



Safety, Health, Environment & Quality (SHEQ) Manual

Issue: K

| Issue | Date | Modifications | Owner | Quality | MD |
|-------|------------|---|-------|---------|----|
| A | 28/04/2015 | First Issue | SJG | PK | JB |
| B | 12/04/2019 | Update changing name to SHEQ Manual | PD | PD | GP |
| C | 01/12/2020 | Updated to include changes to EHS and BMS Policies, also the removal of SHEQ Manager as a roll and addition of SHEQ Advisor | PD | PD | GP |
| D | 22/03/2021 | Updated 1.1.1 & 1.1.3 to incorporate reference to bf1 group companies | SC | PD | GP |
| E | 17/11/2021 | Policies reviewed and re-signed. No changes | SC | PD | GP |
| F | 04/05/2022 | Updated to reflect changes in job roles | SC | JW | GP |
| G | 20/07/2022 | Updated EHS policy wording | SC | SC | GP |
| H | 24/10/2022 | Updated for change of job role (JW) | SC | SC | JW |
| I | 16/01/2023 | Updated EHS policy for suppliers/Subcontractors | SC | SC | JW |
| J | 05/06/2023 | Updated to reflect change of structure | PD | PD | JW |
| K | 19/02/2024 | Updated to reflect JW job title of MD (no longer joint) | PD | PD | JW |

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Environmental, Health & Safety Policy General Statement

At bf1systems group, we are committed to the achievement of the highest standards in Environmental, Health & Safety (EHS) matters and recognise that they are an integral and essential part of our business success. We will endeavour to ensure the Health, Safety & Welfare of our employees, visitors, and contractors. We will assess and pursue strategies to minimise negative impacts on the environment and interested parties that may be affected by our business activities. Through regular reviews of the company strategic direction, setting aligned EHS objectives and associated measures we will achieve continual improvement in our EHS performance.

Our EHS Vision is: To enjoy a safe, healthy, and environmentally sound workplace where everyone shares the responsibility for driving towards zero incidents and making continual improvements in our EHS performance.

To achieve our vision our main aims are:

- To promote and develop a culture of continual EHS improvement.
- To commit to protect the environment and prevent pollution to air, land, and water.
- To identify, evaluate and control all significant EHS hazards, risks, and opportunities, including human behaviour and capabilities.
- To comply with all relevant EHS compliance obligations
- To provide a framework for setting EHS objectives
- To maintain our 'Beyond Net Zero Company' certification, and actively aim to reduce our carbon footprint on an annual basis.
- To maintain a working environment which actively supports good physical and emotional wellbeing for all employees.
- To develop and maintain a clear organisational structure for managing EHS.
- To undertake regular EHS audits and inspections of the workplace.
- To provide all employees with the information, instruction, training, and supervision they need to work safely, effectively and with due regard to the protection of the environment.
- To promote and develop EHS awareness and responsibility at all levels of the business.
- To fully involve all employees in EHS matters and have clear lines of communication.
- To promote and reinforce positive safe behaviours, challenging and positively modifying unsafe behaviours.
- To work with key suppliers and sub-contractors to support them in meeting the EHS requirements of the bf1 group, wherever practical.
- To recognise all our interested parties and be a good neighbour within the community in which we operate.

To help us achieve these aims we expect all our employees and other persons whilst on site to act responsibly, to take reasonable steps to protect the Health & Safety of themselves and others, to act in a way that does not negatively impact the Environment, to maintain our EHS standards and to actively participate in the implementation of this policy.

To ensure our EHS procedures are communicated, and key documents are readily accessible they can be found on the Business Management System (BMS).

This policy will be reviewed annually and at any other time it is considered necessary due to changes in business context, strategic direction, or legislative requirements.

Signed:



James Welham

Date: 19/02/2024

HSS9 201120

Business Management System Policy

The success of bf1systems group depends on its ability to understand fully the requirements of all interested parties. The Business Management System (BMS) is designed to capture those requirements and ensure we have the resources available to deliver to customers in-full and on-time.

We will continuously improve the BMS

The BMS is available to all staff in the group via the bf1hub and all are encouraged to become familiar with how we work to meet the requirements of the business and external stakeholders while complying to all applicable laws, regulations, and standards.

This policy provides a framework for senior management to set objectives which are cascaded down through the organisation.

Senior management reviews this policy and the BMS as part of the annual business planning cycle to ensure that they remain applicable.

