

# HellermannTyton Data QEHS Information Pack



Issue Date	February - 2024
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## HellermannTyton Data Quality Policy

HellermannTyton Data Ltd (HT Data) is a division of HellermannTyton Group PLC, a multinational world leader in providing both FTTH and LAN network connectivity products to a global market. HellermannTyton Data currently operates two manufacturing, warehousing and logistics sites based in Northampton, UK.

HellermannTyton Data Ltd has an overall aim to be partner of choice for all our customer's data connectivity requirements. Our aim is to achieve this by maintaining a reputation as an innovative provider of high-quality products, and by being flexible and responsive to customer needs and those of an ever-evolving marketplace. To enable us to achieve this aim, it is of utmost importance that we constantly monitor and improve our products and processes, to enable us to consistently manufacture and deliver products that meet the demanding quality requirements of both ourselves, and all of our stakeholders. To ensure consistent achievement of these aims we currently operate a mature quality management system (QMS), externally verified, and certified as meeting the requirements of ISO 9001.

The foundational principles upon which we base our QMS are:

- That all staff have a contribution to make regarding product and service quality.
- As a minimum we must meet all applicable legislation requirements and those of any voluntary standards to which we commit.
- That we control, reduce, or eliminate any actual, or potential causes of quality nonconformances.
- That we monitor and measure the effectiveness of our quality management system via the recording and analysis of KPI's and internal and external audits.
- We continually strive to improve the organisation's performance by the setting and reviewing of management objectives, determined by analysis of the outputs from our monitoring activities. Management system objectives will be determined as part of our management review process.
- That we provide the resources and training required for our staff to meet stringent quality standards.
- All interested parties are provided with relevant and appropriate information as and when required.

This policy, and the procedures that extend from it, are approved by the undersigned, and must be adhered to by all personnel.



Matthew Hunter,  
Managing Director

Issue Date	February 2024
Review Due	February 2025



# Certificate of Registration

QUALITY MANAGEMENT SYSTEM - ISO 9001:2015

This is to certify that:

HellermannTyton Data Limited  
Waterside House  
Edgar Mobbs Way  
Northampton  
NN5 5JE  
United Kingdom

Holds Certificate Number:

FM 34289

and operates a Quality Management System which complies with the requirements of ISO 9001:2015 for the following scope:

**The design, manufacture and supply of patch panels, floor outlets, broadband distribution infrastructure and cable assemblies.**

For and on behalf of BSI:

Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 1996-06-13

Latest Revision Date: 2022-11-25

Effective Date: 2021-07-26

Expiry Date: 2024-07-25

Page: 1 of 2



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BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.  
A Member of the BSI Group of Companies.

Certificate No: FM 34289

Location

Registered Activities

HellermannTyton Data Limited  
Waterside House  
Edgar Mobbs Way  
Northampton  
NN5 5JE  
United Kingdom

The design, manufacture and supply of patch panels, floor outlets, broadband distribution infrastructure and cable assemblies.

HellermannTyton Data Limited  
Unit 2  
Nectar Way  
Pineham  
Northampton  
NN4 9BX  
United Kingdom

Goods-in, storage, picking, transfer of goods to manufacturing site and, despatch of patch panels, floor outlets, broadband distribution infrastructure and cable assemblies to customers.



Original Registration Date: 1996-06-13

Effective Date: 2021-07-26

Latest Revision Date: 2022-11-25

Expiry Date: 2024-07-25

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## HellermannTyton Data Environmental Policy

HellermannTyton Data Ltd (HT Data) is a division of HellermannTyton Group PLC, a multinational world leader in providing both WAN and LAN network connectivity products to a global market. HellermannTyton Data currently operates two manufacturing, warehousing and logistics sites based in Northampton, UK.

At HellermannTyton Data we recognise and appreciate the importance of balancing economic success with environmental responsibility, and as such, endeavour to consistently provide high quality products and services to fulfil the market's current requirements, without compromising the ability of future generations to meet their own needs. This policy sets out our approach to environmental management, which is key to us achieving the group's objective of becoming carbon neutral by the year 2040.

### Scope:

This policy covers all activities, premises and assets related to HT Data activities carried out in relation to the operation of the two sites located on Edgar Mobbs Way and Nectar Way. This policy also documents our commitment to cooperate with objectives set by the parent group.

### Responsibilities:

While HT Data expects all employees to cooperate and contribute, ultimate responsibility for the successful implementation of the Environmental Management System (EMS), and achievement of environmental objectives lies with the Managing Director. The day-to-day management and monitoring of the EMS is undertaken by the Environmental Coordinator, with oversight provided by the Supply Chain director.

### Objectives and commitments:

While the overarching policy at HT Data is to monitor our activities and improve our performance with a view to minimising our associated environmental impact, the following objectives and commitments are key in enabling us to achieve this aim.

- We will as a minimum comply with all relevant legislation and voluntary obligations to which we have committed.
- Ensure that all employees have the required training and competences to contribute to the achievement of the organisation's environmental objectives.

- To ensure the ongoing relevance and suitability of our environmental management system and maintain the continued external certification to ISO 14001.
- To ensure that all suppliers meet minimum legal requirements with regards to materials used in supplied components.
- To continue to monitor and look for improvement opportunities with regards to our scope 1 & 2 emissions with a view to reducing our environmental impact.
- To monitor and look for potential improvement opportunities regarding the reduction of our water usage.
- To reduce the number of single use plastic packaging used in our products to the minimum level allowed by functionality considerations. Consideration is given to both the impact of the packaging's creation and disposal requirements at end of life.
- Define specific quantitative objectives as part of the annual management review based on the outputs of our monitoring activities.
- Report to the Senior Management team quarterly on our environmental performance and the progress of set objectives.
- Maintain an up-to-date record of our identified environmental aspects and their potential impacts.
- Ensure that suitable and sufficient measures are in place to enable us to deal with any reasonably foreseeable emergency situations and mitigate their environmental impact.
- Ensure information regarding our environmental performance is available to interested parties including publishing on our website as of Q2 2023.
- To reduce the amount of waste generated as a result of our activities, including continuing to explore improvement opportunities within our supply chain, and reducing the environmental impact caused by waste that requires disposal by downstream product users.
- Where possible, product components are made from recyclable materials and are identified as such to facilitate their recycling.
- Cooperate with HellermannTyton Group to achieve group wide objectives.

