

Health and Safety Policy

Scope

This Health & Safety Policy applies to Mayflex Holdings Ltd and all its legal entities, including domestic and international operations. It covers all employees, managers, contractors, visitors, and business partners involved in any activities conducted at all company locations and sites. The policy encompasses all work activities, operational areas, and processes within the organisation, ensuring the health, safety, and wellbeing of everyone affected by Mayflex's operations. It defines roles, responsibilities, and expectations for employers, managers, employees, contractors, and visitors to maintain a safe working environment in compliance with applicable legal requirements and standards.

Mayflex Holdings Ltd – Locations			
Country	Address	Registered Activities	ISO Accreditations
United Kingdom	Head Office: Excel House, Junction 6 Industrial Park, Electric Avenue, Birmingham, West Midlands, B6 7JJ	Stockholding, product sourcing, supply, assembly and testing of configured cabling infrastructure, networking products, and IO security products (from quality assured sources without lot traceability). Design and manufacture of end-to-end infrastructure solutions including copper and optical structured cabling, components, panels, and enclosures.	ISO 9001 ISO 14001 ISO 27001 ISO 45001
United Kingdom	Environ House , 100 Grosvenor Road, Aston, Birmingham, B6 7NA	Assembly and testing of configured cabling infrastructure, networking products, and IO security products (from quality assured sources without lot traceability). Manufacture of end-to-end infrastructure solutions, copper and optical structured cabling, components, panels, and enclosures. Includes assembly of pre-terminated copper/fibre and custom solutions.	ISO 9001 ISO 14001 ISO 27001 ISO 45001
United Kingdom	St Neots 1 Ground Floor, Yew Tree House, St. Neots, PE19 2BU	Sale of configured cabling infrastructure, networking products, IO security products (from quality assured sources without lot traceability). Sale of end-to-end infrastructure solutions, including copper and optical cabling, components, panels, and enclosures. Includes pre-terminated copper and fibre solutions, configured enclosures, and customized solutions.	ISO 9001 ISO 27001 ISO 45001
United Kingdom	London Portsoken House, 4th Floor, 155–157 Minories, London, EC3N 1LJ	London office and fully operational M-Tech Demonstration Suite. Showcases latest solutions in data centre infrastructure, security, networking, and Environ rack systems. Provides facilities for meetings, product demonstrations, and customer engagements.	N/A
United Arab Emirates	Mayflex MEA DMCC Office 22A/B AU (Gold) Tower, Cluster I, Jumeirah Lake Towers, Dubai, UAE	Sales of cabling infrastructure, networking products, and internet protocol security products from quality assured sources without lot traceability within the Middle East and Africa.	ISO 9001 ISO 27001 ISO 45001

Health & Safety Policy References

Mayflex Holdings Ltd is committed to complying with all relevant health and safety legislation and standards applicable to our operations in the United Kingdom and the Middle East, including Dubai. Our policy references the following key legislation and standards:

United Kingdom Legislation and Regulations:	
- Health & Safety at Work Act 1974 - Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) - Manual Handling Operations Regulations 1992 - Workplace (Health, Safety, and Welfare) Regulations 1992 - Health and Safety (Display Screen Equipment) Regulations 1992 (as amended in 2002) - The Management of Health & Safety at Work Regulations 1999 (Risk Assessments) - Working at Height Regulations 2005 - Provision and Use of Work Equipment Regulations 1998 (PUWER)	- Control of Substances Hazardous to Health Regulations 2002 (COSHH) - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) - Construction (Design and Management) Regulations 2015 (CDM) - Electricity at Work Regulations 1989 - Control of Noise at Work Regulations 2005 - Personal Protective Equipment at Work Regulations 1992 - Control of Asbestos Regulations 2012 - Health and Safety (Offences) Act 2008
United Arab Emirates (Dubai) Regulations:	
- UAE Federal Labour Law No. 8 of 1980 (Regulation of Labour Relations), supplemented by Federal Decree Law No. 33 of 2021 on Occupational Safety and Health in the Private Sector - Ministerial Decree No. 32 of 1982 Concerning Occupational Health and Safety	- Dubai Municipality Health and Safety Regulations (regularly updated) - Other applicable local laws and regulations
International Standards:	
- ISO 45001:2018 Occupational Health and Safety Management Systems - ISO 9001:2015 Quality Management Systems (where applicable)	- ISO 14001:2015 Environmental Management Systems (where applicable) - ISO/IEC 27001:2022 Information Security Management Systems (where applicable)

Mayflex Holdings Ltd ensures ongoing compliance with all applicable health and safety legislation and standards across all locations, continuously monitoring and updating policies and procedures to meet evolving legal and regulatory requirements.

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1. Revision History and Approval

Revision	Nature of changes	Approval	Date
0.0	Original Release	Andrew Percival (Managing Director)	01.03.2016
0.1	Section 3 Arrangements for Ensuring the Health & Safety of personnel: - Vaping aligned with smoking policy; - Lone worker wording expanded; Section 5 General Arrangements: - Fire Controller and Fire Marshals list replaced with reference to notice boards; - First Aiders list replaced with reference to notice boards; - Health and Safety resources details updated; Section 6 Appendices: - Fire Emergency Safety Procedure updated; - PPE introduced for Visitors Safety Guidelines; - Form for Incident/Accident investigation report updated; - Travelling Abroad Checklist expanded.	Andrew Percival (Managing Director)	05.04.2017
0.2	Section 2 Organisational Responsibilities: - Financial Director updated - Sales Director added Section 3 Arrangements for Ensuring the Health & Safety of Personnel: - Title 3.12 to include Peripatetic workers Section 6 Appendices: - Appendix 4 swapped with appendix 5 - Form for Incident/Accident investigation form updated	Andrew Percival (Managing Director)	14.11.2019
0.3	Section 2 Organisational Responsibilities: - Operations and Services Director updated - International Sales Director name change - Operational HR Manager updated - Role Name Change: Chief Operational Officer changed to Operations and Services Director Section 4 General Arrangements - Training contacts update - Removal of contact details for Ergonomic consultants - RIDDOR Reporting contact details update Section 6 Visitors' Safety Guidelines - Site induction added	Andrew Percival (Managing Director)	21.01.2022
0.4	Section 3 General Arrangements - First aid locations updated - Signing in method for visitors and contractors updated Section 6 Appendices - Fire Alarm Systems – Record of tests updated - Site Induction document updated. Fire evacuation assembly points updated	Andrew Percival (Managing Director)	19.01.2023
0.5	Update on Statement of Intent and Commitment	Andrew Percival (Managing Director)	18.01.2024
0.6	Update on Formatting Update on Health & Safety Policy References Section 7 Accidents Update on Accident Reporting following the new arrival of Connected Safety Net	Andrew Percival (Managing Director)	17.06.24
0.7	Updated to reflect implementation of Connected Safety Net and alignment with ISO 45001. Revisions include: • Fire Safety Procedure • Visitors' Safety Guidelines • Travelling Abroad Checklist • Incident Investigation Process • Process Owner Responsibilities • Contractor Health & Safety Guidance Key changes: • Enhanced subcontractor controls (prequalification, permits, supervision) • Clearer accountability across HR, Line Managers, H&S Committee, and Senior Leadership • Strengthened RIDDOR reporting and root cause analysis • Embedded lessons learned from recent incidents • Formatting and consistency improvements	Andrew Percival (Managing Director)	16.06.25
0.8	Amendment to the Scope to include Mayflex Holdings Ltd	Andrew Percival (Managing Director)	27.08.25

