideline is intended to provide suitable information to all employees regarding the potential toxic effects of Benzene so that adequate measures can be taken to limit exposures through controls in the workplace.

1. General

Of all the hydrocarbons, Benzene poses the most serious long-term threat. Exposure over time, to even low levels of Benzene can cause leukaemia, blood changes and aplastic anaemia.

2. Characteristics

Benzene is a colourless to light-yellow liquid with a pleasant, sweet odour.

Formula (C6H6) CAS No: 71-43-2

Benzene is a flammable liquid that can accumulate static electricity. Benzene vapours are heavier that air and may travel to a source of ignition and flash back. The vapours are readily dispersed by wind movement and/or air currents. Liquid benzene tends to float on water and may travel to a source of ignition and spread fire. Benzene is highly reactive with no oxidizing materials.

3. Uses:

Benzene is a component of gasoline, both in the manufacturing process and found naturally in crude oil; Benzene is also used as a feed stock for chemical manufacturing.

4. Health effects:

WARNING

Benzene is a cancer-causing agent in humans. All contact should be reduced to the lowest possible level. The above exposure limits are for air levels only. Skin contact may also cause overexposure.

Benzene is one of the most hazardous of all petroleum products because of its adverse health hazards and high flammability.

The following adverse health effects are important to remember where there may be a potential exposure to Benzene:

Acute: At high concentrations (1000 PPM) Benzene has an acute effect on the central nervous systems causing headaches, dizziness, drowsiness, unconsciousness, and possible death. Acute exposure can also cause breathlessness, irritability, and giddiness.

Chronic: Benzene has the chronic exposure effect on bone marrow (aplastic anaemia leukaemia). Chronic exposure can also cause convulsions, liver damage, heart damage, blood diseases (aplastic anaemia), and cancer (leukaemia). These symptoms can take months or years to surface and can develop without physical or visible indications.

Repeated skin contact leads to irritant contact dermatitis (rash); as with any petroleum solvent (which Benzene is also classified as), it will leach the natural oils out of the skin. Direct contact with the skin can cause erythema and/or blistering.

Benzene is irritating to eyes and mucous membranes.

Flammable/dangerous fire risk: benzene has a very low flash point making it dangerous to have any open flame, spark or source of ignition when vapours are present.

Explosive limits in air 1.5 to 8% by volume: benzene is highly flammable at low levels of vapor quantity in air.

5. Personal Protective Measures

All employees are not permitted to work in areas where there may be a potential for Benzene exposure.

6. Training

All employees will be provided awareness training in this program in order to be familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard.

Appendix 2 : H2S Awareness

This safety guideline is intended to provide suitable information to all Sigma GRP Ltd employees regarding the potential toxic effects of Hydrogen Sulphide (H2S) so that adequate measures can be taken to limit exposures through controls in the workplace.

General

Hydrogen sulphide is ever present in all refineries. In addition, it is generated in many industrial processes as a by-product and also during the decomposition of organic matter containing sulphur.

Hydrogen sulphide (H2S) is a colourless gas that at low concentrations has the odour of rotten eggs. At high concentrations, it kills your sense of smell.

Formula H2S

CAS No.: 7783-06-04

H2S is a highly flammable and extremely toxic gas that can form an explosive mixture with air over a wide area.

Characteristics Of Hydrogen Sulphide

When ignition occurs, the combustion produces irritants and toxic gases, including sulphur dioxide (SO2). SO2 has an irritating effect on the eyes and lungs and can be fatal at concentrations about 100PPM.

H2S is heavier than air, has a tendency to settle in low-laying areas, and is readily dispersed by wind movements or currents.

H2S attacks most metals, especially in the presence of water, forming sulphides that are usually insoluble precipitates. It is also very corrosive to plastics and tissue.

H2S dissolves in water forming a weak acid (hydro sulphurous acid).

H2S will be released when in water when agitated making it a dangerous hidden hazard.

Health Effects:

The following information outlines the symptoms of hydrogen sulphide at specific concentrations.

10 PPM (0.001% H2S)

- Obvious and unpleasant odor.
- Burning eye irritation.
- Permissible exposure limit is eight hours.

200 PPM (0.02% H2S)

- Kills smell quickly.
- Stings eyes and throat.
- Respiratory irritation.
- Death after one to two hours of exposure.