**Group objectives:**

- Implement a centralised system for the monitoring, and external verification of accuracy of scope 1 & 2 emissions reporting across the group (Q1 2023).
- Extend recording and reporting to include scope 3 emissions.
- Ensure that 25% of the group's electricity usage is from renewable sources by 2025
- Ensure that 100% of the group's electricity usage is from renewable sources by 2030
- Become a carbon neutral company by 2040



Matthew Hunter,  
Managing Director

Issue Date	February 2024
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To Whom It May Concern:

The HellermannTyton Data Statement on  
 UK & EU REACH Legislation Compliance

## Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

EU Regulation 1907/2006

Adopted by the UK under SI 2019/758

REACH is a regulation of the European Union and the UK, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the chemicals industry. It also promotes alternative methods for the hazard assessment of substances to reduce the number of tests on animals.

As HellermannTyton Data Ltd. is not a producer of chemical substances we are not required to register any of our products, however appropriate action is taken by us to ensure that all supplied substances and components comply with current UK & EU REACH legislation.

As part of our obligation, we regularly monitor suppliers to ensure that supplied components meet the required standards, and do not contain any substances contained on the ECHA SVHC candidate list in concentrations >0.1% by weight. We regularly ensure that we are in compliance with all relevant legal obligations, and the requirements of ISO 14001.

Further information regarding REACH requirements and the latest SVHC candidate list can be found on the websites listed below:

<https://echa.europa.eu/regulations/reach/understanding-reach>

<https://echa.europa.eu/candidate-list-table>

<https://www.hse.gov.uk/reach/index.htm>



Matthew Hunter  
**Managing Director**

Issue Date	February 2024
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## The HellermannTyton Data Statement on RoHS and WEEE Legislation

HellermannTyton Data takes its responsibilities in meeting existing and future environmental statutory legislation seriously. We manage this process through our ISO 14001 Environmental Management System and our compliance is independently assessed by BSI.

Changes to the WEEE and RoHS legislation at both the EU and UK level are routinely reviewed to ensure continued compliance.

### Waste Electrical Electronic Equipment: EU Directives and UK Regulations

The company supplies a range of passive fibre optic products, and these have been reviewed against the current UK “retained legislation” and the relevant EU Directives. The review showed that our products do not fall under the UK or EU definitions of EEE and as a result they are not required to comply with the requirements of the WEEE regulations. This decision is recorded on a Due Diligence Documented Record. Therefore, the company reports a zero EEE return for the group EEE Producer registration.

### Restrictions on the Use of Certain Hazardous Substances in Electrical & Electronic Equipment: EU Directives and UK Regulations

As part of the HellermannTyton Data ISO 14001 environmental management system we have committed to ensuring that all the materials and components in our products meet or exceed the requirements of current legislation on hazardous material including EU and UK RoHS. To achieve this, we have carried out a survey of our products and the materials and components used in their manufacture. This has involved our suppliers who are required to ensure that they are compliant with current EU and UK retained regulations and their status is regularly updated. Supplier compliance is specified as part of the ongoing purchase order requirements.

The company has appropriate compliance review procedures at the design stage for new products.

Current UK legislation status

WEEE: Meets SI 2013/3113 amended by SI 2019/188 and SI 2019/ 1078.

RoHS: Meets SI 2012/3032 amended by SI 2020/1647

Current EU legislation status

WEEE: Meets Directive 2012/19/EU.

RoHS: Meets Directive (EU) 2015/863 and Directive (EU) [2017/2102](#)



**Matthew Hunter**  
**Managing Director**

Issue Date	February 2024
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## Conflict Minerals

HellermannTyton’s conflict mineral reporting information is collated and published by our parent company Aptiv. Aptiv does not track material usage in a manner that allows us to respond at an individual product level for any of its products, customers, or sites. Aptiv’s “company level” response is applicable to all products sold by Aptiv, including Antaya and HellermannTyton. The results of Aptiv’s review is available via their website.



### Aptiv Conflict Minerals Policy

Aptiv supports the initiatives of governments and industries to prevent human rights violations associated with the mining of “Conflict Minerals” - columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives commonly described as tin, tantalum, tungsten and gold (3TG) – from the Democratic Republic of the Congo (DRC) or an adjoining country. These minerals can be mined and sold in violent and abusive conditions under the control of armed groups with the proceeds being used to fund armed conflict in the region.

Aptiv is committed to operating in a socially responsible manner and expects suppliers throughout the supply chain to supply products and materials from socially responsible sources. Aptiv supports an industry-wide approach to addressing such social responsibility matters. We support these efforts through membership in the Automotive Industry Action Group (AIAG) and the Responsible Minerals Initiative (RMI).

Aptiv has established a conflict minerals compliance program in accordance with the OECD internationally recognized framework - OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The Aptiv compliance program includes management systems, policies and procedures that comply with the SEC Conflict Minerals rule and mitigate the risk that the Conflict Minerals necessary to our products benefit armed groups or contribute to human rights abuses in the DRC and adjoining countries. In accordance with this compliance program, we have and will continue to exercise due diligence over our mineral supply chain by surveying our global suppliers to identify the sources of conflict mineral-containing components and materials, as well as the measures being taken by our suppliers to track the source of minerals supplied to them from lower tier suppliers.

We will continue to evaluate our policies and procedures in order to improve our Conflict Minerals compliance program, and will continue to collaborate with our suppliers, customers, trade organizations and other industry groups in order to share information and approaches to compliance.

For more information on Conflict Minerals, please contact:

Alex Marie  
HellermannTyton

E-Mail: [alex.marie@hellermanntyton.co.uk](mailto:alex.marie@hellermanntyton.co.uk)

# ISO 14001 Certificate





## Certificate of Registration

**ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015**

This is to certify that:

Holds Certificate Number: **EMS 504454**

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

**The design, manufacture and supply of patch panels, floor outlets, broadband distribution infrastructure and cable assemblies.**

HellermannTyton Data Limited  
Waterside House  
Edgar Mobbs Way  
Northampton  
NN5 5JE  
United Kingdom



For and on behalf of BSI:

---

Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 2006-06-13  
Latest Revision Date: 2022-11-25

Effective Date: 2021-08-14  
Expiry Date: 2024-08-13





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BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.  
A Member of the BSI Group of Companies.

Certificate No: EMS 504454	
Location	Registered Activities
HellermannTyton Data Limited Waterside House Edgar Mobbs Way Northampton NN5 5JE United Kingdom	The design, manufacture and supply of patch panels, floor outlets, broadband distribution infrastructure and cable assemblies.
HellermannTyton Data Limited Unit 2 Nectar Way Pineham Northampton NN4 9BX United Kingdom	Goods-in, Storage, Picking, Transfer of goods to manufacturing site and, Despatch of patch panels, floor outlets, broadband distribution infrastructure and cable assemblies to customers.