0.9	Amendment to Health & Safety objectives to refocus on reduction of preventable housekeeping-related incidents (based on 2025 incident data)	Andrew Percival (Managing Director)	26.01.26
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Statement of Intent and Commitment

Mayflex Health & Safety Policy

Mayflex Holdings Ltd recognises its responsibility to ensure, so far as is reasonably practicable, the health, safety, and wellbeing of all employees and others who may be affected by its operations in both the UK (Excel House, Environ House, London and St Neots) and the MEA region (Dubai). The company is committed to maintaining full compliance with all applicable health and safety legislation, Approved Codes of Practice (ACoPs), and best-practice standards in the jurisdictions in which it operates.

Mayflex operates a certified Occupational Health and Safety Management System under ISO 45001, reflecting our proactive approach to managing risk, preventing injury and ill-health, and promoting a culture of continuous improvement. Our health and safety strategy is integrated into business decision-making at all levels and supported by competent resources, regular consultation with employees, and structured performance review.

To drive forward our performance in 2025/2026 and support continual improvement of our ISO 45001 management system, the company has set the following measurable health and safety objectives, applicable to all sites and teams:

- **Achieve a 10% increase in the reporting of Near Misses, Unsafe Behaviour, Unsafe Conditions and Safety Conversations via the Connected Safety Net (CSN) platform compared to 2025 levels**, improving visibility of risk and enhancing our preventative approach to health and safety.
- **Ensure that 100% of incidents are reported with a Flash Report uploaded to CSN within two business days**. All supporting evidence — including statements, photographs, and CCTV footage where applicable — must be fully documented in accordance with our internal investigation and compliance standards.
- **Reduce the number of preventable incidents caused by housekeeping failures by at least 10% during 2026, compared to 2025 results**, recognising that housekeeping-related issues accounted for 52% of incidents in 2025. Progress will be monitored through CSN data and reviewed monthly by the H&S Committee.

These objectives reflect our proactive approach to safety reporting, incident management, and system engagement, ensuring we meet the requirements of ISO 45001. While training remains an operational necessity across the business, our focus this year on incident reporting and documentation underscores its critical role in enabling timely response, robust root cause analysis, and maintaining legal compliance.

All Mayflex employees and contractors are required to cooperate fully with this policy, take reasonable care of their own safety and that of others, and follow any health and safety instructions provided. Senior managers, supervisors, and team leaders are accountable for ensuring that safe working practices are maintained within their areas of responsibility and that all work is carried out in line with internal procedures and applicable regulations.

Risk assessments are reviewed annually and whenever significant operational changes occur. Where occupational health surveillance is required based on risk exposure (e.g. noise, manual handling, or DSE use), appropriate controls and assessments are implemented.

Training needs are identified through role-specific requirements and ongoing review by Managers and Supervisors. All employees will receive suitable instruction, information, and supervision to ensure they are competent to carry out their roles and operate tools, Material Handling Equipment (MHE), and equipment safely.

In addition to ISO 45001, Mayflex holds certifications to ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and ISO 27001 (Information Security Management). These accreditations collectively reflect our integrated approach to risk, compliance, and continuous improvement.

Mayflex is committed to ongoing review and continual improvement of this policy and our wider health and safety performance. The policy is reviewed annually, or more frequently if required, and communicated to all employees, stakeholders, and interested parties.

Signed



Andrew Percival, *Managing Director*

2. Organisational Responsibilities

2.1 Overall Responsibility

Andrew Percival	Managing Director
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2.2 Delegated Responsibility

Israr Ghulam	Finance Director
Jason Rudge	Commercial Procurement Director
Tom Healey	Logistics Director
Siobhan Bourke	HR Manager
Nadeen Bilgin	International Sales Director
Ross McLetchie	UK Sales Director

2.3 Responsible for Health & Safety

Tom Healey	Logistics Director
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2.4 Responsible for Staff Inductions, Training, Operational Compliance & Risk Assessments

Siobhan Bourke	HR Manager
Caroline Grant	HR Manager (Learning and Development)
Managers, Supervisors & Team Leaders	

2.5 Appointed Persons

First Aiders	Displayed on Notice Board and SharePoint
Fire Wardens	Displayed on Notice Board and SharePoint
Health & Safety Committee Representatives	Displayed on SharePoint

2.6 Responsible for Building Maintenance

Tom Healey	Logistics Director
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The Managing Director shall:

- Ensure an effective Health & Safety Policy is established, implemented, and maintained in line with the Health and Safety at Work etc. Act 1974 and relevant regulations, including the Management of Health and Safety at Work Regulations 1999 and the Workplace (Health, Safety and Welfare) Regulations 1992.
- Review and approve the policy at regular intervals, assessing its effectiveness and ensuring that updates are made where necessary.
- Provide visible leadership and demonstrate personal commitment to health, safety, and welfare across all areas of the business.
- Promote a strong and positive health and safety culture at all levels of the organisation.
- Ensure that clear responsibilities are defined and delegated to competent persons, including line managers and supervisors, to support the effective implementation of the health and safety management system.
- Ensure that managers understand and fulfil their responsibilities for maintaining safe workplaces and managing health and safety risks.
- Provide sufficient resources, training, and supervision to enable all employees to work safely and competently.
- Maintain open and effective communication channels to share health and safety information, expectations, and performance across the organisation.
- Oversee the investigation of serious incidents, major injuries, or fatalities, ensuring objectivity and involvement of competent safety professionals.
- Monitor performance, support continuous improvement, and set an example through leadership behaviour.

2.7 Directors

Senior managers shall:

- Be fully familiar with, and actively support the implementation of, the Company Health & Safety Policy across all operational areas.
- Ensure that responsibilities for health and safety are clearly defined, assigned, and accepted at all levels of the organisation.
- Take prompt action to address conditions or practices that may adversely impact health and safety.
- Evaluate and manage risks associated with workplace accidents, occupational health hazards, damage to company property, and risks to third parties arising from Company operations.

- Ensure safety training programmes are delivered effectively and actively endorse those undertaking or delivering training.
- Promote and maintain a high standard of housekeeping and workplace organisation throughout the business.
- Review accident, incident, and near miss reports, ensuring timely corrective and preventive actions are implemented.
- Lead by example and promote a strong health and safety culture in both words and actions.
- Ensure the organisation maintains adequate insurance cover for statutory and operational liabilities and that risk acceptance (whether insured or self-insured) is informed and justified.
- Periodically review insurance and loss records, providing advice or recommendations to address adverse trends or emerging risks.
- Stay informed of relevant legislative developments, including key laws such as the Corporate Manslaughter and Corporate Homicide Act 2007, and ensure compliance measures are in place.
- Ensure there are documented systems and sufficient resources to investigate work-related incidents and cases of ill health, including the assignment of a designated point of contact for such investigations.
- Ensure that Dynamic Risk Assessments are conducted where required, in line with the process outlined in section 3.2.
- Consistently demonstrate commitment to health and safety by setting a visible and positive example for all employees.

