GORDIAN STRAPPING LIMITED

HEALTH & SAFETY POLICY & ENVIRONMENTAL STATEMENT

POLICY STATEMENT

(ISSUE NO. 9 - NOVEMBER 2011)

Gordian Strapping Limited recognises and accepts its responsibility to provide a safe and healthy working environment for employees and all other persons working in or entering our premises. To achieve this objective we will comply with all applicable legal and other requirements which affect our business activities and have developed a management system based on the requirements of OHSAS 18001:2007 and also to:-

- ➤ Pursue continuous improvements in Health and Safety performance through the development of the Gordian Safety Management System.
- Systematically identify hazards and adequately assess and control risk to which employees and others may be exposed.
- ➤ Develop and maintain a positive Health and Safety culture through communication and consultation with employees, and setting objectives annually and reviewing their progress on a regular basis.
- Provide and maintain safe plant and equipment for employee use.
- Specify, design and install safely machinery in clients premises
- > Select substances with least hazard potential to ensure safe handling and use
- Provide information, instruction and training on Health and Safety issues to staff and clients personnel as appropriate.
- Prevent accidents and cases of work related ill health.
- Maintain safe and healthy working conditions.

In addition, the Company will assess the impact of its activities on the environment and will seek to identify ways to reduce waste and protect the wider environment.

The ultimate responsibility for Health and Safety lies with the Gordian Managing Director, who will ensure that safety issues are given suitable & sufficient attention. Implementation of the Health and Safety Policy is a line management responsibility at all levels and the Company expects all employees and non-employees on Company premises and employees when on Company business on customer's premises, to accept their individual responsibilities for safe working to protect themselves and others.

This Policy will be brought to the notice of all employees. It will be reviewed by the Board of Directors on an annual basis and improved and modified as required. The Health and Safety at Work Act (1974) places general responsibilities on employers and employees. Details of people and groups of people, who have specific responsibilities within the Company, are given in the Company's Health and Safety Policy booklet which is issued to all employees.

Signed	Date:	November	2011
A. Lea - Managing Director			

MANAGEMENT

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EMPLOYEE RESPONSIBILTIES

THE BOARD OF DIRECTORS

The Board of Directors has the following responsibilities for Health and Safety issues.

- Arranging the preparation of the Health and Safety Policy.
- > Ensuring the regular review and revision of the Policy on a regular basis.
- > Providing sufficient resources to make the Policy effective.
- Arranging for information on Health and Safety issues to be made available to those who require it.
- Arranging for appropriate training on Health and Safety matters.
- Consulting with employees on Health and Safety matters.

MANAGING DIRECTOR (Director for Safety)

The Managing Director is accountable for all safety activities in the company and will:

- Initiate and administer the effective implementation of the health & safety policy.
- Have an understanding of the application of the Health & Safety at Work Act 1974 and subordinate legislation to Gordian Strapping's business operations.
- ➤ Advise the Board on the finance and facilities necessary to meet the requirements of this policy.
- Make arrangements for maintaining an awareness of changes in legislation which affect the organisation.
- Promote the safe conduct of work by setting a personal example in complying with the company's H&S rules and procedures.

MANAGERS

Managers have overall responsibility for Health and Safety in their areas of responsibility. This will include the safety of plant and people, including contractors labour working on site and the keeping of appropriate records, registers, etc. as identified in this policy.

They must ensure that the Company policy is effective and that adequate supervision, instruction and training is provided and that all practices are safe within the meaning of any relevant legislation or code of practice.

They will make information and advice available to all managers and will make them aware of the priority the Company attaches to providing a safe place of work.

They will investigate all accidents and incidents within their sphere of operations and, where appropriate, progress action to prevent a recurrence.

They will not introduce new processes or chemicals or make major changes to the plant, building, doorways, gangways etc., without first seeking advice and approval from the Health and Safety Officer or the Managing Director. They must ensure that

all risk assessments (with assistance if requested), are carried out before making the changes and that identified safety precautions are implemented.

They must set a personal example in fully complying with company H&S rules and procedures.

They will be required to investigate and report all accidents and incidents.

To enable them to carry out their responsibilities, they have authority to stop any process, plant or machine that they consider poses an unreasonable hazard. This authority is conditional upon them immediately referring the matter to a more senior member of management who will then become responsible for any further decision.

They shall inform and instruct employees in their charge in relevant safety matters.

They will provide close supervision to those who require it either of necessity e.g. a person carrying out an operation for which they have little or no experience, or because it is required by legislation e.g. a young person (under the age of 18).

One of the prime duties of Managers is to ensure that guards are fitted, used, and are maintained in good condition and that employees wear appropriate personal protection whenever they are at risk. They shall further ensure that people work safely and in accordance with any legislation, codes of practice and safe systems of work etc.

They must provide adequate supervision and instruction for employees and others as applicable.

The Company recognises the difficult role of the managers and has arranged for help and advice to be available from the following people:

Industrial Relations Managing Director, Finance Director or any

Departmental Manager.

Health and Safety Managing Director/Health and Safety Advisor

Medical Qualified First Aider

Engineering Maintenance Production Manager

Maintenance of Premises Production Manager

ALL EMPLOYEES

The Company reminds all employees of their own duties and obligations under the Health and Safety at Work Act, to take care of their own safety and that of other workers and to co-operate with Managers to enable them to carry out their health and safety responsibilities successfully.

In particular, they must work safely and without causing risk to themselves or other people who may be affected by their work. Safe systems of work contained in this Policy or elsewhere must be complied with.

All employees must:

- Work safely and efficiently, acting at all times in the best interests of their own and other people's safety.
- Use any personal protective equipment provided for the work being carried out.
- ➤ Report to their managers all incidents or situations that have led or may lead to injury or damage.
- Adhere to all company safety rules and procedures that have been designed for securing a safe work place.
- Assist when required in the investigation of accidents and the development of risk assessments with the object of introducing measures to prevent recurrence.
- Obey all instruction notices, e.g. No Smoking, Wear Hearing Defenders, etc.

The Company wishes to develop a culture of safety awareness and needs the cooperation of all employees to achieve this. This Health and Safety Policy is part of the overall effort by the Company to achieve a safe working environment and all employees are reminded that disciplinary action will be taken against anyone who does not comply with this policy.

HEALTH AND SAFETY POLICY

OPERATING MANUAL

In the next part of this booklet is an explanation of the arrangements that have been made for first aid, accident investigation and other matters, along with information on the enforcement authorities.

MANAGEMENT STRUCTURE AND AREAS OF RESPONSIBILITY

BOARD OF DIRECTORS (GORDIAN STRAPPING LIMITED)

SALES DIRECTOR

A LEA Overall responsibility for compliance MANAGING DIRECTOR with Health and Safety at Work Act.

D SPICE Specific responsibility for Health and

Safety matters relating to all external

activities in the Sales and Service

Division

P V MARSH, FINANCE DIRECTOR Responsible for keeping original

> copies of certificates relating to the Company's Health and Safety Policy. Also for the ground floor of

the office building.

