

Introduction

The following pages are intended to give an overview to employees to highlight important information regarding health and safety issues. This document is not intended to provide comprehensive information on every aspect of health and safety an employee may encounter. Line Managers have full departmental information and access to relevant policies and procedures.

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Brintons Carpets Limited manufacture high quality yarn, rugs and broadloom carpet, and has a wide range of customers across both commercial and residential markets worldwide.

Operating an integrated management system, we seek to incorporate quality, environmental and health & safety considerations into daily activities within the organization. The Company operates to the international standards of ISO 9001:2015 (Quality), ISO14001:2015 (Environmental) and furthermore in line BS ISO 45001:2018 (Occupational Health and Safety).

We strive to improve product and services that we offer to our customers, whilst minimizing any negative environmental impacts of safety risks. Key areas of focus for the leadership and management teams, in order to attain the highest levels, include:

- Ensuring that we identify and comply with relevant legal obligations and interested parties' requirements.
- Establishing that products meet the necessary statutory, regulatory, or specified requirements for quality, performance and reliability.
- Assessing and managing risks and aspects that pertain to the business.
- Providing safe systems of work that prevent injury and ill health.
- Setting management system objectives with indicators to track achievement with realistic targets for continual improvement of the Integrated Management System.
- Committing to managing activities to ensure the protection of the environment, the control of significant aspects of resource use, waste minimization and pollution prevention.
- Striving to achieve complete customer satisfaction, and when a complaint occurs to deal with it promptly and fairly.
- Working closely with our interested parties to ensure mutually beneficial customer and supplier relationships.

Brintons Carpets Limited is committed to the continual improvement of its integrated management systems and the benefit this will offer to customers and suppliers alike.

This policy statement is available on request.

Duccio Baldi Chief Executive Sept. 2020



Health and Safety Organizational Responsibilities

- The Chief Executive has overall responsibility for the Company's health and safety performance. It is the CEO's responsibility to ensure that the management of the health and safety function is conducted in an appropriate manner throughout the organization, and that adequate resources are available for the Company to fulfill its obligations.
- The Company's health and safety management system adopts the approach of planning, monitoring, and reviewing performance throughout the organization
- The Company's policy, objectives and performance is reviewed by the Executive Team on an annual basis, or more regularly if there are major changes.
- The Company employs a health and safety specialists, with responsibility to advise management on all relevant matters across all its manufacturing sites. The UK Health & Safety function reports directly to the CEO.
- Disciplinary action will be taken against an employee who deliberately and knowingly acts in a way contrary to agreed health and safety standards or expectations, or whose behavior is seriously negligent.

Duties of Line Managers

The general term Line Manager is used to cover all employees who are directly responsible for people i.e. Team Leaders, Coordinators, Shift Leaders etc. Line Managers are accountable for upholding all elements of the Company's Health and Safety Policy, which are applicable to their own individual areas of responsibility.

Specific duties of line managers include the following:

- By action and example to develop a positive health and safety attitude within their department, with clear responsibilities in place within their structure.
- To ensure that all personnel within their control understand and implement the company's Health and Safety Policy.
- To ensure that all statutory health and safety requirements are met.
- To carry out regular monthly safety audits of their department and ensure any remedial work is completed within an appropriate time frame.
- To ensure that all new employees are instructed in 'Safe Systems of Work' for their job together with general safety training connected with their employment. Where applicable, specific specialist training provided by suitable personnel.
- To ensure that Line Managers produce and review Risk Assessments and involve employees carrying out the activities being assessed.
- To ensure that all employees under their control follow Safe Systems of Work for each particular job as detailed in the department's Risk Assessments.
- To ensure that all fire fighting equipment and fire doors are free from obstructions.
- To ensure a good standard of housekeeping is maintained in the department.



- To investigate thoroughly the causes of any accident, occupational ill health, or dangerous occurrence within the department. To report them in the proper way using the Company's reporting system and take all steps necessary to prevent a recurrence.
- To liaise with a safety specialist and / or other relevant specialists on matters where further advice is required on safe methods of work, machinery safety, statutory obligations, etc.
- To discuss and implement safety improvements in conjunction with the departmental Safety Representative, and where necessary, refer to higher management those items which require further consideration.
- To enforce the wearing of personal protective equipment and safety clothing by all employees within their control as appropriate to the task and detailed in Risk Assessments.

