



Health and Safety Policy UK

Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder / partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

Contents

Policy

A handwritten signature in blue ink, appearing to be "Javier Peiro".

Javier Peiro
Managing Director

Cheltenham, GL53 7JT

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 1 of 74
------------------------------	------------	-----------	--------------



1. Introduction

Urbaser began its activity in 1990 to provide value-added services to municipalities and local authorities in waste and environmental matters.

Over the next decade, the Company was strengthened by setting up specialized subsidiaries to cover the full spectrum of environmental services. Urbaser continued its process of national consolidation and diversification thanks, among other things, to the complete acquisition of Sertego, a division dedicated to the integral management of industrial waste. In recent years, there has also been an expansion in the commitment to R&D&I projects in the field of renewable energies.

Internationally, since 2009, the Company has been expanding thanks to the incorporation of companies in Mexico, France, Bahrain, Oman and India, among other countries. Since December 2016, Urbaser belongs to Firion Investments, in what represents the final push in the Company's international expansion phase, placing it among the world's leading environmental companies.

Today Urbaser has 659 million euros in resources, with more than 11 million tons of treated waste and more than 1,400 Gwh of electricity generated. We have a presence in 21 countries on four continents. Urbaser is a worldwide company, a network of more than 40,000 people dedicated to improving the living conditions of citizens all over the globe. Collection, management, treatment and recovery of waste, for conversion into resources. We guarantee access to basic natural resources such as water and minimise the environmental impact of human progress.

Our business strategy is underpinned by three objectives. Delivering on our objectives ensures that, as our business grows, we respond better to new demands whilst observing our ethical principles and our ongoing commitment to do business in a fair and sustainable way.

Urbaser Ltd was incorporated in 1998 in the UK and has been providing environmental services since then. Across the UK, Urbaser Ltd provides services to nearly 4 million residents, employs over 700 staff and handles more than 1 million tonnes of waste and recycling. We work closely with our customers to ensure that their waste is being managed and their services are being delivered in the correct way.

1.1 Scope

This Policy is part of the Corporate Management Manual of Integrated Management System (IMS) issued on the 28/02/2022. This policy ought to be the local/country extension of the Corporate Management Manual of Integrated Management System (IMS) and should be consulted in combination with the stated.

This policy describes the Health and Safety Management System of Urbaser Limited. It specifically refers to the organisation's policies and describes how these are implemented and sustained throughout the organisation. The system core elements are described with reference to key organisational procedures. This bespoke system will enhance Health and Safety performances through the effective application of its policies and procedures, by constantly providing high standard of safety and prevention that meet and exceed our statutory and legal and other requirements. The Policy aims to achieve the intended outcome of its OH&S management system. To this and this document includes:

- Urbaser's statement of continual improvement of OH&S performances;
- Urbaser commitment to fulfil its legal and other requirements; and
- Urbaser achievements of its pre-set yearly OH&S objectives.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 2 of 74
------------------------------	------------	-----------	--------------



This policy also highlights within it section procedural instructions for:

- Hazard identification and risk assessment, risk control and risk reduction in H&S.
- Determination of professional competence and coordination of training actions
- Procedure for the establishment of safety and health systems on the use of equipment by workers.
- Procedure for maintenance of machinery and vehicles
- Procedure of monitoring and measurement (including methodology for conducting service inspections).

All Companies/Joint Venture shall perform an analysis of the applicability of the IMS requirements, considering internal and external issues, requirements of its stakeholders and services provided. It may consider, with justification, certain IMS requirements as not applicable, leaving documented evidence of this analysis in the **MM-01-CORP-D01-Organizational Context and Stakeholder**.

To allow a better understanding of the Organization and the specific scope of the IMS, the **Company QHSE Director** must complete the records associated with this policy, which are as follows, before starting to implement the IMS:

- **MM-01-CORP-D01-Organizational Context and Stakeholders:** brief presentation of the Company implementing the IMS, as well as a description of the internal and external context, and of the needs and expectations of stakeholders, which helps to understand the profile of the Company and its activities in greater depth.

At the corporate level, the **Corporate QHSE Director** will prepare the following record:

- **MM-01-CORP-D02-Scope of application:** containing the perimeter of all the countries/companies/centres included in the IMS, and the reference standards implemented in each case.

The core of the local Health and Safety Management System is to prevent accidents and incidents by effectively controlling risks, training, monitoring and auditing. Urbaser Limited commits to continuously improve its Health and Safety performances and achieve its pre-set OH&S objectives.

The **Local-UK Health and Safety Management System** applies to all Urbaser Limited’s service activities. This document forms the core of the company ethos and *modus operandi* for present and future endeavours.

Based on an analysis of the internal and external issues, interests of stakeholders, and in consideration of its Services, Urbaser Limited has determined the scope of the management system as follows:

- Manual and Mechanical street cleaning for highways and other designated areas
- Refuse collection
- Ground Maintenance
- Winter Maintenance
- Recycling and Collection
- Graffiti removal
- Waste Treatment and
- Designing, construction improvement, and repair of commercial, industrial plant for public

1.2 Health and Safety Objectives - Corporate

The OH&S system applies to all processes, activities, and employees of the following locations within the company:

- Head Office

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 3 of 74
------------------------------	------------	-----------	--------------



- London Borough of Waltham Forest
- Burnley
- Gosport
- St. Albans
- Windsor and Maidenhead
- Dartford
- Gloucestershire EfW
- North and East Hertfordshire
- Southwest Kent
- Wokingham
- Welwyn Garden City
- J&B working as part of Urbaser (with Corporate Policies being dictated from Urbaser and Local procedure implementing the Urbaser' certified system
- Sixfields (Northampton) HWRC (Main Office) , Walter Tull Way, Weedon Road, Northampton.
- Kettering HWRC- Garrard Way, Telford Way Industrial Estate, Kettering.
- Wellingborough HWRC-Paterson Road, on Finedon Road Industrial Estate, Wellingborough.
- Rushden HWRC-Northampton Road, East of Sanders Londge on old A45 Road, Rushden.
- Ecton Lane (Northampton) HWRC-Lower Ecton Lane, Great Billing, Northampton.
- Brixworth HWRC - Scaldwell Road, Brixworth.
- Daventry HWRC-Browns Road, Off Staverton Road, Daventry.
- Towcester HWRC-Old Greens, Norton Road, Towcester.
- Corby HWRC-Kettering Road, Corby.
- Eden (Penrith)- Main Office-The Depot, Old London Road, Penrith, Cumbria.
- J&B - Windermere Road, Hartlepool, Middlesbrough.
- J&B -Monument Park, Washington, Sunderland.
- J&BDockside Road, Middlesbrough, South Tees.
- J&B-Baltic Street, Hartlepool, Middlesbrough.
- Thorn Turn HWRC, Grendall Lane, Houghton Regis.
- Leighton Buzzard HWRC, Shenley Hill Rd, Leighton Buzzard.
- Biggleswade HWRC, Bells Brook, Lane, Biggleswade.
- Ampthill HWRC, Abbey Ln, Ampthill, Bedford.
- Crewe – Leighton Grange, Middlewich Road, Crewe.
- Esholt – The Avenue, Apperley Lane, Esholt.
- Willerby (including head office) – Albion Lane, Willerby.
- Ashcourt (HGVs based but no other personnel here) – 40 Foster Street, Hull.
- Selby Depot, Prospect Way Selby.
- Rigestste Industrial Estate, Station Road, Berkley.

Significant issues or risks in our activities

Each day we are faced with several issues or risks specific to our work as a leading waste service provider. These the main hazards our workforce may face:

- Manual Handling & Ergonomic
- Contact with Vehicles
- Equipment failures
- Entanglements
- Aggressive behaviors by members of public
- Encountering Asbestos
- Handling Hazardous or Chemical waste
- Slips Trips and Falls
- Noise, loose animals and Vermin
- Leptospirosis
- Driving on public highways and Reversing

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 4 of 74
------------------------------	------------	-----------	--------------



- Sorting on conveyors belts
- Escaped Gases from contained spaces
- Confined Spaces
- Working in inclement Weather
- Bioaereosol from garden waste
- Stress
- Contact with stationary obejects
- Punctures and cuts
- Vandalism
- Vehicle Mechanical Failure
- Equipment failures
- Fauty guards
- Behevioural issues
- Chemicals from Clinical Waste Collections and Weed Spraying

2. Normative references

ISO 45001:2015 Occupational health and safety management systems - Requirements

3. Terms & Definitions

Acceptable risk: Risk that has been reduced to a level that can be tolerated by having regard to legal obligations and the company's Health and Safety Policy.

Audit: Systematic, independent and documented process for obtaining 'audit evidence' and evaluating it objectively to determine the extent to which 'audit criteria' are fulfilled.

Continual improvement: Year on year improvements on health and safety performance and the Health and Safety System.

Corrective action: Action to eliminate the cause of a **nonconformity** or other undesirable situation.

Document: Hard copy or electronic information in written, diagrammatic or pictorial form.

Hazard: Source, situation or act with a potential for harm in terms of injury or **ill health**.

Hazard identification: The process of recognising that a **hazard** exists and defining its characteristics.

Ill health: Identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation.

Incident: Work-related event in which an injury or **ill health** or fatality occurred or could have occurred.

Note 1: An accident is an incident which has given rise to injury, ill health, or fatality.

Note 2: An incident where no injury, ill health or fatality occurred is referred to as a near miss.

Note 3: A dangerous occurrence is a particular type of near miss.

Note 4: An emergency situation is a particular type of incident.

Interested party: Person or group outside the **workplace** concerned with or affected by the **OH&S performance** of the company.

Nonconformity: Non-fulfilment of a requirement.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 5 of 74
------------------------------	------------	-----------	--------------



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

OH&S management system: Part of an organisation's management system used to develop and implement its **OH&S policy** and manage its **OH&S risks**.

OH&S objective: **OH&S** goal, in terms of **OH&S performance** set annually by Urbaser Limited in order to achieve one of its Health and Safety Policy commitments.

OH&S performance: Measurable results of Urbaser's management of its **OH&S risks**.

OH&S policy: Overall intentions and direction of the company related to **OH&S performance** as expressed by the Board of Directors.

4. The Context of the Organisation

Urbaser Limited is committed in defining the relevant activities arising from OH&S management issues that influence our strategic OH&S direction. To this end an organisational context analysis has identified all the external and internal issues that are relevant to the purpose of such activities and obliged to analyse, monitor and review all the factors that may affect our ability to satisfy legal and statutory OH&S requirements.

The Company grouped all the OH&S conditions and factors that may affect the business or being effect by its undertaking to achieve the desired outcome of protecting the wellbeing of personnel and members of the public and identify new opportunities.

Urbaser Limited has reviewed and analyzed key aspects of itself and its stakeholders to determine the strategic direction of the company. This involves:

- Understanding our core and scope of management system;
- Identifying other "interested parties" (stakeholders) who receive our services and have a significant interest in our company;
- Understanding internal and external issues that are of concern to clients and their interested parties; also identified in the document;
- The relevant needs and expectations of workers and other interested parties;
- Which of the worker's expectation could become legal and other requirements; and
- Considering the planned and performed work activities.

This information is then used by senior management to determine the company's strategic direction. This is defined in records of management review, and periodically updated as conditions and situations change.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 6 of 74
------------------------------	------------	-----------	--------------



Urbaser Limited Organisational Context Internal and External Issues Table

External Issues	Needs and Expectations
Regulator	<ul style="list-style-type: none"> - Identification of Appropriate statutory and regulatory requirements for the hazards identified. HSE
Customers	<ul style="list-style-type: none"> - Demonstrate our ISO 45001:2018 conformance and compliance
Insurers	<ul style="list-style-type: none"> - Prompt reporting of accidents investigations and circumstances - Continuous ISO 45001 2018 Compliance - Evidence of non-financial risk management
Pressure Groups	<ul style="list-style-type: none"> - Adherence to best practice and contractual agreements
Local communities	<ul style="list-style-type: none"> - Absence of noise, odours, vibration incidents and vermin.
Banks	<ul style="list-style-type: none"> - Absence of incidents / no costs/public liabilities
Staff Dependents	<ul style="list-style-type: none"> - Social / reputational responsibilities - Health and Safety compliance
Competitors	<ul style="list-style-type: none"> - Benchmarking with their OH&S

Table 1: Urbaser Limited Organisational Context



Internal Interested parties	Needs and Expectations
Staff	<ul style="list-style-type: none"> - Good OH&S reputation image - Wider focus than just profits - Training and support for all - Continuity of employments - Opportunity for dialogues/improvements and changes - Good working conditions, training opportunities continued income
Contractors / Suppliers	<ul style="list-style-type: none"> - Clear statement of Health and Safety compliance in tender contracts - Consistent approach to contract variations involving Health and Safety - Adherence to agreements
Unions / Representative (Unions)	<ul style="list-style-type: none"> - Terms and Conditions for Workers Environmental and Health and Safety Good Working Conditions, training opportunities and continued income
Executive Board / Directors	<ul style="list-style-type: none"> - Financial Benefit, Legal Compliance, avoidance of fines reputational gain / Good risk management and continued growth
Parent Company	<ul style="list-style-type: none"> - Good risk management, Good Reputation
Business Partners	<ul style="list-style-type: none"> - Good Working Conditions, training opportunities Maintenance of company reputation continues growth
Staff / Family Members	<ul style="list-style-type: none"> - Good Reputation, good risk management, safe environment.
Hazard from activities	<ul style="list-style-type: none"> - Policies and Procedures, Risk Assessment and Safe system of Work

Table 1b: Urbaser Limited Organisational Context-External Interested Parties



The following documented information will be kept and reviewed in order to describe our organisational context

- Analysis, strategies and statutory regulatory commitments
- Analyses of technologies and competitors
- HSE report from various business sectors
- Technical reports/consultancies from technical expert and consultants
- **SWOT** analysis reports or schedule for internal issue
- **PESTLE** analysis report or schedule for external issue
- Minutes of meetings with the authorities

4.1 General arrangements for controlling health & safety issues or risks

Urbaser Limited employ dedicated Health & Safety Manager / Advisors to provide advice on matters of workplace health, safety or wellbeing, monitor changes in health and safety legislative (or other) requirements and keep up to date with developments in the waste industry with the interaction between the Operation and Business Development departments.

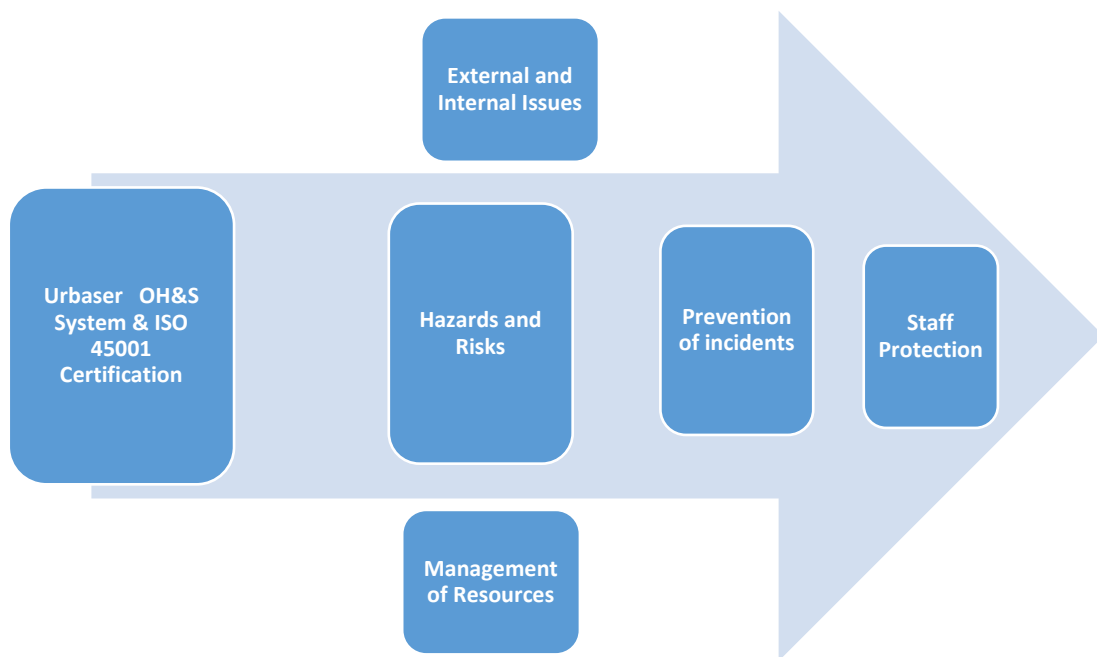
Urbaser Limited aims to ensure compliance with all relevant statutory provisions and other requirements. We seek to do this in such a way that we avoid the need for complaints or any issue of enforcement (improvement or prohibition) notices, or prosecution whilst simultaneously developing our strong safety culture. We will achieve this aim by:

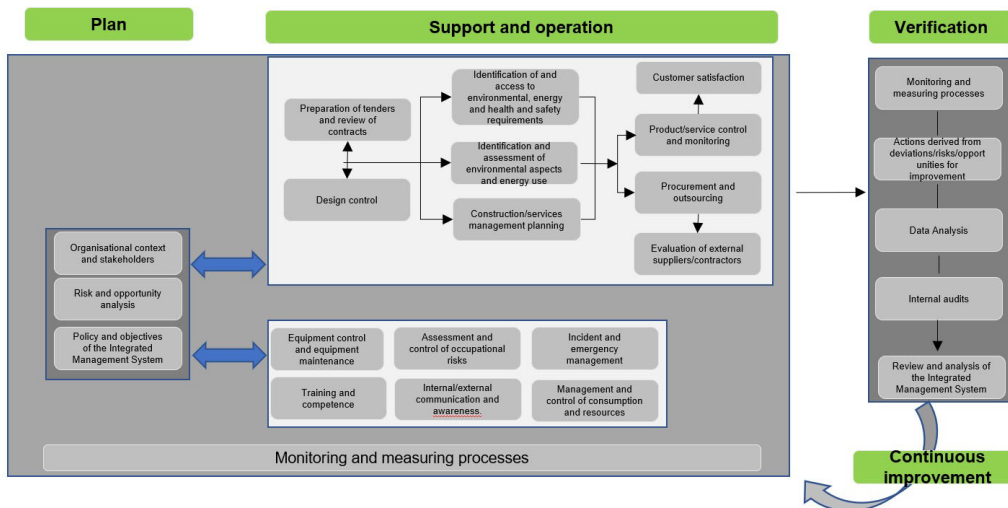
- Providing safe systems of work and communicating them in sufficient detail to those affected;
- Making financial allowances at the tender stage for the management of health and safety;
- Providing adequate information, instruction, training and supervision;
- Identifying and eliminating hazards or risk through effective control measures;
- Making arrangements for consultation with employees;
- Providing appropriate plant and equipment which is tested, certificated and safe to use;
- Maintaining high standards of hygiene, cleanliness and housekeeping;
- Reporting and investigating accidents and implementing corrective or preventative controls;
- Ensuring the occupational health and mental well-being of our employees;
- Carrying out appropriate health surveillance;
- Monitoring and reviewing performance;
- Listening to the concerns of the local and wider communities affected;
- Reviewing our policies in line with real-time health and safety concerns, and;
- Seeking alternative design solutions to reduce health and safety risks where possible.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 9 of 74
------------------------------	------------	-----------	--------------

4.2 Interaction of Urbaser's Processes

Urbaser Limited will establish, implement and maintained continual improvements of its OH&S system, including the processes needed and their interaction as specified in the figure below.