Original Registration Date: 2006-06-13  
Latest Revision Date: 2022-11-25

Effective Date: 2021-08-14  
Expiry Date: 2024-08-13

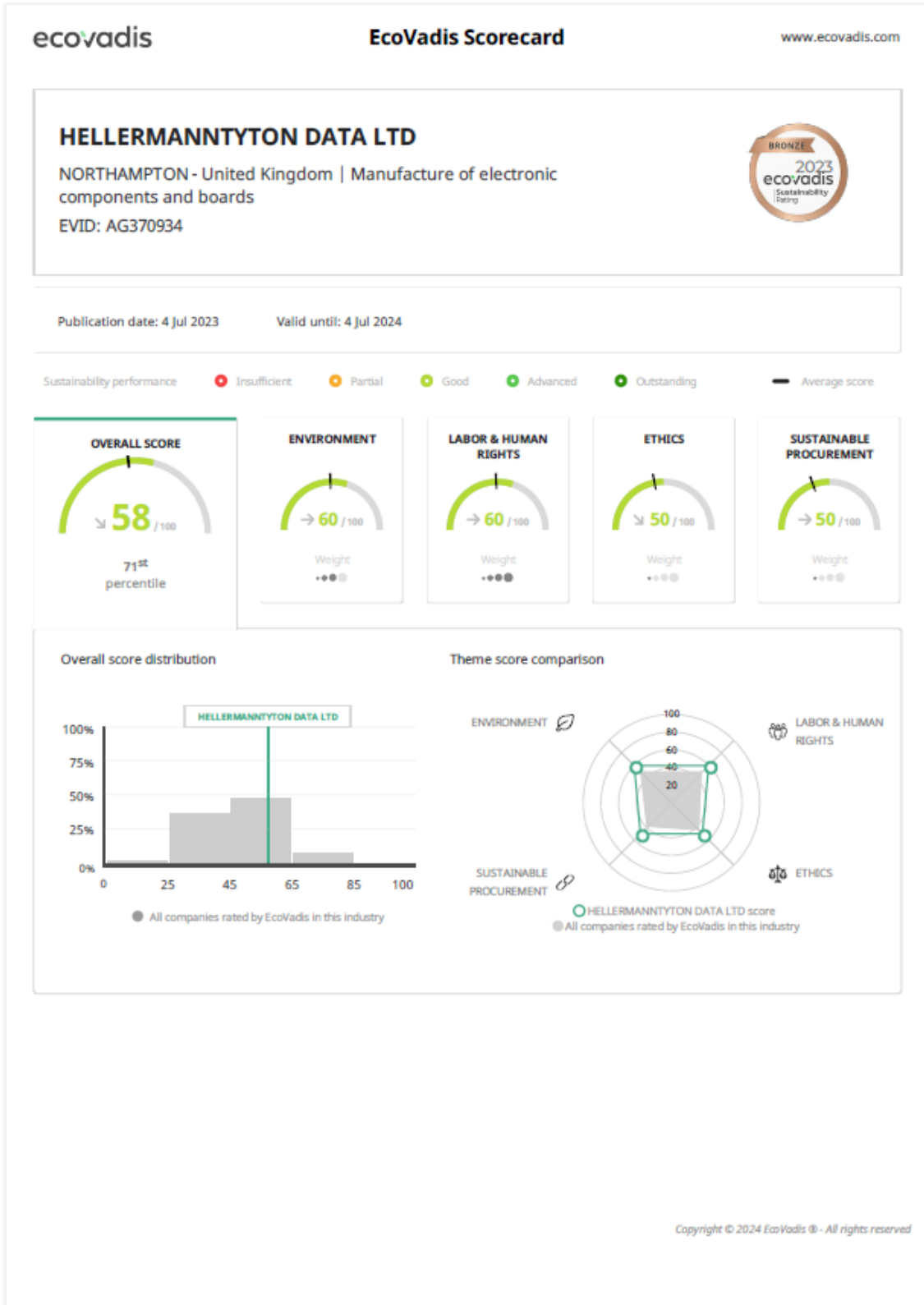
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A Member of the BSI Group of Companies.

# EcoVadis

For score card share requests please send your request to Dave.Mutton@HTData.co.uk.



## Waste Transfer License

### Certificate of Registration under the Waste (England and Wales) Regulations 2011

#### Regulation authority

Name



Address

National Customer Contact Centre  
 99 Parkway Avenue  
 Sheffield  
 S9 4WF

Telephone number

03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

#### Carriers details

Name of registered carrier

HellermannTyton Data Ltd

Registered as

A lower tier waste carrier, broker and dealer

Registration number

CBDL448988

Address of place of business

HELLERMAN TYTON DATA  
 WATERSIDE HOUSE  
 EDGAR MOBBS WAY  
 NORTHAMPTON  
 NN5 5JE

Telephone number

01604706633

Date of registration

12 August 2022

#### Making changes to your registration

Your registration will last indefinitely so does not need to be renewed but you must update your registration details if they change, within 28 days of the change.

