

	RHINO ENGINEERING GROUP LIMITED HEALTH & SAFETY PROCEDURE HEALTH AND SAFETY POLICY	Doc Ref. HS-01
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This is the Health and Safety Policy of **Rhino Engineering Group Limited (REGL)** and is applicable to all subsidiary companies (Rhino Systems Limited (RSL), Rhino Site Systems Limited (RSSL), and Rhino HySafe Limited (HySafe)).

Policy and Commitment

Our Health and Safety Policy is to:

- **Comply fully with the requirements of the Health and Safety at Work etc Act 1974 and any other applicable health and safety legislation**
- **Maintain ISO 45001 Certification**
- **Prevent accidents and cases of work-related ill health**
- **Manage health and safety risks in our workplace and seek to reduce any hazards**
- **Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work**
- **Provide personal protective equipment as appropriate for the tasks, and ensure it is correctly used**
- **Consult with our employees on matters affecting their health and safety**
- **Provide and maintain safe plant and equipment**
- **Ensure safe handling and use of substances**
- **Maintain safe and healthy working conditions**
- **Implement emergency procedures, including evacuation in case of fire, or other significant incident**
- **Respect and react to legitimate safety concerns raised by employees without reprisal**
- **Continually improve and develop our Health & Safety systems**

We commit to assigning responsibilities and making arrangements to effectively implement this policy to meet our Health and Safety obligations to all staff and anyone visiting our premises or affected by our work.

This policy will be reviewed at least annually by the Senior Management of the Company.



Stuart Lawrence

Group Managing Director



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Responsibilities

Stuart Lawrence (Group Managing Director)

- Overall and final responsibility for health and safety

Matt Richards (RSL – Managing Director), **Paul Andrews** (RSSL – Managing Director)

Andrew Davies (HySafe - General Manager)

- Day to day responsibility for ensuring this policy is put into practice
- Safety, risk assessments, consulting employees, accidents, first aid and work-related ill health
- Maintaining equipment, facilities, information, instruction, supervision and training

Jan McPherson (Senior Director Port Talbot (PT) Site)

Stewart Handler (Senior Director Carr Place (CP) Preston Site)

- Accident and ill health investigation, emergency procedures, fire and evacuation

Jez Alston (SHEQ Manager)

- Monitoring, auditing, advising the company on H&S matters

Fire Marshals (Russ Davies, Phil Walters, Keenan Baitup (PT), Jez Alston (CP), **Senior Manager (CP))

- To co-ordinate activities in the event of an emergency evacuation (** CP facility is only open part time – in the event of an emergency and Jez Alston not being present, the senior manager on-site shall co-ordinate activities)
- To carry out routine checks on fire and emergency equipment and systems

First Aiders (Steve Bruton, Josh Alexander, Declan Pagett (PT), Jez Alston (CP))

- Trained first aiders to administer first aid in an emergency
- Maintenance of first aid kits

All Employees

- Co-operate with supervisors and managers on health and safety matters
- Take reasonable care of their own health and safety
- Report all health and safety concerns to management as above

Arrangements

The company has a variety of policies and procedures in place defining the arrangements that are followed to meet its Health and Safety obligations. The predominant areas are listed below and expanded on in the Arrangement Details section of this policy.

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| <ul style="list-style-type: none"> • Competent Advice • Information and Records • Induction and Training • Consultation and Communication • Supervision and Inspection • Monitoring, Measurement and Review • Risk Assessment and Safe Systems of Work • Safe Plant and Equipment • Manual Handling • Control of Substances Hazardous to Health | <ul style="list-style-type: none"> • Personal Protective Equipment • Fire & Emergency Procedures • Asbestos Management • First Aid • Accident & Incident Reporting • CDM Regulations • Site Access • Welfare • Smoking, Drugs & Alcohol • Company Vehicles |
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Arrangement Details

Competent Advice

It shall be company policy to mainly utilise the services of in-house expertise via a SHEQ Manager holding NEBOSH Certification in H&S Management. If necessary, services may be supplemented by external health and safety support.

Information and Records

Information relating to health and safety matters shall be obtained through a variety of mediums including official websites, external advisors and professional bodies.

A central electronic file of such information will be maintained, being the responsibility of the SHEQ Manager. The SHEQ Manager shall determine the method of communication for relevant information. General update information shall be provided through the Company Intranet.

Records referenced throughout this policy, shall be retained in line with Company Procedures and in accordance with data protection legislation.

Induction and Training

It is REGL policy that all employees receive formal Induction Training as near to the first day of employment as practical, and that any sub-contractors receive an induction prior to starting work. Line management are responsible for ensuring this is completed in regard both health and safety for all and occupational health attributes for employees.