Part 1 SHEQ System

1.1 Policies:

- 1.1.1 The Managing Director will issue and approve the EHS Policy General Statement & Business Management System (BMS) Policy, which sets a clear direction for SHEQ matters throughout the whole of the bf1 systems group.
- 1.1.2 The EHS Policy General Statement and BMS Policy will be briefed to all existing employees and new employees during their induction. Both documents will be re-briefed following any changes and are displayed in areas around the site as well as on the company intranet.
- 1.1.3 The EHS Policy General Statement and BMS Policy forms part of the SHEQ Manual. The SHEQ Manual details the responsibilities, organisation, and arrangements for SHEQ across the whole of the bf1 group including all UK and international sites.

1.2 Organisation:

- 1.2.1 The Head of SHEQ will be appointed to provide direction, advice, and support on SHEQ matters, they will be supported by a SHEQ Advisor/Co-Ordinator (SHEQ Team) where applicable.
- 1.2.2 The SHEQ Team will be assisted by all Department Managers and Team Leaders, in the delivery of the EHS & BMS policies.
- 1.2.3 Other persons, e.g., EHS Committee Members, Risk Assessors, Fire Marshals, First Aiders and Internal Auditors will be appointed as necessary to aid the implementation of SHEQ policies and procedures.
- 1.2.4 Information and instruction will be provided, and training carried out to meet both statutory and business requirements, to help ensure employees are competent to undertake their duties safely and effectively. This will be achieved via internal and external training courses, briefings, competency-based assessments and one to one training.
- 1.2.5 Communications on SHEQ related matters will be achieved via Management Meetings, EHS Committee Meetings, briefing sessions, the bf1hub, notice boards and toolbox talks.

1.3 Planning and Implementation:

- 1.3.1 The Managing Director in consultation with the Head of SHEQ and the rest of the Senior Leadership Team will ensure that appropriate SHEQ objectives are set for bf1systems.
- 1.3.2 SHEQ objectives will be included as appropriate within individual's objectives.
- 1.3.3 The Senior Leadership Team and Department Managers will ensure that appropriate risk assessments and work instructions are undertaken and recorded for the relevant SHEQ hazards and/or risks within the operations under their control. They will ensure that control measures are implemented, and assessments are reviewed as required.
- 1.3.4 Department Managers will ensure that any changes to equipment or processes are managed to control adverse impacts on SHEQ.
- 1.3.5 The SHEQ Team will ensure that emergency arrangements are in place to cover all reasonably foreseeable EHS emergencies; the procedures will be documented and communicated.
- 1.3.6 The relevant site shared drives will contain the specific SHEQ procedures and arrangements; these documents will be protected and controlled by the sites document management system.
- 1.3.7 Health Surveillance will be carried out in accordance with the relevant legislative requirements; this will be delivered via an accredited external Occupational Health provider.
- 1.3.8 The management and the outputs from the Health Surveillance will be controlled by the Head of Human Resources (HR), who will liaise with the Head of SHEQ and relevant Department Manager as appropriate.

1.4 Measuring Performance:

- 1.4.1 Managers at all levels will monitor SHEQ performance of their reports by direct observation of work and behaviours, the site Unsafe Situation Reporting tool provides a mechanism to record these observations where applicable.
- 1.4.2 Planned systematic inspections of the workplace will be regularly undertaken by each department, appropriate records will be maintained. The relevant Manager/Team Leaders responsible for the department will ensure that actions coming from the inspections are tracked to completion.
- 1.4.3 Investigation of all EHS accidents and incidents will be commenced within 24 hours; it is the responsibility of the relevant Department Manager/Team Leader to ensure this happens. The relevant Department Manager/Team Leader is also responsible for ensuring that any actions following the accident/incident are tracked for completion.
- 1.4.4 Accident/Incident data will be stored securely on the relevant shared drive, and as applicable on the HR System.
- 1.4.5 Investigation of any quality related incidents will be carried out effectively, the timescales of these investigations will be relevant to the impact of the incident.
- 1.4.6 All significant SHEQ actions will be documented and tracked using the site CAR process, the CAR tracker will be regularly reviewed by the SHEQ Team.
- 1.4.7 Any outstanding SHEQ actions will be raised by the SHEQ Team or in their absence the most senior person attending the weekly departmental briefing.