# Environmental Aspects and Impacts Assessment Waterside House

	Life Cycle Stage	Control/Influence	Related activity, product, or service	Operating Condition			Aspects? Inputs & Outputs	Impacts?	Probability	Severity	Overall Rating (see criteria)	Significant (Y/N)
				Normal	Abnormal	Emergency						
1	Production	High	Office Processes (All areas)	x			Use of electricity, use of paper/office supplies disposal of waste products. Use of printer toner and batteries. Use of electrical equipment e.g. computers, keyboards, phones, etc	Depletion of natural resources & landfill/waste burden. Contribution to global warming & potential land/water contamination.	3	1	3	N
2	Production	Medium	Health & Safety, Emergency Prep		x		Use of, and storage, of fuel oil for the sprinkler system. Generation of heat, noise & exhaust fumes during testing. Storage and disposal of oil and containers.	Depletion of natural resources. Pollution to air. Potential for land and/or water pollution. Landfill/waste burden. Nuisance/health impact.	2	3	6	N
3	Production	Low	Health & Safety, Emergency Prep			x	Fire risk including fire appliance & sprinkler system discharge.	Pollution to air. Compromised groundwater protection, risk of flooding, local nuisance. Potential for land and water pollution. Health impacts.	2	3	6	N
4	Production	Low	Health & Safety, Emergency Prep			x	High volume water storage for the sprinkler system. Potential for leachate contamination of surface drains in the event of structural failure or over filling. A risk is presented due to the proximity of the fuel storage tank for the diesel engine.	Potential release of water leading to pollution of local land, and water courses.	2	3	6	N
5	Production Pre-Production Post-Production	Medium	Design		x		Selection of materials. Consider the environmental impact of the manufacture of materials, and the way in which they can be disposed of at the end of their life i.e., biodegradable, recyclable etc.	pollution to air land and water during material manufacture. Possible landfill/waste disposal burden at end of life. Health impacts	3	1	3	N
6	Production	High	Manufacturing	x			Use of packaging materials for finished products, including plastic, paper, cardboard & wood.	Depletion of natural resources & landfill/waste burden	3	1	3	N
7	Post-Production	Low	End customer	x			Removal/Disposal of product packaging. Disposal of product at end of life.	Increased landfill/waste burden	3	1	3	N
8	Production	Medium	All	x			Production/Office waste disposal of sanitary and hazardous waste. Includes compliance obligations as to proper disposal.	Increased landfill/waste burden potential compliance obligations could lead to sanctions.	3	2	6	N
9	Production	High	Staff	x			Smoking areas/disposal of cigarette ends, fire risk.	Minor pollution to air risk, possible nuisance, health impacts, and landfill burden	2	2	4	N
10	Production	Medium	Staff	x			Car travel by staff attending the premises, contribution to congestion, carbon monoxide and brake dust production.	Depletion of natural resources pollution to air & land, impact on local air quality, health impacts.	3	1	3	N
11	Production	High	All	x			Business travel by car, plane & train	Depletion of natural resources pollution to air, contribution to global warming.	3	2	6	N
12	Production	High	All	x			Use of utilities including fossil fuels i.e., Water, Gas, Electricity	Depletion of natural resources, indirect contribution to pollution/contribution to climate change.	3	1	3	N
13	Production	High	Print room, compressor & pressure test	x			Discharge of waste to foul sewer, including compressor distillate, pressure tank emptying screen wash booth and general wastewater.	Depletion of natural resources, potential land and/or water pollution. Potential release of water.	3	2	6	N
14	Pre-Production	Medium	Purchasing		x		Sourcing of suppliers, considering required packaging, location/transport implications and materials supplied and the by-products of their manufacture.	Depletion of natural resources, indirect contribution to pollution/ climate change, and increased landfill/waste burden.	3	1	3	N
15	Production	Medium	Despatch	x			Despatch related activities including packaging used, vehicles employed and types of shipping options i.e., land, sea, or air.	Depletion of natural resources, contribution to pollution/contribution to climate change, and increased landfill/waste burden.	3	1	3	N
16	Production	High	All		x		Use of pool car causes emissions to air. Maintenance will include replacement and disposal of parts.	Depletion of natural resources, contribution to climate change, landfill/waste burden	2	1	2	N
17	Production	High	Stores	x			Use/charging of forklifts & MHE. Increases use of electricity	Depletion of natural resources (Electricity generation). Pollution to air contributing to global warming.	3	1	3	N
18	Production	Influence	Stores		x		Maintenance of forklifts & MHE. Use of oils replacement send disposal of parts/hazardous waste	Depletion of natural resources, compliance obligations-potential for sanctions. Increased landfill/waste burden	2	1	2	N
19	Production	High	Housekeeping	x			Use of cleaning chemicals and materials. Disposal of used chemical containers and contaminated cleaning materials. Compliance considerations.	Potential for creation of pollution during material manufacture. Possible landfill/waste disposal burden. Potential for sanctions relating to water pollution and disposal non-compliance.	3	2	6	N
20	Production	High	Catering	x			Use of consumables, gas, electricity & water. Increased carbon footprint. Use of livestock & agricultural products. Disposal of waste. Hygiene compliance requirements.	Contribution to carbon emissions leading to climate change. Increased waste/landfill burden. Potential for health impacts and sanctions.	3	1	3	N
21	Production	High	All	x			Heating & air conditioning equipment. Compliance obligations, high energy use, potential health implications from dust, bacteria & virus build up and recirculation.	Chance of air pollution from release of greenhouse gases. Financial penalties/sanctions. Depletion of natural resources. Potential health impacts.	1	3	3	N
22	Production	High	Design	x			Use of lab equipment including the environmental test chamber and 3D printer. Use of CFC/HFC gasses, solvents, plastics and chemicals. Compliance obligations, potential health risks, generation of both hazardous & non-hazardous and high energy usage.	Depletion of natural resources, contribution to air pollution, landfill/waste burden. Potential for financial sanctions.	1	3	3	N
23	Production Pre-Production Post-Production	High	IT	x			Use of computer systems including servers and electronic equipment. Materials used in their production are harmful to the environment. Servers require 24-hour electricity. End of life disposal is subject to legal regulation due to harmful materials.	Depletion of natural resources. Contribution to air/land pollution. Increased landfill/waste burden. Potential for sanctions. Health impacts.	2	2	4	N
24	Pre-Production Post-Production	Low	Marketing	x			Creation and distribution of marketing materials including catalogues and leaflets. Use of inks, raw materials, and machinery in manufacture. Potential short lifespan of marketing materials increases waste disposal requirements.	Depletion of natural resources, potential air, land, and water pollution. Increased landfill/waste burden.	2	1	2	N
25	Production	High	Cable Cutting	x			Cutting of cable including printing. Use of ink/chemicals harmful to the environment and people. Consumption of electricity and generation of waste cable offcuts.	Potential for creation of pollution during material manufacture. Possible landfill/waste disposal burden. Health impacts. Depletion of natural materials.	3	2	6	N
26	Production	High	Fibre Optic Termination	x			Use of chemicals, solvents, adhesives & alcohol. Creation of hazardous & non-hazardous waste	Depletion of natural materials. Potential for creation of pollution during material manufacture. Possible landfill/waste disposal burden. Health impacts.	3	2	6	N