SENIOR MANAGEMENT STRUCTURE AND AREAS OF RESPONSIBILITY

Specific responsibility for Warehouse MATERIALS MANAGER areas and for visitors and external

hauliers drivers who enter the Basingstoke premises. Also for first

floor of the office building.

Responsible for safety within

the Development and Engineering MANAGER, DEVELOPMENT AND **ENGINEERING DEPARTMENT**

workshop area and for the

safeguarding of equipment sold by

the Company.

HEALTH, SAFETY & ENVIRONMENTAL POLICY HEALTH AND SAFETY EXECUTIVE

The address of the Enforcement Officers who cover Gordian Strapping Limited is:

Health and Safety Executive Priestley House Priestley Road Basingstoke Hampshire RG24 9NW

Telephone number 01256 404000

FIRE SERVICES

The Fire Station serving the Basingstoke premises is:

Divisional Fire Prevention Officer Hampshire Fire Brigade Divisional Headquarters West Ham Close Basingstoke Hampshire RG22 6PH

Telephone number 01256 818881

See Fire Safety Guidance Note

ACCIDENT INVESTIGATION AND REPORTING-(Procedure GSHS01)

This section covers accidents, incidents and work related ill health at Gordian Strapping Ltd, including employees on clients sites. It is relevant to all employees. All accidents happening to employees and subcontractors at work and members of the public caused by Gordian operations must be reported. This applies whether or not any injury has been caused. All incidents and near misses, including aggressive incidents, must be reported in the same way.

To assist the Company in investigating all accidents, employees are required to report

- Injury accidents
- Non-injury accidents
- Traffic accidents occurring whilst on company business
- □ Incidents or Near-misses
- Aggression, violence or verbal abuse
- III health associated with work
- Hazards spotted

To make a report from a clients site, contact your Manager or the Head Office should your manager not be available.

The Manager responsible for any injured person will investigate the circumstances of the accident and pass a written report to the Health and Safety Advisor.

The Health and Safety Advisor will carry out his own investigation into all accidents and dangerous occurrences using the Accident Report Form. He is responsible for advising the Health and Safety Executive of such accidents as appropriate. A record of all accidents that are reported is kept by the Managing Director.

Whenever possible and certainly if a fatal or serious injury is involved, the scene of the accident must be left untouched until the department manager has been informed and investigations are complete. After such an accident, the HSE must be informed and their decision obtained as to whether they wish to investigate. If so, the accident scene must remain untouched until the HSE have completed their investigation.

Copies of all accident reports are passed to the Managing Director by the Health and Safety Advisor.

To obtain treatment for an injury or health problem, contact your nearest first aider. The names of first aiders are posted on signs in the workplace.

Your manager, first aider or you yourself, will record your accident in the Accident Book.

The Manager shall monitor any absence following injury. The Managing Director will decide upon the need for the reporting of injuries, incidents or sickness as required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

A RIDDOR report is made by phone on 0845 300 9923 and/or on form F2508 to the central Incident Contact Centre. The Manager must report accidents to the Managing Director or Safety Advisor involving employees if:

- □ they result in a major injury such as a broken bone, loss of sight, amputation or unconsciousness.
- □ they result in admission to hospital for more than 24 hours
- □ they result in the employee being incapacitated for more than 3 days (including Saturdays and Sundays).

Report accidents involving non-employees if:

- □ they result in admission to hospital **and**
- they arise out of the work activity

Certain dangerous occurrences at work require reporting, such as the failure or over turning of lifting equipment such as a fork lift truck, the escape of a hazardous substance or a serious fire.

Certain ill health occurring at work requires reporting, such as dermatitis, repetitive strain injury or silicosis. This will follow a doctor's report.

The Directors will review accident figures and completed accident investigations annually.

FIRST AID-(Procedure GSHS03)

The first aid arrangements shall be maintained as required by the first aid risk assessment of all the company's operations. This assessment shall be reviewed 2 yearly.

Ensuring adequate First Aid provision for staff working on a clients site is the responsibility of the Sales Director

The Managing Director must ensure that the provisions of the **Health and Safety** (First Aid) Regulations 1981 together with the **Approved Code of Practice** (ACOP) and Guidance Notes (revised and updated 1998) are observed.

The Company provides First Aid facilities and a qualified First Aid Representative is available.

The First Aid Representative is:

Mr G Sanderson

Engineer

First Aid facilities are available at the following locations within the Basingstoke premises.

Set out on company notice boards and also in;-

- 1. Warehouse Manager's Office
- 2. Maintenance Engineering Workshop
- 3. Development and Engineering Manager's Office
- 4. Office of Secretary to Managing Director

The First Aid Representative is responsible for inspecting all first aid facilities within the Basingstoke premises 2 monthly to ensure that kits are fully equipped and clean.

First Aider's Duties.

If any person has been injured, a record shall be made in the Accident Book. Any incident as defined above, whether or not injury results, must be entered in the Accident Book. First aiders are asked to strongly encourage reporting.

If the first aider gives any treatment, an entry shall be made in the Accident book. First aiders shall remember that the treatment they give must be limited to first aid –

never give out paracetamol for a headache or other medication. If trained to do so, an Epi-Pen dose may be administered.

First aiders are also required to monitor all the first aid kits and keep them fully stocked.

Injuries to non-employees on site, such as contractors or visitors, shall be recorded using the same system.

First aiders are asked to ensure that their training is kept up to date and to request Head Office to arrange retraining in good time.

RELEVANT LEGISLATION

Gordian Strapping Ltd have developed a "Register of relevant Health and Safety Legislation", the details of which are set out on company form GSHSF 20. This register is maintained by the Health and Safety Coordinator in conjunction with the Health and Safety Advisor.

The register is retained in the Health and Safety Coordinators office and in the "Public Files" on the company intranet.

Gordian Strapping Ltd will endeavour to fully legislation and any others that may from time to time impact on their operations.

SAFE METHODS OF WORK

General Notes for All Employees

In addition to the system laid down to cover the particular hazards of your job, you should conduct yourself in a safe and responsible manner at all times.

- 1. Always act in a responsible way and do not fool about or play practical jokes on other people.
- 2. Do not shout unless in some form of emergency.
- 3. Carry out your job in a manner which will not create a danger to other people.
- 4. Maintain a high standard of personal hygiene. If you work with oil or adhesives, *wash your hands both before and after going to the toilet.* Always wash your hands before eating.
- 5. Use the gangways to move around the warehouse and production areas. Do not take short cuts through stock or machinery.
- 6. Always walk, do not run.
- 7. Do not lift or move heavy loads that are likely to strain or injure you. Always seek help or mechanical assistance.

- 8. Do not ride as a passenger on fork lift trucks, pallet trucks or any other inappropriate vehicle.
- 9. Wear sensible footwear to work. If your work involves moving goods or equipment, wear safety shoes. In some cases, the Company will provide safety shoes, but there is a scheme available under which the Company will pay a proportion of the cost of safety shoes purchased by some employees.