Picture 2: Interrelation of URBASER's Integrated Management System processes.

5. Leadership

Urbaser Limited governance structure provides necessary support for creating and establishing appropriate processes that are important for maintaining and achieving our quality objective policies. In addition, the governance activates, include systematic verification of the effectiveness of our OH&S management system by undertaking internal audits and analysing data. Regular Management Reviews ensure that our QHSE management system is adequate and effective and that any necessary adjustments are made as a result

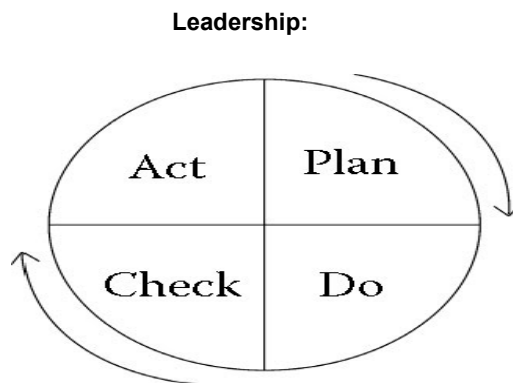
Top Management is committed to implementing and developing the QHSE management system and this commitment is defined by our corporate policies and objectives. Urbaser Limited ensures that our policies are understood, implemented and maintained throughout at all levels of the organisation throughout printed distribution of our policy statement and through periodic management review of the policy statement and corporate level improvement objectives. Urbaser Limited communicate our mission, vision and strategy policies and processes through:

- Taking overall responsibility and accountability for the prevention of work-related injury and ill health as well as the provision of safe and healthy workplaces and activities.;
- Ensuring that the OH&S policy are related OH&S Objectives are established and are compatible with the strategic decision of the organisation;
- Ensuring the integration of the OH&S management system's requirements into the organisation's business processes.
- Ensuring that the resources needed to establish, implement, maintain and improve the OH&S management system are available;
- Communicating the importance of effective OH&S management and of conforming to OH&S management system requirements;
- Ensuring that the OH&S management systems achieves its intended outcome(s)
- Directing and supporting persons to contribute to the effectiveness of the OH&S management system;
- Ensuring and promoting continual improvements
- Supporting other relevant management roles to demonstrate their leadership as it applies to their area o responsibility



- Developing, leading and promoting a culture in the organisation supports the intended outcome of the OH&S management system
- protecting workers from reprisal when reporting incidents, hazards, risk and opportunities
- ensuring the organisation establishes and implements a process (es) for consultation and participation of workers
- support the establishment and functioning of health and safety committee.

Leadership at Urbaser will also be establish by using the principle set in the Deming Shewhart cycle of: **PLAN-DO-CHECK-ACT**.



Plan: Urbaser Limited to establish organisational context and strategies. Determine regulatory and statutory commitments

Do: Develop policy and objectives, provide resources, and assign process owners to enable focus on improving and archiving objectives. Address risk and opportunities

Check: review system and process performances data to ensure alignment is maintained between strategy and context

Act: Agree changes and improvements to maintain the integrity of the QHSE management system

5.1 Local -UK- Health & Safety Policy

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 12 of 74
------------------------------	------------	-----------	---------------



The general provisions of the Health and Safety at Work etc Act 1974 impose a duty on all employers to ensure, as far as is reasonably practicable, the safety of their employees at work. To this end, Urbaser Limited has developed a positive health and safety culture throughout the organization because we believe that high standards of health and safety are necessary for company efficiency and competitiveness. To put the above mission statement into practice the company will continually strive to identify all workplace hazards and take appropriate measures to eliminate or control risks to employees and others affected by our waste cleansing, waste treatments and construction operations. This will be done by applying positive control standards with the provision of information, training and supervision as needed. All employees, visitors and others working in, for or on behalf of Urbaser Limited, are to co-operate with the company in the implementation of this policy by:

- Taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities;
- Having its OH&S policy and related OH&S objectives established and compatible with the strategic direction of the organization;
- Ensuring the integration of its OH&S management system requirements into the organization's business processes;
- Ensuring that the resources needed to establish, implement, maintain and improve the OH&S management system are available at all time;
- Communicating the importance of effective OH&S management and of conforming to the OH&S management system requirements;
- Ensuring that the OH&S management system achieves its intended outcome(s);
- Directing and supporting persons to contribute to the effectiveness of the OH&S management system;
- Ensuring and promoting continual improvement through the compliance of all relevant statutes, regulations and codes of practice
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility;
- Developing, leading and promoting a culture in the organization that supports the intended outcomes of the OH&S management system;
- Protecting workers from reprisals when reporting incidents, hazards, risks and opportunities;
- Ensuring the organization establishes and implements a process(es) for consultation and participation of workers as well as consulting and communicating with Union Representatives on matters affecting the health and safety of the workers;
- Supporting the establishment and functioning of health and safety committees,
- Taking reasonable care of their own health and safety at work and of those who may be affected by their actions or by their omissions;
- Ensuring safe handling and use of substances Providing and maintaining safe plant equipment and machinery
- Maintaining safe and healthy arrangements and working conditions for employees and visitors;
- Co-operating with their employer to ensure that any duty, or requirement, for health and safety imposed upon their employer by law is performed or complied with;
- Co-operating with any other holder of health and safety duties (such as contractors or other employers working at our premises, and other employers when you are working at their workplace) as far as is necessary to enable them to perform their duties;
- Not intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety or welfare;
- Reporting hazardous conditions or defects in the Company safety arrangements to Line Managers
- Fully investigating accidents and other incidents and taking appropriate actions to reduce the likelihood of their reoccurrence

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 13 of 74
------------------------------	------------	-----------	---------------



All levels of management, all supervisors and general workforce are responsible for carrying out those health and safety duties placed upon them. The Directors will ensure that the safety plan includes sufficient resources for the successful implementation of the Health and Safety Policy. Development of the Health and Safety Policy will be conducted through normal business meetings where health and safety will be given standing no less than equal to other activities of the business

This Policy statement is available as a documents information and it is communicated to all personnel who may work with or on behalf of the Company and is available to the public via our website and shown on the Health and Safety board at each operational location. Both the Health and Safety Policy and Policy statement will be reviewed annually and updated as necessary.

Javier Peiro
Managing Director

5.2 Organisational Roles, Responsibilities and Authorities

5.2.1 Managing Director

The key role of the Managing Director is to devise and formulate the company safety policy, establishing strategies to implement the policy and integrating these into the general business mission. They are required to specify a structure for planning, measuring, reviewing, auditing, and implementing the policy and any supporting plans. More specifically:

- The MD approves the health and Safety Policy and Objectives;
- The MD ensures the correct organisational structures and resources are in place to meet the OH&S requirements;
- The MD promotes the policy and objectives to employees increasing awareness, motivation and involvement;
- The MD periodically review the OH&S management system; and
- The MD appoints a management representative to monitor and report on the development, performance and improvement of the health and safety management system.

5.2.2 Directors

- The Directors at Urbaser facilitate engagement between the MD and the health and safety management system;
- The Directors ensure that the correct organisational structure and resources are in place to support these objectives; and
- The Directors provide Health and Safety Management system leadership and participate in Managerial reviews and OH&S Corporate committee

5.2.3 Head of Operations and Operations Manager

- Reviewing and approving changes to the OH&S management system which effect their daily operations;
- Facilitating the engagement between the Director(s) and the OH&S management system;

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 14 of 74
------------------------------	------------	-----------	---------------



- Ensuring that those working under their control are aware of the OH&S policy and specific duties;
- Aiding in the OH&S assessment of suppliers and subcontractors; and
- Choose suitable OH&S ISO 45001:2018 approved suppliers;
- Aid the director and managers in the safe keeping and monitoring of the vehicle fleet;

5.2.4 Contracts Managers

Each Contracts Manager (**General Manager or Plant Manager**), where applicable, is responsible for:

- Contract Manager are responsible for the Health and Safety of their site (Depots, EfW plant or MBT)
- Ensuring that those working under their control are aware of the health and safety policy and any specific duties they may hold;
- Carrying out task-specific assessment of risk (including COSHH);
- Preparing formal construction method statements or construction phase plans;
- Reviewing & approving method statements, Safe System of Work or General Risk Assessments;
- Ensuring that site supervision, by travelling on collection and street sweeping routes, effectively implements and monitor all necessary health and safety controls;
- Ensuring that operatives and site supervision are suitable, competent, trained and authorized to carry out their work;
- Arranging pre-start health, safety and environmental planning meetings;
- Arranging inspections of sites with the Health & Safety Manager(s) as necessary, and
- Attending contract meetings with the authorities; and
- Attending QHSE Corporate Committee at HQ.

5.2.5 Site supervision

It is the responsibility of site supervision to:

- Be familiar with health and safety requirements and comply with all relevant legislation;
- Ensure that all potentially harmful substances or materials are correctly handled and stored;
- Ensure that relevant COSHH assessments are in place and communicated to those at risk;
- Ensure that operatives are aware of the company's policy for health and safety management and that they have understood its requirements;
- Report all accidents and incidents to site management and the Health & Safety Manager;
- Implement any advice given by the company Health & Safety Manager;
- Attend any health and safety training arranged by the company;
- Brief out weekly toolbox talks on relevant health or safety issues;
- Attend any regular health, safety meetings;
- Ensure that operatives are suitable, competent, trained and authorized to carry out their work;
- Ensure that operatives have attended a site safety induction and sign for Safe System of Works and Risk assessments;
- Make the Management aware of changes in environmental conditions or circumstances of roads and people;
- Provide effective front-line supervision on site, and;
- Encourage operatives to work in a safe, responsible and tidy manner, and where necessary, disciplining offenders

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 15 of 74
------------------------------	------------	-----------	---------------



5.2.6 The QHSE Managers / Advisors across sites

- The QHSE Manager is responsible for ensuring that the Health & Safety System conforms to ISO 45001:2018. The QHSE Manager is responsible for reporting on the performance of the Health & Safety System to top management.
- Formulate and issue a written statement of the general health and safety policy and strategic objectives that will give direction to employees and encourage the development of a positive safety culture.
- Provide a policy for the systematic approach to the identification of risks and the allocation of resources to control them, which in turn will minimise financial losses arising from avoidable unplanned events.
- Set up an effective organisation to recruit and retain competent employees and provide the necessary resources to update employee competence as and when necessary.
- Deliver and support Health and Safety training requirements across all level of employees in Urbaser
- Distribute and communicate health, safety and welfare information regarding new methods of accident prevention and new legislative requirements
- Liaise with, and represent Urbaser to external health and safety bodies
- Report all matters for Health and Safety to the Management Committee and the Directors of Urbaser Limited.
- Analysis of data from **RIDDOR**
- Review Risk Assessments
- Arrange External Health and safety Training

Through the Corporate IMS documentation, the roles and responsibilities of the members of the Organization are attributed and the authority and relationships between all personnel who manage, perform, review or decide on tasks and/or resources related to quality, occupational health and safety, environment and energy management are known, with the aim of meeting the defined objectives. Next, the organizational structure defined for the IMS is defined, which establishes relevant positions to achieve an adequate implementation of the system, whose main functions and responsibilities are

RESPONSIBLE	ROLES AND RESPONSIBILITIES IN RELATION TO IMS
Chief Executive Officer	<ul style="list-style-type: none"> • Approve the Corporate Policy on Quality, Health and Safety, Environment and Energy, as well as other specific policies in these areas, as deemed appropriate. • Ensure the dissemination of the Policy and Objectives in order to motivate all workers to achieve them. • To provide the necessary resources to the Organization to achieve an adequate implementation and maintenance of the IMS.
Documentary Framework Committee	<ul style="list-style-type: none"> • Review and disseminate relevant IMS documentation.
Members of the Steering Committé	<ul style="list-style-type: none"> • Disseminate, within their area of responsibility, the IMS Policy and Objectives defined by the Organization. • Review and approve (when applicable, according to the established flows), new procedures or new versions of existing ones, related to the IMS matters that fall under their area of responsibility, as well as ensure their compliance.
RESPONSIBLE	ROLES AND RESPONSIBILITIES IN RELATION TO IMS

Country Director	<ul style="list-style-type: none"> • Manage the responsibilities that apply to them in the areas of Quality, Environment, Occupational Health and Safety and Energy. • Collaborate to promote among the workers under their responsibility, the correct implementation and maintenance of the IMS. • Ensure that the workers in their charge have sufficient training and information in the matters of application of the IMS, for the development of their activity in a safe and sustainable manner. • Propose improvements in the aspects related to the IMS that are applicable to its area of action.
Corporate Directors of other Areas different from QHSE	
Corporate QHSE Director	<p>Same functions as the previous block, and additionally:</p> <ul style="list-style-type: none"> • To act as the person responsible for matters related to the IMS at the Corporate level and the Management's representative for these matters within the framework of the IMS. • Ensure that the management system is established, implemented and maintained in accordance with the requirements of the applicable international reference standards (ISO 9001, ISO 14001, ISO 45001 and ISO 50001). • Report to top management on the performance of the IMS for review, including recommendations for improvement. • Maintain relations with the external company in charge of certification. • Ensure the support of other departments of the Organization when necessary. • Ensure that the necessary economic and personnel resources are allocated to ensure the proper functioning of the IMS. • Promote continuous improvement of the IMS and the Organization's performance in the aspects related to the IMS. • Promote awareness of the need to ensure compliance with customer requirements, legal requirements and other requirements associated with the activity in the IMS matters, at all levels of the Organization. • Coordinate the actions before the Public Administrations in IMS matters. • To request assistance in all that he/she considers necessary for the performance of his/her duties, from the Managers and Technicians of his/her Department, as well as from the Energy Management Department. When the QHSE Department appears in any document as being in charge of assuming a certain responsibility or signing a certain register, these functions will be assumed by the Managers and Technicians designated by the Corporate QHSE Director, according to the functions attributed to each of them, or assumed by the Corporate QHSE Director himself.
Director of	
other	<ul style="list-style-type: none"> • Ensure compliance with those aspects of the IMS that apply to it.
Corporate	<ul style="list-style-type: none"> • To offer support for the correct development of the activities related to their area.

Areas	
Country and Company QHSE Director	<ul style="list-style-type: none"> • Ensure compliance with those aspects of the IMS that apply to it. • To provide support for the correct development of activities related to QHSE, especially supporting the Contract Managers of those companies in which they have assigned responsibilities. • Represent, collaborate and report when appropriate, to the Corporate QHSE Director on the implementation, evolution and maintenance of the IMS.
QHSE Specialist	<ul style="list-style-type: none"> • Ensure compliance with those aspects of the IMS that apply to it. • To provide support for the correct development of activities related to QHSE, especially supporting the Operations Managers of those companies in which they have assigned responsibilities. • Collaborate with the QHSE Country/Society Manager to ensure proper coordination and management of IMS related tasks. • Represent, collaborate and report when appropriate, to the Corporate QHSE Director on the implementation, evolution and maintenance of the IMS.
Contract Manager	<ul style="list-style-type: none"> • To disseminate, within the area of his/her responsibility, the Policy and Objectives defined for the Organization. • Ensure that IMS procedures are properly implemented. • Ensure compliance with those aspects of the IMS that apply to it. • Collaborate with and inform, when appropriate, the QHSE Country/Society/ QHSE Specialist, on the implementation and maintenance of the IMS. • Ensure that records associated with the IMS are completed, archived and maintained. • Evaluate the effectiveness of corrective actions, if necessary.
Internal Auditors	<ul style="list-style-type: none"> • Communicate and clarify audit requirements to auditees. • Typify the findings made during the audit in the different categories (deviations, observations and opportunities for improvement).
RESPONSIBLE	ROLES AND RESPONSIBILITIES IN RELATION TO IMS
	<ul style="list-style-type: none"> • Prepare the audit report. • Ensure the confidentiality of the information obtained. • Act with objectivity. • Propose improvements whenever necessary.
Other Staff	<ul style="list-style-type: none"> • Ensure compliance with those aspects of the IMS that apply to it. • Active participation in the continuous improvement process through suggestions for improvement and implementation. • Ensure, based on the information and training received, compliance with the preventive measures related to their job. • Immediately communicate, as established, any situation that they consider may present a risk to their safety and health, to that of third parties or to the environment.

5.2.7 The Responsibilities of the Employer

The general provisions of the Health and Safety at Work etc. Act 1974 impose a duty on the employer to ensure, so far as is reasonably practicable, the safety of their employees at work. In the context of the EPC phases of Construction the employer is deemed to be an 'ostensible employer' in that all those working on site are under the day-by-day control of one body, whether employed by them directly or not. All employees, visitors and others



working in, for or on behalf of Urbaser Limited, are to co-operate with the Company in the implementation of this policy by undertaking the following actions.