# Environmental Aspects and Impacts Assessment Pineham

#	Life Cycle Stage	Control/Influence	Related activity, product or service	Operating Condition			Aspects? Inputs & Outputs	Impacts?	Probability	Severity	Overall Rating (see criteria)	Significant (Y/N)
				Normal	Abnormal	Emergency						
1	Production	High	Office Processes (All areas)	x			Use of electricity, use of paper/office supplies disposal of waste products. Use of printer toner and batteries. Use of electrical equipment e.g. computers, keyboards, phones, etc	Depletion of natural resources & landfill/waste burden. Contribution to global warming & potential land/water contamination.	3	1	3	N
2	Production	Medium	Health & Safety, Emergency Prep		x		Use of, and storage, of fuel oil for the sprinkler system. Generation of heat, noise & exhaust fumes during testing. Storage and disposal of oil and containers.	Depletion of natural resources. Pollution to air. Potential for land and/or water pollution. Landfill/waste burden. Nuisance/health impact.	2	3	6	N
3	Production	Low	Health & Safety, Emergency Prep			x	Fire risk including fire appliance & sprinkler system discharge.	Pollution to air. Compromised groundwater protection, risk of flooding, local nuisance. Potential for land and water pollution. Health impacts.	2	3	6	N
4	Production	Low	Health & Safety, Emergency Prep			x	High volume water storage for the sprinkler system. Potential for leachate contamination of surface drains in the event of structural failure or over filling. A risk is presented due to the proximity of the fuel storage tank for the diesel engine.	Potential release of water leading to pollution of local land, and water courses.	2	3	6	N
5	Production	High	Despatch	x			Use of packaging materials for finished products, including plastic, paper, cardboard & wood.	Depletion of natural resources & landfill/waste burden	3	1	3	N
6	Post-Production	Low	End customer	x			Removal/Disposal of product packaging. Disposal of product at end of life.	Increased landfill/waste burden	3	1	3	N
7	Production	Medium	All	x			Production/Office waste disposal of sanitary and hazardous waste. Includes compliance obligations as to proper disposal.	Increased landfill/waste burden potential compliance obligations could lead to sanctions.	3	2	6	N
8	Production	High	Staff	x			Smoking area/disposal of cigarette ends, fire risk.	Minor pollution to air risk, possible nuisance, health impacts, and landfill burden	2	2	4	N
9	Production	Medium	Staff	x			Car travel by staff attending the premises, contribution to congestion, carbon monoxide and brake dust production.	Depletion of natural resources pollution to air & land, impact on local air quality, health impacts.	3	1	3	N
10	Production	High	All	x			Business travel by car, plane & train	Depletion of natural resources pollution to air, contribution to global warming.	3	2	6	N
11	Production	High	All	x			Use of utilities including fossil fuels i.e., Water, Gas, Electricity	Depletion of natural resources, indirect contribution to pollution/contribution to climate change.	3	1	3	N
12	Pre-Production	Medium	Purchasing		x		Sourcing of suppliers, considering required packaging, location/transport implications and materials supplied and the by-products of their manufacture.	Depletion of natural resources, indirect contribution to pollution/ climate change, and increased landfill/waste burden.	3	1	3	N
13	Production	Medium	Despatch	x			Despatch related activities including packaging used, vehicles employed and types of shipping options i.e., land, sea, or air.	Depletion of natural resources, contribution to pollution/contribution to climate change, and increased landfill/waste burden.	3	1	3	N
14	Production	High	All		x		Use of pool car causes emissions to air. Maintenance will include replacement and disposal of parts.	Depletion of natural resources, contribution to climate change, landfill/waste burden	2	1	2	N
15	Production	High	Stores	x			Use/charging of forklifts & MHE. Increases use of electricity	Depletion of natural resources (Electricity generation). Pollution to air contributing to global warming.	3	1	3	N
16	Production	Influence	Stores		x		Maintenance of forklifts & MHE. Use of oils replacement send disposal of parts/hazardous waste	Depletion of natural resources, compliance obligations-potential for sanctions. Increased landfill/waste burden	2	1	2	N
17	Production	High	Housekeeping	x			Use of cleaning chemicals and materials. Disposal of used chemical containers and contaminated cleaning materials. Compliance considerations.	Potential for creation of pollution during material manufacture. Possible landfill/waste disposal burden. Potential for sanctions relating to water pollution and disposal non-compliance.	3	2	6	N
18	Production	High	All	x			Heating & air conditioning equipment. Compliance obligations, high energy use, potential health implications from dust, bacteria & virus build up and recirculation.	Chance of air pollution from release of greenhouse gasses. Financial penalties/sanctions. Depletion of natural resources. Potential health impacts.	1	3	3	N
19	Production Pre-Production Post-Production	High	IT	x			Use of computer systems including servers and electronic equipment. Materials used in their production are harmful to the environment. Servers require 24-hour electricity. End of life disposal is subject to legal regulation due to harmful materials.	Depletion of natural resources. Contribution to air/land pollution. Increased landfill/waste burden. Potential for sanctions. Health impacts.	2	2	4	N

## Emissions Information for Customers to year end 2023.

At HellermannTyton Data we appreciate the importance of acting to reduce the overall impact of businesses on the environment and support the initiatives of our customers with regards to the monitoring and improvement of their environmental performance. In an effort to assist we have compiled this document presenting relevant information from our scope 1 & 2 emissions; this combined with relevant financial information should allow you to apportion the relevant percentage to your scope 3 emissions.

### Energy Usage

Usage Kwh	2018	2019	2020	2021	2022	2023
KWH Electricity	296,635	292,586	288,801	289,549	397,443	476,444
KWH Gas	135,933	140,504	160,907	178,543	229,883	386,231
KG's CO2e generated	2018	2019	2020	2021	2022	2023
Electricity	57,363	56,580	55,848	55,993	76,858	97,652
Gas	24,468	25,291	28,963	32,138	41,379	69,522

### Business Travel

Mileage	2018	2019	2020	2021	2022	2023
Car	164,316	170,329	33,786	94,500	121,913	143,558
Plane	129,124	130,467	7,484	1,064	76,006	13,649
KG's CO2e generated	2018	2019	2020	2021	2022	2023
Car	46,196	47,886	9,499	26,568	34,275	39,605
Plane	29,699	30,007	1,721	245	17,481	4084

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### Water Usage

Cubic Metres	2018	2019	2020	2021	2022	2023
Water	499	635	606	761	1859	2347

### Waste Generation

KG's	2018	2019	2020	2021	2022	2023
Cardboard	13,237	8060	23,224	46,236	55,078	16,651
General and Mixed Recycling*	10,109	12,290	13,390	35,138	52,983	18,893
Wood				21,088	23,616	26,210

\* Since the beginning of 2021 the general waste and recycling collections have been consolidated and are separated at a waste sorting centre.

### Customer Information

To be completed by a member of the sales team.

Customer:	2018	2019	2020	2021	2022	2023
Annual spend:						
% Of HT Data Turnover						

## HellermannTyton Data Health and Safety Policy

### Statement of Intent.

It is the objective of HellermannTyton Data to maintain full legal compliance with the Health and Safety at Work Act 1974, and all applicable subordinate legislation. We view this as critical in meeting our main aim of providing a safe environment where employees can have confidence that their health, safety, and welfare, are of paramount importance.