2.8 Health & Safety Committee/Health&Safety Representatives

Health & Safety Committee members and appointed Safety Representatives shall:

- Familiarise themselves with the Company Health & Safety Policy and all relevant procedures.
- Actively support the implementation and continuous improvement of the policy across all business areas.
- Promote a positive safety culture by identifying, reporting, and helping to resolve any conditions or behaviours that could affect the health, safety, and wellbeing of employees.
- Serve as a communication link between employees and management on health and safety matters, ensuring issues raised by workers are taken seriously and escalated appropriately.
- Participate in workplace inspections, audits, incident investigations, and committee meetings as required.

2.9 Managers and Supervisors, / Team Leaders

Managers, Supervisors, and Team Leaders are responsible for day-to-day implementation of health and safety within their areas and shall:

- Be fully familiar with the Company Health & Safety Policy and ensure it is effectively implemented within their teams or departments.
- Ensure all team members know the appropriate emergency procedures, including what actions to take in the event of a fire or serious incident.
- Make sure that all staff under their supervision are adequately trained and informed of the specific risks and hazards in their work area, including control measures and safe systems of work.
- Continuously develop, communicate, and monitor safe systems of work to prevent incidents and promote good practices.
- Ensure that all accidents, incidents, and near misses are promptly reported and thoroughly investigated in proportion to their actual and potential severity.
- Personally investigate all accidents and dangerous occurrences, ensuring statements are taken, causes are identified, and corrective actions are implemented. All findings must be shared with the Warehouse Manager, Logistics Director and the HR Manager.
- Ensure employees under their supervision cooperate fully with investigations and understand the importance of reporting.
- Provide adequate supervision at all times, with special attention to young, new, or inexperienced employees.
- Enforce compliance with all Company health and safety rules and ensure that Personal Protective Equipment (PPE) is issued, worn, and maintained correctly.
- Check that safety devices on equipment are correctly fitted, functional, and regularly maintained.
- Prohibit the use of any plant or equipment that is not in a safe condition.
- Immediately address or escalate all actual or potential safety hazards to an H&S Representative if not resolved.
- Ensure staff complete Dynamic Risk Assessments when appropriate, as defined in section 3.2.
- Maintain a clean and orderly working environment through consistent housekeeping standards.
- Take all health and safety concerns raised by employees seriously and respond appropriately.
- Lead by example at all times and promote a proactive, responsible approach to health and safety.

2.10 Employees

All employees must take personal responsibility for health, safety, and welfare by ensuring they:

- Familiarise themselves with, and comply fully with, the Company's Health & Safety Policy and relevant procedures at all times.
- Follow all applicable safety rules, signage, and site-specific requirements without exception.
- Wear and correctly use all required Personal Protective Equipment (PPE) appropriate to the task, including but not limited to safety footwear, safety glasses, and respiratory protection (as outlined in the relevant Standard Operating Procedure).
- Comply with instructions and guidance provided by Directors, Managers, Supervisors, Team Leaders, or any person with designated health and safety authority.

- Promptly report any defects, unsafe conditions, near misses, or health hazards to their immediate Supervisor or Manager.
- Immediately report all accidents, incidents, or damage to machinery, equipment, or property to their Supervisor or Manager, regardless of severity.
- Take a proactive role by suggesting improvements to health and safety practices or conditions to Supervisors or Managers.
- Maintain high standards of personal and workplace housekeeping to prevent hazards.
- Lead by example in all health and safety behaviours, including when interacting with visitors, customers, or third parties.
- **Refuse to undertake any task they believe to be unsafe or beyond their competence and report such concerns immediately to their Supervisor or Manager.** Health and safety is a shared responsibility, and every employee is empowered to protect themselves and others from harm.
- If a formal risk assessment is not available for a task the employee feels uncomfortable completing, employees must complete a dynamic risk assessment before starting the activity. They must identify potential hazards, apply appropriate controls, and notify their Supervisor or Manager before proceeding. No task should be carried out unsafely.

Responsible for Internal Audit and Compliance

- InfoSec & Compliance Manager and Legal & Compliance Officer shall be responsible for internal audit and compliance activities, including but not limited to:
- Plan and coordinate internal audits relating to health, safety, information security, and legal compliance in line with ISO standards (e.g. ISO 27001, ISO 45001).
- Monitor and review the effectiveness of management systems, controls, and policies.
- Identify gaps or areas for improvement and ensure findings are communicated to relevant Directors or Committees.
- Ensure compliance with relevant legislation and certification requirements, including those relating to data protection, occupational health and safety, and information security.
- Support and guide operational areas in implementing corrective and preventive actions following audit findings.
- Maintain documentation and evidence required to support external audits and certification reviews.

Legal Duties under the Health and Safety at Work Act 1974

Employees are reminded of their legal obligations under the Act, which apply at all times while at work:

Section 7:

It shall be the duty of every employee while at work to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work; and as regards any duty or requirement imposed on the employer or any other person by or under any of the relevant statutory provisions, to co-operate with them so far as is necessary to enable that duty or requirement to be performed or complied with.

Section 8:

No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of Health, Safety or Welfare in pursuance of any of the relevant statutory provisions.

These sections apply to all employees and, in the case of Section 8, to all persons present on site, including contractors and visitors.

Escalating Health & Safety Concerns

If an employee raises a health, safety, or welfare concern with their Manager and remains dissatisfied with the outcome, they are encouraged to escalate the matter by:

- Using the formal Grievance Procedure
- Raising the issue with a Health & Safety Representative, or
- Submitting a report directly via Connected Safety Net (CSN) <https://capture.connectedsafety.net.co.uk/login>

This ensures that concerns are recorded, escalated appropriately, and responded to in line with internal procedures and legal obligations.

Arrangements for Ensuring the Health & Safety of Personnel

3.1 Training

Mayflex recognises that effective training is essential for embedding a strong safety culture and ensuring compliance with legal and regulatory obligations. Directors and Managers will ensure that suitable and sufficient training is provided so that employees at all levels are:

- Aware of their Health & Safety responsibilities under both Company policy and the law
- Competent to carry out their health and safety duties in their respective roles, including Managers, Supervisors, Team Leaders, and Operatives
- Competent to safely operate any specialist tools, plant, machinery, or equipment required in their role

Key arrangements:

- Training needs are identified through a combination of risk assessment findings, operational requirements, and line management observations.
- Health & Safety training will form an integral part of the **staff induction process**, ensuring that all new employees are familiar with the Health & Safety Policy, relevant procedures, and any hazards or controls specific to their role or department.
- Training records will be maintained and periodically reviewed to ensure all training is current, effective, and refreshed as necessary.
- Where legislation, procedures, systems, or working practices change, refresher training will be delivered to ensure continued competence.
- All training — whether formal or informal — must be appropriately documented and signed off.