500 PPM (0.05% H2S)

- Dizziness. Breathing ceases within a few minutes.
- Requires prompt artificial respiration.

- Loss of muscle control, making self-rescue impossible.

1000 PPM (0.10% H2S)

- Unconsciousness at once, followed by death within minutes.

Exposure Warning

H2S CAN PARALYZE THE SENSE OF SMELL. DO NOT USE THE SENSE OF SMELL TO DETECT H2S.

H2S Detection And Alarm Systems

In most refineries emergency employee alarms are installed to meet the regulatory standards. The alarms provide warning for the necessary emergency action according to the site emergency action plan and provide time for employees to safely escape from the workplace or the immediate area.

Systems are also used on drilling locations, offshore platforms and produce H2S, and some plants. It is not readily used on land production leases. Signs are and should be posted stating the presence of poison gas and urging caution.

Warning Conditions

There are three conditions that you must be aware of when working around H2S. The following information identifies the level of danger and alarms associated with each condition.

Condition Green:

- Possible Danger
- No Alarms

Condition Yellow:

- Moderate Danger
- H2S to 50 PPM
- Intermittent Audible Alarm and Yellow Flashing Light

Condition Red:

- Extreme Danger
- H2S at 50 PPM or Above
- Continuous Audible Alarm and a Red Flashing Light

*** These conditions appear specific to a site rather than a general policy?**

Hydrogen Sulphide Detection Devices

Fixed H2S detection devices (monitor and indicator) are designed to detect H2S concentrations in air and established TWA (time weighted average) (10 PPM) and STEL (15 PPM).

The alarm should be capable of being perceived above the ambient noise or light levels in the affected area. The alarm should be distinctive and recognizable as a sign to evacuate the area and to start emergency status emergency procedures.

Personal Monitors

Personal monitors are also available in many types. They are also designed with the employee's safety in mind. Familiarize yourself with the equipment available at your current work assignment.

Plant Monitors

Plant monitors are available in many types and are designed with the employee's safety in mind. Familiarize yourself with the equipment available at your current work assignment.

In order to respond effectively in an emergency situation, every individual at the site should know their specific responsibilities. Whether or not an individual has an assigned duty, each individual should know what to do in the event of an emergency.

Evacuation

Follow these procedures in the event of a hydrogen sulphide release that requires evacuation:

- Hold your breath and quickly leave the area containing H2S. Do not inhale.
- Move quickly to the upwind "Safe Breathing Area" to receive instructions.
- Always be conscious of the wind and constantly monitor wind direction. Wind socks and streamers show which direction the wind is blowing so that you can determine the proper safe breathing area.

SCBA Escape

When in an area, on some client's premises, which has required you to be trained to use or wear an escape respirator such as an SCBA, put on your SCBA and help anyone who appears to be affected by the gas.

Before taking off your mask, ensure that the air you will breathe is safe.

Always be conscious of the wind and constantly monitor wind direction. Windsocks and streamers show which direction the wind is blowing so that you can determine the proper safe breathing area.

Emergency Rescue And First Aid

To prevent risk and injury to other personnel, re-entry into an area of unknown concentration of H2S will require the use of self-contained breathing equipment and backup personnel.

- Wear a full rescue unit (minimum 30-minute breathing apparatus) before attempting a rescue.
- Remove the victim immediately to fresh air.
- If breathing, maintain the victim at rest and administer respiration immediately.
- If the victim is not breathing, start artificial respiration immediately.
- Call an ambulance and get the victim medical treatment.
- Keep the victim lying down with a blanket or coat under the shoulders to keep airway passage open. Conserve the victim's body heat and do not leave the victim unattended.

If the eyes are affected by H2S, wash them thoroughly with clear water. For slight eye irritation, cold compresses are helpful.

A victim should not return to work until authorised to do so by a physician, even if the victim has had minor exposure and has not completely lost consciousness.

PPE (Personal Protective Equipment)

Depending on the exposure i.e., the amount of gas in the air and the type of work, employees will be required to wear different levels of PPE. Examples of protection include:

When the exposure level is near or above 10 PPM, you will be required to wear self-contained fresh air gear.

Wear chemical goggles or a face shield when eye contact with this material is possible.