To achieve this, we are committed to:

- Prevent accidents and cases of work-related ill health.
- Conduct workplace risk assessments on all relevant areas, and activities according to a schedule, or when required due to changes to processes, equipment, or staff.
- Ensure competence where necessary by providing suitable information, instruction, training, and supervision.
- Consult with the workforce on matters relating to their health, safety, and welfare.
- Provide adequate PPE free of charge.
- Provide a safe and healthy work environment with safe access/egress for all staff, contractors, or visitors.
- Implementing, and maintaining emergency procedures, including evacuation in case of fire or other significant incidents.
- Ensure the safe handling, use, and storage, of hazardous substances.
- Provide safe systems of work where risks to employee safety exist.
- Provide and maintain suitable equipment for any tasks carried out on our behalf by our employees.
- Monitor the effectiveness of our health & safety management system and implement improvements where possible.

Signed:



Matthew Hunter  
Managing Director

Issue Date	February 2024
Review Due	February 2025

## Organisation

### 2.1 Managing Director

The Managing Director retains ultimate responsibility for the effectiveness of the Health & Safety management system. With this in mind they will:

- Appoint a competent member of staff to manage, maintain, and administer the Health and Safety management system.
- Ensure that the Health & Safety management system is reviewed annually.
- Consult on, and agree to, appropriate Health & Safety objectives.
- Provide adequate finances, resources, and facilities, to achieve organisational Health & Safety objectives.
- Ensure that the Health and Safety policy is current, and relevant to the organisation.

### 2.2 Health & Safety Coordinator

The primary responsibilities of the Health & Safety Coordinator will be to:

- Manage, maintain, and improve, the Health and Safety management system.
- Consult with members of all departments and advise regarding legal requirements, and best practices.
- Ensure safe systems of work are created and maintained for all regular tasks.
- Oversee the permit to work system.
- Manage a scheduled system for audits, and risk assessments.
- Compile reports both quarterly and annually, on the performance of the Health and Safety management system. These will be available for review by all staff via briefings and publication on the Health and Safety notice board.
- Ensure fire safety audits are conducted, and procedures implemented to ensure compliance with all relevant legislation.
- Chair Health & Safety Committee meetings.
- Ensure Fire alarms, and sprinkler systems are tested on a weekly basis.
- Ensure that emergency procedures are kept up to date.
- Consult with colleagues on matters regarding their health and safety.

### 2.3 HR Business Partner

The Human Resources Business Partner will have responsibility for:

- Overseeing Occupational Health, and welfare facilities, for all staff
- Ensuring adequate records are maintained regarding competences relevant to the Health and Safety management system e.g., records pertaining to first aid training, fire marshal training or load handling equipment training.
- Determining where, and when, employee medical assessments are appropriate, and organising the provision of medical services such as: examinations, flu vaccinations, or precautionary testing.
- Ensuring that sufficient records are kept regarding medical reports, services, and incidents, obtained from, provided to, or occurring at work, according to all relevant standards or legislation.
- Ensuring that when identified via risk assessments, required training needs are provided for.
- Supplying appropriate personal protective equipment, free of charge, wherever it is deemed a requirement, or is beneficial to employee safety.
- Ensuring consideration is given to requirements for new and expectant mothers, vulnerable workers, and staff members with temporary or permanent physical/mental impairment.

## 2.4 Senior and Departmental Managers

The Departmental Managers have a responsibility to ensure the following:

- That they provide all new staff members within their department with a thorough induction, to include items such as: safe working practices, welfare facilities, areas of particular risk, and PPE requirements
- All staff members are aware of the Health and Safety policy, and the requirements applicable to them.
- That all staff members are aware of their legal obligation to work in a manner that protects their own, and other staff member's safety.
- That adequate information, instruction, training, and supervision is provided for all required tasks.
- That regular work-place inspections are carried out.
- That they set a good example with regards to the use of PPE, and safe working practises.
- Instituting or initiating as appropriate, any safety measures, repairs, maintenance, or remedial measures, found to be necessary within their respective departments.
- That they make themselves sufficiently available to receive, discuss, and communicate, Health and Safety concerns both to, and from, employees.

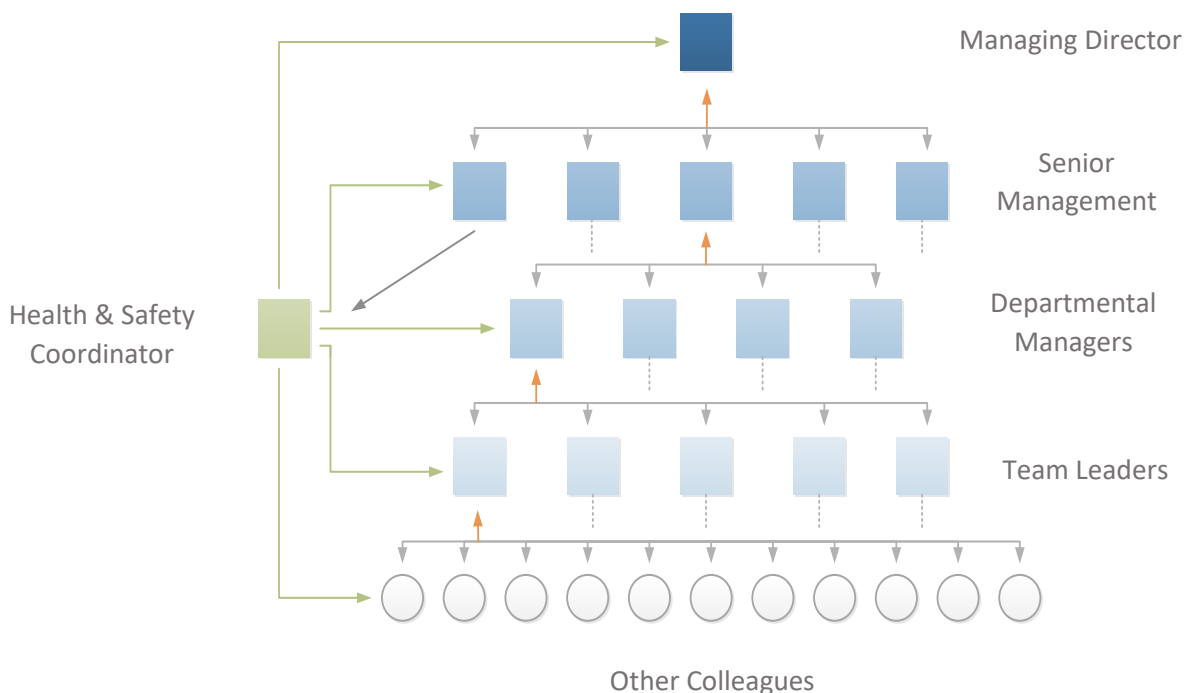
## 2.5 Other Colleagues

All colleagues regardless of their position have an obligation to:

- Cooperate with risk assessments.
- Observe Health & Safety rules and procedures at all times.
- Wear PPE where required.
- Report all accidents, damages, and near misses.
- Communicate either new hazards, or hazards that have previously not been identified.
- Work in a manner that minimises risk to themselves, and others.
- Not interfere with or misuse any item of PPE or equipment provided for the purpose of Health and Safety.