3.2 Risk Assessments

To fulfil its legal obligations and ensure the health and safety of all personnel, Mayflex will conduct and maintain suitable and sufficient risk assessments across all business operations.

Mayflex follows the HSE's **5-step approach** to risk assessment:

1. **Identify hazards** — anything with the potential to cause harm
2. **Determine who might be harmed and how**
3. **Evaluate risks** and decide on appropriate control measures
4. **Record significant findings** in a clear and traceable format
5. **Review and update** assessments regularly or in response to changes

Additional measures:

- Risk assessments will be completed for all operational processes, equipment, and environments.
- They will be reviewed at least annually, and immediately if there are changes to processes, equipment, staffing, or location — or following an incident or near miss.
- Controls will be developed in accordance with the **hierarchy of controls** (eliminate, substitute, engineer, administer, PPE).
- Assessments will be retained in a documented format and made accessible to all relevant personnel.
- Actions arising from risk assessments will be tracked through to completion, with responsibilities clearly assigned.

Definitions:

- **Hazard:** *"Something with the potential to cause harm."* (HSE, 2000)
- **Risk:** *"The likelihood that harm will occur and the severity of that harm."* (HSE, 2000)

Responsibilities and Types of Risk Assessments

- **Managers and Supervisors** are responsible for ensuring that suitable and sufficient risk assessments are completed for all tasks and activities within their areas of control. They must implement and monitor control measures and ensure assessments are reviewed at least annually, or when changes occur (e.g., new equipment, processes, or personnel).
- **Employees** must cooperate with risk assessment processes, follow the controls in place, and report any new hazards or changes in conditions to their Manager or Supervisor.
- **The Health & Safety Team** provides guidance, training, and oversight to ensure risk assessments comply with legal requirements and company standards.

Types of Risk Assessments:

- **Generic Risk Assessments:** Cover common workplace hazards and routine activities.
- **Task-Specific Risk Assessments:** Required for non-routine, new, or high-risk tasks to ensure controls are tailored and effective.
- **Dynamic Risk Assessments:** No task should ever be carried out unsafely. If an employee feels uncomfortable—whether because conditions have changed, no formal assessment exists, or the task doesn't match the original plan—they must stop work immediately and complete a Dynamic Risk Assessment before proceeding. This on-the-spot check ensures hazards are identified, risks evaluated, and appropriate controls confirmed prior to any further activity.
- **Display Screen Equipment (DSE):**
Risk assessments for DSE users are carried out in accordance with section 3.6 of this policy, which outlines the self-assessment process, training, and corrective actions for ergonomic and health concerns.

3.3 Plant and Machinery

Mayflex is committed to ensuring that all work equipment, including plant and machinery, is safe, suitable for its intended use, and compliant with legal and regulatory requirements.

Key arrangements include:

- All equipment fitted with guards or safety devices must have these measures in place and functioning at all times. Guards must not be removed, bypassed, or tampered with under any circumstances.
- All faults or suspected issues with machinery or plant must be immediately reported to the responsible Manager or Supervisor. Equipment must be taken out of service if it presents a health or safety risk.
- Electrically operated machinery will be inspected periodically by qualified and competent personnel, in accordance with manufacturer instructions, legal requirements, and internal maintenance schedules.
- Any new equipment procured by Mayflex must comply with relevant legal standards, including UKCA (or CE where still applicable under transitional agreements), and must be accompanied by all relevant documentation such as declarations of conformity and user instructions.
- Lifting equipment will be:
 - Inspected by a competent person at least every 6 months when used to lift people
 - Inspected at least every 12 months for all other lifting equipment
- Thorough examinations and maintenance of lifting equipment will be conducted in accordance with a written scheme of examination as required by LOLER.

All equipment-related arrangements will be carried out in compliance with the following legislation:

- Provision and Use of Work Equipment Regulations (PUWER) 1998
- Lifting Operations and Lifting Equipment Regulations (LOLER) 1998
- Electricity at Work Regulations 1989
- Any applicable sections of the Health and Safety at Work etc. Act 1974

Inspection records, maintenance logs, and certification for all regulated equipment will be maintained and available for review during internal audits or inspections.

3.4 **Stacking and Lifting of Goods and Materials**

Mayflex recognises the risks associated with the improper stacking, storage, and manual handling of goods and materials. To ensure the safety of all personnel and to prevent workplace injuries or property damage, the following requirements apply:

- All materials must be stored safely, securely, and in an organised manner, using the most appropriate storage medium (e.g., racking, pallets, shelving) for the weight, size, and nature of the items.
- Materials must not be stacked in a way that creates a risk of collapse, obstruction, or injury. Consideration must be given to the height, stability, and access to stored goods.
- Aisles, exits, fire routes, and emergency access points must never be blocked or obstructed by stacked materials.
- Where mechanical aids (e.g., forklifts, pallet trucks) are used, they must only be operated by trained and authorised personnel, and loads must be lifted and moved according to safe systems of work and manual handling training.
- If at any point it is considered that the conditions do not allow for safe handling, lifting, or stacking of materials, this must be immediately reported to the Manager or Supervisor, and the task must not proceed until the issue is addressed.
- Regular inspections of storage areas must be undertaken to ensure continued compliance with safety standards and to proactively identify any risks.
- Where appropriate, manual handling risk assessments will be conducted to ensure employees are not exposed to undue physical strain or injury.

These arrangements align with:

- The Manual Handling Operations Regulations 1992 (as amended)
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Relevant sections of PUWER 1998 where mechanical handling equipment is used

3.5 **Manual handling Operations**

All Associates and Managers must ensure that a suitable and sufficient risk assessment is completed before undertaking any non-routine, hazardous, or manually intensive tasks involving manual handling.

- When such tasks are assigned or delegated, the **responsibility to initiate and ensure completion of the risk assessment lies with the manager or supervisor assigning the task.**
- If an Associate identifies a manual handling task as potentially hazardous and no assessment has been conducted, they must **stop the task immediately** and escalate the concern to their Manager or a Health & Safety representative **before proceeding.**

- Employees must **never attempt to lift objects that pose a risk of injury** due to weight, shape, or condition.
- If mechanical assistance is unavailable or impractical, other measures such as job rotation, team lifting, or safe work procedures will be considered and implemented to reduce risk. Where necessary, external experts or third parties may be consulted to help identify and manage manual handling risks effectively.
- All manual handling operations must comply with the Manual Handling Operations Regulations 1992 (as amended) and follow safe lifting techniques communicated during training.

3.6 Forklift Trucks (FLT) & Manual Handling Equipment (MHE)

Forklift trucks (FLT) and manual handling equipment (MHE) are to be used exclusively on Company premises. Only authorised personnel holding a valid FLT certificate are permitted to operate FLT's owned or leased by Mayflex. For agency staff working as FLT operators, licences will be verified and competency assessed prior to commencing work. All authorised operators undergo training and testing in accordance with the Approved Code of Practice for Rider Operated Lift Trucks – Operator Training. Operators must carry out basic mechanical safety checks on the equipment daily before use. Additionally, FLT's are maintained on a scheduled basis by qualified forklift engineers and inspected annually by a representative of the Company's insurance provider. Any faults or safety issues discovered with FLT's or MHE must be reported immediately to Supervisors, Managers, or a Health & Safety Representative.