Avoid skin contact. Wear proper clothing such as impervious gloves, long sleeves, apron, and boots.

Ventilation (Indoor)

Use adequate general and local exhaust ventilation to keep atmospheric vapor concentrations below the occupational exposure limits.

Eyewash And Showers

Safety showers and eyewash stations must be available in the vicinity of a potential exposure to the material. Familiarize yourself with the location of these facilities before starting the job.

Training *(Where required)*

All employees will be provided awareness training where necessary in order to be familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard. The training will be provided prior to working in any job with potential exposure to H2S operations.

The purpose of hydrogen sulphide training is to familiarize employees with the regulations affecting H2S operations. Employees will learn the necessary skills to recognize, detect, and use the proper safety equipment in the event of an H2S incident.

Appendix 3: Lead Awareness

Purpose

This safety guideline is intended to provide suitable information to all employees regarding the potential effects of lead and where lead may be found so that adequate measures can be taken to limit exposures through controls in the workplace.

i. General

The objective of this guideline is to prevent absorption of harmful quantities of lead. The guideline is intended to protect employees from the immediate toxic effects of lead and from the serious toxic effects that may not become apparent until years of exposure have passed.

ii. Characteristics & where it can be found

To understand why lead is so hazardous, it is important to know what it is, the hazardous effects on people, and which materials do or may contain lead. Once this is understood, employees will gain a respect for the safety guidelines set forth in this policy.

What Is It?

Pure lead (Pb) is a heavy metal and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

Where Can It Be Found?

Lead can be found in:

Old glossy paints used on walls and pipe.

Building and roof metal support frames.

What are other names or identifying information for lead?

CAS Registry No.: 7439-92-1

Other Names: Elemental Lead, Lead metal, Inorganic lead

Main Uses: Manufacture of many products including storage batteries and ammunition, in construction materials, in solders and alloys, etc.

Appearance: Blue - grey lustrous solid.

Odour: Odourless

What is the WHMIS classification?

D2A - Very Toxic (Chronic toxicity; Teratogenicity/embryotoxicity; Carcinogenicity; Mutagenicity; Reproductive toxicity)

Class D2A

What are the most important things to know about lead in an emergency?

Emergency Overview: Blue - grey lustrous solid. Odourless. COMBUSTIBLE DUST. Dust may form explosive dust-air mixture. VERY TOXIC. Prolonged or repeated exposure causes damage to nervous system, kidneys, blood. if inhaled and/or ingested. SUSPECT CANCER HAZARD. Suspected of causing cancer. REPRODUCTIVE HAZARD. May damage fertility. TERATOGEN/EMBRYOTOXIN. May damage the unborn child. MUTAGEN. May cause genetic defects.

What are the potential health effects of lead?

Main Routes of Exposure: Inhalation. Skin contact. Eye contact. Ingestion.

- Inhalation: At high concentrations: can irritate the nose and throat.
- Skin Contact: Not irritating.
- Eye Contact: May cause slight irritation as a "foreign object". Tearing, blinking and mild temporary pain may occur as particles are rinsed from the eye by tears.
- Ingestion: Not expected to cause effects following short-term exposure. See Effects of Long-Term (Chronic) Exposure.
- Effects of Long-Term(Chronic) Exposure: VERY TOXIC. Can cause permanent damage to the nervous system. Symptoms may include restlessness, reduced ability to think, muscle tremors, memory loss and personality changes. In severe cases, symptoms may include muscle weakness, loss of feeling or prickly sensation in the hands, feet, arms or legs, clumsiness, and paralysis. Can cause permanent damage to the kidneys. Kidney function tests may show abnormal results. In severe cases, symptoms may include fatigue, increased, or decreased urination, nausea, and vomiting. May harm the blood. Can cause a decrease in the number or size of red blood cells (anaemia). Blood tests may show abnormal results. In severe cases, symptoms may include paleness, fatigue, weakness, dizziness, confusion, shortness of breath and headache. Has been associated with increased blood pressure.
- Carcinogenicity: Possible carcinogen. May cause cancer based on animal information.

International Agency for Research on Cancer (IARC): Group 2B - Possibly carcinogenic to humans. Inorganic lead compounds are Group 2A - Probably carcinogenic to humans.

American Conference for Governmental Industrial Hygienists (ACGIH): A3 - Confirmed animal carcinogen.