NOTE: It is illegal to charge employees for safety equipment needed to keep them safe whilst carrying out their employment activities.

- 10. Oil leaks or wet spills must be wiped away as soon as they appear. Report spillages to your Manager.
- 11. Beware of objects protruding into gangways and creating tripping or collision dangers. Report cases to your Manager.
- 12. Work areas must be kept clear for the efficient movement of materials and people. Keep your work area tidy.
- 13. Report damaged floor areas, loose carpets or other trip hazards to your Manager.
- 14. Do not run cables across gangways without protection or warning signs.
- 15. If you use ladders, step ladders or scaffold towers, make yourself aware of the safety rules for using such equipment.
- 16. Keep your work area clean and tidy. Dispose of waste materials in a sensible way. Maintain high standards of housekeeping. Do not throw rubbish onto the floor.
- 17. All internal parts of the Basingstoke premises have been nominated as nosmoking areas. In the designated smoking areas (far corner of car park), cigarette ends must not be thrown on the floor; they must be disposed of safely in any receptacles provided.

HEALTH, SAFETY & ENVIRONMENTAL POLICY SAFE METHODS OF WORK

OFFICE SAFETY GUIDANCE NOTE

Introduction

A number of Gordians employees work in an office environment. This is traditionally a low risk setting in respect of health and safety but vigilance from management and employees is required to keep it so. The Company is concerned that the office employees shall be protected at all times from risks to their health and safety and that they shall be provided with a pleasant work environment. All office employees are required to read this Guidance Note carefully and to put its requirements into practice so far as is practicable.

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General Office Safety
Good Housekeeping
Electrical Safety
Computers
Telephones
Photocopiers and Printers
Other Office Equipment
First Aid and Accidents
Fire
Dealing with the Public
Violence and Aggression
Stress

Pregnancy at Work

General Office Safety

Slipping or tripping in an office environment is the cause of many serious office accidents. These incidents are often minor, but can result in serious injury. Floor areas shall be kept completely clear and clean and floor coverings must be firmly fixed and well maintained. If you believe something is a hazard, move it or mention it to your manager.

Objects falling from above are another common cause of office accidents. Shelves at height shall be carefully filled and kept tidy. Open-ended shelves shall be sealed by putting them against a wall, by fixing shelf ends, or by using bookends to stop items falling off.

Do not lean large items against walls - it is safer to lay them down flat.

Filing cabinets can cause serious injury by tipping over. This happens if more than one drawer of the cabinet is opened at once, disturbing the centre of gravity of the cabinet and making it liable to tip. Always ensure when opening a filing cabinet drawer that all the other drawers are securely closed. Where possible, fill filing cabinet drawers from the bottom one up. Don't leave drawers open - this is a frequent cause of injury for someone walking past and catching their leg on the open drawer.

Ensure that items of office equipment are situated securely on suitable surfaces or floor standing. Do not balance equipment on small surfaces or on top of stacks of paper. Walkways around the office shall be clear at all times.

Kettles and other drink making equipment shall be kept and used in the safe area provided. They are a serious hazard and shall be handled with care.

Good Housekeeping

Good housekeeping is as crucial to safety in the office as in any other workplace. Walkways, stairs and fire exit routes must be clear at all times. Floor spaces around and under the desk shall be free from piles of papers, files and other tripping hazards. Cables must not create tripping hazards; waste bins must be properly sited where they do not form a hazard. Carpets shall be properly edged to prevent tripping or falling hazards..

Electrical Safety

Management will ensure that the mains wiring of the building is safe for use and that the electrical appliances you work with are regularly tested for safety. Every appliance with a plug on it, including computers, kettles, photocopiers and extension leads will be examined and electrically tested as appropriate.

If you observe any visible wires, damage to the lead or plug, signs of scorching or other evidence that the appliance could be unsafe or you are in any doubt whatsoever, do not use the appliance, but refer the problem to your manager.

All equipment plugged in at Gordian is tested for electrical safety. For this reason, do not bring your own kettle, hair dryer or fan heater or any other electrical appliance in to work.

Computers

Safety in the use of computers is covered by the set of regulations called the Display Screen Equipment Regulations 1992. Compliance with these regulations is covered separately in the Guidance Note on computers.

Cable management must be good. If you are unable to arrange the cables in your workplace adequately, raise the matter with your manager.

In compliance with the DSE Regulations, you must have a certain amount of desk area to house your screen, mouse and keyboard. If that desk area is full of papers, you will be forced to work in awkward positions, possibly giving rise to the sort of injuries the DSE Regulations aim to prevent.

Telephones

The points on cable management mentioned above apply equally to telephones. You must make sure that the lead to your phone is not positioned such that anyone could trip over it - including you!

Phones are often used communally, and are brought into very close contact with the face and mouth. Because of this, it is important to keep the mouthpiece clean. Special telephone sanitising wipes are available in the office and must be used regularly.

Where people are making and receiving calls throughout the day, it is important that the volume of sound received at the ear is not excessive. Hearing damage can result from the sound level being adjusted unduly high for long periods. Obviously you need to be able to hear, but it makes sense to adjust the sound level as low as is comfortable. This applies equally to the sound level set for the "ringer", this must be set as low as practicable whilst allowing you to hear the phone when it is ringing.

Photocopiers and Printers

You are likely to make frequent use of photocopiers and printers. These items of equipment are designed to be very safe in use, but there are points to be aware of.

Training from the equipment supplier will be given to some employees on changing cartridges, loading paper and clearing blockages. Unless you have had this training, do not attempt to do these jobs yourself but seek help from a trained person. When tackling these jobs and any others that involve removing covers from the machine, make sure no clothing such as a tie is dangling into the machine and tie your hair back if it is long. These machines have moving rollers, which can catch and draw in any loose material.

When changing toner, use disposable gloves and be very careful. Any spills shall be cleared up by vacuum cleaner. Whilst used toner powder often contains small amounts of a cancer-causing chemical, the amount an employee can come into contact with is very low. However, it is sensible to protect your health by avoiding skin contact with it and being careful not to inhale it.

Photocopiers and printers both produce small amounts of a toxic gas called ozone. Because of this, both types of equipment shall be positioned where there is good general ventilation and not too near workstations. Good maintenance schedules are important in minimising the production of ozone. If you are aware of fumes from photocopiers or printers, particularly if you notice any health effect such as a sore throat, bring it to the attention of your manager.

Other Office Equipment

For other office equipment, particularly paper shredders, the point made above about trailing clothes and hair will apply. Be careful in positioning any appliance with a lead, so as not to cause tripping hazards.

You must not attempt to move heavy items of office equipment. Special training is needed to lift and carry heavy objects safely. If you have not had such training, then do not make the attempt. Never lift any object if a gentle testing of its weight leaves you uncertain about your ability to manage it safely.