Duties of Employees

All employees are required to:

- Take reasonable care of themselves and others who may be affected by their acts or omissions at work.
- Co-operate with the Company in carrying out duties which are mandatory in respect of health and safety.
- Not interfere with, or misuse anything provided in the interests of health and safety.
- Use any equipment or substance in accordance with training or instruction given by the Company.
- Report to the Company any serious or imminent danger.
- Report any shortcomings in the Company's health and safety arrangements.

Health and Safety Organization : Key Functions

I. Management Training

The Company has established minimum levels of health and safety training for line management. This is provided externally, and meets IOSH Safely for Senior Executives and Management.

2. Risk Assessments

The Company undertakes Risk Assessments for all its activities. The written results of the assessments and the preventative and protective measures to be taken are available to all employees through line management, and are displayed in work areas as appropriate.

3. Safety Walks

Line Managers, are required to undertake monthly health and safety audits of their department. The results of the audit are evaluated and acted upon promptly.

4. Occupational Health Service

The Company employs the services of occupational health providers whose activities include assisting the Company with preemployment health screening, health surveillance, counseling, and return to work health assessments.



Health and Safety Organization: Key Functions (cont.)

5. Accidents / Incidents / Dangerous Occurrences

The Company has trained Accident Investigators to examine accidents, incidents, and dangerous occurrences across all Operational sites.

The objectives of these teams are to establish the underlying and recommend ways of preventing a recurrence.

Arrangements

<u>Accident Emergency Procedures</u>

In the event of an accident at work, the following procedure must be followed:

- In cases of injury obtain first aid treatment immediately from a Company First Aider, when it is deemed safe to do so.
- If the accident is serious, telephone for medical assistance by dialing the emergency number.
- Contact the senior Line Manager on site, who in turn will advise the H&S Manager.

Fire and Other Emergency Procedures

Emergency procedures for employees to adopt in cases of fire are posted in each department. If a fire breaks out the nearest fire alarm point should be activated. An attempt to extinguish it should be made with a suitable fire appliance if it is safe to do so. Only persons trained to use fire appliances should tackle a fire.

- 1. Report the fire immediately on the internal telephone system as per site arrangements.
- 2. Immediately vacate the building.
- 3. Report to the assembly point.

Remember the following points:

- Stop work at once.
- Vacate the building immediately by the nearest exit or fire escape and assemble at your designated assembly point.
- DO NOT USE LIFTS.
- DO NOT stop to collect personal belongings.
- DO NOT re-enter the building until the 'all clear' has been given.

Fire drills and weekly fire alarm tests are held regularly to familiarize employees with the evacuation procedures.

All exits and fire appliances must be kept clear and free from obstructions at all times. Each site has its own emergency procedures to include dealing with chemical spillages, with trained staff to facilitate.



Arrangements (cont.)

Visitors

Visitors to the Company should report to security or reception on arriving at a site so their attendance on site can be recorded. Visitors are the responsibility of their site contact in the event of an emergency.

First Aid

First aid treatment is available on all sites from a number of fully trained and registered First Aiders. The names of First Aiders are displayed in each department

Communicable Disease

Emergency procedures for employees to adopt in cases of fire are posted in each department. If a fire breaks Any employee who suspects they have a communicable disease should contact their Line Manager immediately and follow self isolation instructions.

Safety Awareness

As part of the initial induction program new employees will receive health and safety information and training from their Line Manager.

Specific Individual Training

Comprehensive training programs exist for all jobs and special emphasis is placed on the health and safety aspects. Safe Systems of Work applicable to each job are thoroughly explained.

Human Resources maintains up-to-date records of safety training; line managers are responsible for training plans and will undertake to arrange retraining for employees when necessary. These programs are regularly assessed, updated, and improved. Specific specialist health and safety training e.g. slinging and lifting is identified by individual functions.

Safe Systems of Work

All functions should be carried out in a correct and safe manner. Safe Systems of Work are explained to new employees during their training period. Some specialized jobs incorporate pre-work precautions and other measures to ensure that the work is carried out safely.

Permits to Work

The following activities require the issue of a permit to work:

- Working in a Confined Space
- Working at Heights
- Working on Pressure Systems
- Hot Work outside a Workshop



Arrangements (cont.)

Permits must be signed off by a competent person before and after the work is completed. The specific safety precautions must be followed, and the time of the permit must not be exceeded.

Control of Noise

The Company is committed to controlling noise levels to minimize the risk of damaging employees hearing. Where noise levels cannot be reduced below 80db(A), then hearing protection is made available, and where noise levels cannot be reduced below 85db(A) provided hearing protection must be worn.