All employees will receive training appropriate to the tasks they are required to carry out. Refresher training will be carried out at appropriate intervals or repeated whenever changes in legislation or working methods require this to take place. In addition, the company will provide suitable training to employees as required by working conditions and legislation. The Group Commercial Director will oversee training which will be arranged via Line Management in consultation with the SHEQ Manager.

Installation teams may need to complete additional inductions specific to the working site or demonstrate extra competencies. Where this is required, details are agreed, and appropriate processes followed before installation work can commence.

Consultation and Communication

REGL will consult with employees regarding H&S issues formally through H&S meetings or via the SHEQ Manager or line management.

The SHEQ Manager shall ensure that H&S meetings are convened regularly, or on request. The meetings shall include representatives from Management and the Production and Installation workforce. H&S information may also be discussed at other meetings.

Employees are free to raise H&S concerns at any time directly with line management or via workforce representatives involved in the H&S meetings

The company shall ensure that if any visually or hearing impaired persons are employed, they are provided with effective means of communication. Line Management shall be responsible implementing the agreed arrangements and ensuring they are followed.

All employees are required to contribute to the consultation process and communicate effectively through the available communication chains.

Copies of this policy will be displayed in location entrance foyers, and health and safety notice boards in the factory. Business supporting policies will be communicated to all employees by issue of a 'staff handbook' subject to update at appropriate intervals and any significant policy changes will be communicated via 'toolbox talks'.



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Supervision and Inspection

Adequate supervision levels will be provided for activities undertaken during manufacture, or installation. This shall be determined by considering factors such as task difficulty, risks involved, operator experience, client requirements, etc.

Where contractors are engaged, they will be required to provide their own supervision regardless of company provision.

The SHEQ Manager shall ensure that the Group's offices and regular places of work are periodically inspected. Reports of inspections are to be evaluated by the SHEQ Manager and Line Manager responsible for the area and may be considered at the H&S meetings. Any remedial actions will be documented via the company NCR system monitored by the SHEQ Manager.

Monitoring, Measurement and Review

The requirements and performance of this policy shall be monitored through a range of mediums, including inspections, audits, and safety tours, where key activities and operations are evaluated. The SHEQ Manager shall be responsible for co-ordinating arrangements.

REGL shall endeavour not to rely on accident, ill health, and incident statistics as a measurement of performance, though these shall be evaluated.

Line management are responsible for ensuring the relevant information is collected and passed to the SHEQ Manager, who shall ensure statistics are analysed.

The Senior Management team shall measure performance in relation to set aims and objectives on an annual basis at the Management Review. Internal audits shall be undertaken to ensure on-going compliance with the Management System and these audits will also be used to monitor Health, Safety and Security operational controls. The Senior Management Team shall review policy and performance on an annual basis, having access to appropriate information.

Risk Assessment and Safe Systems of Work

It is REGL policy to assess all aspects of its operations to determine significant risks. All significant risks shall be recorded via Risk Assessment and communicated to those who may be exposed to them.

Risk Assessments and Method Statements (RAMS) shall be specific to works carried out. For routine production tasks they shall be reviewed regularly to ensure that they remain suitable and sufficient. Any changes will be communicated to those affected.

For site installation at client sites, a project specific RAMS shall be agreed with the principal contractor and/or client before works can commence. Installation personnel will be required to agree to the RAMS before starting work.

The SHEQ Manager shall ensure that activity specific risk assessments are maintained and controlled on Rhino sites and the Installation Manager shall be responsible for these items at client sites.

Businesses contracted by the Group shall be expected to provide their own assessments, where appropriate. Confirming these shall be the responsibility of the manager engaging the sub-contractor.

The risk assessment process shall be used to identify adequate measures to control that risk and to develop a safe system of work that shall follow the expected hierarchy of:

- Avoiding risks
- Combating risks at source
- Adapting the work to the individual
- Adapting to technical progress
- Substitution of the dangerous for the less dangerous
- Giving collective protective measures priority over individual protection measures
- Giving appropriate instruction, information and training to employees



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If applicable, the company will take specific account of vulnerable persons (e.g. young persons or pregnant women) and to make assessment of the potential impact upon them to determine adequate controls.

All Directors are responsible for ensuring risk assessments are undertaken as applicable for matters under their direct control. They shall also be responsible for ensuring that safe systems of work are implemented.

Safe Plant and Equipment

Company owned equipment will be maintained in a safe working condition by an internal maintenance programme, or by external contractor. Calibration or safety checks shall follow manufacturers recommendations or recommended industry practice. Hired in equipment shall be in calibration or have appropriate certification.