First Aid and Accidents

Accidents and incidents shall be reported. This includes any episode of aggression from the public or another employee which leaves you feeling disturbed. It also includes traffic accidents or other out of office accidents while you are travelling on company business. You must also report any episode of ill health which you feel could be related to your work.

Notices in the office tell you who your first aider is. Contact the first aider directly if you need first aid.

Reporting incidents is very important, as it helps the Company to comply with the law and to prevent further accidents. It also protects your rights, should you ever need to claim damages in respect of a workplace injury.

Fire

Fire is a serious risk in the office. Combustible materials such as paper and cardboard are always around and sources of ignition are in every electrical fitting. Smoking a particular risk and is only permitted in the designated area (car park).

If you hear the fire alarm - believe it! In a serious blaze, you get the warning of fire in time to give you just a few minutes to get out. Don't go back to your desk or fetch your bag - just get out, and go straight to the Assembly Point. You will not be kept hanging about unnecessarily.

If you find a fire, your priorities are to warn others, by activating the nearest call point and to make sure the Fire Brigade is summoned. Don't attempt to fight the fire until you have done those two things. If you have been trained to use a fire extinguisher and you feel it is safe to do so, you can then tackle the fire providing someone else is with you to watch what is happening around you. Always keep your back to a safe exit - don't get cut off from your escape route by the blaze. If in doubt, retreat. Fire fighting is best left to experts.

Prevent fires by keeping accumulations of combustible material to a minimum, and by keeping combustible material away from sources of ignition.

Dealing with the client by telephone

Gordian's clients are made up of people just like you, so your instinct is a reliable guide to how to treat the caller. If you dislike being called by people when you were busy then it follows that the people you call on the phone may be irritated and hostile. Your position as a representative of Gordian means that you cannot fight back if people are unpleasant to you. You need to treat the client at all times with perfect courtesy, even if they do not accord you the same respect. However, if anyone continues to be abusive, advise him or her that if they do not stop, you will put the phone down and end the call.

Violence and Aggression

In your job, it is not likely that you will be at risk of physical violence, as you rarely meet the client face to face. However, verbal aggression is a risk, from an individual over the phone. If you are concerned about any such incident(s), raise them with your manager.

Stress

Stress is part of modern life and you have probably experienced it, at work or in your personal life.

The symptoms of stress can be many and various and you are probably the best judge of whether you are excessively stressed. Stress arising at work shall be reported to your Director. Don't feel foolish in raising the subject - you are an important and valuable member of the team, and it makes good sense for Gordian Strapping to ensure you can do your job. There may be many things management can do to ease a stress burden, but they must be aware of the problem.

Counselling or other support may help you to cope through stressful periods, and there are many sources of such help available. Don't leave it until stress makes you really ill and you have to take time off work.

Pregnancy at Work

Most women now work through pregnancy. There are certain special risks, to you and your baby, in being at work whilst pregnant and there are particular legal requirements for the protection of you and the child during and following the pregnancy.

Please report your pregnancy as soon as you know yourself. Many of the most serious risks apply in the very early weeks of pregnancy so action to protect you and your unborn child may have to be taken quickly. Tell the Managing Director or advise a member of the management team.

Once they are aware of your pregnancy, the management will make a risk assessment of your work in relation to pregnancy. Following this, changes may be needed in your work. For instance, you will probably not be allowed to lift heavy weights. Your workstation may need to be altered. You will be carefully protected from chemicals and fumes.

The risk assessment will identify and put right any parts of your job that might cause problems in pregnancy. However, should you have difficulties or suffer any discomfort, report this immediately.

Use of Company Owned Vehicles

Please refer to Drivers Handbook

Users of Company owned vehicles must make themselves aware of the rules covering the use of company vehicles.

SAFE METHODS OF WORK

PRODUCTION DEPARTMENT

Steel Re-winding

When operating steel re-wind machinery, always observe the following safety points.

Safety shoes are provided and shall be worn at all times when at work. Safety gloves are also provided and must be worn whenever handling or cutting steel.

A hoist is installed for lifting the oscillated coils of steel onto the winding machine. When one coil has been lifted on to the machine, always engage the lifting hook of the hoist on to the next coil on the pallet. This prevents the hoist and jib from swinging around in a dangerous manner.

When moving pallets of steel, always ensure that gangways and fire exits are kept clear. It is also very important to practice good housekeeping by keeping floors clear of metal scraps etc. Off cuts of metal must always be placed in the bins provided.

Pallet trucks are provided only for the moving of pallets, they shall never be used to ride on.

When lifting ribbon wound coils of steel, always lift in the correct manner, keeping your back as straight as possible.

Shrink Wrapping

The Shrink Wrapper sealing unit consists of a pedal operated head which is fitted with one cutting wire and two sealing wires which, when the sealing head is closed, are electrically heated.

During constant operation, the sealing head becomes very hot and care must be taken to avoid contact with it.

The cutting and sealing wires become electrically charged only when the sealing jaws are fully closed, but it is extremely important that any thin metallic objects such as scissors, knife blades or metal foil, are not allowed to come into contact with the wires when the sealing jaws are closed, as a short circuit can present the risk of electrocution. The machine must never be operated if any wires on the sealing head are loose or broken.

The conveyor belt which passes through the heat tunnel requires cleaning from time to time. This must never be attempted while the conveyor is moving. Switch off the machine and isolate from the power whilst cleaning one section of the conveyor at a time. Remember that the conveyor slats may remain hot if the machine has been in operation for a long period.

When lifting full cartons of Tytape or Pakord, always remember to lift in the correct manner, keeping your back as straight and vertical as possible.

Pallets of finished goods may be stacked no higher than 4 layers.

A pallet truck is provided for the removal of pallets. This shall never be used as a passenger vehicle for riding on.

Looming

Safety footwear is provided to all machine operators and must be worn at all times when at work.

Before starting any machinery, check that all the safety guards are in position and any electrical interlocks are functioning correctly. If any of the guards have been removed or interlocks fail to work, do not run the machine, but report the fault immediately to your Manager.

The emulsions in use on the looms are low hazard, however, contact with skin and eyes must be avoided. Water shall be used to wash any emulsion from the skin. If any emulsion comes into contact with eyes, running water shall be used to flush any adhesive from the eye. In the event of accidental swallowing of emulsion, quantities of water must be swallowed to dilute it.

Emulsion spillages can be very slippery and must never be allowed to remain on the floor. Clean spillages up using water. If larger spillages occur, report them to your Manager who will arrange for them to be cleaned up.

When cleaning dried emulsion from the slats of the looms, always ensure that you are well clear of the drums before 'inching' them round.

The spools of Tytape should be removable from the winder without undue effort. If spools stick to the spindles, the cause may be too much emulsion, the wrong mix, heaters not working or too much tension on the winders. If difficulty is experienced, seek help from your Manager.

When unloading Pakord winders or loading creels, do not attempt to carry more than one spool at a time. Never overstretch when lifting or carrying. If the creel is too high, seek assistance from your use safety steps.