- Fully investigating incidents and taking appropriate actions to learn lessons and to reduce the likelihood of incidents in the future.
- Providing and maintaining safe plant equipment and machinery.
- Constantly improving Health and Safety standards through the compliance of all relevant statutes, regulations and codes of practice; and
- Complying with the Construction (Design and Management) Regulations 2015 (CDM) as subsequently amended.
- Maintaining safe and healthy arrangements, welfare facilities and working conditions for employees, contractors and visitors.
- Producing suitable and enough Risk Assessments, Safe System of Work and other operating procedures.
- Provision of information, instruction and training in order to ensure competence and training;

5.2.8 The Responsibilities on all Employees

The key role of employees is to comply with relevant plans, procedures and systems in the Company's Health and Safety Policy and, where necessary, to bring to the attention of their elected representative and superior any situation which could place employees or others at risk or in imminent danger. Employees are reminded that they have a duty to ensure that the Company's health and safety policy is complied with. Requirements are to:

- Take reasonable care for their own health and safety at work and the safety of those who may be affected by their actions, or by their omissions
- Co-operate with their employer to ensure that any duty, or requirement, for health and safety imposed upon their employer is complied with
- Co-operate with any other duty holder (such as contractors or other employers working at our premises, and other employers when you are working at their workplaces) so far as is necessary to enable them to perform their duties
- Not intentionally, or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare
- Notify to supervisory staff hazardous conditions or defects in the Company arrangements for safety, health and welfare at work
- Report all potentially hazardous situations likely to cause injury or damage
- Notify all injuries and dangerous occurrences
- Ensure that Company work activities, products or services do not create risks to anyone and report to their supervisor any which do create an unmanageable risk
- Ensure that they are aware of the Company's emergency procedures for serious and imminent danger
- Ensuring safe handling and use of substances.
- Reviewing and revising this policy annually.
- Co-operating with their employer to ensure that any duty, or requirement, for health and safety, imposed upon their employer, is performed or complied with.
- Co-operating with any other duty holder (such as contractors or other employers working at our premises, and other employers when you are working at their workplaces) so far as is necessary to enable them to perform their duties.
- Not intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety or welfare.
- Consulting and communicating with Trade Union Safety Representatives on matters effecting their health, safety and welfare.
- Notifying hazardous conditions or defects in the Company safety arrangements to Line Managers.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 19 of 74
------------------------------	------------	-----------	---------------



5.3 Consultation and Participation of Workers

Consultation and participation of workers is carried out through the Health & Safety QHSE meeting at local sites where the Contract Managers and Supervisors sit in presence of an elected member of the union and the workforce. Conversely contract Mangers and other site representative sit in the Corporate QHSE committee in presence of par of the board of Directors and the Head of QHSE UK. Risks assessments and Safe Systems of works take into consideration the view and comments of Contract Managers, Plant Managers, Operation Manager, Supervisors and workforce.

5.3.1 Urbaser Health and Safety Corporate Committee

The Objectives of Urbaser Committee are:

- To promote a good Health and Safety Practice
- To monitor standards of health and safety, including accident and ill-health statistics
- To provide advice and guidance on the operational impact of new and existing health and safety legislation
- To act as a forum for consultation between Management and Union Safety Representative
- To cascade relevant health and safety information to employees at all location.

Members of the committees reflect the various functions within Urbaser in respect of health and safety issues. These se will include:

- Managing Director (Head Office and Operational Site when required)
- HR Manager (Head Office and Operational Site when required)
- Head of QHSE (Head Office and Operational Site when required)
- Local QHSE Managers (Local)
- Contract Managers (Local)
- Supervisors (Local)
- Member of The Union (Local)
- Operation Manager (Local)
- Employees Representative (Local)
- Project Directors (Local)
- Waste Treatment Director (Head Office)

Meeting are called, at a time, in response to an immediate and serious health issue, in which case also a Union Representative(s) from the site effected must sit the meeting. Otherwise the meeting is strategically placed on the day after the company monthly meeting in the Municipal Service meeting at HO in which the above-mentioned member sites.

5.3.2 Appointed Managers for Health and Safety Corporate Committee responsibilities

Manging Director, Waste Treatment Director, Head of QHSE, Head of HR, Head of Operations and Contract Managers.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 20 of 74



Managers of the committee will:

- Ensure the policy is understood by all employees and responsibilities are properly assigned and accepted at all levels.
- Ensure employees receive appropriate health and safety information, instruction and training as laid down in the policy.
- Ensure safe working practice are implemented in line with Urbaser policy and that any control measure put in place are used at all time and not interfered with
- Maintain a tidy workstation area, including access to and from the equipment being used
- Ensure fire escape and first aid arrangements are not compromised.
- Take immediate action to control and report any hazardous situation or unsafe act in order to prevent a risk to staff or other persons
- Ensure all accidents, dangerous occurrences (near misses) are reported promptly, in accordance with procedure
- Brief new starters to the team on health and safety and the fire and evacuation procedures
- Co-operate with changes in work practice where necessary due to changes in materials, plant, procedures, systems or technology.
- Ensure that they are aware of the company's emergency procedures for serious and imminent danger.

Their Key Tasks regarding Co-operation are to:

- Participate, when required, in briefing meetings and any other meeting which discusses health and safety.
- Participate in ballots for electing safety representatives or welfare representatives to present their views at safety committee meetings.

6. Actions to Address Risks & Opportunities as per PIN 3 & PIN 8

Urbaser Limited, when planning the OH&S management system, considered the internal and external issues, its scope, and hazards previously highlighted in this policy. The hazards, risk and opportunities identified are holistically addressed in order to:

- Give assurance to all stakeholders and clients that the OH&S system can achieve its intended outcome;
- Prevent or reduce undesirable outcomes, and
- Archive continual improvement.

Thus, the following elements have been considered in the development of the Health & Safety System / policy:

- Hazards.
- OH&S risks and other risks.
- OH&S opportunities and other opportunities.
- Legal and other requirements

6.1 Hazard Identification & Assessment of Risks & Opportunities

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 21 of 74
------------------------------	------------	-----------	---------------



Urbaser Limited activities have been reviewed using experience within the company and by reference to ACOP L 114. Well known hazards within the industry are as follows:

- Slips, trips and falls
- Noise and vibration
- Workplace Health, Safety and Welfare
- Manual Handling Operations
- Substances / Materials Hazardous to Health (COSHH)
- Vehicles: Driving, reversing collisions, driving in the proximity of schools and hospitals
- Collection of Hazardous Waste-e.g. clinical waste
- Legionella
- Leptospirosis
- Asbestos
- Lone Working
- Encountering aggressive Behavior
- Working in proximity to or near waters
- Sorting refuse on conveyors belts
- Working in Confined Spaces
- Vehicle Cleansing
- Various hazards of the daily street cleansing operating activities
- Using of Pesticides
- Traffic Management within Depot or Plants
- Handling of Chemicals
- Escape of Gases from Bio-halls
- Ergonomics

All the risks arising from any associated activities on site are rated as:

- **High Risk – unacceptable risk.**
Another way of carrying out the task must be found before this starts or the activity must be stopped immediately.
- **Medium Risk – undesirable risk.**
An activity, which has resulted or could have resulted in a RIDDOR reportable accident or incident within the company in the last 3 years or is not being controlled by a Method Statement, which meets an Approved Code of Practice or equivalent to this.
- **Low Risk – acceptable risk.**
A risk that has been reduced to a level which is unlikely to result in an injury or ill health.
- **Opportunities**
Opportunities for improvement are identified and reviewed for incorporation into the Health & Safety System as part of the continual improvement process.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 22 of 74
------------------------------	------------	-----------	---------------



This methodology has been used to create a hazard register where all the hazards are contained and subsequent production of:

- Safe System of Work
- Risk Assessments
- COSHH Assessments
- Ad hoc procedures
- Other bespoke operating procedures
- Risk and Opportunity Register
- Hazard Registers

6.1.1 Determination of Legal and other Requirements as per PIN2

Legal and Other Requirements

The organisation establishes and maintain procedures to identify legal and other requirements to which the organization subscribes to and that are applicable to its activities, or services. All applicable legislations form integral part of a Corporate Legal Register.

Legal requirements will cover environmental, health and safety, waste industry regulations, and act of parliament. The stated legal register will be compiled and reviewed three times per year by the QHSE Manager/Advisors and the Legal Manager accordingly.

Evaluation of compliance to legal and other requirements is done through specific audits once per year at each location along with other general audits seeking evaluation to legal compliance in specific fields of activities. Those evaluation audit will be based on the site main activities hence the main legislation applicable to the cited, this audit can thus differ from site to site or be general for site covering the same activities. Other requirements on top of the legal compliances will also be ascertained by the audit process.

Updates are carried out using the Health and Safety and legislation.gov.uk, Cronos, Pegasus ad ENDS. Th legal register is emailed upon each review to top Management, middle management and Contract Mangers and auditors.

6.1.2 Planning Action

Plans are established to address:

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 23 of 74
------------------------------	------------	-----------	-----------------------------



- The risks and opportunities.
- Legal requirements.
- Proactive Monitoring
- Reactive Monitoring

6.2 OH&S Objectives & Planning

6.2.1 OH&S Objectives - Corporate

OH&S objectives are established annually. The objectives to be met in ensuring the success of this policy are:

- To actively involve employees at all levels in ensuring a competent workforce that continually operates safe and efficient working methods. This will reduce lost time from accidents, sickness, stress and absence with the consequent benefits of high morale and increased productivity. It will also help in creating a public image of a well-run, safe and trusted business.
- To set standards that will meet and exceed the relevant statutory, legal and contractual (client) requirements for health and safety, product safety and environmental matters as these may affect our employees, customers, contractors and their employees and the public at large. Retain certification to ISO 45001:2018 at all times.
- To review and, where appropriate, develop these standards in the light of changes in technology, industry practices and legislation.
- To co-operate with the appropriate authorities on the formulation of standards and means of compliance.
- To inform employees of their health and safety responsibilities and provide sufficient information, instruction and training to enable them to be aware of and avoid the hazards to which they are exposed.
- To ensure that contractors working under the control of subsidiary companies within the group are informed of its standards, and that appropriate procedures exist for monitoring compliance without detracting from the legal responsibilities of the contractors.
- To ensure that the company's established vehicles and are used for employee consultation and participation on matters affecting health and safety at work.
- To ensure as far as reasonably practicable, safe systems of work and the elimination of any foreseeable hazard which may result in injury, occupational health illness, property damage, process loss, fires, security loss and environmental damage.
- To ensure that these objectives are being fulfilled through auditing company activities.
- To ensure legal and standard compliance at all time.
- Safety and occupational health related targets-Operational
- The Company puts into place annually a series of objectives and targets. Those objectives may change or "rotate" from year to year, to ease the process of target achievement
- The Company will strive to continuously improving its OH& S standards and places a series of objectives and targets aimed to improve upon the previous year's performance and identify any gap in the system.

6.2.2 Corporate Safety related targets for site staff, contractors and seconders etc. to be sought.

- Fatalities = 0 incidents. (Fatalities do not appear in any AFR, AIR or LTIR rate calculations).
- Accident frequency rate (AFR) = Zero (Specified Injuries and Injuries >3 days absence and > 7 days absences).
- High potential incidents = 0 events. (N.B. AFR and LTI safety targets for 2020 are Zero).
- Lost time injury rate (LTIR) = 0 (Injury illness rate, person away from work for >1 day). Per 100,000 hours.
- Lost time & specified injury rate (LTMIR) = 0 (Injury rate for LTIs PLUS major injuries). Per 100,000 hours

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 24 of 74
------------------------------	------------	-----------	---------------



- No. of injuries to members of the public: 0 events, as a result of our undertakings **AND** RIDDOR reportable to HSE etc.
- No. of RIDDOR Dangerous Occurrences = 0 events.
- No. of outbreaks of fire on site = 0 events.

Occupational health and welfare related corporate targets to be sought

- Permanently disabling injuries or ill-health = 0 injuries.
- RIDDOR Occupational Diseases = 0 instances of diseases.
- Minor injuries in offices = 0 incidents.
- Minor occupational (or reversible) ill-health in offices = 0 incidents.
- Lost time illness rate (LTIR) = 0 (New Illness rate, person away from work for >1 day). Per 100,000 hours.
- Lost time & major injury rate (LTMIR) = 0 (New Illness rate for LTIs PLUS RIDDOR Occupational Diseases). Per 100,000 hours.

Please refer to the yearly targets and objective for targets based on improvements from previous years

6.2.3 Planning to Achieve Objectives as per PIN 09

When planning how to achieve OH&S Objectives the following will be determined:

- What will be done.
- What resources will be required.
- Who will be responsible.
- When it will be completed.
- How will the results be evaluated, including indicators for monitoring.
- How the actions will be integrated into the company's business processes.

A Target and Objective tracker have been implemented for the monitoring of the action allocated against targets and objectives.

6.2.4 Hazard Identification

Urbaser Limited is a well-established business and engages standard processes with well understood hazards. A Corporate Hazard Register has been produced, after detailed risk profiling, entailing all the hazards that the company activity may bring about. The 5 steps used by Urbaser for Hazard Identification are as follow:

- Step 1: Look for Hazards in the surrounding environment
- Step 2: Decide who might be harmed, and how by the newly identified Hazard
- Step 3: Evaluate the risks and decide if current precautions are adequate or need improvement
- Step 4: Record the findings on the Risk Assessment and Safe System of Work

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 25 of 74
------------------------------	------------	-----------	---------------



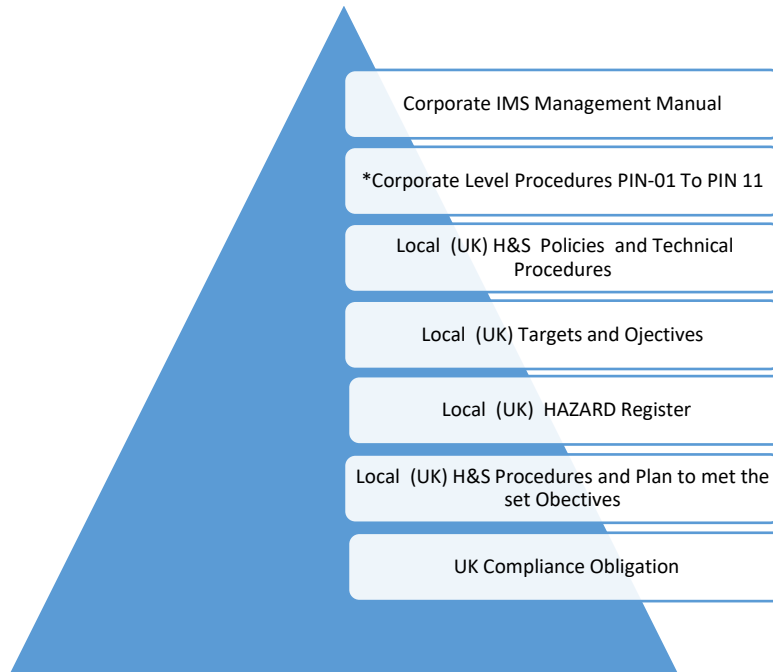
- Step 5: Review the assessment and revise it if necessary.

6.2.5 Assessment of OH&S Risks & Other Risks

A detailed risk profiling of each activity is carried out with the involvement of all interested parties. The specific hazards are assessed in the company's Risk Assessments and Safe System of Works. A Hazard Register is present at each operational location and all the single Hazard register converge into a Corporate Hazard Register.

6.2.6 Corporate& Local Procedures

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 26 of 74
------------------------------	------------	-----------	---------------



*** PIN Porcedures:**

PIN-01-CORP CREATION AND CONTROL OF IMS DOCUMENTATION

PIN-02-CORP DENTIFICATION AND EVALUATION OF LEGAL REQUIREMENTS

PIN-03-CORP ACTIONS DERIVED FROM DEVIATIONS, RISKS AND OPPORTUNITIES FOR IMPROVEMENT

PIN-04-CORP INTEGRATED MANAGEMENT SYSTEM AUDITS

PIN-05-CORP IMS MANAGEMENT REVIEW

PIN-06-CORP SERVICE MANAGEMENT PLAN

PIN-07-CORP EMERGENCY RESPONSE

PIN-08-CORP RISK AND OPPORTUNITY MANAGEMENT

PIN-09-CORP OBJECTIVES AND PERFORMANCE INDICATORS

PIN-10-CORP COMMUNICATION AND AWARENESS

PIN-11-CORP CUSTOMER REQUIREMENTS MANAGEMENT

7.0 Resources



The Board of Directors are responsible for ensuring that all necessary resources for the establishment, implementation, maintenance and continual improvement of the Health & Safety System:

- Personnel.
- Equipment including vehicles.
- IT.
- Information.
- Training
- Mobility

7.1 Resources, duties, requirements

The following paragraphs outline roles and responsibilities of the Company, its directors and officers, managers, supervisors and those who are seconded to work on site

7.2 Resource identification

The Company is required to demonstrate its commitment by undertaking the following:

- Ensuring the availability of resources essential to establish, implement, maintain and improve the health and safety management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.
- Defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective health and safety management; roles, responsibilities, accountabilities, and authorities shall be documented and communicated.
- Appointing one member of its top management as the Director of Safety with specific responsibility for health and safety, irrespective of other responsibilities, and with defined roles and authority for:
- ensuring that the health and safety management system is established, implemented and maintained in accordance with this OHSAS Standard;
- Ensuring that reports on the performance of the Health and Safety management system are presented to top management for review and used as a basis for improvement of the Health and Safety management system

7.3 Competence & Training

Individuals are deemed to be competent if they have the appropriate level of qualifications, knowledge, training and skills to be able to carry out tasks assigned to them to an acceptable standard; in a reasonable amount of time and without close supervision.

7.3.1 Competence

The Company ensures that any person(s) on site, under its control, performing ordinary or safety critical tasks that can impact on Health and Safety is (are) competent on the basis of appropriate knowledge, attributes, training or experience (KATE), and appropriate records are maintained by the HR community / business partners. The

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 28 of 74
------------------------------	------------	-----------	---------------



Company identifies training needs associated with its health and safety risks and its health and safety management system. Consequently, with advice from the QHSE Managers and Advisors.

The Company provides training internally or through external providers or takes other action to meet these needs, evaluate the effectiveness of the training or action taken, and retain associated records. The Company has established with HR business partners processes to establish, implement and maintain procedures to make staff working under our control aware of:

- The Health and Safety consequences, actual or potential, of their work activities, their behavior, and the Health and Safety benefits of improved personal performance;
- Their roles and responsibilities and importance in achieving conformity to the Health and Safety policy and procedures and to the requirements of the Health and Safety management system, including emergency preparedness and response requirements
- The potential consequences of departure from specified procedures.

Training procedures shall take into account differing levels of:

- Responsibility;
- Ability;
- Language skills;
- Numeracy, and
- Literacy and risk.

7.3.2 General competence

We expect all our staff will be competent in safety and, with encouragement, we expect that they will undertake training and awareness courses and take an active interest of their own safety, of those around them, and for those that they are responsible, including the public.