3.7 Display Screen Equipment (DSE)

Mayflex undertakes risk assessments for employees who regularly use display screen equipment (DSE). Employees receive appropriate information and training to ensure the safe use of DSE and are required to participate in these assessments.

To streamline this, employees can complete their own DSE self-assessment via Connected Safety Net (CSN) by searching "DSE assessment" or using the direct link provided <https://capture.connectedsafetynet.co.uk/login>. Once completed, the assessment is reviewed by the Health & Safety team and forwarded to the employee's Manager for minor adjustments to be actioned.

If significant risks or persistent issues are identified, or if the required adjustments exceed the Manager's scope, the Health & Safety team will provide further support.

Employees who use DSE as a significant part of their daily work are entitled to appropriate eye and eyesight tests from an optician or doctor. If glasses are needed specifically for work, Mayflex will provide them upon request. The HR Department manages reimbursements for these tests on receipt of valid proof and keeps records of all requests.

3.8 Smoking Policy

In compliance with relevant health and safety legislation, and to promote the health and well-being of employees and visitors, Mayflex operates a completely smoke-free workplace. The use of all tobacco products, including e-cigarettes (vapes,) and chewing tobacco, is prohibited within Mayflex premises except in designated smoking areas as outlined in the Smoking Policy.

3.9 Hazardous Substances (COSHH)

The Company will use non-hazardous substances whenever possible. Where this may not be possible, all necessary precautions will be taken to ensure the Health & Safety of all personnel who may be affected by these operations.

Assessments will be carried out to determine the safest ways of working when using hazardous substances in accordance with COSHH Regulations 1988, ensuring that the Occupational Exposure Level (OEL) / Maximum Exposure Level (MEL) is not reached. Where necessary, monitoring will take place to determine the levels present. The finding of these assessments will be brought to the attention of all personnel who may be affected.

3.10 Driving at Work (Company car drivers or employees using hire cars on Company business)

Mayflex requires that all employees who drive as part of their work activities hold a valid full UK driving licence or an equivalent licence recognised in the UK and checked by the People Ops Team.

Employees must report any car accidents they are involved in while driving for work purposes to the Payroll Manager promptly. Employees using their own vehicles for work must ensure they have appropriate insurance coverage that includes business use. People Ops Team is responsible for verifying that all employees have valid business-use insurance and for maintaining records of these checks.

3.11 Overseas Travel

Certain roles within Mayflex may require overseas travel. Most international work is considered no riskier than similar activities conducted in the UK and generally takes place in countries deemed safe for travelers.

However, travel to countries or regions where the UK Foreign, Commonwealth & Development Office (FCDO,) or the equivalent national authority for non-UK employees, advises against travel should be avoided unless prior approval is obtained and appropriate safety measures are followed.

For detailed information and guidance on planning safe overseas trips, including security protocols and travel risk management, employees should refer to the [Business Travel and Security Guidance document](#), in addition to Appendix 6.

3.12 Lone and Travelling Workers

Employees working alone—whether on-site without direct supervision or at third-party premises—are personally responsible for ensuring their own safety. Before commencing any lone-working activity, individuals must inform their colleagues or Manager of their location and expected return time, obtain and review all relevant risk assessments (including Lone Working Risk Assessment RA 3) and training materials they deem necessary, and confirm they fully understand identified hazards and control measures—such as those related to violence, aggression, and vehicle use. Wherever practical, lone workers must also carry a means of communication (for example, a mobile phone) to maintain contact and summon assistance if needed. No lone-working task should begin unless the individual is confident that all hazards have been identified and appropriate controls are in place.

3.13 Welfare

Mayflex is committed to providing adequate welfare facilities to ensure the health, comfort, and safety of all employees. This includes clean, suitably ventilated toilets and washbasins with hot and cold running water, soap, and drying facilities accessible to all users. Drinking water will be provided, free from contamination, with clearly labelled taps or containers, and cups or drinking fountains available.

A suitable seating area will be provided for employees to use during rest breaks. This area will be kept clean and maintained to prevent food contamination.

Mayflex maintains a working environment free from irritation caused by tobacco smoking or vaping emissions, in line with the company's Smoke-Free Policy.

Employees should report any issues relating to toilet facilities, drinking water, or other welfare provisions to their Supervisor or Manager without delay.

The company will ensure that the workplace, including equipment, devices, and systems, is kept in efficient working order. Any defects or faults should be reported promptly to a Supervisor or Manager, preferably via email. Supervisors and Managers are responsible for rectifying any faults and maintaining records of actions taken.

Walking routes will be kept in good condition and free from obstruction to reduce risks of slips, trips, and falls. Any spills or contamination must be reported immediately and addressed promptly, with employees advised not to put their own safety at risk when doing so.

Mayflex will provide suitable and sufficient lighting to allow employees to work and move safely throughout the premises.

All employees are expected to take reasonable care to keep the workplace free from foreseeable hazards. This includes ensuring that access and egress routes are clear of obstructions, fire exits and safety equipment remain accessible, and that fire doors are not propped open.

Health & Safety Guidance Mayflex Contractors

The following guidance outlines the statutory health and safety duties of contractors and supports Mayflex's commitment to maintaining a safe working environment for all employees, visitors, and third parties. Contractors are expected to operate to the highest standards of safety, aligned with Mayflex's internal policies and legal requirements.

Contractors **must** seek guidance from the relevant Line Manager or the Supply Chain Director if in doubt about any health and safety measure **before** commencing work.

Pre-Work Requirements

Contractors shall:

- Undergo a prequalification process to verify competence, experience, training records, relevant accreditations/licenses, and previous health and safety performance.
- Provide evidence of valid insurance in line with the Employers Liability (Compulsory Insurance) Act 1969.
- Complete a site-specific risk assessment or Job Safety Analysis (JSA) before any work begins, with special focus on high-risk tasks such as working at height, hot works, electrical work, and machinery maintenance.
- Complete a Mayflex contractor induction, which covers site rules, emergency arrangements, key contacts, and specific hazards.
- Not commence any work on Mayflex premises until a valid Permit to Work has been issued by a competent Mayflex representative.
- Be aware that Mayflex reserves the right to audit and monitor contractor activities at any time, and contractors must cooperate fully with all inspections.

During Work

Contractors shall:

- Ensure safe work practices and implement effective supervision of all subcontractors on site.
- Adhere to the site-specific Permit to Work system, especially for:
 - Working at height
 - Hot works

- Electrical work
- Confined spaces
- Maintenance on rotating machinery
- Actively comply with the Mayflex Health & Safety Policy, and display safe behaviours at all times.
- Notify Mayflex management of any significant hazards or safety arrangements in advance.
- Ensure good housekeeping is maintained throughout the task.
- Use only compliant scaffolding, ladders, and work-at-height equipment, in accordance with the Construction (Working Places) Regulations 1966.
- Ensure all electrical tools and lighting operate at 110 volts through a mains isolator transformer unless otherwise authorised.
- Conduct work with minimum environmental disturbance, complying with the Control of Pollution Act 1974 and applicable Codes of Practice for noise and emissions.
- Provide and ensure use of adequate PPE, including suitable clothing.
- Comply with Mayflex's no smoking and no vaping policy at all times while on site.