The operation of lifting or carrying anything heavy must always be carried out in the correct manner by keeping your back as straight and vertical as possible.

Scissors are provided by the Company, which have a sharp point in order to facilitate the separation of threads more easily. These scissors (or knives) should never be carried in pockets, as in the event of a fall or a collision, they could cause serious injury.

General Duties

Always lift in accordance with guidelines published in the Lifting Regulations. Never attempt to lift any load which may cause injury. If assistance is not available for heavy loads, report to your Manager and wait until assistance is available.

Safety shoes and gloves are available and must always be worn when handling heavy loads or scrap metal. If any work proves to be excessively dusty, ensure that a face mask and, if necessary, safety goggles are worn.

Never use any chemical cleaners until a CoSHH Assessment has been carried out and you have familiarised yourself with any safety requirements associated with it.

Do not drive any fork lift truck unless you have been trained and are authorised to do so.

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SAFE METHODS OF WORK

DEVELOPMENT AND ENGINEERING DEPARTMENT

1. Use of Portable Electrical Equipment

- Always operate tools with care and in a safe manner.
- Check the condition of cables and plugs before use.
- Do not carry tools by their cables.
- > Isolate tools from the mains when not in use.
- > Store tools in safe places.
- Wear eye protection when using rotating or impacting equipment.
- Wear eye protection when uncoiling wire or strip
- Wear gloves where sharp edges are produced.
- When using extension cables do not trail over gangways without warning signs displayed
- Report any defective equipment to your Manager.

2. Use of the Cleaning Bath

- Ensure that the correct level of cleaning fluid is maintained.
- Check that air and power supply cables are sound.
- > Empty the bath when not in use and isolate supplies.
- Confine the spray within the bath.
- Wipe spillages from surrounding areas and floor immediately.
- > Always use safety visor and impervious gloves.
- Report any defective equipment to your Manager.

3. Use of Chemicals

Any solvents or cleaning substances used should be environmentally friendly in that they may not contain CFC's, be bio-degradable and must be phosphate free. For further information see the Company's Environmental Impact Policy.

The use of any substances that are marked with hazard symbols shall be avoided wherever possible. If their use is unavoidable, you must ensure that you are fully aware of any hazards associated with them and follow proper safety procedures resulting from the CoSHH Assessment.

If no Material Safety Data Sheet is available, please see your Manager, who will arrange for it to be provided so that a CoSHH Assessment can be carried out.

4. Use of Safety Equipment

- Use the guards provided when operating powered equipment.
- Use guards on machine tools and guillotine.

5. Changing of Grinding Wheels

- ➤ Grinding wheels may only be changed by qualified persons in accordance with the Abrasive Wheels Act 1970.
- Advise your Manager when wheels need to be replaced.

6. Falling/Tripping Dangers

Make sure trailing cables from machines are kept short and laid flat in a safe and tidy way. When not required for use, coil the cable.

- ➤ Keep foot switches close to the machines when testing and isolate from the power when not in use.
- ➤ Clear all waste strapping from the floor, do not let it accumulate. Place in the bin provided.
- Keep coil-holders safe and stable.
- > Store hand tools on a rack, not on the floor.
- > Mark dangerous machine protrusions or fit protective cover.
- Warn others of any danger.
- Report any tripping hazards to your Manager.

7. Danger from Electric Shock When Working on Strapping Machines

- > Always isolate machines from the mains when repairing equipment.
- ➤ When testing machines always ensure that temporary guards are fitted, be aware of potential danger and warn others.
- Do not leave live equipment unattended.
- > Ensure that equipment is correctly connected and earthed.

8. Safe Method of Connecting 3 Phase Strapping Machines to Supply for Testing Purposes

- ➤ Use the RS Safebloc System connected to 415 volt 3 phase, neutral and earth.
- Make sure that all three isolating lids open together.
- When connecting a cable to the Safebloc, make sure that the outer cable sheath is stripped to allow at least 150mm of core and remove only 10mm of wire insulation.
- Make sure that wires are firmly clamped under the correct coded connections, one phase to each block and the neutral wire, where used, to any one of the three neutral connectors and the earth to any one of the three earth connectors.
- Always position the Safebloc in a protected position on the floor only.

➤ If any wires become detached from the Safebloc, isolate from the mains power, open the Safebloc and then re-connect.

9. Use of Step Ladders

- Observe the safety notices displayed on step ladders.
- Take care when carrying a step ladder to site.
- ➤ Before use, make sure that the step ladder is placed firmly on all four feet, is fully opened and locked.
- > Do not carry heavy or awkward items up or down the steps.
- Ask for assistance where heavy items are involved.
- > Do not drop removed items to the floor.
- > Return the steps to the storage point after use and padlock in position.
- Report any damage to step ladders to your Manager.

10. Welding

- Welding equipment is to be used by authorised personnel only.
- ➤ Wherever possible, welding shall be carried out in the designated welding area where there is proper fume extraction.
- Request authorisation from your Manager
- Keep trailing leads from welding machines tidy.
- Always use a face shield and eye protection when welding.
- Warn others not to watch welding if working on a client's site.
- Use safety screens.
- Be aware of local fire extinguisher positions.
- > Isolate the equipment when not in use.
- > Store the equipment in a tidy and safe condition.
- Ensure no flammable materials are at risk from weld splatter.

11. Spare Parts Stores

- > Storage racks are to be loaded with heavy items on the lower shelves.
- Long parts must not protrude into passageways.
- Keep floor areas clean and clear of obstructions.
- Opened packing cases may not be left with exposed nails or splinters. Remove empty boxes to the waste collection area. Do not allow them to block gangways

12. Hand Tool Storage

- Ensure that tools are firmly placed on racks, unable to fall.
- Retain loose returned tools on a pallet before sorting.

13. Machine Storage

- ➤ Keep loose items shelved. Make sure top plates, arches, coil guards etc are secure on shelves.
- Ask for assistance when loading the racks.
- > Observe ladder warnings. .
- > Keep machines tidy under racks without protruding into gangways.
- > Keep floor areas tidy and when storing machines, leave sufficient space for access.
- > When a fork lift truck is required to lift machines to or from the upper shelves, ask your Manager to locate a fork lift.
- Only authorised personnel are allowed to operate fork lift trucks.

SAFE METHODS OF WORK

PLANT MAINTENANCE DEPARTMENT

No persons, other than the engineers employed by the Company, are to operate any of the machinery in the Maintenance Department unless they have been authorised in writing by the Manager responsible to the Maintenance Department.

The company continues to apply the requirements of the Abrasive Wheels Regulations 1970. No person is to mount an abrasive wheel unless they have been suitably instructed and they have been appointed and registered to do so by the Management.

No machinery is to be operated without all the safety guards in position and any other safety features operating.

Personal Protective Equipment is provided by the Company and must be worn at all times when operating machinery.