Regarding competency, to advise on safety, health and environment, the accepted Industry Standard is corporate membership at Chartered Member level of the Institution of Occupational Safety and Health (IOSH), a Post Graduate level qualification in Health and Safety and an appropriate environmental management qualification. As a safety adviser one has also to be appointed under Reg 7 of the Management of Health and Safety at Work Regulations 1999, and this standard is certainly upheld in Asset and Concession Companies.

Competence of Managers

Managers are expected to ensure they obtain sufficient knowledge to enable them to recognise situations with potential to cause damage or harm, and to design and implement effective preventative or protective actions. The level of competence required of managers in health and safety will depend on the extent to which they must be involved in the planning and implementation of risk assessment and control measures.

Competence of the Safety Officer

The Group Health and Safety Officer is the appointed "competent person" under the management of Health and Safety Regulations 1992 to assist the Group in achieving compliance with statutory requirements and implementing this health and safety policy. Competence is to be demonstrated by the QHSE Head of Department and Managers



by holding a technical qualification or by working towards the qualification, and by meeting the required educational standard and level of experience as set by the company.

7.3.3 Health and Safety Training

Urbaser Limited shall provide employees with the necessary skills and information to carry out their jobs in accordance with recognised best practice and statutory standards necessary for efficient production, quality and safety. To achieve this, subsidiary companies/departments are to identify and meet their own training needs and quality requirements by:

- Identifying the training needs, also through the risk assessments processes, for statutory compliance and employee competence relating to each post.
- Formulating training plans and programmes to meet the requirements above.
- Measuring the effectiveness of the training and adjusting the content or means of delivery where necessary.

7.3.4 Training Needs Identification

Responsibility for ensuring that each employee receives the necessary health and safety training rests with the employee's manager. The Urbaser 's QHSE Manager/ Safety Officer will consult managers and assist in identifying training requirements on a basis of those groups below:

- Specified individuals (e.g First Aiders, Fire Wardens) with crucial health and safety responsibilities
- Managers and supervisors
- Employee-elected Safety Representatives
- New recruits, younger inexperienced employees and agency staff
- Employees exposed to new or increased risks
- All other employees

Subsidiary company / department training plans will be co-ordinated with the assistance of the QHSE Manager. All training plans must be approved by the Managing Director who will authorise the provision of adequate resources to carry out the training. Training plans will be distributed throughout Urbaser Limited so that all subsidiaries may take advantage of training available.

7.3.5 Training Requirements

Training is an important means of achieving competence and helps convert information into safe work practices. Situations where all of the company's employees must be trained or retrained are listed below:

- A statutory requirement.
- Induction into the company and job.
- Emergency procedures (regular practice in the drill).
- A change of work equipment, system of work or technology
- A change of responsibility of work activity
- As necessary for on-going professional development
- Retraining, post-accident of due to poor performances
- Where an employee takes on extra responsibilities (e.g. first aider)
- Where a risk assessment identifies a need.

7.3.6 Induction Training

Induction of new and young employees, including those on work experience programmes etc., is covered later in this policy document and is to be followed by all managers who recruit staff (see section on "induction of new employees"). Induction is delivered prior to the new appointee starting his assigned task and it is delivered by the QHSE Manger and Contract / Plant Managers and/or Supervisor on our operational sites.

7.3.7 Ongoing Training

Effective job performance depends on good selection, training and development of staff. The NVQ assessment, which is a system based on competence and aims to achieve a universal standard within a job function, will be

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 30 of 74
------------------------------	------------	-----------	---------------



adopted where it is applicable to operations in subsidiary companies/departments. Training in other aspects of health and safety will be carried out using a modular approach with the objective that all employees within a job function obtain a similar level of competence in a time span set by management.

Line managers and supervisors are responsible for the actions of employees and, due to the far-reaching implications of this responsibility, must be trained to:

- Apply the relevant health and safety legal requirements and company policy.
- Formulate and implement safe systems of work.
- Apply effective supervision of employees and working activities.
- Identify any areas of weakness in the company health and safety arrangements.
- Apply the procedures of discipline related to failures in health and safety compliance.
- Recognise their own limitations in experience and knowledge and where/from whom to get assistance.
- Communicate with all levels of employee/management within the company on matters relating to health and safety.
- Hand out task specific risk assessment to the employees inducted.

Other employees (operatives, craftsmen and technicians etc.) need to fully understand the requirements and the arrangements for ensuring their health and safety. They need to know how to discharge their responsibility to work safely without creating risks to themselves or others. They also need to know how to report deficiencies in the company health and safety arrangements. Their training will cover:

- What their duties are under health and safety law.
- What the in-house safety arrangements are, including company policy and any emergency evacuation rules.
- Safe working practices relating to their job, including use of personal protective clothing and equipment.
- Hazard identification and avoidance.
- Specialist training
- How to report health and safety problems.

Employee Elected Safety Representatives, who have a role which supports Management in monitoring the health and safety management system must be trained in addition to the above to:

- Carry out their role as required under the Health and Safety (Consultation with Employees) Regulations 1996.
- Hazard spotting and reporting using company systems.
- Communicating with managers on health and safety.

Means of Training

- External courses at venues/premises organised by recognised training organisations.
- In-company training carried out by visiting trainers from recognized organizations and/or carried out by competent company trainers.
- On the job training.
- Manufacturers' training courses and briefings.
- Distance learning courses.
- Toolbox Talks
- Conferences and Seminars

7.3.8 Awareness

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 31 of 74
------------------------------	------------	-----------	---------------



- The OH&S Policy and Objectives are posted on the workshop's noticeboard at each operational site.
- All employees have the ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health and will not suffer any undue consequences for doing so.
- All employees must be familiar inducted and trained for all equipment they will use.

7.4 Communication as per PIN 10

Communications on health and safety will be accurate, clear and timely.

7.4.1 Safety Management Communication

Within Urbaser Limited, communication is essential both to keep employees informed of the business's safety performance and to build a shared understanding of safety priorities and needs, communication is vital part of safety and it is one of the 4Cs of building a safety culture. Communication will be achieved using regular meetings involving committees, pre- planned monthly meetings, meeting with the clients (Authorities). Managers and supervisory staff shall be encouraged to maintain regular and frequent personal contact with employees to give relevant advice and agree risk controls. A formal system of raising health and safety matters, which is to be actively encouraged by managers, is defined earlier in this document and is considered an important means of health and safety communication. Urbaser Limited has establish and maintain procedures with regard to its quality, environmental aspects and health and safety for internal and external communication between the various levels and functions in the organization, and receiving, documenting, and responding to relevant communications from external parties. Urbaser Limited will demonstrate management commitment to the safety of its employees and the environment; deal with concerns and questions about significant environmental aspects; Raise awareness on environmental policies, objectives, targets and programs; inform internal and external interested parties about OH&S and performance as appropriate. Energy saving procedures will be cascaded down via Memo and or PowerPoint.

7.4.2 Contractor communication

The Contractor will make H&S of the Project part of weekly team meetings. During the Works Period, design team meetings and project meetings will also include environmental matters. Where Site controls dictate it, a specific environmental meeting will be held.

Personnel engagement in this H&S Plan will follow the health and safety consultation model and include group toolbox talks as well as confidential reporting, an open door policy and a culture of openness and honesty. Notice boards will also have regular updates on environmental performance and Site-specific issues.

7.4.3 External

The General Manager and H&S, manager will also deal with external organisations, such as the HSE and the local environmental health officer.

7.4.4 Subsidiary Company and Department Meetings

Local meetings are an important means of ensuring effective communication of health and safety information to all levels of employees. Managers and supervisors are encouraged to hold short meetings such as yard briefings whereby employees are updated on new information or existing work methods. These meetings will, through time, achieve a positive safety culture within the company and ensure that the safety message is communicated to all staff. A number of situations when safety should be discussed are:

- Weekly briefing and staff meetings with employees run by supervisory staff.
- Monthly meetings involving Function Managers and Supervisors.
- Monthly meeting of Departmental Managers at Head Office.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 32 of 74
------------------------------	------------	-----------	---------------



7.4.5 Subsidiary Company, Depots, Departmental Health and Safety Committees

Urbaser Limited recognises that consultation with its employees on health and safety is of high importance and encourages employees to become involved in the improvement of health and safety management and standards. Subsidiary Company (e.g. Urbaser Environmental Limited, UBB) operational Depots and Departmental health and safety meetings are a necessary vehicle for successful communication and addressing problems at the level most affected.

Meetings will take place at agreed intervals with the following objectives:

- Reviewing the existing arrangements for safety
- Proposing suggestions and actions for health and safety improvements
- Monitoring new equipment, processes and changes which may significantly affect
- Employees' health and safety
- Examining safety audit reports
- Monitoring safety training plans and implementation
- Keeping up to date and ensuring that new information is available to those affected

7.4.6 Health, Safety and Welfare Meetings and Workers Forums

Elected safety representatives (either a Union or Staff representative) shall, where the situation dictates, raise at these monthly meetings matters of health and safety affecting employees whom they represent, and which remain unresolved at local level. A condition of raising such matters is that all avenues to resolve the matter at local level have been exhausted. At Basildon, their representation appears at the workers forum.

7.4.7 Information to Employees and On Which Elected Representatives Are To Be Consulted

Managers are to make arrangements to brief employees on the information listed in this section. Relevant information can be obtained from the contents of existing generic risk assessments, health and safety information sheets, the Group Employee Health and Safety Handbook, Subsidiary Company Safety Policy and Rules documentation and, where applicable, Departmental Safety Information Booklets. Employees are to be issued with the Handbook. This policy documentation must be made available at convenient locations for reference by all employees by being available electronically on the company share's drive. Ready to download and a hard copy present in the supervisor's offices. Departments may call upon the assistance of the QHSE Manager(s) when carrying out briefings required in this section which must inform each employee about:

- The risks to the employee's health and safety identified by any risk assessment.
- The preventative and protective measures applicable to all risks identified.
- The procedures for evacuation of the premises in the event of serious and imminent danger.
- The identity of the appointed competent person in respect of health and safety and any other person with specific health and safety duties inclusive of those nominated to oversee any evacuation procedure. Others include First Aiders etc.
- The risks notified by any contractor working on the site or in the premises which might affect company employees.
- The company arrangements for obtaining competent advice on implementing health and safety laws.
- The planning and organisation of health and safety training.
- The health and Safety consequences of introducing new technology or changes to procedures or equipment etc. into company operations

7.4.8 Sources of Health and Safety Information

Managers and other employees shall be kept updated on health and safety matters through participation in meetings mentioned earlier in this document. Further communication of health and safety information throughout the company will be disseminated as necessary by circulation or display on notice boards of:

- Various health and safety publications.
- Company QHSE reports.
- Reports on health and safety incidents in the company or other relevant companies.
- Health and Safety Instruction Policy (Safe Works Procedures).
- HSE (Health and Safety Executive) reports and notices and other publications.
- Environmental Health Department reports and notices and other publications.
- Minutes of Health and Safety Committee meetings

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 33 of 74



- Risk Assessments and Health and Safety Audit reports.
- Health and Safety in-house training events.
- Prescribed notices.
- Prescribed registers and certificates.
- Company employee Health and Safety Information Booklets.
- Statutory Instruments and Regulations.
- BSI reports
- Other third parties' reports

7.5 Documented Information

The Urbaser Limited Health & Safety System includes the following documentation:

- Health & Safety Policy.
- Risk Assessments.
- Safe System of Works
- Hazard Register
- Risk and Opportunities Register
- Near Miss Procedures
- Drivers 'Instructions
- Vehicle Daily Check
- Machine Instructions.
- Standard Operating Procedures
- Methods Statements
- Permits to Work

7.5.1 Creating & Updating

The responsibility for creating and updating documents is as follows:

- **Health & Safety Policy** -Gaetano Cristiano and all staff consulted
- **Health & Safety System Procedures** -Contract Mangers with Supervisors and Staff
- **Process documentation** - Contract Mangers with Supervisors and Staff
- **Risk Assessments.** Gaetano Cristiano, Contract Managers with Supervisors, Staff and / or QHSE advisors
- **Safe System of Works** Gaetano Cristiano, Contract Managers with Supervisors and Staff
- **Hazard Register:** Gaetano Cristiano, Contract Managers with Supervisors
- **Risk and Opportunities Register:** Gaetano Cristiano, Contract Mangers with Supervisors
- **Near Miss Procedures:** Gaetano Cristiano, Contract Managers with Supervisors
- **Drivers 'Instructions:** Gaetano Cristiano, Contract Managers with Supervisors
- **Vehicle Daily Check:** Gaetano Cristiano, Contract Managers with Supervisors
- **Machine Instructions,** Contract Managers with Supervisors and Team Leaders
- **Standard Operating Procedures:** Gaetano Cristiano, Contract Mangers with Supervisors and / or QHSE advisors.
- **Methods Statements:** Gaetano Cristiano, Contract Managers with Supervisors and / or QHSE advisors

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 34 of 74
------------------------------	------------	-----------	---------------



- **Permits to Work:** Gaetano Cristiano, Contract Managers with Supervisors and / or QHSE advisors

7.5.2 Control of Documented Information

Documented information is controlled so that:

- It is available and suitable for use when and where needed.
- It is legible.
- It is updated as necessary.
- Obsolete copies are removed promptly and archived or destroyed.

7.5.3 Document Control & Control of records as per PIN 1

Urbaser Limited has established and maintained procedures for the control of all documents required for the OH&S Management System. Procedures exist for the approval of documents to ensure that they are adequate to issue. The procedures ensure that documents are traceable, that current document revision status is identified, and that relevant current versions are available in the areas where they are needed to maintain effective operation of the system. The documents have to be at all the time legible and easy to identify and retrievable with date of issue and date of amendments where applicable, maintained in an organized fashion and retained for a specific period of time, and that documents which originated externally are similarly identified and controlled. Records are established and maintained to supply evidence of compliance with defined requirements and the successful achievement of the OH&S Management System. Records are to be legible, identifiable and easily located. Document procedures have been established which defines the controls required for identification storage protection, retrieval, loss, damage, deterioration and disposal

Document control

Applies to all documents that are used by the Integrated System or any work within the scope of Urbaser's activities. All such documents are known as 'controlled documents' and every publication, check list and form will display a unique document registration using the guidelines published by Urbaser SAU in Regulation 0

Control of Records

Concerns the controlled storage and movement of records, which are the records of all the work and communications relating to any work in the scope of accreditation. (Examples are test reports, letters to clients,

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 35 of 74
------------------------------	------------	-----------	---------------



quotations, planning and meetings records relating to the work and any syllabuses or documents that are being kept as a record of what document applied at the time of the work).Records must be held secure for confidentiality of clients and personnel.

Document control concerns

The issuance of the correct and current documents, such as standards, training syllabuses, blank forms or workbooks. Issue of documents and forms is controlled by computer system access permissions, which is set and maintained to mirror authorisations of each person.

7.5.4 Document approval and issue

The master versions of all templates are stored in secured access areas of the office computer system. Site documents like procedures along with HSE guidance will be on the company's share drive. In case such keys are lost documents will be available via internet. All required documents and forms must be available to the persons who require them. The QHSE Manager is responsible for carrying out issue and distribution of documents and forms, and for collecting superseded and obsolete issues. The Integrated manual issued form Madrid must be immediately available for all management, quality staff and project controllers. **Control of all issues is made effective by use of Document Issue Records which include one for sites to ensure that all sites storing documents for use are updated promptly. This operation is controlled centrally from HQ.**

7.5.5 Document Review

External documents are checked at least annually for current version being up to date. This is done by using information from or contacting the supplier of the document. The schedule and record for this is kept in the Document Issue and Review File.

Internal documents: All are reviewed at least annually for appropriateness of use, layout and content. They may be for example be modified to accommodate difficulties or errors made in use or to accommodate system design modifications. The standards to which the quality system is applied and policies within the quality system must be observed before making changes. The review is also to check compliance with the standard. It must be carried out by a person knowledgeable and experienced about the work and current quality procedures. Schedules and records for reviews are kept in electronic folder Document Review' in 'Current Records'. Quality Manager implements reviews and persons or positions who issued or previously reviewed a document will often review the same documents.

The issuing function (person) is displayed at the foot of all documents and forms (display on labels is optional.) Further specific requirements of the review may apply; check this section and the review forms used. The review schedules and forms are kept as electronic records only, but are kept in year labeled batches for the requisite records storage period (refer to Control of Records).

Any review of **audit programme** must include a review of all aspects of the current ISO 9001:2015 standard and the usability of the scheduling system. Documents held in **electronic** only format will be included in the lists in the 'Document Review' file. The document review file will contain or point to the schedules for the reviews. The QSHE Head of Department and the Board's Directors are the only authorities within Urbaser that are permitted to ameliorate / replace / change both Quality and the Technical documents.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 36 of 74
------------------------------	------------	-----------	---------------



7.5.6 Document Compilation and Authorisation

Obsolete forms; Obsolete forms are removed from the system and destroyed on a regular basis. This is carried out by QHSE or Office Manager. One copy of each obsolete document is kept and clearly marked as obsolete or superseded as appropriate. The QHSE or Office Manager ensures that this is completed by using the document issue registers and recording the return and destruction or transfer to archive as is the case for each document.

7.5.7 Document and form identification

Documents must be uniquely identified with date of issue and version number. In the case of forms this is normally using the form / document registration system given in **Appendix A**. The system is also used for documents produced from templates

In addition all documents and forms are to include the following:

- The issuing authority
- Page number

The above policy also applies also to any forms and documents that are electronic only in format, including forms in a database or spreadsheet program (e.g. Excel).

Where possible, **(not a requirement)** templates should also display their storage location. The table below shows the particular configurations of the above requirements applied to the various documents.

Type of Document	Unique Identification Format	Format of number of pages display
Environmental Policy	Individual pages to display Title of Document, No. & title of section, page issue number (historic issue count for that page), and date of issue.	Numbered as page number within the section. 'Page x of y' where x is the sequential page count and y is the total number of pages in the section

7.5.8 Review of changes to documents

Any changes to all documents and forms relating to any accredited activities are reviewed by the Head of QHSE Department. Approval of all documents for accredited work areas is carried out by the Head of QHSE Department. Any altered documents must show that they are a new issue by one of two means. 1) For the Quality Policy and Procedures each page should show the issue date, 2) For all other documents and forms a new Form / Document Registration Number is applied containing a date section that indicating the start date of authorisation for use.