Incident Management & Reporting

Contractors must:

- Promptly report and investigate all work-related accidents and near misses to Mayflex management.
- Participate fully in incident investigations, including provision of written witness statements and cooperation with root cause analysis.
- Implement corrective actions to prevent recurrence and share findings internally within their organisation, where appropriate.
- Comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) and provide copies of any reports submitted.
- Leave the premises in a safe state, ensuring all electrical equipment is turned off and no naked flames remain, unless otherwise required by the task.

Emergency Awareness

Contractors must:

- Familiarise themselves with Mayflex's fire safety procedures, including alarms, escape routes, fire points, and evacuation protocols.
- Exercise extreme caution when using or handling flammable substances. These substances must not be stored on site.

Learning from Incidents

Mayflex shares lessons learned from serious incidents and expects all contractors to reflect on these internally. Contractors are also encouraged to bring forward any relevant alerts, safety bulletins, or industry incidents to support continuous improvement across the supply chain.

General Arrangements

5.1 Emergency Contact Summary by Site

Site Name	Emergency Phone Numbers	Internal Emergency Contact(s)
Birmingham Excel House	Fire: 999 / Ambulance: 999 / Police: 999	Mike Hickman-Smith (Savills Landlord) +44 7870 999 659 Logistics Director: Tom Healey – 07375 787245 Finance Director: Israr Ghulam – 07795 113 989
Birmingham Environ House	Fire: 999 / Ambulance: 999 / Police: 999	Lorraine Donnelly (CBRE Landlord) +44 7776 635037 Logistics Director: Tom Healey – 07375 787245 Finance Director: Israr Ghulam – 07795 113 989
St Neots Office	Fire: 999 / Ambulance: 999 / Police: 999	Hayley Parratt (Futuresmart Ltd Landlord) 01480 775295 Director of Sales – North:

		Kayleigh John - 078705 12450 Director of Sales – South: Donna Hughes - 0781 140 9818
London Office	Fire: 999 / Ambulance: 999 / Police: 999	Workspace Centre Coordinator Roxana Puscasu - 07890894832
Dubai Office	Fire: 999 / Ambulance: 999 / Police: 999	Regional Operations Manager: David Proctor - +971 55 5586509 MEA Regional Director: Hani Roumieh - 0097155-1677045 Reception: +971 4 421 4352

5.2 Fire Safety

Escape routes and Assembly points:

Location	Nearest Fire Exits	Assembly Point
Birmingham Excel House	Main building and warehouse exits	Main car park at front of building (Points A–D)
Birmingham Environ House	Main building and warehouse exits	Front car park near exterior fence
St Neots Office	Main building exits	Main car park near exterior brick wall
London Office	Main building exits	Front of the building
Dubai Office	Main building exits	Front of the building

Fire Controllers and Fire Marshals as per notice boards in each building.

Item	Details
Fire Controllers and Fire Marshals	As per notice boards in each building
Frequency of Fire Drills (Full Evacuation)	Annually
Fire Alarm & Smoke Detector Maintenance	Maintained annually by each site's facilities management provider
Location and Type of Fire Extinguishers	Various locations throughout the building
Annual Maintenance Check of Fire Extinguishers & Other Firefighting Equipment	Annual Check

5.3 Training

Responsibility Area	Individual / Team	Role / Contact	Key Responsibilities
Training Tracking & Recordkeeping	HR	Siobhan Bourke – HR Manager +44 7825 172665	Track H&S training compliance; maintain induction records (Starter Pack in HR files); support audits.
Online Induction & Refresher Training	L&D (Learning & Development)	Caroline Grant – HR Manager (L&D) +44 7775 578239	Manage SonePeople inductions, e-learning modules, and refresher training schedules.
Task-Based & Contractor/Temp Training	Managers / Dept Heads	N/A	Ensure all staff, including contractors/temps, complete site-specific and SOP-based training.
Training Effectiveness & Escalation	Managers, Dept Heads, HR & L&D	N/A	Assess training effectiveness via audits or observations; escalate non-compliance and support corrective action.

5.4 First Aid

First aiders provision is based on a minimum ratio of one to every 50 employees. First aiders are identifiable as per notice boards present in each building.

5.5 First Aid Kits

Location	First Aid Kit Locations	Person(s) Responsible
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Birmingham Excel House	Office First Floor: Central Door Ground Floor: Meeting Village Canteen: Kitchen Warehouse: Goods In / Admin Office Export Office Health, Safety and Operations Comms Hub Trade Counter	First Aiders
Birmingham New Environ House	Admin Office First Floor Kitchen Health, Safety and Operations Comms Hub	First Aiders
St Neots	Main Office	First Aiders
Dubai	Main Office	First Aiders

5.6 Accident records

Location of accidents book(s):	HR Department (prior to June 2024) and Connected Safety Net (after June 2024.) https://capture.connectedsafety.net.co.uk/login
Person responsible for notifying of RIDDOR-reportable accidents:	Tom Healey (Logistics Director)

5.7 Health & Safety Resources

Contact details of local authority inspector:	Birmingham Excel and Environ House: Health & Safety Office 19 Ridgeway, 9 Quinton Business Park Quinton, Birmingham, B32 1AL Fax: 0121 607 6349 St Neots: Health & Safety Office St Neots Business Park, Cambridgeshire, PE19 8EP Fax: 01480 123 456 London: Health & Safety Executive – Canary Wharf Office 10 South Colonnade, Canary Wharf. London E14 4PU Tel (HSE InfoLine): 0300 003 1747 Dubai: Health & Safety Office Mayflex Middle East Office, Dubai Silicon Oasis Dubai, UAE, PO Box 123456 Fax: +971 4 123 4567
Contact details of MOHS Workplace Health for all sites	Lianne Goddard 83 Birmingham Road, West Bromwich, B70 6PX Tel: 0121 601 4041
Other sources of information i.e. trade journals, Health & Safety leaflets, journals, books, or computer databases	- Health & Safety Notice Boards - Trade Journals, Health & Safety Leaflets, Books, and Computer Databases

RIDDOR Accident Reporting	RIDDOR reports must be submitted online at: https://www.hse.gov.uk/riddor/report.htm For fatal or major incidents, please contact: Tel: 0345 300 9923 (Operating hours: Monday to Friday, 8:30 am to 5:00 pm)

5.8 Waste

Arrangement(s) for waste collection:	Upon collection request via Waste Management.
Arrangement(s) for special waste if appropriate:	Collected through authorised waste carriers.