Isolate any electrical machinery before attempting to repair it. If necessary remove fuses and place a sign on the isolating switch. Only simple and straightforward repairs (plug changing, cable changing etc) should be carried out by the Maintenance Department. All other electrical work is to be carried out by qualified electricians.

Electrical equipment, especially portable equipment, shall be regularly inspected for signs of any loose or frayed cables or any other damage. If any machine is found to be defective it must not be used until repaired. If an electrician is required to repair it, arrange with your Manager for this to be done.

Before using any cleaning agents, chemicals or solvents, please make sure that you are fully conversant with any hazards that are associated with it by reading the CoSHH Assessment for that substance. If no Health and Safety instructions are available please see your Manager, who will arrange for them to be provided. Any chemicals or solvents used shall be environmentally friendly in general and be biodegradable and phosphate-free. See the Company's Environmental Impact Policy for further information.

When welding, it is important to ensure that safety equipment is used (eye and face protection, ventilation equipment etc) and also that adequate facilities for fire fighting are available. **This especially applies when welding on a clients site.** If necessary, arrange for a second person to watch for sparks and fires whilst welding is carried out.

SAFE METHODS OF WORK

EXTERNAL SERVICE DEPARTMENT

- 1. All Service Engineers will conform with the General Notes For All Employees contained in this manual.
- Service Engineers shall work in accordance with any 'Health and Safety Policy for Contractors' issued by customers. Nothing done by a Gordian Service Engineer shall create any danger to himself or to customers' personnel. All safety signs and warning notices found on site shall be complied with unless they create hazards for the engineer, in which case they must be discussed with the client contact.
- 3. Service Engineers must report their presence on site to the customer's authorised representative before entering the factory/works area and commencing work
- 4. Copies of the Company's Employers Liability, Public/Products Liability and Contract Works insurance certificates are available from the Service Administration Manager or Secretary to the Managing Director.
- 5. All tools and equipment used by Service Engineers must be maintained in good condition and be inspected by the user before use. Worn tools must be repaired or replaced. Tool requirements must be notified to the Service Administration Manager.
 - Portable electrical appliances must be of suitable voltage and must be tested for electrical safety (PAT Certificates must be available). Cables and glands must be examined regularly and replaced if damaged.
- 6. All Service Engineers will be provided with Personal Protective Equipment (PPE) including high-visibility clothing, safety shoes, hearing and eye protection and hard hats. High-visibility clothing and safety shoes are to be worn at all times when working on customer's premises and other items of PPE must be worn when appropriate or when required by the customer's own Health and Safety Rules. When PPE needs replacement, Service Engineers will inform the Service Administration Manager. It is the Service Engineers responsibility to ensure that the PPE provided is available, suitable for their use and used and stored correctly.

- 7. Life Jackets must be worn by all persons going to sea on Company business. Life Jackets may be obtained on request through the head office, or purchased/hired locally according to circumstances.
- 8. Each Service Division vehicle will be equipped with a basic First Aid Kit. Stocks of individual first aid items shall be maintained by purchasing locally by the Service Engineer, who may claim repayment in the normal way. Complete kits are available upon request via head office.
- 9. Where the work involves standing at a height of 2 metres or more, a safety harness with appropriate fittings must be worn and used.
- 10. When servicing equipment which is integrated into a customers production plant, eg a conveyor system, Service Engineers shall satisfy themselves that the work area is safe for them to enter before working on the strapping machine. A customers representative must be aware that a Gordian Service Engineer is working on the system before any attempt to service the equipment is made. The plant must be isolated by use of padlocks and/or interlocked key systems where available before entering area guard enclosures.
- 11. Gordian Service Staff must never short-circuit or interfere with a safety system installed by a customer. If the safety system will not allow work to be carried out on the strapping machines, the customer must be informed accordingly. The customer must be made aware of their responsibility for providing safe access to the packaging equipment.
- 12. Any solvents or cleaning substances used should be environmentally friendly in that they should not contain CFC's, be bio-degradable and phosphate free. For further information see the Company's Environmental Impact Policy.
 - The use of any substances that are marked with hazard symbols shall be avoided wherever possible. If their use is unavoidable you must ensure that you are fully aware of any hazards associated with them by obtaining the CoSHH Assessment for that substance and follow proper safety procedures. If the assessment and Health and Safety Data Sheet are available, please see your Manager, who will arrange for them to be provided.
- 13, Hot Work must not be carried out by any Gordian employee or contractor until a hot Work Permit has been issued by the customer. Hot work will include gas welding or cutting, electric welding, naked flame working and dry grinding of any metal. Hot Work Permits should be issued by a member of the customer's site management team. A permit to work shall also be obtained where any new electrical installation or modification is being carried out. Some customers might designate certain maintenance workshop areas as work zones where no specific permit is required, but a request for a Hot Work Permit must always be made in the first instance.

- 14. The Gordian engineer will be responsible for ensuring that lock-off procedures are carried out and a watch kept during the heat application process.
- 15. Any equipment associated with a Gordian packaging machine, including the machine itself, which is considered unsafe by the Gordian Service Engineer must be reported immediately to the customer's management and to the Gordian Senior Management, who will arrange for the customer to receive a written report describing the dangerous situation.
- 16. Any accidents, however minor or dangerous occurrences resulting from the servicing of packaging equipment must be reported to the Gordian Service Administration Manager and the customer's management immediately. A full written report describing the incident will be required and a full investigation will be carried out by the Service Administration Manager. All incidents must be entered into the Company's Accident Book, which is located at Basingstoke under the care of the Secretary to the Managing Director.
- 17. No Service Engineer shall become involved in 'horseplay' or practical joking or any other unsafe practice when on a customer's premises.

SAFE METHODS OF WORK

WAREHOUSE DEPARTMENT

- 1. Only authorised drivers are allowed to drive fork lift trucks. Authorisation will be given by the Company following training courses given by approved training companies..
- 2. No person, other than the driver, may be carried on a fork lift truck. Where it is necessary to use fork lift trucks for high point access, the specially constructed personnel cage must be securely attached to the forks of the lift truck by a trained operator.
- 3. Staff must not stand on pallet trucks as passengers.
- 4. When lifting heavy loads manually, care must be taken to ensure that the correct lifting procedures are used. Posters are displayed to illustrate correct lifting procedure.
- 5. The 'No Smoking' rule must be observed in recognition of the fire hazard which exists with stocks of paper and consumable packing materials.
- 6. Stacked materials must be rigid and safe. Any leaning stacks must be dismantled. Stack height must not be closer than 18 inches to any head under the sprinkler system.
- 7. Great care must be taken when using ladders and working platforms. When using ladders ensure that the footing is secure and that the ladder is angled correctly at 1 in 4. Use the mobile step-ladder with fixed hand-rails wherever possible. Defective ladders must be reported to the Assistant Warehouse Manager or Warehouse Manager immediately.
- 8. Warehouse staff must maintain an awareness of the fork lift trucks operating in the warehouse areas throughout the day. Great care is to be taken when working in the proximity of fork lift operations.