Employees and learners must not operate any item of machinery or equipment unless they have received formal training, adequate and comprehensive instruction, or are adequately experienced in operating the equipment in a safe and competent manner.

Any defect or damage to work equipment shall be reported to the relevant supervisor. Operatives must not maintain or clean work equipment without first isolating it from its power supply and ensuring any stored energy is released.

Manual Handling

Manual handling operations are subjected to risk assessments before carrying out the task. The risk assessment takes into consideration the load to be handled, the task being carried out, the lifting environment, and individual capabilities.

Manual handling risks are avoided where practicable by using mechanical aids (e.g. cranes, fork lift trucks, trolleys, etc.), or reduced by appropriate actions (e.g. splitting larger loads into smaller units, getting assistance from colleagues, effective planning of activities movements and routes, ensuring adequate rest and recovery periods, and knowing and accepting personal limitations).

All employees are given training on manual handling techniques and made fully aware of any risk assessments applicable to their task.

Control of Substances Hazardous to Health (COSHH)

No substances that have hazard warning symbols shall be used unless an assessment has been made to identify control measures applicable to the hazard. Consideration shall be given to the substance format, issues affecting the substance, the environment, purpose of use, routes of exposure, people involved, waste control, hazards arising and emergency actions. All aspects of handling, use, storage, and transport shall be considered.

Information about such substances shall be obtained from the manufacturer or supplier by Material Safety Data Sheets (MSDS), to enable assessment to be undertaken. Those ordering materials shall be responsible for obtaining the MSDS and for passing it to the SHEQ Manager for assessment.

The findings of the assessment, control measures and necessary precautions (and any emergency procedures) will be made clear to all affected prior to use.

The Group's policy and hierarchy of controls shall be followed:

- Eliminate – physically remove the hazard
- Substitute – replace with a less hazardous product
- Engineering Controls – isolate people from the hazard
- Administrative controls – change the way people work
- PPE – protect the worker with Personal Protective Equipment



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Information shall be made available to the users via hardcopy located in the PT Stores or CP Mess Room, or the computer system. Relevant information shall be provided to installation personnel with the project specific RAMS.

Personal Protective Equipment (PPE)

PPE is required when risk to health and safety has not been adequately controlled by other means. When required, specified PPE is provided free of charge and its wearing is mandatory.

PPE may include protective clothing such as overalls, aprons, adverse weather clothing, gloves, gauntlets, safety footwear, safety hats and helmets, high visibility clothing etc., and/or protective equipment such as eye protectors, hearing protection, breathing apparatus, respirators, face masks and shields, safety harnesses, etc.

Employees are required to properly use and care for any PPE provided in accordance with the information, instruction and/or training provided including the immediate reporting and replacement of defective or lost PPE.

Fire and Emergency Procedures

REGL has fire and emergency procedures in place at its permanent sites and liaises with clients regarding emergency procedures at client sites.

Rhino controlled premises are subject to annual Fire Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005, to determine the level of fire precautions and that staff will be trained to enable them to act correctly in the event of a fire.

As a minimum the system requires the following:

- Staff to be fully informed and trained in local evacuation procedures at induction and receive suitable refresher training annually
- Electronic Fire Alarms to be tested weekly (normally Tuesday 11:00am at Port Talbot)
- Electronic Fire Alarm Systems to be serviced every 6 months by external contractor
- Fire Fighting Equipment to be checked monthly for condition and availability
- Fire Fighting Equipment to be serviced annually by external contractor
- Fire Exit Doors and Escape Routes to be inspected monthly for condition and free access
- A Fire Drill to be carried out at least every 6 months
- Fire Extinguisher use training to be given to nominated employees and refreshed at appropriate intervals.
- Emergency lighting to be given a monthly check to confirm battery power levels are maintained and to ensure satisfactory illumination.
- Emergency lighting systems to be checked annually for functionality by external contractor.
- At least two fire marshals to remain trained at the Port Talbot site; see page 2 above.

Other emergency evacuations prompted by other events (e.g. pollution threat) will have the same essential principles as for fire evacuation. These emergency procedures may differ as escape routes or assembly points could be impacted. Employees are trained regarding these requirements.

Asbestos Management

Rhino controlled permanent sites have been surveyed for asbestos, with none being detected at Port Talbot, and the roof containing asbestos at Carr Place. Due consideration will be given to asbestos risks for any modification to building works considered at either facility.

Asbestos risks will be considered individually for site installation activities. Where there is a risk of asbestos contamination, it shall be the responsibility of the client or principal contractor to remove or make safe any contaminant before work will proceed. All installation personnel are given asbestos awareness training so they are aware of actions that must be taken if asbestos contamination is found



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First Aid

The company shall carry out a First Aid Risk Assessment to determine required levels of first aid cover and first aid equipment required.