- Teratogenicity / Embryotoxicity: DEVELOPMENTAL HAZARD. May harm the unborn child. Known to cause: learning disabilities, effects on behaviour.
- Reproductive Toxicity: REPRODUCTIVE HAZARD. May cause reproductive effects in men and women. Has been associated with reduced fertility.
- Mutagenicity: MUTAGEN. May cause genetic damage. Exposure of the parent may cause effects in children.

What are first aid measures for lead?

Inhalation: Take precautions to ensure your own safety before attempting rescue (e.g. wear appropriate protective equipment). Move victim to fresh air.

Skin Contact: Quickly take off contaminated clothing, shoes, and leather goods (e.g. watchbands, belts). Quickly and gently blot or brush away excess chemical. Wash gently and thoroughly with lukewarm, gently flowing water and non-abrasive soap for 5 minutes.

Eye Contact: Avoid direct contact. Wear chemical protective gloves if necessary. Immediately flush the contaminated eye(s) with lukewarm, gently flowing water for 5 minutes, while holding the eyelid(s) open. If irritation or pain persists, see a doctor.

Ingestion: Have victim rinse mouth with water. Call a Poison Centre or doctor if the victim feels unwell.

First Aid Comments: If exposed or concerned, see a doctor for medical advice. All first aid procedures should be periodically reviewed by a doctor familiar with the chemical and its conditions of use in the workplace.

Note to Physicians: Some jurisdictions specifically regulate an ingredient of this product and require a complete medical surveillance program. Specific information should be sought from the appropriate government agency in your jurisdiction.

What are fire hazards and extinguishing media for lead?

Flammable Properties: Does not burn. (lead metal) COMBUSTIBLE DUST. Powder may form explosive dust-air mixture.

Suitable Extinguishing Media: Not combustible. Use extinguishing agent suitable for surrounding fire. (lead metal).

Specific Hazards Arising from the Chemical: In a fire, the following hazardous materials may be generated: very toxic lead oxides.

What are the stability and reactivity hazards of lead?

Chemical Stability: Normally stable.

Conditions to Avoid: Generation of dust.

Incompatible Materials: Reacts violently with strong acids (e.g. hydrochloric acid), when hot. Not corrosive to metals.

Hazardous Decomposition Products: When heated in air or during a fire, forms highly toxic lead oxide fumes.

Possibility of Hazardous Reactions: None known.

What are accidental release measures for lead?

Personal Precautions: Keep unnecessary and unprotected personnel out of spill area. Do not touch damaged containers or spilled product unless wearing appropriate protective equipment.

Methods for Containment and Clean-up: Small spills or leaks: collect using shovel/scoop or approved HEPA vacuum and place in a suitable container for disposal. Large spills or leaks: contact emergency services and manufacturer/supplier for advice.

Other Information: Report spills to local health, safety, and environmental authorities, as required.

What handling and storage practices should be used when working with lead?

Handling: Avoid generating dusts. In event of a spill or leak, immediately put on escape-type respirator and exit the area. Good housekeeping is extremely important. Prevent dust accumulation on ALL surfaces including ceiling rafters and other hidden surfaces.

Storage: Store in an area that is: cool, dry, well-ventilated, out of direct sunlight and away from heat and ignition sources. Keep amount in storage to a minimum.

OEL- For Lead in air = 0.15 mg/m3

BLSL- For males and females = 60 and 30ug/dl, respectively

BLSL- For young workers (under 18) = 50 ug/dl

Exposure Acronym Guide:

OEL= Occupational Exposure Limit

BLSL = Blood lead suspension levels

Ref: Control of Lead at Work Regulations 2002 (CLAW)

What are the engineering controls for lead?

Engineering Controls: Use a local exhaust ventilation and enclosure, if necessary, to control amount in the air. Use stringent control measures such as process enclosure to prevent product release into the workplace.

What personal protective equipment (PPE) is needed when working with lead?

Eye/Face Protection: Wear chemical safety goggles.

Skin Protection: Wear chemical protective clothing e.g. gloves, aprons, boots.