Monitoring, measurement and review of noise levels within Production Areas is completed on a three yearly cycle. The frequency may change if there is a significant change to internal processes and/or as Legislation dictates.

Vibration

The Company takes steps to reduce the likelihood of vibration from work equipment which may lead to health problem. Tests are conducted as required to measure and reduce vibration. The Company sets maximum utilization periods per day, and monitors employees' health through its occupational health provider.

Personal Protective Equipment (PPE)

PPE equipment is issued free of charge in line with departmental PPE Risk Assessments. All employees have a legal obligation to wear such equipment when instructed.

Hearing protection must be worn at all times in mandatory hearing protection zones, which are appropriately signed. Hearing protection is available for any employee working on the shop floor.

Training Instructors give training in the fitting and use of PPE equipment to new employees. Any employee unsure of the correct way to fit and use PPE must discuss this with their Line Manager. Apart from disposable PPE e.g. foam earplugs, employees will be required to sign for the receipt of the equipment.

Employees are responsible for the storage, care and cleanliness of PPE issued to them. Any loss or damage must be reported immediately, and damaged or faulty PPE must not be used.

In addition to safety shoes provided for identified occupations, provisions exist for all employees to purchase safety shoes as work wear, at subsidized prices.



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Arrangements (cont.)

Display Screen Equipment (DSE)

The Company's DSE risk assessment needs to be completed for all employees who use DSE as a significant part of their normal duties, and any actions resulting from the assessment need to be promptly implemented.

Any employee who is classified as a User as outlined in the DSE Policy, will receive free eye tests, and spectacles where required solely for DSE use.

Any employee who uses a 'hot desk' is responsible for ensuring that the DSE is set up appropriately for their use as per the training provided.

If any employee at anytime is suffering from any aches and pains that may be caused by the use of DSE they must contact their line manager so that a health and safety specialist or an occupational health provider can review the situation.

Contractors

The Company operates strict health and safety procedures for the management of Contractors. These procedures are designed to ensure the health and safety of Contractors and anyone they come into contact with.

No Contractor is allowed to commence work before agreement has been reached between the Contractor and the Company's 'Responsible Person' regarding:

- The completion of a formal risk assessment into all aspects of the work.
- A suitable method statement.
- Agreed safe systems of working, including applicable 'Permits to Work'.
- Authorization to work issued by the Brintons Responsible Person.

Accidents / Incidents / Dangerous Occurrences and III Health

All accidents, dangerous occurrences, near miss incidents, infectious diseases and occupational ill health symptoms must be reported immediately to the manager of the department concerned. Departmental management will investigate all incidents, taking note of recommendations made by the H&S Manager.

An Accident Investigator will investigate an incident as quickly as possible and pass the report to the Line Manager. Line Managers complete in detail the relevant parts of the accident report.



Arrangements (cont.)

Health Issues

The company operates health surveillance programs as required, including:

- Audiometry checks
- Lung function checks
- Eye tests for DSE Users

Employees need to be aware of any health issues they may be exposed to and understand the symptoms they should look out for. Any health problems must be reported to Line Managers without delay.

The Company also requires employees to complete health questionnaires in order to assess their suitability to carry out their work – this includes employees driving powered vehicles and return to work assessments. Any medical details are viewed only by Occupational Health and are treated in strict confidence. If any details are required by the Company or any other parties then written permission by the employee is required before the details can be released.

Stress

The Company recognizes that employees can suffer as a result of stress in their lives, which may be as a result of personal circumstances, work related issues, or a combination of both. The Company aims to manage this with all employees to help tackle problems at source.

Employees should advise their Line Manager, or alternatively the Human Resources Department of any such problem in order that specific issues can be resolved.

Drugs and Alcohol

No employee shall be allowed to continue to work if their performance is found to be impaired by drugs or alcohol or any other substance. It is the employee's responsibility to inform Management if they have problems so adequate support can be given.

Intermittent drugs and alcohol tests maybe undertaken at anytime by the line manager.

Smoking

The Company wishes to promote the healthiest possible working environment and minimize the risk of fire; to this end it operates a No Smoking at Work Policy on all sites. This also includes all types of Electric Cigarettes.

Smoking and chewing tobacco is not allowed within Brintons boundaries, which includes on site parking areas and security offices, or within the Company's vehicles.



Safety Critical Activities

Machinery and Equipment

All machinery and equipment should be purchased in a condition that complies with the relevant legislation, or is brought up to standard and signed off as being compliant prior to use. It should comply to a maintenance regime in line with the manufactures' recommendations. Any faults or defects identified should be reported to line management immediately for prompt rectification.