The company shall ensure that suitably qualified numbers of people have attended First Aid at Work courses to be trained 'first aiders' at its permanent sites. This conforms with HSE guidance and provides a comprehensive set of practical skills needed by first aiders in most workplaces, giving both the ability and knowledge to deal with first aid emergencies. It meets the standards required to help comply with Health and Safety (First Aid) regulations. Additionally, these first aiders shall be responsible for the maintenance of the first aid equipment including all reserve stocks within their designated area.

Site Installation engineers shall have attended an on-line first aid course and it shall be the intention to have at least one engineer in each team to attend an Emergency First Aid at Work course to cover emergency protocols.

Accident / Incident Reporting

It is REGL policy that all employees are responsible for reporting accidents or incidents to their line manager, and line managers for reporting on to the SHEQ Manager. The SHEQ Manager will submit all reportable incidents (as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) to the relevant authorities.

Where reportable incidents occur to employees working away from one of the Groups offices, they shall be reported to line management and onward to the SHEQ Manager, who shall where necessary, forward a copy of the report to the Client.

All accidents or incidents shall be investigated by line management in conjunction with the SHEQ Manager and actions recorded. When an accident /incident report sheet is raised, those making the entry shall return the data immediately to the SHEQ Manager. Accident / incident report sheets shall be saved electronically as a record. External consultants may be requested to assist in investigation of any major reportable incidents.

Incident statistics shall be collated by the SHEQ Manager and reported at board level.

The Directors shall be responsible for ensuring this arrangement is adhered to.

CDM Regulations

Rhino works as a designer or contractor in support of the principal designer or principal contractor. In that respect Rhino

- provides a list of client responsibilities to clients
- plans and controls its own work and co-ordinates its work with others
- minimises health and safety risks by effective design consideration and operational control
- ensures its workers are suitably skilled, trained, supervised, informed and instructed
- makes sure all workers under Rhino control have a site specific induction
- controls entry into Rhino controlled working areas, and
- confirms or provides and maintains welfare facilities for workers under Rhino control

Welfare

The Company shall ensure that suitable and sufficient welfare facilities are provided at its permanent sites. Arrangements shall be made for the facilities to be regularly cleaned and maintained.

When working on client sites, the company will ensure that the client or primary contractor has made suitable welfare provisions for Rhino employees.



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Site Access

During working hours, access to company controlled permanent facilities is restricted to company employees and authorised visitors. Outside working hours facilities are kept locked to prevent unauthorised access. Nominated personnel are given keys to allow access to the premises.

On site installations access procedures are agreed with the principal contractor or client. When working on site it is normal for 'exclusion zones' to be specified in the working area to prevent unauthorised access.

Smoking, Drugs and Alcohol

Smoking is not permitted inside Rhino controlled buildings or Rhino owned vehicles; smoking is permitted outside buildings in designated smoking areas. On site installations, Rhino personnel follow the requirements of the individual sites.

Rhino requires the working environment to be free from the influence of alcohol and drugs. Persons must not report for work when unfit due to the influence of alcohol, drugs (whether illegal or not) or influencing substances, nor be in possession of, or consume, alcohol or illicit drugs in the workplace.

Random testing may be undertaken by the company at any time. Any person found to be unfit for work by failure the test shall be prohibited from working until a retest is taken to confirm they are clear of the drug. Where the drug is medically prescribed, management may authorise continuation of working in low risk situations with medical guidance.

Company Vehicles and Personal Vehicles used for Company Business

The company maintains a small fleet of vans for company business and travelling to and from sites. The company is responsible for maintaining these vehicles in a legal, road worthy and safe condition. Hire vehicles may be used to cover additional requirements. Employees should check basic details (tyres, light functions, oil, fuel, etc.) before setting off on journeys.

Employees may only drive company owned or hired vehicles with the permission of the company and must hold a valid licence for the class of vehicle they are driving. Any faults or accidents with company owned or hired vehicles should be reported to Line Management or the hire company for appropriate action.

Employees may drive their own vehicles for company business but must be insured for business purposes.

When driving on company business, the driver is responsible for their own safety and that of any passengers or loads carried within the vehicle. Passenger numbers must not exceed the capacity of the vehicle. The company expects drivers to follow all applicable road traffic laws and regulations; mobile phones should not be used unless with an appropriate 'hands free' system.

Drivers should reduce risks from fatigue by sharing driving or taking regular breaks on long journeys. Where statutory regulations exist, drivers must not drive more than the maximum distance or time allowed in a normal working day.



Stuart Lawrence

Group Managing Director