Respiratory Protective Equipment (RPE) – **wear RPE with an assigned protection factor of 20** (eg FFP3 disposable mask or half mask with P3 filter). For longer duration work consider powered RPE with the same protection (eg TH2 powered hood / helmet). Make sure any RPE is compatible with other protective equipment. Fit testing is needed for tight fitting masks. General Hygiene Considerations: It is good practice to: avoid breathing product; avoid skin and eye contact and wash hands after handling.

Appendix 4 : Confined Space

It is the policy of the Company to take all reasonable steps to secure the health and safety of those persons in our employ who are required to make entry into confined spaces will be made.

Health and Safety hazards may arise when entry into confined spaces is required. It is the intention of the Company to ensure that any risks are reduced to a minimum, so far as is reasonably practicable.

When entry into a confined space cannot be avoided the Company will ensure that a Safe System of Work is adopted and followed. The Company will, in consultation with employees and their representatives ensure that:

- Design work tasks so as to avoid the need for entry into confined spaces where practicable
- Provide such information, instruction and training as is necessary to enable the appointment of "competent persons" capable of carrying out Risk Assessments when entry into confined spaces is planned
- Maintain a documented Permit to Work system that must be used whenever entry into "confined spaces" is required
- When entry into confined spaces is required for employees:
- Maintain sufficient serviceable sets of appropriate breathing apparatus (and, if applicable, safety belts and ropes) to ensure safe entry where there is danger from gases, fumes, vapours, etc or where there is liable to be a deficiency of oxygen
- Provide training in the use of breathing apparatus (and safety ropes where necessary) for those employees who may be required to use such equipment when working in confined spaces

When entry into confined spaces by contractors and sub-contractors (including the self-employed) is required:

- Ensure that only serviceable sets of approved breathing apparatus (and safety ropes) are used so as to allow safe entry into confined spaces where there is danger from gases, fumes, vapours, etc or where there is a deficiency of oxygen
- Ensure that users of breathing apparatus and safety ropes have received adequate training in their use
- Provide such equipment and resources as are necessary to safely carry out entry into confined spaces

Record Keeping

In accordance with legislation a suitable and sufficient Risk Assessment for the purpose of deciding what measures are necessary for safety will be undertaken. For work in confined spaces if the Risk Assessment identifies risk of serious injury, then the Confined Spaces Regulations 1997 will apply. The Company will ensure that records will be kept of the following:

- Appointed competent persons, including date of appointment, date of review, any limitations
- Approved breathing apparatus and its inspection and maintenance history
- Trained "Approved Breathing Apparatus" users, including date of training, date of review and name of trainer
- Safety harnesses or lines, reviving equipment and any other emergency equipment, as well as its inspection and maintenance history
- Appointed examiners of breathing apparatus

- Training of attendants and rescue teams, including dates of training, date of review and name of trainer

Permits to Work

A Permit to Work system will be in place and appropriately controlled. When Permits to Work are issued the record will be in the form of a copy of the Permit to Work and will contain the following details:

- Plant detail (location / identity)
- Name of recipient
- Work being undertaken (detail to allow suitable and sufficient Risk Assessment)
- Person carrying out work (the Company / contractor / self-employed)
- Plant out-of-service period (statement of when / period of removal from service)
- Isolation carried out (electrical / fumes / mechanical / heat)
- Precautions introduced (monitoring of fumes / purging of vessels)
- Testing (results of any testing for contaminants)
- Further precautions required (breathing apparatus / low voltage and or intrinsically safe equipment)

The following information will be recorded on the Permit to Work when applicable:

- Extension of time period for work to be completed
- Changes in work to be carried out which are identified after commencement of work emergency cancellation

Provision of Ventilation

The Company will ensure that where possible to do so it will increase the number of openings into a confined space to improve ventilation. Where this is not possible mechanical ventilation will be provided to supply an adequate amount of fresh air. This is essential where portable gas cylinders and diesel fuelled equipment are used inside the space because of the dangers from build-up of engine exhaust.

NB: The use of petrol fuelled engines is not allowed to be used in confined spaces due to the high levels of carbon monoxide emitted from the exhaust!

Testing the Air

Where the Risk Assessment identifies appropriate testing of the atmosphere prior to entry into a confined space will be undertaken to confirm that it is free from toxic and flammable vapours and fit to breathe.