1.5 Auditing and Reviewing Performance:

- 1.5.1 An annual SHEQ audit plan will be scheduled by the SHEQ Team to ensure that all areas within the business are covered; the frequency of the audit will be dependent on perceived level of risk in the specific area.
- 1.5.2 All audits will be conducted by staff with the correct level of competency, using the specified company audit tools.
- 1.5.3 SHEQ Key Performance Indicators (KPIs) will be reviewed monthly during the SLT Review meeting.
- 1.5.4 The Managing Director and Head of SHEQ supported by the SLT will review SHEQ performance at least annually, the review will reference the following:
 - Achievement of the annual SHEQ objectives.
 - Identification of SHEQ major risks and the strategy to manage them.
 - SHEQ statistics and common trends.
 - Identification of areas where performance standards are absent or inadequate.
 - Ensuring the level of resource is adequate to continually improve the level of SHEQ performance.

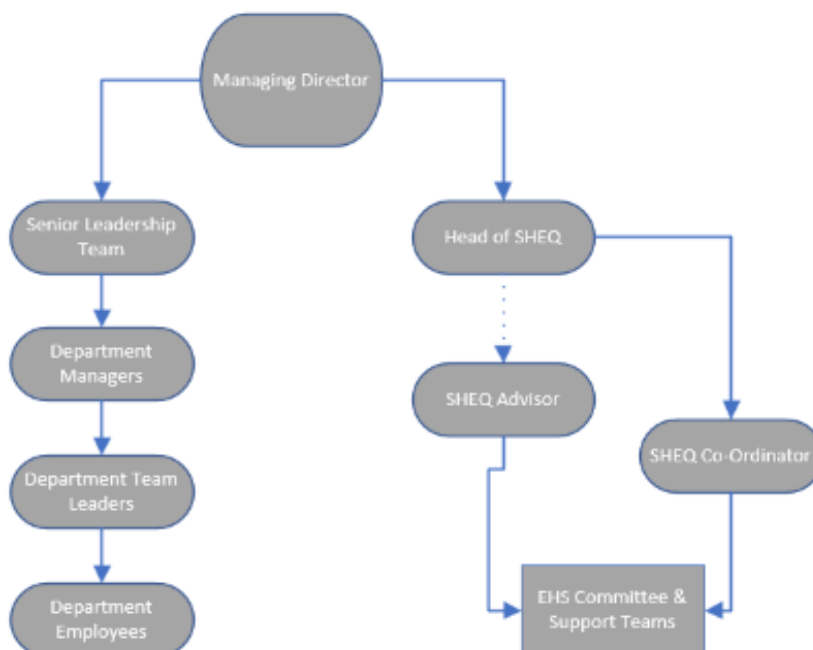
Part 2 Organisation and Responsibilities

2.1 General Statement:

Any significant organisational changes will be reviewed, and appropriate measures will be implemented.

The basic organisation for SHEQ matters follows the structure below:

SHEQ Organisational Structure



2.2 Managing Director (MD)

- Has overall and final responsibility for SHEQ throughout the Company.
- Will ensure that there are effective policies in place for SHEQ.
- Will ensure that systems are in place to enable the organisation to effectively carry out the SHEQ policies.
- Will ensure that systems are in place to promote right first-time methodology and encourage safe working behaviours.
- Will ensure SHEQ KPIs are set, regularly monitored, and reviewed.
- Will ensure that adequate resources are identified and allocated to ensure SHEQ standards are maintained.
- Will ensure that a Competent Person is employed to facilitate the implementation of the SHEQ policies.

2.3 Head of SHEQ

The Head of SHEQ is appointed as the competent person under the Management of Health & Safety at Work Regulations 1999.

- Shall in conjunction with the MD and SLT develop and maintain effective SHEQ Policies.
- Shall ensure that there is a documented SHEQ Manual implemented, and that document control is maintained.
- Shall assist the MD and SLT in the establishment and maintenance of an effective BMS.
- Shall assist the MD and SLT in setting SHEQ KPI's and to monitor progress towards achieving them.
- Shall assist the MD and SLT in the development of SHEQ strategies and to champion their implementation.

2.4 Senior Leadership Team (SLT)

- Shall ensure that the Company Policies for SHEQ are effectively carried out.
- Shall continually review their responsibilities in respect to SHEQ.
- Shall ensure that the Company SHEQ Programme is understood and disseminated throughout their teams.
- Shall ensure that all significant SHEQ risks within their area of responsibility are assessed and controlled.
- Shall ensure that SHEQ KPI's for their area of responsibility are disseminated, regularly monitored, and reviewed.
- Shall ensure that all members of staff within their area of responsibility receive adequate training, information, and instruction to be able to discharge their duties effectively.