Coding format for documents

Templates of the various document types detailed below are available for use by all staff and are accessed via the shared area

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 37 of 74
------------------------------	------------	-----------	-----------------------------



Policy

Codification example:						
CODING	DOC. TYPE	No.	CORPORATE / (COUNTRY / COMPANY / WORK CENTER)	TITLE	VERSION	FINAL CODING
POL - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	POL	01	UK	INSURANCE	V1	POL-01-UK-INSURANCE-V1

Procedure: depending on its contents:

- ✓ Administrative Procedure (PA):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
PA - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	PA	01	UK	INSURANCE	V1	PA-01-UK-INSURANCE-V1

- ✓ Systems / IT Procedure (PS):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
PS - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	PS	07	UK	SYSTEMS	V1	PS-07-UK-SYSTEMS-V1

- ✓ QHSE and Energy Procedure:

- PIN (Integrated)



- **PCA** (Quality)
- **PMA** (Environment)
- **PSS** (Health and Safety)
- **PE** (Energy):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
PIN - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	<i>PIN</i>	<i>02</i>	<i>UK</i>	<i>ENERGY</i>	<i>V1</i>	<i>PIN-02-UK.-ENERGY-V1</i>

✓ Innovation Procedure (PI):

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	FINAL CODING
PI - No. - CORP / (COUN/COMP/CEN) - TITLE - VNo.	<i>PI</i>	<i>01</i>	<i>UK</i>	<i>CORRECTIVE ACTIONS</i>	<i>V1</i>	<i>PI-01-UK-CORRECTIVE ACTIONS-V1</i>

Instructions / Protocols: INS / PRT:

Depending on the content of the regulation, the following acronym will be added to INS / PRT: Administrative (A; for example, INSA o PRTA), System (S), QHSE and Energy (IN, CA, MA, SS and E), Innovation (I).

Codification example:						
CODING	DOC. TYPE	No.	CORP / (COUN / COMP / CEN)	TITLE	VERSION	CODING
PRTxx - No. - CORP/(COUN/COMP/CEN) - TITLE - VNo.	<i>PRTA</i>	<i>01</i>	<i>UK</i>	<i>VALVES</i>	<i>V1</i>	<i>PRTA-01-UK-VALVES - V1</i>

Records and Documents:

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 39 of 74
------------------------------	------------	-----------	---------------



CO DIN G	DOC CODIFICATION TO WHICH THEY BELONG	D + No.	DOC. TITLE
Pxx - No. - CORP/(COUN/COMP/CEN) - DNo. - RECORD TITLE	PA-14-UK	D14	LOSS INVOLVING DAMAGE TO PROPERTY

8.0 Operation

8.1 Operational Planning & Control

Criteria for processes are defined by Gaetano Cristiano and will include some or all of the following:

- Guarding / machinery in Basildon
- Vehicles Procurements-
- Risk Assessment and Safe System of Work deployments
- Ergonomics-QHSE
- Equipment - Operation
- List of Competent Operatives. Training Matrix
- PPE- Operation
- Standard Operating procedures
- Method Statements
- Equipment use / policy
- Driving procedures
- Driver Assessments
- Other local safety procedures.

QHSE and Operations are responsible for ensuring that the above controls are in place at all times.

8.1.1 Outsourcing

The following outsourced functions are controlled as follows:

- Vehicles Maintenance
- Vehicle Leasing

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 40 of 74
------------------------------	------------	-----------	---------------



- Agency Staff used for streets cleansing, driving and sorting
- Graffiti Removals and paint spraying
- Building Safety: Fire Risk Assessments/DSEAR Assessments/Confined Spaces
- Third Party Auditing
- Tracking for Vehicles Systems

8.1.2 Eliminating hazards & Reducing OH&S Risks Proactive and Reactive Monitoring

Active Monitoring

- Inspection of the workplace / sites on a daily basis in conjunction with visits for other reasons by managers and supervisors.
- Joint inspection on a three-monthly basis with employee representatives. These inspections will include all plant and work activities. Checklists should be used to remind inspectors of the control measures identified as necessary by risk assessments.
- Auctioning of hazard reports from employees in general and from employee representatives.
- Regular meetings with employee representatives to discuss health and safety matters.
- Risk Assessments
- COSHH Assessments
- Near Misses
- Safe System of Work
- Permit to Work

Work, Health, Safety and Welfare

- Plant and Equipment Check
- Toolbox Talk (also reactive)
- Training
- Fire Risk Management

Reactive Monitoring

- Accident Investigations
- Post-Accident Risk Assessment
- RIDDOR Reporting
- Post-Accident Toolbox talk
- Post-Accident Audits

8.1.3 Near Misses Reporting

A near miss is an unplanned event that could have resulted in personal injury or property damage, but fortunately did not.

Urbaser Limited, believes that valuable lessons can be learnt from the occurrence of a 'near miss', hence, steps are taken in order to prevent the recurrence, thereby making the workplace safer. Urbaser Limited is constantly encouraging its staff in reporting the hazardous situation they face daily, so that they contribute to ameliorate and expand on current safety procedures.

It is Urbaser Limited's policy to:

- Encourage Near Misses;
- Record Near Misses;
- Report Near Misses and
- Investigate Near Misses

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 41 of 74
------------------------------	------------	-----------	---------------



The steps to follow in the reporting procedure are:

- Near Misses cards are issued to all operatives at operational sites while at HQ in Cheltenham, near misses reporting cards are located in the Staff Room, for operatives to use. Operatives to fill in correctly and clearly the Near Miss card and hand it back to the office
- HQ and operational sites have been provided with Near Misses databases via Alcumus where to record the incidences investigate the route cause and allocate corrective actions. The administrator will enter the data collected into the Near Misses Database.
- The Supervisor and /or the Contract Manager on site will allocate the Corrective actions and monitor their effectiveness.
- Near misses provide valuable information for the QHSE Manager about health and safety issues at both HQ and operational sites. Directors, QHSE and Contract Managers therefore need to be made aware of near misses that happen and ensure that appropriate remedial actions are taken. Director and /or QHSE manager to evaluate the Corrective action allocated

Near Misses MUST be logged on the company's database system Alcumus.

NEAR MISS / HAZARD REPORTING (Dangerous Occurrences)

Date : Time :

Location :

Description :

.....

Reported by : Signed :

Please tick all the relevant boxes below

- Head Office
- Operational Site please specify: _____
- Plant/Equipment Vehicles
- Work at Height Excavation Work
- 'At Risk' Behaviours Mechanical Hazard
- Manual Handling Fire
- unsafe condition
- Other (specify): _____





What can/should be done to stop this happening again?

Outcome:

8.1.4 Workplace Health, Safety and Welfare

Urbaser Limited (Head Office and operational sites) will take such steps as are necessary to meet current legislation and other requirements. Rest rooms at sites, where provided, are not to be used for storage of equipment or other items or materials. Segregated facilities will be provided for non-smokers where smoking is allowed on the company premises. Managers are encouraged to agree and adopt a non-smoking policy at all company premises. Due account will also be taken of lighting, ventilation and other facilities to ensure a safe and healthy environment. Each site including MBT'S will have designated and stand-alone Health, Safety and Welfare plans. Every workplace and the furniture, furnishings and fitting therein shall be kept sufficiently clean. Adequate toilet and washrooms facilities in appropriate number in compliance with Workplace Regulation 1992, including dedicated toilet and washroom facilities will be provided.

8.1.5 Substances / Materials Hazardous to Health (COSHH)

Urbaser Limited is aware that certain substances/materials may cause bodily harm by inhalation, ingestion, skin contact or absorption through the skin. Suppliers' Health Hazard Data sheets are to be acquired for all items purchased and retained in a retrievable location ideally indexed. Prior to putting into use a substance COSHH assessment carried out by a competent person, shall be carried out to determine any health risks and whether control measures are necessary to guard employees against harm from the substance or material. The control measure will form part of separate assessments present at each operational location. These assessments are to be recorded on the COSHH Assessment form, stocks of which are available from the H&S Manager.

8.1.6 Safe Systems and Method Statements

Where complex or potentially hazardous works are to be undertaken by labour or contractors, safe systems of work documentation and method statements are essential. Departmental managers are to arrange that either they, or nominated persons, take responsibility for ensuring that safe system documents and method statements include all necessary safety points.

Employees are fully engaged in the production and revision of Safe System of Work as per the statutory requirements of ISO 45001

Employees are to be fully briefed on the safe system/method of work decided upon and copies of the document shall be available for reference during the work.

8.1.7 Permits to Work

Where the nature of the work necessitates introduction of a Permit to Work (e.g. Entry and Work in a Confined Space), training should be given and risk assessment compiled.

8.1.8 Workplace Inspection, Checks and Audits

Managers and Supervisors are to measure the performance of their department on a continuous basis.

8.1.9 Procedures Compliance

Each department will have access to the current health and safety arrangements and works health and safety instructions. Managers should check departmental compliance with the standards set out in the instructions.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 43 of 74
------------------------------	------------	-----------	---------------



8.1.10 Performance Monitoring

All employees with direct duties for health and safety and safety monitoring will themselves be subjected to performance monitoring by their immediate managers.

Each department will appraise the information from risk assessments and ensure that risk control measures, including health surveillance, at their workplaces are reviewed to ensure they are suitable and sufficient.

Managers, Contract Managers, Plant Managers, and supervisors will observe employees to ensure that they are complying with the company work procedures and/or safe systems of work. Deviations are to be investigated and, where a serious health or safety risk is found, reassessment of hazards and employee re-training should be carried out so that the risk can be controlled.

Contract managers and Plant Managers will prepare an annual report on the health and safety performance of their departments for submission to the Managing Director.

A health and safety tour should be carried out by each Department manager/Plant Manager at least on an annual basis. Managers are encouraged to invite a colleague from another department to participate in order to provide an independent assessment of compliance. This is relevant to all street cleansing, waste treatment and energy from waste facilities contracts.

8.1.11 Safety Inspection

Safety inspections are to be carried out by department managers and should generally be conducted using a checklist. Inspections may involve:

- A general inspection of a complete site or department.
- An inspection of one specific area of a site, a particular operation or controls for a particular hazard (e.g. fire precautions).

Whatever method is used, the deficiencies highlighted by the inspection should be prioritised and corrected as soon as is reasonably practicable. Where a statutory requirement is breached the deficiency must be corrected as soon as possible.

8.1.12 Employee Participation Inspections

Employee-elected safety representatives are empowered to carry out workplace inspections and shall be encouraged to do so on a regular basis having first agreed a day and time with the department manager concerned.

Situations where safety representatives may exercise their rights to carry out inspections are:

- Planned general workplace quarterly inspections
- A substantial change in conditions of work
- Notifiable accidents, diseases or dangerous occurrences (in conjunction with management)
- Inspection of documents

The employer is required to keep records regarding workplace health and safety under a statutory provision (but not individual health records). The company will co-operate with safety representatives by allowing them reasonable time during working hours to carry out their duties.

8.1.13 Manual Handling Operations

Many work activities include the need for manual handling of materials, etc. The Company will provide training on manual handling where required, carry out on-site assessment of risks to employees from specific operations. Employees who suffer from health conditions or pre-existing conditions that may affect their capability during manual handling tasks are required to report to their managers how these may limit their capability to lift. Managers shall acknowledge if employees have problems affecting their lifting capability and take this information into account during the preparation of any assessment involving the employee.

All staff will undergo a Manual Handling training course. Regular annual refresher is also a good practice that Urbaser Limited will follow each year.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 44 of 74
------------------------------	------------	-----------	---------------



8.1.14 Emergency Plans

The company has prepared different emergency plans at each operational site. All staff should familiarise themselves with any requirements they need to meet under the plan, record of training and understanding will be held in accordance with the company's induction and training procedures. Incident rehearsals/practice of procedures will take place from time to time. Up-dating of the emergency plan will be co-ordinated by the Plant Manager and Contract Manager.

8.1.15 The Control of Legionellosis

HSG274, on the control of legionellosis including legionnaires disease, requires employers to:

- Identify and assess sources of risk
- Prepare a scheme for preventing or controlling the risk
- Implement and manage precautions
- Keep records of the precautions implemented

Managers are required to ensure that water storage and distribution within the premises under their control is subject to routine inspections and that any disinfection or remedial work is carried out. These inspections are to be carried out once a year and the necessary records kept. The main problem areas within company premises will involve storage tanks and shower units, including emergency showers. Specific procedures for assessing the risk and allocation of responsibilities are present on site.

8.1.16 Fire Prevention and Action on Serious Imminent Danger

Urbaser Limited will comply with Regulatory Reform (Fire Safety) Order 2005 which directs owners/occupiers of works premises to assess, mitigate the risks and put into place adequate fire safety precautions at premises not already regulated by existing fire legislation. Those employees delegated responsibility for managing premises shall ensure that fire precautions as listed below are implemented taking into account the size, layout and use of the premises:

- Undertake a fire safety risk assessment and identify the control measures necessary.
- Identify and provide an adequate means of fire detection and of warning people in the premises.
- Implement a visitor / contractor register and accompaniment procedure where required during their time in the premises.
- Provide and maintain (by regular inspection and servicing) adequate firefighting equipment.
- Draw up and post fire emergency instructions and ensure those using the premises understand how to carry them out.
- Clearly sign all escape routes, fire equipment and alarm points throughout the premises.
- Identify a fire assembly point.
- Provide information, instruction and training to inform employees of the findings of the risk assessment.

Fire Evacuation Plans will be available at each operational site. Each site will undergo two yearly fire drills and fire equipment's statutory checks.

8.1.17 Specific Duties

These duties are common throughout the Group and are mandatory under this policy. Managers in control of premises are required to ensure that the precautions listed are below are implemented:

- Fire drills are carried out twice yearly and records kept.
- Fire alarms are tested weekly and records kept.
- Emergency lighting is tested every 3 months and records kept.
- Training of staff is carried out yearly and records kept in the local fire log book
- Fire extinguishers are in position and safety pins/devices are in position.
- Extinguishers are inspected / serviced by contractors yearly. Department checks to be carried out weekly

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 45 of 74
------------------------------	------------	-----------	---------------



- Fire escape routes checked regularly for any obstructions.
- Fire Awareness training that covers as a minimum the causes of fire

8.1.18 Fire Prevention

Fire prevention is the responsibility of all staff and precautions taken by staff are as below:

- Keep heat sources (such as electric fires) and combustible materials separate.
- Do not overload electrical circuits or use non approved fitments (multi-socket adapter plugs) or obvious defective electrical appliances.
- Report all defects.
- Switch off and isolate where possible all electrical appliances at the end of the working day or when not in use.
- Ensure good housekeeping and do not allow accumulation of combustible materials.
- Strictly control the use of flammable substances and always follow the manufacturer's instructions for use.
- Hot work carried out by craftsmen/contractors must be carried out under Permit to Work conditions.
- Use and storage of highly flammable liquids and gases must comply with the relevant regulations.
- Yearly Fire Risk assessment review conduct by a third party appointed company on a yearly basis.

8.1.19 Fire Emergency Action

Fire drills are a necessity to ensure that all employees are aware of what action is expected of them if there is a fire and evacuation of the premises is necessary. Employees are to ensure that all visitors to the premises are escorted to safety. Notices are posted at all company manned premises showing the relevant assembly point and fire officer for the premises. Briefly the fire instructions require action as below.

- Raise the alarm.
- Call the Fire Brigade.
- Fight the fire if possible and only if trained dot do so. (Do not put yourself at risk.)
- Prevent the spread of fire (close doors and windows.)
- Evacuate the building and move to the designated assembly point.

Managers with health and safety responsibilities at each manned company premises are to ensure that Fire Officers are appointed for that premises; that they are aware of their duties in the event of a fire; and that all other staff know the location of the assembly point.

Employees / visitors / contractors will not be permitted back into the building until instructed to do so by the Fire Brigade or the Senior Manager / Supervisor present on site, who will have first ensured the premises are safe to enter.

8.1.20 Vehicles

Company-owned vehicles and rented ones may only be driven by employees and others in possession of an appropriate valid driving license (CITB, CTA or equivalent) and authorised to do so by the company. This applies on private property and the public highway. Urbaser Limited has devised a Driving Policy which will apply to all operational sites. Vehicle Accidents are recorded into appositely designed "Vehicles Accident Databases". Vehicle for Refuse Collection and similar activities are safety check daily prior to their shift commencing. Defects are checked by means of a checklist called "Vehicle Safety Checks" and quickly brought about to the attention of the fleet manager. All sites will have a bespoke Traffic Management Plan

8.1.21 Lifting operations & lifting equipment

All lifting operations must follow the Lifting Operations and Lifting Equipment Regulations 1998. All lifting must therefore be planned, supervised and safely executed. All those involved in the planning, supervision and carrying out of lifting operations must have the appropriate level of competence for the task being undertaken. Competency checks shall be undertaken to assure that all those undertaking roles within lifting operations have the necessary skills, knowledge and experience to carry out their duties.

Evidence of thorough inspection of lifting equipment shall be made available for all equipment and accessories prior to lifting taking place. Lifting equipment:

- Used for lifting materials and equipment shall be thoroughly inspected every twelve months, and;

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 46 of 74
------------------------------	------------	-----------	---------------



- Used for lifting people shall be thoroughly inspected every six months

8.1.22 Inspection / Audit Report Procedure and Documentation

Audits are to be reported and actioned as set out in the procedure shown later in this section. Findings of all audits are to be recorded on the Audit Form available from the QHSE Manager.

The Risk Assessment Form, also available from the site's QHSE Manager, and Head of Department, should be used to record information as necessary during an audit from which the summary and action plan is formed. The summary and action plan is to be used for information to employees as required in the **The Management of Health and Safety at Work Regulations (2006 Amendment & 1999)**

8.1.23 Plant and Equipment Checks

QHSE Manager is responsible for ensuring that the checks of premises, equipment, substances and work systems listed in the health and safety management audit record book are completed on a 3-monthly rotation and are forwarded to them for inspection on dates below:

- 31st March each year
- 30th September each year

Contracts and General Managers are responsible for ensuring that various periodic checks of equipment and machinery are carried out and that the necessary records are kept, some of which are prescribed registers.