- 9. Fork lift trucks must be maintained in good condition. Servicing and maintenance of vehicles is the overall responsibility of the Operations Manager. Each day, the first driver to use any fork lift truck must be responsible for inspecting the vehicle and signing the check-list to be found with the vehicle.
- 10. Gloves are provided to all warehouse staff and these should be used when handling steel and other rough packages.
- 11. Safety shoes are provided and must be worn.
- 12. Work areas should be kept clean and tidy. Excess packaging materials must not be allowed to fall to the floor or block passageways and fire exits. Waste materials are to be disposed of in the bins provided.
- 13. Extreme care shall be taken when handling bladed instruments. Fixed blade knives shall not be used. Retractable blade knives only may be used for general packaging operations. Sharp instruments such as scissors must not be carried in pockets, to prevent accidents during falls.
- 14. All staff working or passing through the warehouse must comply with the nosmoking regulations.
- 15. Cigarette ends must never be thrown on the floor. They must be disposed of carefully in the bins provided in the area where smoking is allowed.

SAFE METHODS OF WORK

EXTERNAL SALES STAFF

All sales staff will be issued with personal protection equipment (PPE) including highvisibility waist coats or jackets, safety shoes, eye and hearing protection. Hard hats will be provided where necessary. Sales staff must ensure that PPE is available for use when needed. (PPE can be obtained through Basingstoke).

Sales staff will visit customer's premises where there will be a variety of local safety requirements. All local safety procedures must be followed and all safety signs on customer's premises must be noted and due regard taken of them. No one should enter a customer's premises without first reporting to a reception desk or a representative of the customer. All clients reception procedures must be followed.

When visiting customer's premises, sales staff shall assess the risk of possible personal injury to themselves and must ensure that they do not expose themselves to any risk of injury. Where customer's staff offer assistance they must not be asked to do anything which would expose them to any danger of injury.

FIRE SAFETY GUIDANCE NOTE

Gordian Strapping takes all reasonably practicable steps to prevent fire from occurring at its premises or on any site where employees are working. The company has a duty under the Regulatory Reform (Fire Safety) Order 2006 to carry out a formal Fire Risk Assessment for the premises. This risk assessment is available to all employees who work at the premises. It is reviewed at annual intervals.

Fire risk assessments are carried out by the Health and Safety Advisor

Whilst wishing to preserve property if possible, Gordian puts the lives and health of its employees first in any fire situation. Means of early warning against fire have been provided and also precautions to ensure employees can escape from a fire.

All employees shall be trained in what to do in the event of a fire. The fire procedure will be posted on notice boards and issued to all employees at the outset of their employment, all new employees being instructed in the fire arrangements. In addition, annual fire drills test the efficiency of the fire procedure.

Employees and subcontractors on client's sites should receive a site induction on their first day on site, which would include the site specific fire procedure and an explanation of fire escape routes. If not given, the Gordian Manager shall carry out an informal fire risk assessment and advise the team of his findings.

Storage Areas

Areas where combustible materials are stored in quantity are high fire risks. They shall be sealed off as far as possible from the rest of the workplace. Smoking is not permitted, and other sources of ignition shall be excluded. Good stacking of materials will reduce potential fire spread.

Housekeeping

Escape routes must be kept clear. Fire appliances, exit doors and alarm points must never be obstructed. Walkways through the premises shall be kept clear. General tidiness in the workplace both reduces the risk of fire starting and improves the chances of people escaping from a fire.

Solvents and Flammable Liquids. Solvents are a high-risk fire hazard. Their use must be strictly controlled. The amount of solvent stored shall be the smallest possible for the operation to proceed. The solvent must be stored in a fire-resisting store, properly labelled and well ventilated.

Smoking. Smoking is a major cause of fire in commercial premises and is not permitted in the office or factory premises.

Escape Routes

Every person working in or visiting the Brunel Road premises or clients site must have access to a fire exit to the outside, via a fairly short travel distance. The escape route must be wide enough for the maximum number of people that might try to pass down it. Fire exits must be identified by a sign. If the fire exit cannot be seen from where people work, additional signs shall point the direction to be taken. If people cannot reach the exit inside 2 minutes, or if there are stairs in the way, or other features that mean they might be trapped, an alternative route of escape must be provided. This could be a window, or a ladder. Employees must be made aware of their fire exit routes, including any alternatives available.

Fire Alarm

Fire alarms are installed in the offices and workshops of Gordian. However, arrangements on clients sites will vary with the circumstances, but a warning system should be provided that is effective throughout each site. If not advised, the Gordian people must ask what the fire arrangements are.

Fire Extinguishers

Fire extinguishers appropriate for the likely type of fire in the area are provided at Brunel Road. They are mounted on the wall adjacent to fire exit routes and have identification signs. A competent person is contracted to maintain fire extinguishers at yearly intervals. Appropriate employees are instructed in how to use them.

Fire Training

The factory and offices have personnel who have received Fire Marshal training and fire extinguisher training. All site staff receive training in the use of Fire Extinguishers.

Copies of the Company's Fire Evacuation Procedure have been issued and spare copies are available from the Managing Director.

The Health and Safety Advisor arranges fire evacuation exercises and keeps appropriate records.

ELECTRICAL SAFETY GUIDANCE NOTE

The mains wiring of the office building and factory areas is required to be inspected and tested by a competent electrical engineer at five-year intervals. A certificate shall be provided by the electrical contractor undertaking the work to show that this has been done.

Portable electrical appliances (anything which plugs in to the mains) shall be tested and checked by a competent electrician at regular intervals. These intervals will vary according to the amount of wear the appliance receives from 3 yearly in the case of a static appliance like a computer to six monthly in the case of an appliance like a site drill which is plugged in and disconnected frequently and used daily.

Portable electrical appliances shall be rapidly checked by the user each day before they are plugged in, this takes just a few seconds.

Points to check include:

- Make sure the appliance is not wet or contaminated.
- Make sure there are no cracks in the appliance casing
- Look for wear to the cable
- Make sure the plug is intact and not cracked
- □ No un-insulated wires and no metal wires shall be visible
- □ The cord grip on the plug must be retaining the outer sheath of the mains cable
- □ The label shall confirm that the appliance is "in date" and not due for another full safety check.

Unless all these points are satisfactory, the electrical appliance shall not be used and the problem shall be reported to the appropriate manager.

Employees shall not bring their own electrical appliances to work without permission from management.

Whenever possible, equipment used on clients sites must be battery powered or 110V only, powered from a centre tapped earth transformer.

Residual current devices, either on the mains supply in the workshop or on individual items of electrical equipment, will improve the outcome in the event of an electrical accident and their use is to be strongly encouraged, 230v equipment shall not be used without one.

WORK EQUIPMENT GUIDANCE NOTE

The Provision and Use of Work Equipment Regulations 1998, known as PUWER, cover the safe use of all equipment at work. These Regulations cover all tools, machines, apparatus and installations used at work, whether in existing use, bought new or second hand.