## 2.6 Communication Structure

All employees are encouraged to communicate any health and safety concerns, accidents, or issues, either to their direct team leader, manager, or the Health and Safety Coordinator.



## Arrangements

### 3.1 Risk assessment

Risk assessments will be carried out according to a predetermined schedule and where/when required due to significant changes in operations. Relevant staff will be consulted/required to cooperate with risk assessments where necessary. The associated risk of a particular task, or area, will be considered when determining the interval between assessments. Significant findings will be recorded and retained for a period of 3 years.

### 3.2 Safe Place of Work

Employees will be provided with a place of work that as a minimum, meets statutory legal requirements. This includes safe access and egress to and from the building. Arrangements will be made to ensure:

- Housekeeping standards are maintained, and slip/trip hazards are minimised.
- Hazardous substances are stored safely.
- The movement of people, and vehicles, will be controlled.
- Building maintenance tasks, when required, will be carried out by an appropriate, competent contractor.

### 3.3 Safe Systems of Work (SSW)

Documented procedures will be provided for routine tasks, including maintenance. These procedures will document safe working practices, requirements and considerations associated with a particular task. SSWs will be determined by the results of risk assessments and reviewed as required.

### 3.4 Training & Competence

Health & Safety will form a key part of any task-based training. High risk activities such as operating machinery, Forklift Truck operation, or working at height, will be provided with specialised training. No employee will be asked to perform a task for which they are not sufficiently competent, neither should any employee take it upon themselves to perform such a task.

### 3.5 Occupational Health & Welfare

Adequate welfare facilities will be provided and maintained, for employee use. These will include drinking water, toilets, washing facilities, changing/clothes storage areas, and break facilities.

First aiders, including defibrillator trained staff and mental health first aiders, will be provided at a ratio no lower than 1 first aider to every 50 employees. First aid training, and refresher courses will be provided.

### 3.6 Plant & equipment

The organisation will provide when required, suitable plant and equipment to achieve the company's objectives. Where provided, this plant and equipment will meet relevant legal safety requirements, and be maintained in accordance with any relevant statutory, or regulatory requirements. Where the provision of plant and equipment is required, suitable Information, instruction, training, and supervision will also be provided. Use of supplied equipment will be limited to authorised staff only.

### 3.7 Hazardous Substances

The organisation will ensure, that prior to the use of any chemical substance, consideration will be given to ways in which this use can be avoided. If it is necessary to use a hazardous substance, a safety data sheet will be obtained by the requester of the hazardous substance, then provided to the Health & Safety Coordinator to be risk assessed prior to use. Appropriate controls relating to its use and storage will then be implemented. Records will be kept detailing storage requirements, and emergency measures for each product.

Where necessary the use of local exhaust ventilation systems will be employed to reduce employee exposure.

Risk assessments will also consider the potential for biological hazards, such as legionella, and both ionising, and non-ionising radiation hazards, appropriate controls will be implemented.

### 3.8 Manual handling.

Manual handling issues will be controlled in the following ways:

- Tasks will be risk assessed to determine where specific controls are required.
- Where reasonably practicable, load handling equipment will be provided.
- Departmental managers will ensure that any lifting tasks are matched to an individual employee's capabilities.
- Training will be provided on proper lifting technique.
- Housekeeping standards will be maintained to minimise obstacles.

### 3.9 Display Screen Equipment

The organisation will ensure compliance with regulations on the use of display screen equipment. The risks will be assessed, and controls implemented. Particular actions will include:

- Adequate rest breaks.
- Suitable breakout facilities will be provided.
- The provision of free sight tests where required.
- The provision of occupational health services.
- The provision of training and information regarding the risks associated with the extended use of display screen equipment.
- The provision of adequate workstation equipment that at least meets minimum standards in terms of good ergonomic design.

### 3.10 Fire Precautions

The company will as a minimum, meet legal requirements with regards to fire prevention, and evacuation. To facilitate this, actions taken will include:

- Regular fire risk assessments
- Fire drills carried out at least once a year.
- Fire alarm and sprinkler systems will be checked weekly and serviced regularly.
- Portable fire-fighting equipment will be placed in appropriate locations around the building and regularly maintained
- Emergency lighting systems will be tested regularly.
- A Chief Fire Marshal will be appointed, and Fire Marshals will be selected and trained at a ratio of no less than 1 marshal per 20 employees.
- Housekeeping audits will be carried out with an emphasis on fire exit access, and clear signage.
- Evacuation procedures will include plans to evacuate everybody from the building.

### 3.11 Emergency plans

The organisation has compiled, and will review and maintain, an emergency procedure detailing the appropriate actions to be taken in the event of any reasonably foreseeable emergency. This plan is to include information such as evacuation plans, emergency contacts, building plans, and any other information that is likely to be beneficial to the senior management team, or emergency services in the event of a serious emergency.

### 3.12 Personal Protective Equipment

PPE will be provided to employees where it has been deemed necessary by either a risk assessment, or legal requirement. No charge will be levied upon any employee for the provision of basic PPE. However, it would be acceptable for the employee to contribute above the cost deemed reasonable by the organisation if they wish to upgrade on the offered PPE e.g. If an employee would prefer a branded pair of safety boots, then the organisation will pay the sum up to a reasonable level, and the employee can contribute the difference.

As the lowest level on the hierarchy of control, PPE will not be deemed as sufficient risk control in isolation. It can be used to bolster other actions such as engineering, or administrative controls, but is not to be seen as a solution in its own right.

### 3.13 Contractors and Visitors

Any work such as maintenance, repair, or installation that the organisation requires (but does not have the required competences or certifications to carry out “in-house”, or decides to subcontract), will be supplied by an approved, qualified, and competent, contractor.

It is the responsibility of the employee organising a contractor to ensure that adequate information is provided prior to the work commencing. This information must as a minimum include:

- Confirmation of liability insurance with a minimum amount of cover of no less than £5 million.
- Qualification certificates where necessary such as for electrical, or gas engineers.
- Risk assessment/method statement stating how they plan to complete the work in a manner that is safe to both themselves and others.

Adequate supervision must be provided by the person responsible for organising the contractor to ensure that they conduct their work in line with their method statement.