Fire Extinguishers	Check weekly.
Cable Locators	Check prior to any use. Check every six months.
Portable Electric Tools	Check prior to any use. Check every three, six or twelve months depending on conditions of use.
First Aid Kits	Check every three, six or twelve months. Note: Drivers are responsible for vehicle First Aid Kits
Emergency Lighting	Monthly plus yearly external checks
Fire Alarms	Weekly
Vehicles	Daily for defect and statutory agreed servicing schedule.
Ladder and Step Ladder	Monthly
Ground Maintenance Tools (Blower, grass cutter, tractors)	Please refer to Safe System of Work and Maintenance schedule
Street Cleansing Tools	Please refer to Safe System of Work.
Waste Treatment Facility tools and Equipment	Please refer to Method Statements, Plans of work.
PAT Testing	Annual (good practice, not a legal requirement)
Wiring Certificate for operational sites	Five years.



Prescribed registers shown below must be kept up-dated.

In addition to the foregoing registers, certificates such as test or inspection certificates supplied by examiners are held by the Contract and General Manager at the premises where the equipment is installed / used.

Copies of test certificates relating to appliances purchased or re-tested must be forwarded to our Head Office that will subsequently forward it to the insurers **JLT / Novae** as soon as possible so that the schedule of insurance may be updated.

All new air receivers / pressure systems must be notified to our insurers JLT so that they may be entered on the policy and a written scheme drawn up. All disposals of receivers should also be notified. These notifications are to be carried out through the Group Safety Officer.

8.1.24 Risk Assessments

Elimination of hazards and reduction of risks is carried out in line with the following hierarchy of controls:

- Eliminate the hazard.
- Substitute with less hazardous process, operations, materials or equipment.
- Use engineering controls (guards) and reorganisation of work.
- Use administrative controls, including information, instruction and training.
- Use adequate PPE.

8.1.25 Personal Protective Clothing & Equipment (PPE) and Safety Appliances

Urbaser Limited will provide personal protective equipment to reduce residual risks to a tolerable level where the risk is from a work activity that cannot be adequately controlled by other means such as engineering controls. Training of employees in the correct use of the equipment and its limitations will be carried out as necessary taking into account any statutory requirements. The implementation of this policy requires total co-operation of all employees and the involvement of elected Safety Representatives in consultation on matters regarding the suitability of equipment. Departmental Managers are responsible for implementation of this policy.

8.1.26 Health and Safety Arrangements

Urbaser Limited will, having duly consulted Employee Representatives:

- Carry out an assessment of proposed PPE to determine its suitability for the risks identified.
- Where two or more items of PPE are used simultaneously, ensure they are compatible and that no item reduces the protection offered by the other.
- Implement steps for the maintenance, cleaning, repair and suitable storage of the PPE and for ensuring the PPE does not cause the user to be subjected to other risks.
- Provide a choice of or replace necessary PPE at no cost to employees.
- Inform all employees of the risks which exist and re-assess activities where changes to the works process or substances make this necessary.
- Investigate complaints and take action concerning PPE suitability or defects.
- Investigation of PPE condition through audits

8.1.27 Employee Responsibilities

Employees must:

- Use PPE only for its intended purpose and only in accordance with training provided.
- Not misuse any PPE issued.
- Carry out maintenance and hygiene precautions as required.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 48 of 74
------------------------------	------------	-----------	---------------



- Inform a responsible person immediately of any defects (supervisory staff or manager)
- Keep statutory records updated in any log book which is provided.

8.1.28 Information and Training

Operational sites will give sufficient information, instruction and training to ensure the health and safety of workers using PPE. This includes temporary staff, visitors, work experience personnel and contractors as well as directly employed staff. Managers and supervisory staff responsible for users of PPE will also receive appropriate training.

Minimum information and instruction necessary for competency of staff is:

- The risks the PPE is controlling and the purpose of its use
- The way the PPE controls the risks and its limitations
- The way to use the PPE so that it is effective
- The pre-use tests necessary to ensure the equipment is functioning correctly
- How to maintain the PPE in good working order and repair
- Any documentation to be completed and kept.

8.1.29 Basic steps in risk assessment

- Classify all activities: prepare a list of work activities covering premises, plant, people and procedures, and gather information about them;
- Identify hazards: identify all significant hazards relating to each work activity.
- Consider who might be harmed and how;
- Determine risk: make a subjective estimate of risk associated with each hazard assuming that planned or existing controls are in place. Assessors should also consider the effectiveness of controls and the consequences of their failure;
- Decide if the risk is tolerable: judge whether planned or existing OH&S precautions (if any) are sufficient to keep the hazard under control and meet statutory requirements.
- Prepare a risk control action plan (if necessary) to deal with any issues found by the assessment to require attention. Ensure that new and existing controls are implemented and are effective;
- Review the adequacy of the action plan, re-assess the risks on the basis of the updated controls and check that the risks are tolerable;
- Review assessments periodically and/or on significant change of circumstances affecting how the activity is done.

Tolerable means that risk has been reduced to the lowest level that is reasonably practicable.

8.1.30 Documentation

A number of regulations direct that risk assessments be carried out within the Waste industry, those relevant to Group operations are listed below:

- The Management of Health and Safety at Work Regulations (2006 Amendment & 1999)
- Slip Trips and Falls HSE guidance
- Specific Waste Treatment Plant's risk Assessments.
- Manual Handling Operations Regulations.
- Display Screen Equipment at Work Regulations
- Control of Substances Hazardous to Health Regulations
- Regulatory Reform (Fire Safety) order 2005
- Construction Design and Management Regulations 2015
- Control of Asbestos at Work Regulations 2012

The proforma for recording of assessments is shown later in this document and may be freely copied for use when carrying out assessments. The use of hazard prompt lists is encouraged where the work is carried out.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 49 of 74
------------------------------	------------	-----------	---------------



8.1.31 Bespoke Risk Assessment

Urbaser Limited is committed to achieving and maintaining high standards of health and safety for all employees, visitors, the public and contractors. To do this, subsidiary companies /departments are to identify hazards associated with their operations which threaten health and safety, evaluate the risks which arise from those hazards and put into place sensible, practical precautions which will protect against them. This process is termed risk assessment.

Risk assessments will be carried out periodically as a check on our performance against statutory standards and relate to the buildings and sites we occupy, as well as tasks carried out on behalf of the company, the equipment we use and the methods of work we employ. Urbaser limited will adopt a 5x5 matrix in a semi-quantitative risk assessment.

Assessments shall be conducted by use of questionnaires circulated to employees, task study and analysis. Employees must be involved in the assessment procedure so that account is taken of how a task is performed rather than how the assessor thinks it is done. All hazards where the risk is considered moderate and above will need the implementation of further control measures.

Urbaser Limited is to ensure that assessments are carried out by competent and trained persons and conducted to a plan which will achieve the minimum requirements below:

Initial Review:	Classify all work activities and determine how much has already been done in risk identification, control and documentation.
Carry out Generic Assessments:	Identify whether all statutory requirements, approved codes of practice, guidance notes and best practice have been accounted for in the present method of work. Record this information as minimum standard Generic Assessments for reference by employees and managers.
Site Specific Assessment:	Carry out an on-site assessment to determine how the work will be conducted and whether any significant hazards with associated risks are apparent.

Implement all control measures identified by existing generic assessments which relate to the tasks to be undertaken.

Introduce measures to control all other hazards evident on site and relating to the existing conditions and tasks to be undertaken and which are not covered by existing generic assessments.

All risk assessments are to be recorded and the employees affected informed of the assessment content and requirements. There will also be occasions where work undertaken on other employers' sites will necessitate the company providing risk information to the employer concerned.



Health and Safety - Operational Risk Assessment

Contract:		Area/Department:		Ref No:	
Risk Assessor:		Signature:		Date:	
Contract Manager:		Signature:		Date:	
Summary description of tasks to be undertaken:				Residual Risk Rate:	6

Responsibility for completing risk assessments is the function and responsibility of Line Management, however the task may be delegated to a competent person or persons (The Assessor should be competent in his/her knowledge of the activity or process and be trained in risk assessment techniques)

Persons at Risk = A: Employee/Agency B: Young Person/Trainee C: New/Expectant Mother D: Contractor/Maintenance E: Member of the Public F: Others in the Vicinity

Ref	Identify Identified Hazards and Associated Risks	Those at risk	Evaluate			Eliminate/Reduce/Mitigate/Action Control Measures	Re-Evaluate			Review/Action/Owner Further Actions
			L	S	R		L	S	R	
1	Hazard: Insufficient individual capabilities, underlining, pre-existing health issues affecting capability and fitness to work Risk: Various accidents and injuries caused by insufficient physical capabilities or pre-existing health issues	A, E, F	3	4	12	Occupational Health questionnaire to be completed by all new employees. Induction training to be completed by all new employees. Yearly Occupational Health questionnaire to be completed by all employees. Employees to inform their Line Manager if their physical ability has changed or other medical issue(s) have arisen	2	4	8	
2	Hazard: Insufficient training and competence Risk: Employees being unaware of hazards, engaging in dangerous practices, being exposed to higher risk of accidents occurring	A, E, F	4	4	16	H&S induction training, safety procedures and equipment training is completed by all new employees. Manual Handling training is completed by all new employees. Yearly Manual Handling refresher training for all staff. Management to ensure all training is up to date and full records of training are kept on file.	2	4	8	Regular supervision and checks carried out by management.
9	Hazard: Lack of, or insufficient provision of PPE Risk: Inadequate protection from work related hazards, resulting with or contributing to severity of injuries.		3	3	9	Provision and use of PPE in accordance with standard industry requirements: - High visibility clothing (shirts, coats, jackets) - BS EN 471 - Ballistic trousers - Protective footwear - BS EN 345 - Protective gloves - BS EN 388 - Eye protection - BS EN 166 - Face protection - BS EN 1731 - Hard hats - BS EN 397 - Respiratory protection equipment (FFP1, FFP2, FFP3) - Hearing Protection - BS EN 352 - Additional protection (e.g. shin pads, chainsaw trousers, chainsaw boots, chainsaw gloves)	1	3	3	

Review Record	This Risk assessment must be reviewed at periods not exceeding 12 months or when circumstances surrounding the risk have changed			
Review Date	Reviewed by	Findings	Signed	

8.1.32 Supervisory and Health and Internal Safety Audits as per PIN 04

Urbaser Limited conducts internal audits at planned intervals to determine whether the QHSE management system conforms to the planned arrangements, the requirements of the International Standards and to the integrated management system requirements established by the organisation are effectively implemented and maintained. An audit program has been designed and implemented and identifies an audit schedule based on the importance of the areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency, methods, responsibilities and requirements for planning and conducting audits, and for reporting and maintaining results, are defined and documented in the Internal Audit procedure. The management are responsible for the area being audited are responsible for ensuring that actions are taken without undue delay to eliminate detected nonconformities and their causes, also any follow-up activities include the verification of the actions taken and the reporting of verified results.



Urbaser Ltd Drivers' Daily Vehicle Check & Defect Report									
<small>YOU ARE LEGALLY REQUIRED TO COMPLETE THIS FORM. DO NOT DRIVE IF THE VEHICLE IS DEFECTIVE</small>									
Vehicle Reg. No.:					Driver:				
Start Mileage:			End Mileage:			Date:			
<small>- please ensure all boxes are marked -</small>									
<small>Daily Vehicle Check before/after driving: ✓ = Serviceable, ✗ = Defect, N/A = Not Applicable</small>									
Start- S	Finish - F	S	F		S	F		S	F
				Vehicle Equipment – First Aid Kit/PPE etc.				Exhaust – Condition & Excessive Smoke	
				Steering Controls				Brakes – Warning Devices & Instruments	
				Horn/Wipers/Washers				Battery – Condition & Security	
				Windscreen/Windows				Body Panels/Guards/Cage – Damage & Condition	
				Mirrors				Wheels – Condition & Torqueing	
				On-board Technology – Reversing Cameras etc.				Tail Lift & Security of Load	
<small>TIME OF INITIAL CHECK:</small> Details of Any Noted Defects:									
Reported to: _____ Driver Name: _____ Driver Signature: _____									
<small>TIME OF ADDITIONAL CHECK:</small> Details of Any New Noted Defects:									
Reported to: _____ Driver Name: _____ Driver Signature: _____									
Actions Taken After Check/Any Accidents Occurred/Irregular Circumstances:									
Driver/Fitter Name: _____ Driver/Fitter Signature: _____									
<small>Sign to Confirm You Have Fully Completed This Form, Completed All Required Vehicle and Defect Checks, & Reported any Defects to Management.</small>									
Name: _____					Signature: _____				
ALL DEFECTS MUST BE SUBMITTED TO MANAGEMENT ALL COMPLETED FORMS MUST BE SUBMITTED TO MANAGEMENT									

8.1.33 DSE -Visual Safety & Display Equipment

To secure the health and safety of staff so far as is reasonably practicable, the company will, in consultation with staff and their representatives:

- Carry out an assessment of each workstation, taking into account the display screen equipment, the furniture, the working environment and the employee.
- Take all necessary measures to remedy any risks found as a result of the assessment.
- Take steps to incorporate changes into the employee's work schedule throughout the working day to prevent intensive periods of on-screen activity.
- Review software to ensure that it is suitable for the task.
- Arrange for the free provision of eye tests where an employee reports a visual problem when using VDU equipment and the employee is a designated "User" under the Display Screen Regulations 1992 as amended in 2002
- Arrange for the supply of any corrective appliances where the appropriate optician confirms that they are required specifically for working with display screen equipment.
- Advise employees, and agency staff required to use display screen equipment, of the risks to health and how these are avoided.

Eyesight Tests and Provision of Spectacles

Where an employee experiences visual difficulty and has good reason to believe that these may be caused by work with a display screen, the company will offer free eye tests and will contribute towards the purchase of spectacles.



Job Changes

Where an employee transfers, or is promoted or otherwise moved, to a job involving the use of display screen equipment, he or she will be entitled to an eyesight test. This entitlement also applies where display screen equipment becomes a significant part of the work for an employee not previously considered as a regular user.

Regular Eyesight Tests

Employees who are specifically users of display screen equipment will be invited to undergo an eyesight test at intervals of not more than five years. All such tests must be arranged through the company.

Cost of Testing

All agreed costs of eyesight tests will be met by the company, provided that the testing has been arranged through the company. Where an employee obtains a test independently and without the knowledge of the company, even if the test is specifically related to display screen use, the company shall not be responsible for the costs incurred.

Pre-Employment

All new employees with eyesight difficulties must, when taken into employment by Urbaser Limited, provide him or herself with suitable spectacles prior to taking up employment that involves VDU work. Thereafter, regular eyesight tests and provision of spectacles apply as in all other paragraphs of this policy.

Provision of Spectacles

Spectacles, where an eyesight test indicates they are required, shall be provided at company expense and will be of a frame type and style set by the company. Alternatively, a payment equivalent to the cost of these spectacles may be made to the employee who will then provide his or her own spectacles in his or her own preferred style.

Care and Replacement of Spectacles

Employees will be personally responsible for the safekeeping of spectacles. The spectacles are supplied in accordance with a statutory requirement, in the interest of health and safety. It is an offence to interfere with, or misuse, anything provided in the interest of health and safety. Employees are expected to show the same degree of care for spectacles as for any other item of safety equipment.

Rest Breaks

Users of display screen equipment are encouraged, and will be expected, to take the opportunity of breaks from work with the equipment so as to prevent the onset of fatigue. To achieve this objective the company will seek to encourage changes of activity into the working day. Department managers are expected to assist in achieving the objective through advising and assisting staff to plan their daily work activities.

Radiation from Display Screen and Pregnancy

Scientific research has concluded that no health risk exists from radiation to a pregnant person, or person seeking to become pregnant, when using VDU equipment. Consequently, there is no need for them to avoid working with VDUs. However, should an employee have a genuine concern the company may, after taking into account the effect of any resultant disruption, allow an employee to transfer duties temporarily.

8.1.34 Health Surveillance

Where risk assessments of company operations identify a need for health surveillance due to hazardous chemicals, etc., employees will be expected to co-operate and inform their manager/supervisor of any exposure they have suffered so that the necessary action may be taken to prevent a recurrence of the incident. The services of the company doctor will be sought where exposure to substances/chemicals necessitates a medical inspection and/or diagnosis of the exposure effects. A premedical questionnaire and a full Medical will be offered to all new joiners both at HQ and operational sites.

Procedures

A number of operations / activities questionnaires are carried out at one to one or induction phases to ascertain medical pre-existing conditions. The company will require monitoring by managers for signs of ill health within the workforce. In Street Cleansing operations and Waste treatment / Recycling activities some ill health problems which may occur (Non exhaustive list) are:

Illness	Indications	Sources
---------	-------------	---------

Noise induced deafness / Tinnitus - constant noise in the ears.	Determined only by periodic (2 yearly) audiometry tests.	Noisy machinery or equipment.
Repetitive Strain Injury or Upper Limb Disorder	Pain in the affected limb or neck and shoulder.	Use of VDU equipment or other repetitive work.
Vibration White Finger	Tingling sensation in finger and lack of blood circulation to extremities Swollen and numb fingers.	Use of road breakers and percussive equipment
Carpal Tunnel Syndrome	Extreme pain in lower arm/wrist. Pins and needles sensation in fingers.	VDU work. Use of vibratory machinery/equipment.
Leptospirosis	Flue like symptoms and persistent headache.	Work in areas where employees come into contact with rats' urine.
Asthma	Long-term cough and respiratory difficulties	Dusty work or vehicle/machinery fumes.
Skin/Acne/Rashes etc.	Skin discolouration/dryness, etc.	Corrosive chemicals, tar, bitumen etc.
Diabetes	Access, blisters, and similar to feet.	Pre –existing condition that may be worsen by incorrect use of PPE and walking long distances

8.1.35 Visitors

Managers are responsible for ensuring that provisions are in place to provide visitors with the PPE necessary for those risks which the visitor will be exposed to whilst on company premises.

Eye Protection

The requirements are laid down in the 'Protection of Eyes' Regulations 1974. Where subsidiary company operations necessitate wearing of eye protection, employees must be provided with and wear the necessary PPE. These operations include handling dusty materials, hazardous liquids, cutting and grinding with abrasive wheels, using hand tools and powered tools on materials which may fragment, welding and cutting operations, laboratory work and trimming wires on circuit boards. This list is not exhaustive and risk assessments may identify other situations where eye protection will be required.

Hearing Protection

The 'Noise at Work' Regulations 2005 define action levels based on personal daily noise exposure levels of employees and visitors. The first action level corresponds to a personal daily noise exposure level (LEPd) of 80 dB(A); a second action level corresponding to 85 dB(A) and a third defined level is a peak pressure sound of 135 or 137dB.