Compliance with these Regulations requires a risk assessment to be carried out on each type of work equipment where the risks are not trivial. These risk assessments are to be carried out by or for the responsible manager under whose control the work equipment is used. The Safety Advisor will assist if required.

The risk assessment required takes you step by step through the considerations covered by PUWER.

- You must assess the suitability of the work equipment for its purpose.
- Then you need to consider what maintenance will be required. Regular inspection of the equipment may need to be done and recorded, especially if the risks are high.
- What training will equipment users need and how is this best delivered? Will the person maintaining the equipment require further training?

The risk assessments must be completed prior to the work equipment coming into use.

LIFTING OPERATIONS & EQUIPMENT GUIDANCE NOTE

Gordian Strapping fully realises the hazards inherent in the use of cranes and other lifting equipment due to equipment failure, inadequate preparation and inadequate training for the lifting operations. People in charge of lifting operations and those controlling the lifting equipment must be formally trained, and provide evidence of that training.

Appropriate inspection certificates must accompany lifting equipment hired by Gordian, mobile crane companies must provide evidence of their Employers and Public Liabilities Insurances. Before work commences, these shall be inspected by the senior Gordian employer on site.

A risk assessment must be carried out for each lifting operation. If this involves the use of mobile plant other than the routine movement of material by forklift truck, the risk assessment shall be formalised. (See Risk Assessment below)

Suitability of Lifting Appliances.

- □ The crane, hoist, pulley block, etc, must be rated to carry the maximum load required to be raised. This applies equally to the attachments such as slings ropes, hooks, shackles, eye bolts, spreader beams, etc.
- □ The size and shape of the load, sharp corners that can cut fabric straps, etc must be considered when selecting suitable lifting gear.
- □ They must be suitable for use in the environment, eg. Wet, corrosive atmospheres, soft ground, low ceiling, confined space, wind speed, obstructions, etc.

Risk Assessment.

Persons involved in selecting or working with lifting appliances shall understand the process of risk assessment so that hazards and necessary controls can be properly evaluated and all precautions provided in advance of the work being carried out.

For all major lifts, an Appointed Person for crane use with an NCTC (or similar) card verifying his qualification, shall be employed to carry out the risk assessment and manage the lifting operation/s.

Competency of operators

Personnel involved in lifting operations must have a good understanding of

- □ the signaling arrangements used as required by the Signs & Signals (Health & Safety) Regulations 1996.
- □ The selection and use of slings, chains, cables, straps, etc.,
- □ How to assess the weight and centre of gravity of items to be lifted,

- Causes of failures in lifting equipment ,
- □ Non-lifting hazards such as contact with overhead cables and the back of the crane impinging on walkways.
- □ How to minimise the possibility of the load or part of the load falling during the lift.

Inspection Requirements

The lifting equipment must be accompanied by an appropriate insurance assessors signed certificate, indicating a thorough examination has been carried out, these are valid for a year. In addition, each item of lifting equipment must be subject to a 6 monthly inspection by a qualified and experienced engineer.

The user of the equipment is required to visually inspect all items before use to ensure there is no obvious defect such as knots in chains or cuts to straps.

Reporting Defects.

Any defect found by a user or operator must be reported to the site manager and the equipment taken out of service until repaired or replaced.

Planning a lifting operation

- Assess the weight of the load.
- □ Choose the correct lifting device and accessory/s depending on the weight, environment in which the lift is taking place, size and shape of the load, where the load is required to be placed.
- □ If it is to be travelled, ensure the route to be taken by the crane or forklift truck is clear (including overhead) and that the delivery point for the load is prepared.
- Chains wrapped around metal can slip and straps pulled across sharp corners can be cut, both causing the load to fall. In those circumstances, consider an alternative means of connection to the load.
- If the crane is to operate over an obstruction so the driver cannot see the lift taking place, 2 way radios or mobile phones are much better than a relay of people giving hand signals, this latter is not an acceptable method of communication.
- If ropes are required to control the movement or alignment of the load during the lift, they must be long enough to allow the load to fall without placing those holding the ropes at risk of injury.
- If the crane operator can control the lifting and lowering without guidance, no other person shall be involved. If a guide is necessary, only one person must give signals to the crane operator.
- Where a load has to be traversed over places of work and traffic routes, the affected personnel must be cleared from the area, which must be barriered off or guards located at suitable positions.

NOISE GUIDANCE NOTE

Excessive levels of noise, if continued, can damage the hearing. Some of the work of Gordian involves noisy machinery and equipment, either directly or from the clients processing equipment. The Company intends to prevent damage to the hearing of employees by complying with the Noise at Work Regulations and associated Guidance.

The Company will assess the sound levels produced by all machinery and equipment under their control where there is thought to be a risk.

Where noise levels are considered to pose a risk, the area concerned will be designated a hearing protection zone and signs provided accordingly. Employees will be briefed about the risk to their hearing and the necessity to use hearing defenders. As far as possible, employees will be allowed to select the hearing defenders they prefer.

Employees or subcontractors who are planning to use noisy hand tools must obtain for themselves hearing defenders before they start work. They shall also advise anyone else in the vicinity to use hearing defenders.

Where Gordian Strapping employees are affected during site operations, this "Rough & Ready" guide shall be used. If a conversation at normal voice levels cannot be held by 2 people 1m away from each other, the noise level is at or about 85 dBa and hearing defenders must be worn.

ENVIRONMENTAL POLICY STATEMENT (ISSUE No 8. August 2011)

The Company recognises the need to conserve resources and limit the impact it has on the immediate and wider environment.

As our operations are based around the stocking and distribution of packaging materials without any significant manufacturing processes which use toxic or generally hazardous materials, we can work towards the achievement of minimising environmental impact by creating management objectives in the areas described below.

- To choose as trading partners suppliers who we believe are taking positive steps to identify and reduce their own impact on the environment.
- To actively seek ways of reducing the amount of packaging required on the goods which we both purchase and supply. Negotiations will take place with suppliers to find ways of reducing the amount of packaging and reducing the weight of the packaging considered essential for packaging integrity.
- To re-use external packaging which would otherwise be sent to landfill sites.
- To segregate the materials which we have to send to landfill and investigate best options for the disposal of the material in a legal and professional way by using properly licensed contractors.
- To monitor and limit the amount of services consumed by the operation of the Basingstoke premises, including electricity, gas, water and heating oil.
- To consider the impact of our vehicle fleet and explore ways of reducing the number of miles driven each year and to conserve fuel. To seek agreement from vehicle users to convert from the use of petrol to diesel engine vehicles. To direct vehicle users to ensure that vehicles are serviced in accordance with the manufacturer's instructions.
- To encourage customers to collect and send for recycling used strapping materials.

The overall responsibility for this Policy lies with the Managing Director but line managers who are responsible for specific activities will be expected to accept the intentions and needs of the Policy and apply themselves to achieving the stated objectives.

A Lea Managing Director