### 3.14 Monitoring and Measuring

The organisation will employ both active, and reactive monitoring techniques to monitor the performance of the health & safety management system. This will involve the use of scheduled risk assessments, audits, and both quarterly, and annual reviews.

Accident, near-miss reports, and investigation results will be assessed for trends or indicators of potential underlying issues that may require attention. The results of these actions will be used to both celebrate success and implement improvements where appropriate.

### 3.15 Management review & objectives.

Outputs from monitoring and measuring activities will be collated and presented as part of the annual management review. This information will be considered when setting objectives for the coming year.

### 3.16 Consultation and Communication.

The organisation will consult on matters regarding Health & Safety with all employees. Colleagues are to be actively encouraged to pass on concerns regarding Health & Safety arrangements (see 2.6) and will be required to cooperate with risk assessments that are pertinent to their roles/working environment. Issues that are likely to have the potential to have a direct impact on a particular employee, or group of employees will be discussed with them directly.



### 3.17 Accident, Dangerous Occurrence, Near-miss Reporting, and Investigation.

It is a requirement for all employees that any accident, near-miss, or dangerous occurrence, is reported through the communication structure (see 2.6) at the earliest possible opportunity. All accidents will be thoroughly investigated with a view to implementing controls that will minimise the chance of reoccurrence.

An accident is defined as:

An unplanned, unwanted event which leads to injury, damage, or loss.

A near miss is defined as:

An unplanned, unwanted event that had the potential to lead to injury, damage, or loss, but did not, in fact, do so.

A dangerous occurrence is defined as:

A specified event that has to be reported to the relevant authority by statute law.

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## Fire Safety Policy

### Introduction

HellermannTyton Data (“the Company”) is committed to providing a safe working environment for its staff and visitors. For this reason, the Company has formulated this policy to facilitate compliance with its legal obligations under The Regulatory Reform (Fire Safety) Order 2005 (“Fire Safety Order”).

#### Policy objectives

To provide a safe and healthy working environment for all staff and visitors.

To minimise the risks to Company premises and any others that may be affected by fire.

To manage fire risks in accordance with the requirements of the Fire Safety Order.

To comply with the requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and the Fire Safety Order.

To address obligations under the Fire Safety Order that require the Company to:

Develop a policy to minimise the risks associated with fire.

Reduce the risk of an outbreak and subsequent spread of fire.

Provide means of escape.

Demonstrate preventative action.

Maintain documentation and records in respect of fire safety management.

### The Responsible Persons

The Company has appointed the H&S Coordinator as the ‘responsible person’. The responsible person’s duties are to ensure the safety of staff and visitors by:

Carrying out (or ensuring that a competent person carries out) a Fire Safety Risk Assessment. The Fire Safety Risk Assessment will take into consideration everyone who may come onto the premises, whether they are employees or visitors, and consideration will be given to people who may have a disability or anyone with special needs.

Making sure, as far as is reasonably practical, that everyone on the premises, or nearby, can escape safely if there is a fire.

Preparing a written Emergency Action/Evacuation Plan for the building to be displayed at various locations about the premises.

Preparing Personal Evacuation Plans for disabled persons (if relevant).

#### Fire Marshals

- The Company will appoint competent persons to act as Fire Marshals. The Fire Marshals’ duties will include:
- Carrying out regular checks on all fire safety equipment including emergency lights and alarms.
- Ensuring that emergency escape routes are kept clear at all times and that doors designated as Fire Escapes are operable.
- Assisting in evacuations/fire drills.
- Contacting the emergency services.
- Ensuring that the names and duties of all competent persons are displayed on the safety notice board.

## Communication

The Company will ensure that all persons employed either as direct employees or contractors are provided with all relevant information related to fire safety. The Management of the Company will consult with the employees (where relevant) on all relevant matters of fire safety policy and arrangements and will ensure staff are kept informed of any changes that are made to fire safety procedures.

## Training

Upon commencement of employment all employees (where relevant) will be given training on fire safety and will receive refresher training as appropriate.

All employees will be instructed to report any defective or missing equipment to their line manager.

All employees will receive instruction on their role in the case of an emergency.

Further training may be required if there are any changes that may affect fire safety. All training will be provided during normal working hours.

## Equipment/Testing

The fire evacuation procedures will be practiced as a minimum once every 12 months.

Firefighting equipment will be provided. In general, this means fire extinguishers, but additional provision of fire blankets, hoses or sprinklers may be made where deemed appropriate by the findings of the fire safety risk assessment.

All fire safety equipment will be serviced by a competent person and the service periods will be scheduled in accordance with the manufacturers' instructions.

An appropriate fire detection and alarm system will be installed. The type and extent of the alarm system provided will be based on the findings of the fire safety risk assessment. Alarm systems will be tested regularly. Staff and visitors will be informed when these tests are scheduled.

Emergency lighting will be provided for escape routes where applicable. The location and type will be determined by the findings of the fire safety risk assessment.

Operation of fire exit doors, including any automatic closers, will be tested, and recorded.

Any other safety systems installed, such as emergency lighting and fire doors, will be checked regularly to ensure correct operation.

### Procedures

The Company has introduced the following procedures in order to maintain high standards of fire safety:

Emergency escape routes will be established and kept free from obstruction at all times.

Fire exit doors will be kept in good working order and unlocked at all times the premises are occupied.

The risk of fire spreading through the building will be controlled by the provision of fire/smoke resisting doors.

Signs and notices will be displayed in prominent locations, giving appropriate instructions to employees and others of what to do in the event of a fire.

Signs will be provided to indicate the position of fire extinguishers, fire alarm call points and to indicate the emergency exit routes.

## Records

The Company will record its staff training including fire drills, and the findings of its periodic tests and checks. Such records will include all attendees, fire drill evacuation times and any comments. The Company will keep the following records:

Records of weekly tests of fire alarms.

Records of weekly flow tests of sprinkler systems (where fitted).

Records of wet and dry tests of dry rising mains (where fitted).

Record of annual inspection and test of all firefighting equipment.

Records of periodic tests of emergency lighting (where fitted).

Records of quarterly checks on Fire Doors and Emergency exits

Records of all scheduled and unscheduled maintenance of fire detection and alarm systems.

Records of the inspection, risk assessment and maintenance of workplace and electrical equipment, of storage of hazardous substances and of any other hazards identified with fire safety (where appropriate).

Monthly inspections of fire appliances.

This Policy will be reviewed annually and updated as necessary. The management team endorses this policy and is fully committed to its implementation.

Name: Matt Hunter

Position: Managing Director

Signature:



Issue Date	February 2024
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