Under no circumstances must machine guards be removed whilst machinery is in operation, or machines started up without all the guards in position and properly secured.

Machinery must be electrically isolated and padlocked off, and all other energy sources appropriately controlled before carrying out maintenance work or machine cleaning. If more than one person is involved, then multiple padlocks must be used. Specific isolation procedures for each machine must be adhered to.

Do not clean moving machinery at anytime under any circumstances.

Only specially trained engineers and qualified specialists are allowed to work on exposed machinery, but only when it is not practical to work with the machinery isolated, or impractical to utilize temporary guarding.

It is an employee's responsibility to know the emergency stop procedure for machines on which they work and to report any defects or damage to controls, guards, interlock devices etc., immediately to their Line Manager, who will then arrange for the necessary repairs to be carried out.

All lifting equipment and pressure vessels are subject to inspection by an external competent person. Employees are responsible for checking there are no visible defects whilst using such equipment and reporting any defects or problems immediately. All racking is subject to a monthly check and any damage must be reported immediately.

Use of Chemicals

Numerous chemicals are used in processes associated with the Company's production activities and although most of them are relatively harmless, there are some that are hazardous. Care must be taken when handling these chemicals and they must only be used strictly in accordance with the manufacturer's recommendations and internal COSHH Risk Assessments.

The correct way to store, handle, dispose of and deal with a spillage must be understood and adhered to. Flammable chemicals are used in some processes and special care should be exercised when using these. If any doubts exist regarding the use of any chemical substance, the matter should be referred to the Line Manager.



Safety Critical Activities (cont.)

Powered Vehicles

The Company organizes workplaces in such a way that vehicles and pedestrians can circulate in a safe manner. This is achieved by physical separation where possible, and clear floor markings and signage.

Only employees who possess an authorization to operate and who have completed the Company's training program are allowed to drive any of the Company's electric and other powered vehicles. Health questionnaires are required to be completed to confirm employees' suitability to continue driving. If a driver develops a health condition that may affect their suitability to drive a powered vehicle, then this must be reported immediately to the line Manager.

Employees must use the vehicle for purposes for which they were designed, not drive at excessive speed, nor drive in a negligent manner.

A driver must report any accidents to their Line Manager immediately, including any third party as well as to the vehicle itself. If the Line Manager deems appropriate, the driver will not be allowed to drive again until they have been suitably retrained.

Drivers are required to:

- Carry out a pre-shift safety check of the vehicle before commencing work, and only drive a vehicle that has been pre-shift checked.
- Ensure that they use the correct procedures for changing gas cylinders, charging and changing batteries, and correctly use PPE where required.
- Report any malfunctions or damage to trucks or trailers to their departmental management immediately. A vehicle must only be driven if it is safe.
- Wear a seat belt where the risk assessment specifies one should be worn.

Employees must not:

- Drive vehicles unless trained and authorized to do so.
- Ride as passengers on vehicles.
- Overload vehicles.
- Stand or ride on the forks or use an unauthorized attachment on a Fork Lift Truck.
- Use a mobile phone whilst driving.



Safety Critical Activities (cont.)

Company Car Drivers

Drivers must:

- Ensure their vehicle is roadworthy at all times.
- Regularly check and maintain the legal limit of the tire tread
- Keep their vehicles clean and tidy
- Adhere to the Highway Code
- Not leave items on open display in their vehicles

Drivers must not:

- Allow unauthorized personnel to use their vehicle
- Use a mobile phone whilst driving

Floor Markings

Pedestrians must walk within the green marked walkways, and follow appropriate signage.

Red areas indicate vehicle routes, whilst pedestrian crossing points are marked black and white.

Red diagonal lines on gray indicate areas for fire equipment and emergency exits.

Yellow boxes on gray indicate storage areas.

Yellow and black broken lines indicate hazardous areas.

Gray areas are designated work areas.

Manual Handling

Where reasonably practicable, the Company takes measures to eliminate the need for, or reduce the level of manual handling of loads. Manual handling practices as detailed by departmental risk assessments should be followed at all times.

Instruction in correct manual handling techniques is given to new employees on joining the Company. Employees should not attempt to lift a load which is beyond their lifting capability.

Working at Heights

All reasonable steps must be taken to avoid working at heights if at all possible. If this is not possible then precautions must be taken to prevent a person falling from height. Such measures include platforms with handrails and kick boards, or safety harnesses. There must be safe access and egress at any high level work area.