- Where applicable must ensure that all liability is covered by insurance and advise the extent to which risks are acceptable, whether insured or not.

2.5 SHEQ Advisor/Co-Ordinator

The SHEQ Advisor will be a dotted line report and the SHEQ Co-Ordinator a direct report to the Head of SHEQ and will be known as the SHEQ team. The SHEQ Team will be responsible for the day-to-day delivery and facilitation of all SHEQ activities within the business, this will support the Head of SHEQ in their position as the competent person under the Management of Health & Safety at Work Regulations 1999. The SHEQ Team may deputise for the SHEQ Manager from time to time within clearly defined boundaries.

- Shall assist in the establishment and maintenance of appropriate SHEQ communications.
- Shall investigate and report on major EHS accidents, incidents, and dangerous occurrences, to ensure compliance to the statutory reporting requirements.
- Shall where required liaise with customers and external enforcing agencies.
- Shall co-ordinate the completion of all relevant audit programmes internal and external, including the maintenance of the ISO certification.
- Shall ensure that where required expert resource is appointed to carry out specialised EHS monitoring, e.g., noise assessments.
- Shall ensure the development and continuous improvement of the site behavioural safety programme (unsafe situation reporting).
- Shall facilitate the site EHS committees.
- Shall facilitate the site Risk Assessment programmes.
- Shall facilitate the site Corrective Action programmes, ensuring root cause methodology is used when applicable.
- Shall ensure effective measures are in place with regards to emergency response, e.g., chemical spill, fire, flooding etc.
- Shall ensure that effective procedures are in place for the disposal of all waste, ensuring that the relevant duties of care notices are maintained. Where applicable striving to eliminate/reduce waste streams.
- Shall ensure alongside the Head of HR that there is an efficient Occupational Health Programme in Place.
- Shall ensure that networking opportunities are in place, to enable themselves and the business to stay abreast of best practices relating to SHEQ activities.

2.6 Department Managers

- Shall fully familiarise themselves with the Company SHEQ Policies.
- Shall assist in the effective delivery of the Company SHEQ Policies.
- Shall ensure that the Company SHEQ Program is understood and disseminated throughout their teams.
- Shall ensure that all significant SHEQ risks within their area of responsibility are assessed and controlled.

- Shall ensure that SHEQ KPI's for their area of responsibility are disseminated, regularly monitored, and reviewed.
- Shall ensure that all members of staff within their area of responsibility receive adequate training, information, and instruction to be able to discharge their duties effectively.
- Shall ensure that all documentation relating to SHEQ is controlled and where required completed documentation retained.
- Shall ensure that all equipment required for emergency response is in place within their area of responsibility, is well maintained and where required checks recorded and retained.
- Shall ensure where appropriate that all preventative maintenance tasks are completed to schedule, records kept and maintained.
- Shall endeavour to identify the correct waste streams for their department, and where possible work towards the reduction of waste to landfill.
- Shall ensure that all EHS incidents within their department are adequately investigated, and where applicable root cause identified.
- Shall ensure that a right first-time mind set is embedded throughout their team.
- Shall ensure any incidents of non-conforming product are managed, controlled, and investigated to minimise any impact to the customer.
- Shall always ensure there is adequate emergency response cover for their area of responsibility.
- Shall ensure where applicable adequate representation from their department on the EHS Committee.
- Shall ensure that any visitors or contractors under their responsibility are fully aware of the site SHEQ rules and emergency procedures.
- Shall ensure that the SHEQ Advisor or member of the Internal Audit team is adequately supported during audits/inspections.

2.7 Department Team Leaders

The term 'Department Team Leaders' means all personnel with supervisory responsibilities.

- Shall fully familiarise themselves with the Company SHEQ Policies.
- Shall assist in the effective delivery of the Company SHEQ Policies.
- Shall ensure that SHEQ KPI's for their area of responsibility are regularly monitored and reviewed.
- Shall ensure that all SHEQ documentation required for use in their area is controlled and completed as required.
- Shall ensure that effective training of their teams is achieved and tracked either via a training matrix, or personal development folders.
- Shall ensure that ensure that their team receive all relevant SHEQ information and instruction, to enable them to discharge their duties effectively.
- Shall routinely check the completion of all preventative maintenance tasks within their area of responsibility and take appropriate action if these tasks have not been completed.