Testing will be carried out by a competent person using a suitable and sufficient gas detection monitor which is correctly calibrated. Where the Risk Assessment indicates that conditions within the confined space may change then continuous air monitoring will be provided with a record kept of atmospheric checks three times daily.

Provision of Special Tools and Lighting

Non-sparking or intrinsically safe tools and lighting will be provided where flammable or potentially explosive atmospheres are likely.

For work inside metal tanks suitable and sufficient precautions will be taken to prevent electric shock including the use of low voltage equipment (less than 25volts) and where necessary residual current devices.

Procedures for Dealing with Confined Space Issues

Where an employee raises a matter related to health and safety associated with work in confined spaces, the Company will:

- Take all necessary steps to investigate the circumstances
- Take corrective measures where appropriate
- Advise the employee of actions taken

Where a problem arises associated with work in confined spaces, the employee must adopt the following procedures:

- Inform a responsible person immediately
- In the case of an adverse health condition, advise the Appointed First Aider

Emergency Procedures

All necessary arrangements will be made to raise the alarm and carry out rescue operations in the case of emergency. Contingency plans will be made according to the risks identified in the Risk Assessment and will include the following:

- Communications - How the alarm will be raised, how information will be communicated from inside to outside with arrangements to cover potential shift work and holidays
- Rescue and resuscitation equipment – Will depend on the risks identified. Information, instruction, and training will be given on all equipment to the rescue team
- Capabilities of Rescuers – Rescuers will be adequately trained and sufficiently fit to carry out their task. They will be capable of using the equipment provided and protected from the cause of the emergency
- Shutdown – Where necessary all equipment and plant will be shutdown prior to any rescue being undertaken
- First Aid Procedures – Trained first aiders will be available on site
- Local Emergency Services – All relevant information will be provided upon their arrival on site

Sufficient information, instruction and training will be provided as is necessary to ensure the health and safety of workers who are required to enter confined spaces.

Managers and supervisors who are responsible for workers required to enter confined spaces will also be given appropriate training.

Appendix 5: Control of Hazardous Substances

The Control of Substances Hazardous to Health Regulations requires an assessment to be made of risks created by "hazardous" substances. The regulations are based on the step-by-step approach of identifying the hazardous substance, deciding on the level of risk involved in the use of the substance and implementing controls to ensure those risks are minimised. These controls usually involve:

- Eliminating the use of the substance
- Substituting it with a less hazardous substance
- Controlling the use of the substance and protecting employees and others from risk

An inventory / initial assessment will be retained of the hazardous substances kept, or generated by work processes on the premises, under the control of management. This inventory is kept up to date.

An initial assessment of those hazardous substances on or generated on the premises has been carried out by management. Any new substances or processes resulting in the production of a substance, i.e. substances not already on the inventory, should be preliminary assessed using the attached checklist inventory / initial assessment of hazardous substances. This aims to gather information about the use or generation of hazardous substances on the premises or on site.

If following the preliminary assessment it would appear that there is a significant risk from being exposed to the substance, having regard to its nature and the circumstances of its use, then management will organise a more detailed assessment. Where possible, the supplier's safety data sheet should be obtained to provide necessary information when carrying out the risk assessment. These safety data sheets should be made available to persons using any hazardous substances and preferably kept at the point of use for reference in the event of an accident happening involving the substance. The safety data sheets should be updated as necessary along with the inventory.

Management should ensure that all employees exposed to hazardous substances are given adequate training to enable them to work safely, this includes the findings of the risk assessments, and in particular the control measures needed to minimise the risk. Employees should be instructed not to use any hazardous substance unless trained and authorised to do so and unless it is on the inventory. All training and instruction should be recorded.

In the event of detailed risk assessments having been carried out, the risk assessments will be reviewed regularly and in the event of any process or work activity changes.

Management will ensure that all control measures are correctly applied through regular documented monitoring of the workplace and work activity.

The Company will:

- Identify hazardous substances that are used, handled or produced on site
- Obtain safety data sheets and make them available to employees
- Carry out risk assessments on activities involving exposure to hazardous substances

The Company will ensure control measures are put in place to reduce exposure to the hazardous substance, including:

- Eliminating the hazardous substance, or if not practical
- Substituting the hazardous substance where practical do so
- Segregating the substance from employees if practical to do so

- Using extraction systems if practical to do so
- Proving training, information and instruction to employees
- Providing personal protective equipment
- Monitor control measures in place
- Review the use of hazardous substances including updating safety data sheets and information for employees.