The policy of Urbaser Limited is to reduce noise levels at source by controls other than provision of PPE whenever possible. Those responsible for designing installations and/or purchasing equipment and machinery must, prior to placing any purchase order, consult suppliers as to the likely noise levels from their equipment/machinery and



obtain written documentation as to the design noise levels. Should these noise levels not be achievable after installation then the contract must place a duty on the supplier to correct the hazard at their expense.

Where noise levels of existing equipment and machinery lie between the first and second action level, the company will carry out assessments of the levels, implement any reasonably practicable noise reduction measures by engineering and efficient maintenance of the equipment. Where the residual noise level:

- remains above 80 dB(A), the company will provide hearing protection for use by employees and visitors at their discretion;
- exceeds 85 dB(A), the company will provide hearing protection which employees and visitors must use, mark a hearing protection zone with the relevant statutory signs and enforce the use of hearing protection within the zone.

Assessments of noise levels will be carried out during general risk assessment programmes and at the request of managers or elected Safety Representatives where they have raised a hazard report via a manager.

As a rough guide, should it be necessary for anyone to shout to be heard at a distance of up to 2m away, then it can be judged that a noise level assessment is required and that hearing protection is to be worn.

Respiratory Protection

As with protection against noise, the policy of the Group is to reduce risks to the employee by tackling hazards at source. This is achieved by use of local ventilation and extraction systems (LEV), fixed or portable, as required. However, some operations may also necessitate the use of respiratory equipment. Respiratory protective equipment (RPE) can vary between disposable dust masks/respirators, canister full face masks and compressed air breathing apparatus (CABA). Risk assessments will determine which type of RPE is necessary for any particular activity/task.

Use of **disposable dust masks / respirators** is to be confined to low risk operations and exposures recommended by the manufacturer. Advice is to be sought from the manufacturer prior to making use of this type of protection. There is no need for statutory record keeping with this equipment, however users will require monitoring to ensure contaminated masks are disposed of.

Full face canister respirators are to be used where the exposure is likely to need a higher level of protection, such as maintenance operations carried out by Urbaser Ltd employees. This equipment requires checks that are a statutory requirement under COSHH. These are to be monitored and enforced by managers. Log books have been issued for the recording of these checks.

Compressed air breathing apparatus (CABA) shall be used by trained employees in an emergency situation, such as entry into an area where a toxic gas leak has occurred, or where confined space entry necessitates its wearing. As with full face canister masks, checks and record keeping are statutory requirements. Compliance must be monitored and enforced by managers.

In all instances, managers / supervisors need to assess the hazard and the suitability of protection needed where the risk to employees cannot be reduced sufficiently by other controls.

Foot Protection

Employees and visitors shall be issued with safety boots / shoes and wellingtons if involved in operations where injuries to the foot could occur. Protection to minimise risk of injury from electric shock is achieved from purchasing footwear with high resistivity soles.

Body and Hand Protection

The provision of adequate and suitable clothing to employees as protection against inclement weather conditions. Operations where employees are exposed to substances, sharps etc. will be provided with the necessary protection to combat specific hazards identified by risk assessments.

Hand protection of various types are listed on the subsidiary company activity risk assessments and shall be provided as required.

Head Protection

The requirements are laid down in the Construction 'Head Protection' Regulations 1989. All company staff are to wear safety helmets where there is a foreseeable risk of injury to the head other than by falling. Certain works make the wearing of safety helmets absolute and include working in excavations 1.2 m or over deep, in close proximity to excavators, lifting appliances or other construction plant, on sites where overhead work is in progress, designated hard hat sites, confined space work and any other situations where managers or supervisors decide the need.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 55 of 74
------------------------------	------------	-----------	---------------



Safety helmets are not to be used where the manufacturer's date stamp on the helmet indicates that the helmet is over two years old. Departments should carry out regular inspections of helmets and implement a change programme.

Hi Visibility Clothing

It is a requirement of 'The Code of Practice' Safety at Street Works and Roadworks that persons working on/or near the carriageway wear Hi Visibility clothing. Supervisory staff are to ensure those attending worksites covered by the code of practice comply.

Safety Harnesses

Where it is not practicable to provide platforms or gangways with guard-rails at levels above 2m, safety harnesses are to be worn. Similarly, when working in certain confined spaces safety harnesses shall be worn.

Company risk assessments identify situations and locations where it will be necessary to use safety harnesses. Where they do not already exist, the provision of suitable anchorage-points is the responsibility of the owner department.

At locations where fixed ladders are not guarded by safety hoops, fall arrest systems may be used as an alternative safety measure when using such ladders. Inspection of these systems is to be carried out by a competent person every 12 months.

8.1.36 Accident Investigation

Urbaser Limited policy concerning accident investigation is that all lost time accidents be investigated, and their causes determined. The objectives of a company investigation are:

- To ensure appropriate action is taken to prevent recurrence of similar incidents.
- To investigate ROOT causes as a means to prevent reoccurrences.
- To gather information for use in any criminal or civil proceedings.
- To confirm or refute industrial injury claims over the incident.
- To prepare notifications to be made to the HSE or another enforcing agency.
- Laying the blame is not an objective of the investigation and should be avoided. Where disciplinary action is necessary, management will need to follow employment policy procedures. Discipline will probably be unnecessary on most occasions.

Accident investigations will be carried out by the Contract Manager / Line Manager or the QHSE Manager. Managers and other employees will be expected to assist in any investigation and make available all information, witnesses, plant, materials, equipment and premises which have a bearing on the incident.

Questions which will need to be answered before any investigation can be considered complete are:

- What are the root causes of the accident?
- Who was involved?
- When did it occur?
- Where did it occur?
- Why did it occur?
- How could it have been prevented?
- How can a recurrence be prevented?

If all seven questions cannot be answered, then it may be necessary to re-examine certain witnesses with a view to obtaining further information.

The incident investigation will, in all probability, reveal underlying causes. Dealing with the underlying causes will involve managers and the QHSE Managers in reassessing existing practice and implementing change such as:-

- Review of the risk assessment and controls relevant to the operation.
- Further formal procedures to be drawn up for certain work operations.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 56 of 74
------------------------------	------------	-----------	---------------



- Training programmes to be introduced or amended.
- Guidelines prepared for operations which perhaps do not justify the preparation of formal procedures or training programmes.
- Instructions more clearly defining responsibility and accountability.
- The introduction of new methods, plant, machinery or equipment.
- Improving or extending preventive maintenance.
- Introducing additional check procedures or special monitoring of certain operations.

8.1.37 Accident Investigation Methods

- Collect facts about what has occurred
- Assemble and Analyze the Information obtained
- Compare the information with acceptable industry and company standards and legal requirements to draw conclusions
- Implement the findings and monitor progress

Investigation has three facets which are particularly valuable and can be used to check against each other:

- Direct observation of the scene, premises, workplace relationship of components, material, and substances being used possible reconstruction of events and injuries or condition of the person concerned
- Documents: including written instruction, training records, procedures safe operating systems, risk assessments, policies records of inspections or test and examination carried out.
- Interviews (including written statement) with person injured, witness, people who have carried out similar functions or examination and tests on the equipment involved and people with specialist knowledge

Accident Follow-Up Action

Should any change to existing practice be recommended as a result of an accident investigation, it is the responsibility of the Department Management to monitor its effectiveness. Elected Safety Representatives shall be given the opportunity to have input into any reviews carried out.

Any deficiency still apparent must be brought to the attention of the QHSE Manager(s) for further review and, where necessary, correction.

8.1.38 Employee Elected Safety Representatives

Elected Safety Representatives are by company policy entitled to carry out an investigation of accidents and hazardous situations. Representatives are allowed to carry out such an investigation once the accident scene is safe. The company recognises that Safety Representatives may wish to carry out an independent investigation and keep the results confidential for future use.

All Accidents MUST be logged on the company’s database system Alcumus.

HEALTH AND SAFETY INCIDENT INVESTIGATION REPORT

Health and Safety Services Incident Number:	
RIDDOR Reference (if applicable):	



Date of Incident:	
Department/Area/Location:	
Name of Injured Person (if applicable):	
Injured Person contact details (if not already provided on Incident Report Form) :	
Date(s) of investigation:	
Investigated by:	
Persons contributing to the investigation:	
1. INCIDENT DETAILS - gather the facts	
1.1 Circumstances & sequence of events	
1.2 Injury / ill health / damage sustained & treatment given:	
Details of plant / equipment / substances / location (include photographs and sketches)	
Witnesses (attach statements)	
Management / emergency response to the incident	





2.	INVESTIGATION FINDINGS
2.1	Immediate cause(s)
2.2	Underlying and contributory factors
2.4	Comments
Recommendations and conclusion (what action is needed, by when and by whom?)	

Name of Author:

Date of Report:



8.1.39 Safety Performance by Accidents

Reporting

All injuries, dangerous occurrences, or cases of industrial disease are to be reported to management in order that the circumstances surrounding the event can be investigated and corrective action applied to prevent recurrence. Subsequently Urbaser Limited in accordance with Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013; will report accidents to the HSE in case of:

- Work Related Accident
- Injury type categorised by the HSE as reportable

8.1.40 Reporting RIDDOR

The list of 'specified injuries' in RIDDOR 2013 replaces the previous list of 'major injuries' Specified injuries are (regulation 4):

- The death of any person
- Specified injuries to workers:
- fractures, other than to fingers, thumbs and toes
- amputations
- any injury likely to lead to permanent loss of sight or reduction in sight
- any crush injury to the head or torso causing damage to the brain or internal organs
- serious burns (including scalding) which:
- covers more than 10% of the body
- causes significant damage to the eyes, respiratory system or other vital organs
- any scalping requiring hospital treatment
- any loss of consciousness caused by head injury or asphyxia
- any other injury arising from working in an enclosed space which:
- leads to hypothermia or heat-induced illness
- requires resuscitation or admittance to hospital for more than 24hours

Further to:

- Over-seven-day incapacitation of a worker
- Over-three-day incapacitation to be recorded not reported
- Non-fatal accidents to non-workers (e.g. members of the public)
- Occupational diseases such as, carpal tunnel syndrome or hand-arm vibration syndrome
- Dangerous Occurrences

All Employees

- Each employee is responsible for reporting without delay any injury or ill health condition sustained at work or arising during the working period.
- Each employee is responsible for reporting to his supervisor or manager, any accident, incident or potential source of hazard of which he is aware. A hazard/potential hazard report form is provided for use on such occasions.

Managers

- Managers are responsible for ensuring that all accidents are reported to the QHSE Manager to enable, where necessary, an investigation of the circumstances.
- The accident reporting system that complies with The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) is set out later in this section and is to be followed by managers and other employees.

8.1.41 Analysis of Accidents and Incidents

It is the Urbaser Limited policy that a record of injuries, diseases and dangerous occurrences shall be kept and that these records shall be analysed to determine trends and/or a failure in work practices or systems. Where such deficiencies are identified they shall be corrected through updating work practices/procedures, substituting materials or equipment and, where necessary, improved training to update employee competence. The review of risk assessment and the adequacy of the control measure identified.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 60 of 74
------------------------------	------------	-----------	---------------



8.1.42 Accident Reporting

Company procedures following any accident / incident are as below:

Incident	Inform	Other Action or Documentation
Death	<ul style="list-style-type: none"> ● Contract Manager ● Line Manager ● QHSE Managers ● Health and Safety Head of Department ● MD ● Operation Manager or Waste Treatment Director ● HSE (on line) 	<ul style="list-style-type: none"> ● Keep incident scene undisturbed and safe until accident has been investigated. ● Assist HSE with investigation. ● Log incident/accident in Accident Book ● Send completed company Accident Report to Safety Officer (within 5 days) ● Form 2508 sent by Safety Officer to HSE
Major Injury	<ul style="list-style-type: none"> ● Contract Manager ● Line Manager ● QHSE Manager ● HSE (on line) 	<ul style="list-style-type: none"> ● Keep incident scene undisturbed and safe until accident has been investigated. ● Assist HSE with investigation. ● Log incident/accident in Accident Book ● Send completed company Accident Report to Safety Officer (within 5 days) ● Form 2508 sent by Safety Officer to HSE
Notifiable Dangerous Occurrence	<ul style="list-style-type: none"> ● Contract Manager ● Line Manager ● QHSE Manager ● HSE (BY TELEPHONE) 	<ul style="list-style-type: none"> ● Keep incident scene undisturbed and safe until accident has been investigated. ● Assist HSE with investigation. ● Log incident/accident in Accident Book ● Send completed company Accident Report to Safety Officer (within 5 days) ● Form 2508 sent by Safety Officer to HSE





Injury resulting in over 7 days off work or unable to carry out normal duties	<ul style="list-style-type: none"> ● Contract Manager ● Line Manager ● QHSE Manager ● HSE -on line. 	<ul style="list-style-type: none"> ● Complete the appropriate documentation.
Accident -- no time off	<ul style="list-style-type: none"> ● Line Manager ● QHSE Manager 	<ul style="list-style-type: none"> ● Log in Accident Book ● Forward completed company Accident Report to Safety Officer
Reportable Disease	<ul style="list-style-type: none"> ● Contract Manager ● Line Manager ● QHSE Managers ● HSE (on line) 	<ul style="list-style-type: none"> ● Report disease to HSE after doctor's written diagnosis/statutory sick form ● Complete all documents as for major injury etc.

HSE CONTACT TELEPHONE NUMBERS ARE DISPLAYED ON POSTERS IN EACH WORKPLACE (OPERATIONALSITES)

8.2 Management of Change

- New services and processes will be reviewed, and changes made to the Health & Safety System as necessary.
- Changes to legal and other requirements will be reviewed and changes made to the Health & Safety System as necessary.
- Changes in knowledge or updated information about hazards and risks will be reviewed and changes made to the Health & Safety System as necessary.
- Changes in technology will be reviewed and changes made to the Health & Safety System as necessary.

8.2.1 Procurement of products and services is carried out in line with the requirements of the company's Health & Safety System. Procurement and Purchasing Controls

Urbaser Limited shall within their procurement procedures incorporate controls to ensure that lack of information does not lead to accidental losses through injury, illness, damage or premature equipment failure. The most cost-effective procedure is for Urbaser to bear safety considerations in mind right from the preselection stage. Urbaser Limited specifies and purchasers must in all cases apply a purchasing standard/statement that ensures consideration of occupational safety and health protection and provision of the necessary information and training by the supplier before a purchase is approved. This procedure is to be applied by management using an in-company working group.

The purchasing policy to be applied by all Operational Site shall ensure that:

- All new products, materials (in case of Waste Plant Construction, Street Cleansing and Grounds Maintenance) substances and equipment are reviewed (risk assessed) for safety considerations prior to purchase as well as prior to being put into use.



- Safety specifications are obtained with all tenders for supply and included on all orders raised.
- Suppliers/manufacturers are audited for quality and health and safety on a regular basis as well as on revision or renewal of contracts for supply.
- Safety information regarding machinery and equipment installation, use and maintenance shall be obtained from the suppliers.
- Data sheets giving the chemical composition and hazardous properties of all substances shall be obtained from suppliers.
- An assessment of all substances, including details of safe use, safe storage, safe disposal and first aid treatment, shall be carried out and employees informed prior to use of substances.
- Where necessary the manufacturer/supplier shall be directed to carry out training of staff on the operation and maintenance of the equipment.

8.2.2 Contractors

Control of Contractors

Where the Urbaser Limited retains occupier's liability, the subsidiary company or its agent will plan, co-ordinate, control and monitor the activities of contractors so as to effectively minimise the risks presented to employees and other persons affected by contractors' works. Subsidiary companies will only use contractors who have proved able to discharge their primary responsibility to safeguard their employees and others who may be affected by their works. This will be administered in the form of an approved list of contractors which will describe the contractors' capabilities and limitations. Should it be necessary to invite tenders from contractors not on the approved list, then their competency in health and safety should be assessed by provision of information as listed on the company pre-qualification documents for contractors.

Provision of Information

The company recognises that contractors will only be able to tender allowing for the necessary health and safety resources if they are provided with suitable information prior to tender. Therefore, the company undertakes to provide information concerning existing hazards on site prior to tender.

Safety Rules and Procedures

Where the Construction Design and Management Regulations (CDM) are applicable, the contractor selected to carry out the work will produce a Construction Health and Safety Plan for approval prior to construction work beginning. The contractor shall be responsible for all health and safety aspects of construction work relating to the project. The subsidiary company representative appointed to the project shall, prior to construction work starting, arrange that contractors' staff are briefed on the hazards and safety procedures relevant to the site. In shared work places, the principal contractor on site shall be instructed to arrange the exchange of relevant information arising out of risks from sub-contractors works and ensure all those who may be affected are informed.

Reporting

Urbaser Limited company employees have a duty to report danger from whatever source to their manager or supervisor who will: -

- Stop the work if serious and imminent danger is foreseen, and
- Notify the person appointed to co-ordinate the work, or the department, by telephone followed by a written report.
- Where contractors' employees are in danger, bring this to the attention of the contractors' supervisory staff and then inform the person appointed by the subsidiary company to co-ordinate the project.

Supervision

Urbaser Limited recognises its duty to plan, co-ordinate and monitor contractors' work activities, but the primary responsibility to supervise the contractors' work and workforce lies with the contractor. Provision of adequate supervision by the contractor will be a key factor in all contracts.

Where contractors are employed on a provision of labour only basis, the duty of supervision falls on the subsidiary company / department awarding the contract. The contractor concerned will be expected to supply competent persons, the qualifications/certification of whom must be confirmed by the subsidiary company/department prior to

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 63 of 74



employing them. Contractors employed under these terms are to be briefed by supervisors on the relevant in-house health and safety procedures before starting work.

Safe Systems of Work

Accountabilities must be clearly defined so that all parties know, accept and understand what they are responsible for in advance of work beginning by agreement of a method and systems such as permits to work.

All plant, equipment, personal protective equipment, etc. are to be provided by the contractor unless exceptional circumstances dictate otherwise, in which case any such items loaned by the company need written authority from the owner manager. The item must be in sound condition and the contractor must be competent in its use.

- Current Safe System at work cover
- Street Cleansing operations;
- Waste Collections operations;
- Ground Maintenance;
- MBT & EfW (Waste treatment) multiple operational manuals/ Safe System of Work-please refer to the MBT's Health and Safety Policy for further details; and
- Inductions to: HS Policy. First Aid, Manual Handling PPE and other relevant safety information

Elements of Contractor Site Rules

Urbaser Limited / contractor pre-work agreements concerning site rules are to include the elements shown below:

- Site safety policy and activity risk assessments.
- Procedures for high risk activities such as work in confined spaces, work at heights, electrical work, excavations, etc.
- Method statements.