- Shall ensure that if any machinery, equipment, or tools are highlighted as not being safe to use, that they are taken out of action until fixed or replaced.
- Shall ensure that all procedures in place for waste disposal are followed.
- Following an EHS incident within their department shall lead the initial investigation, following the processes set out by the business.
- Following the report of any non-conforming product shall lead the initial investigation, following the processes set out by the business.
- Shall continually develop safe working practices in their department to ensure maximum safety for all under supervision.
- Must ensure that all SHEQ rules are adhered to within their area of responsibility.

2.8 Department Employees

- Shall fully familiarise themselves with the Company SHEQ Policies.
- Shall assist in the effective delivery of the Company SHEQ Policies.
- Shall always observe all SHEQ rules.
- Shall use anything provided by the employer in accordance with the instructions and training given. This includes machinery, equipment, hazardous substances, and means of transport, plant, and personal protective equipment.
- Will report any product/process faults, accidents or equipment/facilities damage to their Team Leader or Manager whether persons are injured or not.
- Shall report to their Team Leader or Manager if they are involved in any accident, incident or near miss.
- Shall pro-actively involve themselves in the company's Unsafe Situation reporting programme, reporting any unsafe conditions or unsafe acts.
- Shall always adopt a right first-time mind-set and work towards this ideal.
- Shall report any incidents of non-conforming product to their Manager or Team Leader as soon as reasonably practicable.

2.9 EHS Committee

The EHS committee are volunteers from the bf1systems workforce; this is a secondary duty from their main responsibilities.

The role of the EHS Committee is:

- Represent their areas, departments, or functions at the EHS Committee meeting.
- Actively be involved in EHS risk reduction projects.
- Escalate to the committee EHS concerns which they believe have not been adequately addressed, having initially been reported to a Department Manager or Team Leader.
- Communicate back the outputs from the meetings to their applicable team.

- Regularly attend and be pro-actively involved in the EHS committee meetings.

Part 3 SHEQ Meetings

3.1 SHEQ Annual Review (Part of Management Review Meeting)

The aim of the annual review meeting is to ensure compliance with legislation and the companies SHEQ Policies.

The objectives of the meeting are:

- To agree and communicate SHEQ objectives and priorities.
- To monitor and evaluate performance of the Business Management System, and adherence to the SHEQ Manual.
- To agree strategies to ensure SHEQ legislative compliance and ways to ensure the continual improvement of the company's Business Management Systems.
- Promote involvement of everyone to achieve a positive and proactive SHEQ culture.

3.2 SHEQ Quarterly Review (Part of Management Review Meeting)

The aim of these meetings is to ensure that the departmental functions are meeting the requirements set out from the annual review.

The objectives of these meetings are:

- To monitor and evaluate the Departmental SHEQ performance.
- To monitor compliance to the defined SHEQ strategies.
- To review any outstanding SHEQ corrective actions.
- To resolve any issues that have been escalated from the EHS committee meetings.

3.3 EHS Committee Meeting

The aims of these meetings are to ensure that there is a pro-active route for consultation of EHS matters with the workforce, and to ensure there is active in the site EHS strategies.

The objectives of these meetings are:

- To review any new equipment risk assessments requirements.
- To review any new chemical/substance request and COSHH assessments required.
- To review output from the site unsafe condition reporting and agree actions to resolve any concerning trends that have been identified.
- To discuss and agree any value-added activities that be carried out by members of the group to continually improve the sites EHS conditions and culture.
- To discuss any updates/changes to EHS legislation that needs to be disseminated to the wider workforce.

Part 4 Document Control and Management

4.1 Authorisation statement

The Managing Director has issued the SHEQ Policies and SHEQ Manual; these are the overall controlling documents for all aspects of SHEQ Management within bf1systems and are the backbone to the company's Business Management System.

Adherence to the Policy General Statement and SHEQ Manual, which are supported by other policies, procedures, and arrangements on specific subjects, is mandatory.

Amendments to the EHS Policy, BMS Policy and SHEQ Manual can only be authorised by the Managing Director, amendments to specific SHEQ policies, procedures and arrangements can be authorised by The Head of SHEQ, any member of the SLT or Applicable Department Manager.

4.2 Document Control and Management

The Head of SHEQ will control the bf1systems SHEQ policies and SHEQ Manual.

Departmental SHEQ procedures will be controlled and reviewed through the relevant documents Department Manager.

Creation of new or changes to reviewed documents, can only be authorised by the Head of SHEQ or relevant Department Manager.

All policies and procedures will be reviewed on an on-going basis, particularly following a significant EHS incident, significant product non-conformance, after any changes to legislation, or changes to processes or equipment.

Part 5 Business Management System Structure in Relation to SHEQ