Appendix 6: Electrical Safety – Working Near Overhead Power Lines (UK)

1. Purpose

To ensure that all work activities undertaken by Sigma GRP Ltd near overhead power lines (OHPL) are planned and executed safely, preventing electric shock, arcing, fire, serious injury, or fatality.

2. Scope

This procedure applies to all Sigma GRP Ltd employees, subcontractors, plant, equipment, and materials where there is a foreseeable risk of encroachment near overhead electrical conductors of any voltage.

3. Legislative Compliance (UK)

This procedure is implemented in accordance with:

- Health and Safety at Work etc. Act 1974
- Electricity at Work Regulations 1989
- Management of Health and Safety at Work Regulations 1999
- HSE Guidance Note GS6 – Avoiding Danger from Overhead Power Lines

4. Responsibilities

Directors / Senior Management

- Ensure adequate resources, planning, and supervision are provided to manage OHPL risks.
- Ensure compliance with statutory duties and Avetta requirements.

Site / Project Managers

- Ensure suitable and sufficient risk assessments and method statements (RAMS) are produced, signed and followed.
- Liaise with the Distribution Network Operator (DNO) where required.
- Ensure control measures and exclusion zones are implemented.

Supervisors (where applicable)

- Brief operatives on OHPL hazards and site controls.
- Enforce exclusion zones and safe systems of work.

Employees and Subcontractors

- Follow all safety controls and instructions.
- Do not breach exclusion zones.
- Report hazards, changes, or incidents immediately.

5. Procedure

5.1 Planning and Risk Assessment

Prior to commencement of work near overhead power lines:

- Identify the presence, location, and voltage of overhead lines.
- Assess maximum reach of plant, tools, materials, and vehicles.
- Consider ground conditions that may affect stability or height.
- Complete a site-specific Risk Assessment and Method Statement (RAMS).

Work shall not commence until risks are reduced to as low as reasonably practicable.

5.2 Hierarchy of Control

1. Avoidance (Preferred)

- Redesign or relocate work activities to avoid OHPL entirely.
- Select alternative methods or equipment that maintain safe clearance.

2. De-energisation and Earthing

Where avoidance is not reasonably practicable:

- Sigma GRP Ltd shall contact the relevant Distribution Network Operator (DNO).
- Lines shall be isolated, de-energised, and earthed where required.
- Written confirmation of isolation shall be obtained.
- Work must not start until isolation is confirmed.

3. Protective Measures (Where Lines Remain Live)

If de-energisation is not reasonably practicable, the following controls must be applied:

- Establish statutory minimum approach distances in accordance with HSE GS6.
- Install physical barriers, goalposts, or height restrictors.
- Clearly mark exclusion zones with barriers and signage.
- Appoint a trained banksman when operating plant.
- Prohibit storage of materials beneath overhead lines.
- Restrict plant movement and slewing near OHPL.

5.3 Minimum Clearance Distances (Guidance)

Unless otherwise confirmed by the DNO:

- Up to 33kV: Minimum 3 metres
- Above 33kV: Minimum 6 metres

Actual clearance distances must be confirmed during planning.

5.4 Plant and Equipment Controls

- Only trained and competent operators shall operate plant near OHPL.
- Height limits and physical restraints shall be used where applicable.
- No plant shall pass beneath live overhead lines unless a safe system of work is in place.
- Visual judgement alone shall not be relied upon to maintain clearance.

5.5 Emergency Arrangements

In the event of contact with overhead power lines:

1. Operator to remain in the cab if safe to do so.
2. Keep all persons at least 10 metres away.
3. Contact emergency services and the DNO immediately.
4. Exit the vehicle only if unavoidable, using a jump-clear technique.
5. All incidents and near misses must be reported and investigated.

5.6 Training and Communication

- All personnel working near OHPL shall receive appropriate training.
- Toolbox talks shall be delivered before work commences.
- Supervisors must confirm understanding of emergency procedures.

5.7 Monitoring and Review

- Compliance shall be monitored via site inspections and audits.
- Breaches of exclusion zones shall be treated as serious safety violations.
- This procedure shall be reviewed annually or following incidents or legislative changes.