- Communication arrangements with the subsidiary company appointed person.
- Site access arrangements, vehicle restrictions and material storage areas.
- Local emergency procedures and instructions.
- Accident and dangerous occurrence reporting arrangements.
- Risks from company plant, premises and personnel which may affect the contractor staff.
- The existing environment, e.g. services, existing structures, etc.

Project Record Keeping

To demonstrate its commitment to effective management of contractors the subsidiary company / department will, for all, projects maintain the following records:

- Information provided by the contractor as evidence of his competency in health and safety.
- Contractor works specifications and method statements.
- Records of all safety communications with the contractor.
- Minutes of all meetings with the contractor or his representatives.
- Copies of agreements enabling the use of scaffolding, etc. supplied and erected under other contracts.
- Copies of any statutory inspection records, test certificates, etc. supplied by or to the contractor.
- Agreed product quality protection procedures for connection and test running of new apparatus and structures with existing.
- Copies of all risk assessments carried out by the contractor in compliance with the Management of Health and Safety and/or The Construction Design and Management Regulations.
- Copies of Permits to Work (for monitoring compliance and implementation)
- Copies of all site safety audits carried out by the contractor's appointed competent person.
- The Project Safety File to include as built, as installed and materials incorporated. Operation and maintenance procedures provided.

8.3 Emergency Preparation and Response as per PIN 07

All Urbaser Limited employees shall be trained on how to behave and respond in an emergency. All necessary information shall be readily available and posted at appropriate locations in both the head office and on sites. The standard requires the organization to establish and maintain procedures to identify the potential of and the responding to accidents and emergency situations, and for preventing and mitigating the environmental impacts associated with them. Upon appointments Urbaser employees are inducted on health and safety hazard within the

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 64 of 74
------------------------------	------------	-----------	---------------



premises and how to react in case of an emergency rising. Copy of this training is hold on the employee's training files.

The QHSE Head of Department of Urbaser conducted examinations of its operations and identified the potential emergencies below:

- Fire
- Spills
- Emissions
- Pollution of the environment
- Accidental discharge to water.
- Accidental discharge to land
- Disaster preparedness
- Car accident

- Identify and respond to emergency situation

Emergency preparedness plans and procedures at different locations have been developed in order to establish and describe what steps need to be taken for responding to accidents and emergencies situations and to prevent and mitigate any health and safety or environmental impacts/hazard associated with them. Urbaser Limited has also invested on equipment like fire extinguishers, alarms system, fire blankets, security towers, and water storage tanks along with other engineering controls and mitigation in place to safeguard the employees in case of emergencies. Site specific emergency response procedure may depart from the head office one and relate to specific hazard or emission deriving from their daily activities. In such case a new procedure should be drafted, and the operatives trained. Emergency procedures will be tested twice yearly.

9. Performance Evaluation as per PIN 2

Urbaser has established a system of impartiality and objectivity of its internal audits. Urbaser has created a system that separate the auditor's roles and internal auditor from their normal assigned duties. External auditors are also use for impartiality and objectivity

- Corporate Site Inspections Audit are carried out three times per year.
- QHSE Management System Audits are carried out once per year at each location including HQ
- Quarterly inspection form by Contract Mangers
- Supervisory Audits every week or fortnight depending on the site
- Daily Maintenance department visual inspections
- Quarterly audit on site subcontractors
- Evaluation of Legal compliance audits once per year at each operational location
- Accidents and incidents are recorded as they occur and are analysed annually.

9.1 Evaluation of Compliance

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 65 of 74
------------------------------	------------	-----------	---------------



Evaluations of compliance will be carried out annually against the current Register of Legislation

9.2 Internal Audits

Urbaser Limited plans, implement and maintain a system of internal audits at planned intervals to ensure compliance of the IMS with the Organization's own requirements and with the International Standards of reference. Likewise, the Organization must plan external audits to ensure the maintenance of the Certifications under the International Standards of reference. The Company QHSE Director, as decided, shall prepare annually the PIN-04-CORP-D01 IMS Audit Program, which shall include the companies and work centers to be internally audited, trying, as far as possible, to internally audit the scope of the Country or Company's certificate in a 3-year cycle.

Specifically to ISO 45001:2018 Urbaser Limited conducts internal audits at planned intervals to determine whether the QHSE Management System conforms to the planned arrangements, the requirements of the International Standards and to the Integrated Management System requirements established by the organisation are effectively implemented and maintained. An audit program has been designed and implemented and identifies an audit schedule based on the importance of the areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency, methods, responsibilities, and requirements for planning and conducting audits, and for reporting and maintaining results, are defined and documented in the Internal Audit procedure. The management are responsible for the area being audited and are responsible for ensuring that actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities include the verification of the actions taken and the reporting of verified results. The auditor performing site audit for compliance evaluation and performances must have the audit accepted by the operative audited by means of date and signature. Acceptance in the same fashion should be acquired by the line Manager / Supervisor of the department audited.

The results of audits have to be recorded in the form of non-conformities in the Audit Non Compliance Database. The initials of the auditor and the progressive number are the identifier of the non-conformity and correlative corrective action. e.g. Sam Beaumont SB01,SB01 Preventative Actions

Preventative actions are not applicable to situations where problems have already been encountered for which non-conformity reporting or possible corrective actions are the appropriate routes. The objective of preventative action work is to actively reduce likelihood of one or more non-conformities occurring. It aims to identify and minimize risk before a non-conformity event. The application should not be limited and should cover all managerial and technical requirements. Trend analysis may be used but general common sense may also be a useful tool envisaging future non conformities. When a preventative action is to be used, action plans are recorded on a Preventative Action Report obtained from **server / QA Records / Preventative Actions**. Following actions, which detail who will do them and by when, effectiveness of the actions is monitored and also recorded on the Preventative Action Report. Procedures for identification, collection, indexing, access, filing, storage, maintenance and disposal of records must be maintained.

All aspects of the Safety System are audited within each calendar year with some audits being carried out more often where appropriate. Planning and implementation of audits is the responsibility of the QHSE Manager. The audits are scheduled yearly in advance. Procedures are given on the specific audit forms in most cases, otherwise refer to the associated procedures or policy in the procedures or quality policy for the subject concerned (for these a general audit form is used). Refer to 'Safety System Audits'.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 66 of 74
------------------------------	------------	-----------	---------------



TASK / ACTIVITY	RESPONSIBLE
Create IMS Audit Programme PIN-04- CORP-D01	Country or Company QHSE Director
Execution of internal audits	Audit Team
Prepare IMS Internal Audit PIN-04- CORP-D02	Audit Team
Inform to Contract Manager about audit process	Audit Team

The Country or Company QHSE Manager will send a copy of the IMS Audit Program PIN-04-CORP-D01 to the Corporate QHSE Director so that he/she has basic information on internally audited sites and external audit scheduling. Extraordinary internal/external audits may be carried out when a serious problem is detected that may affect the IMS, or when significant changes occur in the Organization that make it necessary (in the applicable regulations, in the Policy or derived from the result of previous reviews that make it advisable). The audit team will visit the facilities or conduct remote internal audits and review the documentation associated with the IMS. As a result of the audit, the IMS Internal Audit Report PIN-04-CORP-D02 will be prepared, where deviations, observations, opportunities for improvement and audit notes will be reflected. The audit team will send a copy of the IMS Internal Audit Report PIN-04-CORP-D02 to the Contract Manager and, once signed by him/her, to the Country or Company QHSE Director. Print off the forms as and when required rather than re-copy previous copies in order to ensure you are using the latest version. Audits cover all aspects of ISO9001:2015 by covering all areas of this Quality Policy. Both the Policy and Policy Statement will be reviewed and updated as necessary within a period of five years in the UK. The international policy will not be signed by the CEO as per internal instructions.

The Auditor will give consideration to the necessary degree of parallel or vertical coverage during the audit. Audits are carried out as far as possible only by staff independent of the audited activities and must be authorised. Quality procedures themselves as carried out by the QHSE Manager will need to be carried out by a person suitably knowledgeable about procedures and their aims and objectives. When audit findings cast doubt on the effectiveness of the operations then Corrective Action will be carried out (see 4.9).

Follow-up check audits and / or other monitoring checks will verify and record the implementation and effectiveness of the corrective action taken. Check audits required are scheduled on the appropriate audit programme (refer to key sheet for the programme.) For re-check audits it may be necessary to make special visits to site. The QHSE Manager receives all completed audits and decides what, if any, corrective actions are required.

Quality procedures themselves as carried out by Quality Manager will need to be carried out by a person suitably knowledgeable about procedures and their aims and objectives. When audit findings cast doubt on the effectiveness of the operations then Corrective Action will be carried out. Follow-up check audits and / or other monitoring checks will verify and record the implementation and effectiveness of the corrective action taken. Check audits required are scheduled on the appropriate audit programme (refer to key sheet for the program) For re-check audits it may be necessary to make special visits to site.

The QHSE Managers receives all completed audits and decides what, if any, corrective actions are required. All completed audit sheets are kept in the audits file, kept with QHSE & Energy Head of Department, and a list of audits is available in electronic format in the QHSE folder of the company's server. Deviation from Statutory and approved procedures will be treated as non-conforming work;

All completed audit sheets are kept in the audits file, kept with QHSE Manager, and a list of audits is available in electronic format in the QHSE folder of the company's server. Deviation from Statutory and approved procedures will be treated as non-conforming work.



9.3 Subcontractor audits

Subcontractors should carry out their role in training their own personnel at least as well as the main contract holder (provider). Health and Safety improvement procedures and effective management regimes will help ensure that subcontractors are compliant with the quality and environmental system of the main provider.

Urbaser Limited will conduct two types of audits on subcontractors; Suitability and Scheduled Annual audits

Suitability audit is carried out upon appointment of the operatives / companies to which the work is subcontracted. In both cases Urbaser Limited will audit:

- Technical competence
- Qualification
- Training
- References
- Membership of professional bodies
- Accreditations
- Legal Status
- Pending Legal Proceeding
- Term and condition of engagement
- Logistic and Equipment



In both cases the operatives / companies will have to adhere to the Health and Safety policies and sign an agreement that they will work according to company's safe working methods throughout out the life cycle of the project.

9.4 Scheduled audit

Upon appointment the operative / company subcontracted for a specific job will be audited by Urbaser (to our standard and procedures) at least three times per year.

Urbaser Limited policy requirements of the appointed Subcontractor will be based on the following principles:

- Quality monitoring of subcontractors
- Sufficient subcontractor management
- Ensuring adequate quality improvement arrangements are in place to cover all training offered, including any that is subcontracted
- Working in partnership with the subcontractor, sharing responsibility for quality improvement
- Complaints procedures
- Ensuring responsibilities are clearly defined, agreeing the division of responsibilities, for example: Regularly monitoring quality improvement arrangements of the subcontractor to ensure that they are working
- Working with subcontractors to review the effectiveness of their quality and improve them
- Holding live performance data that is regularly reviewed with the subcontractor (often monthly) to show overall performance
- Share good practice identified by the main contractor and other subcontractors
- Ongoing joint self-assessment events with subcontractors, sometimes as a group if more than one subcontractor
- Ensuring that the contract with the subcontractor clearly outlines quality improvement expectations
- Communicating with subcontractors frequently
- Building a relationship of mutual trust



Subcontractor Audit Policy		
Quality improvement tool	Main contract holder	Subcontractor
Procedures and internal audit	Checks and agrees that the subcontractor's procedures and internal audit system are at least satisfactory, covering key areas and monitors their use	Uses its own procedures for the key stages of the training process and use its own internal audit system
Feedback	Checks and agrees that the subcontractor's procedures to obtain feedback, produces what is required for self-assessment and quality cycle. Occasionally obtains own feedback from learners / participants who receive training from the subcontractor	Own feedback system that produces core feedback required by main contractor and leads to quality improvements
Self-assessment	Reviews the subcontractor's self-assessment and uses it in own self-assessment. Along with subcontractor plays an active part in validation of findings	Thorough self-assessment process either separate or combined with main contract holder
Development or action plans	Routinely reviews progress of plans with the subcontractor, on at least a quarterly basis	Effectively uses plans to manage improvements to its subcontracted provision and reviews and updates them at least quarterly
Observation	Samples and carries out joint observations with the subcontractor to quality assure their observation system	Has its own system for observing subcontracted training and progress reviews

9.5 Management Review as per PIN 05

Management Reviews are carried out annually and are chaired by Gaetano Cristiano.

General

The review and assesses the continuing Health and Safety System suitability, adequacy and effectiveness and identifying opportunities for improvements and required changes a yearly Management review is preschedule around March.

Records are maintained for each management review meeting. A hard copy set of minutes is also retained and archived. The Board of Directors, Head of QHSE UK and other interested parties will attend the meeting.



Following the ethos of Health and Safety System suitability, adequacy and effectiveness the Corporate Annual Managerial review will contain the following topics of discussion:

- Result of Audits
- Customer Feedback
- Review of Policies
- Process performance and product conformities
- Evaluation of compliance with legal requirements and changes in legal requirements and other to which the organisation subscribe.
- Status of preventive and corrective actions
- Follow up actions from previous management reviews
- Recommendation for improvements
- Resources Needed & Training
- Improvement of service related to customer requirements
- Improvement in respect of the effectiveness of the quality management system and its processes.
- Communications from external parties, including complains
- Environmental Performances of Urbaser Limited
- The extent to which objective and targets have been met
- Changes in circumstances including development in legal and other requirements related to Urbaser Limited Environmental Aspects
- The results of participations in any and consultation
- The OH&S performance of the organization
- Status of incident investigation
- OH&S performances& energy performances
- Customer feedback
- Review of Energy Performance and related EnPIs
- ENMs audits results

10. Improvement

Urbaser Limited continually improves health and safety performance by:

- Analysis of Corrective Actions
- Analysis of internal audits results
- Investing in new vehicles and equipment.
- Investigating and reviewing accidents and incidents.
- Improving risk assessments with the involvement of the workforce.
- Investing in training.
- Improving health and safety procedures
- Instigating Health and Safety Campaigns
- Involving workforce in all Health and Safety Decisions
- Continual Improvement
- Any beneficial innovation

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 71 of 74
------------------------------	------------	-----------	---------------



10.1 Continuous improvement

The company continually improves the suitability, adequacy and effectiveness of the Health & Safety System by:

- Enhancing OH&S performance.
- Promoting a culture that supports an OH&S Management System.
- Promoting the participation of workers in implementing actions for the continual improvement of the Health & Safety System.
- Communicating the relevant results of continual improvement to workers.
- Maintaining and retaining information as evidence of continual improvement.
- Conforming with current legal and statutory requirements
- Acquiring new technologies (if required) and /or new improved equipment/material (if required)
- Changing in worker capabilities or competence promptly addressed
- Streamlining of resources
- Keeping up to date to meet the new knowledge and understanding of occupational health and safety related issues
- Good practices, both internal and external to the organization

Further to, any individual is welcome to make suggestions for improvement to this policy or any health, safety and welfare matter such as Risk Assessments for which the Company is responsible, or on which its activities have an impact and are encouraged to identify any failings in or non-conformance of this policy. In the first instance the relevant Supervisor or Manager should be consulted for advice, who will liaise with the site Contract Manager and the Company's QHSE & Energy Head of Department UK.

10.2 Non-conformities & Complaints as per-PIN 11

Whenever any aspect of work or other requirement documented by the Integrated Management System is not conformed to then this should be reported to the QHSE Manager. The QHSE Manager creates a Non-Conformity Report in the Non-Conformities database. All applicable sections are completed. The QHSE & Energy Head of Department UK maintains the database contents and oversees the operation of the NCR of the programme. Assignment of Corrective Action is almost always applicable.

10.3 Corrective Action

Corrective action follows up non-conformity reporting and is applied when analysis of the non-conformity indicates a possible reoccurrence or there is general doubt about the compliance of operations with in-house procedures. Root causes are determined, and actions are then decided upon. Corrective action aims to reduce the likelihood or re-occurrence.

The Corrective Action Report is used to document the corrective action required and other helpful information.

POL-032-CORP_UK-HSEPOLICY-V5	24/01/2024	Version:5	Page 72 of 74
------------------------------	------------	-----------	---------------

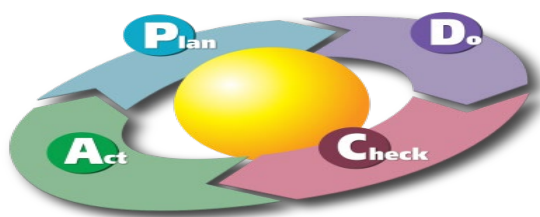
10.3.1 Selection and implementation of corrective action

The QHSE & Energy Head of Department UK normally makes his/her recommendation known and records it on the Non-Conformity report. Managing Director or QHSE & Energy Head of Department UK can decide that a Corrective Action is required, and that person will select and implement the action(s) to eliminate the problem to prevent reoccurrence. Cause Analysis, details of employees, activities, documents, procedures, records, results and reports examined should be investigated and recorded. A member of QHSE & Energy Head of Department UK staff or Managing Director has responsibility for carry this out. Causal analysis is documented on the Non-Conformity report and aims to the correct corrective action to be decided on. The corrective action and timescale allocated for completion will be appropriate to the seriousness and the risk of the non-conforming work identified. Where investigations reveal deficiencies in company procedure the appropriate quality system documentation (policies protocols and procedures) will be updated and all relevant employees informed. Additional audit(s) in the area(s) of deficiency may be appropriate, as directed by the QHSE & Energy Head of Department UK.

10.4 Continuous assessment

In accordance with the Deming cycle (the plan, do, check, act philosophy) associated with figure 1 of ISO 45001, there is a spin-off of continuous improvement. In line with continuous improvement, there is a complementary continuous assessment scheme for reviews of the SMS.

Consequently, on occasion, there may not be a defined systems audit but a monthly or ad hoc review of some aspect of the system and where possible improvements are identified then these are made locally to the system.



The Head office auditors perform annual Health and Safety Management System Audits to ascertain legal and statutory compliance. The audits are currently performed in:

- Essex MBT
- Gosport
- LBWF - London Borough of Waltham Forest
- Burnley
- St Albans
- Windsor and Maidenhead
- Tonbridge & Malling



- Tunbridge Wells
- Dartford
- EfW Gloucestershire
- Bournemouth
- East Hertfordshire
- North Hertfordshire