5.9 Business roles for Contractors and Visitors

Arrangement(s) for arrival of contractors and visitors:	Contractors: • Must report to reception on arrival. • Are required to complete a site induction form before starting work. • Must sign in and out via the onsite tablet system or signing-in book. • Must obtain any relevant permits to work (e.g., hot works, working at height) prior to commencing tasks. • Will be supervised and, where necessary, escorted by a responsible Mayflex employee—particularly when working in restricted or high-risk areas. • May work unescorted in designated areas if they are regular contractors who have completed site induction and hold valid permits, subject to periodic monitoring. • Are expected to wear appropriate PPE and follow all site safety rules during their time on site. Visitors: • Must sign in and out via the onsite tablet system or signing-in book. • Will be shown the Visitor Safety Briefing included in the site induction form upon arrival. This covers: ○ Emergency evacuation procedures ○ Fire exits and assembly points ○ PPE zones (if applicable) ○ Emergency contacts • Do not need to complete a full induction unless entering operational, warehouse, or high-risk areas. • Must be escorted at all times while on site.
Date of Implementation of Health & Safety Policy Statement:	05/01/2012 updated 16/06/2025

Signed:



Name and position:

Andrew Percival: Managing Director

6.0 Appendices

6.1 Fire and Emergency Safety Procedure

Mayflex Excel and Environ	The appointed Fire Marshal conducts weekly fire alarm tests. All test results are recorded in the red Fire Alarm Test Logbook, which is located at reception next to the alarm control panel.
St Neots and Dubai	The appointed Fire Marshal carries out weekly fire alarm tests. All tests are documented in the Fire Alarm Logbook kept at reception.
London	

6.2 Fire and Emergency Safety Procedure

In the event of fire:

1. **Raise the alarm immediately** by activating the nearest fire alarm call point (break the glass) and/or shouting "fire, fire, fire!" and notify a Fire Warden.
2. **Evacuate the affected area immediately.** Do not delay.
3. **Proceed quickly and calmly** to your designated assembly point.
4. **Walk fast – do NOT run.**
5. **Wait for further instructions** from the Nominated Persons or Fire Marshals.
6. **Do not obstruct the Fire Brigade** when they arrive; be prepared to move to another safe location if instructed.
7. **Do not attempt to move vehicles** outside the building unless instructed by a Fire Brigade Officer.
8. **Do not re-enter the building** until given explicit permission by the Fire Brigade Officer.

Fire Wardens will:

- Conduct a thorough sweep of their assigned areas, including toilets and storerooms.
- Perform roll calls at assembly points.
- Report any missing persons to the Nominated Person(s).

Accountability:

- All visitors and contractors must be accounted for.
- Any missing persons must be reported immediately to the Fire Brigade.
- Do NOT re-enter the building until it is declared safe.

Using Fire Extinguishers:

- If trained and confident, and only if there is no personal danger, you may attempt to extinguish a small fire using the appropriate extinguisher.
- Always report any firefighting activity to your Manager immediately.

Nominated Persons, Fire Marshals, and all staff:

- Must not take unnecessary risks.
- Should remain vigilant for signs of fire or smoke at all times.

Summary of Key Roles & Responsibilities

- **Nominated Persons** are responsible for verifying all staff are accounted for at assembly points and liaising with emergency services.
- **Fire Marshals** conduct area sweeps to ensure no one is left behind, check fire alarm panels, and assist with evacuation.
- **Employees, Visitors, Contractors, and Drivers** follow evacuation routes and report promptly at assembly points.

6.3 Visitors' Safety Guidelines

The Mayflex Site Induction is available on Mayspace and is mandatory reading for all staff members.

All staff, contractors, customers, and visitors who will be operating on site without supervision are required to read and sign the site induction before commencing any work or activities.

Visitors who will be accompanied at all times on site must sign in and out at reception and adhere to the site rules provided at reception.

All Mayflex employees responsible for hosting or leading visits must have completed the mandatory site induction prior to the visit.

Mayflex Site Induction Document:

Excel and Environ House:

[illegible]

Dubai:



6.4 Travelling Abroad Checklist

The safety, health, and security of employees travelling abroad are of the utmost importance to Mayflex. All travel must be risk-assessed, planned, and monitored to ensure compliance with company policy and legal obligations, including those under ISO 45001. All employees travelling on business must:

Before Departure:

Health and Medical Preparedness:

- Consult with a healthcare professional regarding required or recommended vaccinations.
- Carry a copy of your blood group card and details of any pre-existing medical conditions or allergies.
- Ensure you have access to necessary prescription medication for the full duration of travel.
- Confirm you have appropriate medical and travel insurance, including cover for emergency evacuation, repatriation, and COVID-19 where applicable.

Insurance Coverage

- Confirm whether you are automatically covered by Mayflex's corporate travel insurance for your trip.
- If unsure, verify your coverage with the HR department or the designated Travel Coordinator prior to departure.
- Ensure your insurance includes medical emergencies, evacuation, repatriation, and COVID-19 where applicable.

Administrative and Legal Requirements

- Check passport validity (minimum six months recommended for most countries).
- Ensure visa and entry requirements for the destination country are met.
- Ensure coverage under a Mayflex-approved travel insurance policy, either via corporate insurance or the credit card provider used for booking.

Risk Assessment & Contingency Planning

- Conduct a travel risk assessment for the destination. Include political climate, health risks, crime levels, and transport safety.
- Record next of kin and provide itinerary details to HR and your Manager.
- Identify and record local emergency contacts (embassy, local medical support, consulate).
- Establish a communication plan with your UK "base contact" for regular check-ins.

During the Trip:

Personal Conduct and Awareness

- Be discreet and avoid drawing unnecessary attention.
- Respect the laws, customs, and cultural expectations of the host country.
- Avoid discussing your role, company, or nationality in public or online.
- Do not post itinerary details or sensitive company information on social media platforms (e.g., Facebook, LinkedIn, X).
- In high-risk countries: Use pre-arranged, verified transport. Avoid public transportation unless deemed safe in advance.
- Monitor travel advisories from reputable sources (e.g., GOV.UK, WHO, FCDO).

Incident Response

- In case of trouble, contact Mayflex, your local contact, and/or the nearest embassy or consulate.

- Avoid involvement in public demonstrations or civil unrest. Do not photograph or comment on such events.
- In case of aggression, do not resist—cooperate and prioritise your personal safety.
- For medical emergencies, contact your designated medical assistance provider immediately.

Working Abroad Check List

Category	Requirements	Yes	No	N/A	Comment
Access	Travel arrangements in place (to/from/during stay)				
	Permission to work in country/site				
	Accessibility arrangements (if required)				
	Emergency support contacts (medical/legal/consular/local) available				
	Additional insurance acquired (if necessary)				
Pre-Planning	Travel documents ordered and received				
	Local conditions evaluated (health, safety, political)				
	Emergency contact/next of kin details provided to HR and Manager				
	Medical needs and vaccination status reviewed				
Training	Itinerary documented and shared with base contact				
	Local language and communication challenges considered				
	Health and hygiene guidance provided				
	Cultural awareness and interpersonal conduct briefing				
Staffing	Relevant technical/specialist training provided				
	Staff are competent for assigned roles, especially hazardous or specialist activities				
Personal Safety	Routine and emergency communication methods established (e.g., mobile, WhatsApp, Teams, check-in times)				

7.0 Incident / Accident Investigation Report

Full How-to guide from Connected Safety Net available on Mayspace, SharePoint and SonePeople.