Ladders should only be used for inspection purposes, access to platforms, or very light work for a short period of time. Employees are required to:

• Examine any ladder or steps before using them, checking for obvious defects and checking the inspection date has not expired.



Safety Critical Activities (cont.)

• Secure the ladder at the top or make sure that a colleague foots the ladder at all times, or ensure that the ladder cannot slip by using a suitable device.

Housekeeping

All employees are responsible for keeping their own immediate work areas clean, tidy and free from obstructions. All gangways, emergency exits and doorways should be kept clear and materials should be stacked safely and tidily when not in use. Any leaks or spillages must be cleaned up immediately, and be reported to the Line Manager. All work areas where possible should be cleaned by employees before and after use and if instructed to do so with a suitable anti-bacterial agent.

<u>Maintenance</u>

No major maintenance work should be started on any equipment without first informing the departmental manager. Technical staff should adhere to agreed safe systems of work, safety procedures and any relevant permits to work. All maintenance, including certain cleaning of machinery must include following the relevant isolation procedure.

<u>Asbestos</u>

All known asbestos is clearly labeled and documented in site asbestos surveys, and is subject to regular inspection. On no account should an employee disturb such labeled materials; either to work on or remove from site.

If there is any suspect material that is thought to contain asbestos, then the area should be cordoned off and the Line Manager should immediately report this to the H&S Manager who will arrange for the material to be tested by a competent person.

Should asbestos be released due to a major incident such as a fire, then no person will be allowed back onto the site without a competent person declaring the site safe. The local emergency services will take the lead in the event of a major incident occurring, and anyone who may have been exposed to asbestos will be notified and health checks made available.

Utilities

Under no circumstances should untrained or unauthorized persons interfere with, or attempt to repair any plant, machinery or appliances, which utilize electricity, compressed air, steam, water or gas.

All breakdowns or leakages must be reported to the Line Manager immediately.



Safety Critical Activities (cont.)

Lifting Equipment

Employees must:

- Only use any kind of lifting device or equipment if trained and authorized to do so.
- Use lifting equipment labeled appropriately, indicating it has been inspected within the period specified.
- Visually check all lifting equipment prior to use, and never use defective equipment.
- Never walk under suspended loads or enter a cordoned off area unless it has been authorized.

Electrical Equipment and Portable Appliances

All fixed electrical installations are subject to an inspection and maintenance regime, and all electrical portable equipment to PAT testing.

Employees are required to:

- Not interfere with any type of electrical equipment, including plugs.
- Report any electrical fault immediately.
- If any equipment is found to be out of date for PAT testing, then it must be re-tested as soon as possible.
- Carry out a visual check before using any electrical appliance.

Tools

- Employees must not use worn or defective tools.
- Defective tools should be removed from service and reported to the Line Manager immediately.
- Company policy is to use 110V or battery powered portable tools wherever possible.
- If 240V powered tools are used then a RCD breaker device must be utilized.
- Only designated body cleaning air devices should be used to blow down employees; on no account should a normal airline be used for this purpose.

Clothing

Employees are required to:

- Always wear protective clothing in good order as issued by the Company in connection with their particular work, and wear appropriate foot wear for the work environment.
- Wear clothing and as appropriate dress their hair when at work such that it cannot get caught in the moving parts of machinery.

Mobile Phones/Personal Music Players

The use of personal mobile phones and music players is prohibited in factory work areas. Outside of the factory environment hands free equipment must be utilized if using a mobile phone whilst driving, and the number of calls should be kept to a minimum.



Safety Critical Activities (cont.)

Driving at Work

At all times, an employee driving any vehicle should be fit to drive, be practicing safe driving techniques, drive a roadworthy and appropriate vehicle for the job, and adequately plan for the journey.

If an employee is unfit, or becomes unfit to drive then they must not continue driving, and make appropriate plans.

Employees driving cars or vans whilst at work must hold the appropriate license and insurance, and have completed a Driver's Questionnaire. Any changes in the status of a driving license must be reported immediately to their Line Manager.

Employees driving HGV vehicles must comply with all relevant legislation including hours of driving, health checks and notification of any change in the status of their license. The driver must carry out daily checks on the vehicle before starting a journey and ensure any defects are rectified. In addition the drivers should undergo manual handling training, and utilize any lifting equipment and PPE provided as instructed. Refresher training will be provided for drivers in liaison with the line managers.