1. Logon to CSN Capture

2. Navigate to Main Screen/App Menu

3. View Earlier or Report a New Incident

4. Create a Flash Report

5. Add Information to Flash Report

6. Continue Adding Information to Flash Report

7. Save the Flash Report

Incident investigation process guide

Objective:

To systematically investigate all incidents and near-misses to identify root causes, prevent recurrence, and drive continuous improvement in health and safety.

1. Secure the Scene and Initiate the Investigation

- Ensure the area is safe before entering.
- Provide immediate care if required and notify emergency responders.

- **Preserve evidence:** Do not move equipment or materials unless needed for safety.
- Notify appropriate internal stakeholders (e.g., H&S, Manager, HR).

2. Gather Initial Incident Facts (Who, What, When, Where)

- Use the **Connected Safety Net platform** to log the incident immediately. <https://capture.connectedsafety.net.co.uk/login>
- Document:
 - What exactly happened?
 - When and where did it occur?
 - What task/activity was underway?
 - Who was involved (injured person, supervisor, witnesses)?
 - Were there any injuries, equipment damage, or environmental impact?
 - Were permits, training, or risk assessments in place?

3. Collect Supporting Information and Evidence

- Use the platform to upload:
 - **Photos**, diagrams, CCTV footage (if available).
 - **Witness statements** or interviews.
 - **Relevant documents**, including:
 - Training records
 - Safe Operating Procedures (SOPs)
 - Risk assessments / RAMS
 - Equipment inspection & maintenance logs
 - Permit-to-work records

4. Identify All Potential Contributing Factors

Use a structured approach (e.g., PEME or STARR model):

Category	Key Questions to Ask
People	Was there human error? Was fatigue, stress, or lack of competence a factor?
Equipment	Was equipment fit for use? Were there faults, failures, or missing safeguards?
Materials	Were substances or materials handled correctly and safely?
Environment	Did lighting, weather, workspace layout, or noise levels contribute?
Methods	Were procedures, supervision, or planning inadequate? Were controls followed?

5. Determine Primary Cause(s)

Ask:

- *"If this factor had not occurred, would the incident still have happened?"*
- Focus on immediate unsafe acts or conditions but also move beyond blaming individuals.

6. Identify Root Cause(s) and System Failures

Use structured methods such as:

- Five Whys
- Fishbone (Ishikawa) diagrams
- Bowtie analysis (for high-risk events)

Focus on why controls failed or were absent, not just what happened. Examples:

- Inadequate training program
- Incomplete hazard identification
- Poor change management
- Failure to act on previous near-misses

7. Record Findings and Assign Corrective Actions

- Use the Connected Safety Net platform to:
 - Document all findings clearly
 - Assign Corrective Actions (CA) and Preventive Actions (PA) to responsible persons
 - Set due dates and track closure
 - Link actions to risk register or audit findings where applicable

8. Review and Share Learnings

- Conduct a debrief with affected team(s) and management.
- Update any:
 - SWPs, risk assessments, training materials
 - Audit schedules if systemic gaps were found
- Share anonymised learnings across departments to prevent recurrence elsewhere.

9. Monitor, Audit and Follow Up

- Ensure actions are verified for effectiveness (not just completed).
- Schedule follow-up audits, toolbox talks, or retraining if needed.
- Record trends using Connected Safety Net dashboards for safety KPIs.

Additional Notes (ISO 45001 Compliance):

- Involve worker representatives where appropriate.
- Ensure investigations are non-punitive and focus on learning, not blame.
- Retain all investigation reports as part of management review and continual improvement.

Process owners – Roles & Responsibilities for Incident Management

To ensure effective and timely incident investigation, reporting, and corrective action, responsibilities are assigned as follows:

1. Manager / Direct Supervisor

Responsible for coordinating the local response and ensuring investigation closure.

Responsibilities:

- Log all incidents immediately in the Connected Safety Net (CSN) system. <https://capture.connectedsafety.net.co.uk/login>
- Lead or delegate the incident investigation.
- Ensure:
 - Witness statements are collected (signed if applicable).
 - Supporting evidence (e.g., photos, CCTV, training records, equipment logs) is attached.
- Complete and submit the investigation report within defined timeframes.
- Implement and monitor corrective/preventive actions through to completion.
- Escalate serious or RIDDOR-reportable incidents to the relevant Manager immediately.
- For RIDDOR-reportable cases, forward the completed investigation report and supporting documents to the Manager for further action.

2. Human Resources (HR)

HR provides support where employee conduct, welfare, or relations are involved—not for routine RIDDOR or incident reporting.

Responsibilities:

- Become involved only where the incident results in disciplinary or grievance procedures.
- Support investigations that involve employee behaviour or wellbeing.
- Maintain personnel records only if related to conduct, capability, or disciplinary action.
- HR does not submit or store RIDDOR records.

3. Health & Safety Committee

Advises and monitors the investigation and prevention process.

Responsibilities:

- Assist with investigations for serious incidents or near misses.
- Review incident reports and action plans to ensure thoroughness and effectiveness.
- Monitor status of corrective/preventive actions via CSN dashboards. <https://capture.connectedsafety.net.co.uk/login>
Recommend further risk controls where systemic issues arise.
- Conduct trend analysis and integrate findings into H&S strategy and training.
- Promote employee awareness of lessons learned and safety initiatives.

4. Manager

(Responsible for RIDDOR compliance and executive review of serious incidents.)

Responsibilities:

- Review serious or RIDDOR-reportable incidents.
- Submit RIDDOR reports to HSE or relevant authority as required.
- Record RIDDOR references and submissions securely within Connected Safety Net. <https://capture.connectedsafety.net.co.uk/login>
- Share submitted RIDDOR details with relevant internal stakeholders (e.g., HR, H&S Committee).
- Escalate high-risk incidents to senior leadership if needed.
- Lead or sponsor post-incident reviews and briefings.

Note on RIDDOR Compliance

All staff involved in incident handling must understand and follow the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

For guidance:

- HSE Publication: HSG245 – Investigating accidents and incidents
- Website: www.hse.gov.uk/riddor

Confidentiality & Data Protection

All information and Data, relating to H&S investigations and applicable personal identifiable information must be classified, as a baseline, as C2 – CONFIDENTIAL. For medical/injury personal information it must be classified as C3 – SECRET. In all cases, relevant information must be treated and handled in accordance with the controls articulated within Sonepar UK Information Security and Data Protection Policies. Specifically:

-  [Data Protection and the Rights of Data Subjects](#)
-  [Information Classification and Data Handling](#)

8.0 Glossary of Terms

- **ACoP (Approved Code of Practice)** – Official guidance issued by the Health and Safety Executive (HSE) on how to comply with legal duties under health and safety law.
- **Accident** – An unplanned event that results in injury, ill health, or damage to property or the environment.
- **Assembly Point** – A designated safe location where personnel must gather during an emergency evacuation.
- **Base Contact** – A designated UK-based person responsible for maintaining communication with employees travelling abroad for safety and support purposes.
- **Bowtie Analysis** – A risk management tool that illustrates the relationship between the causes of an incident, the event itself, and its consequences, along with preventive and mitigative controls.
- **CDM (Construction Design and Management Regulations)** – UK legislation that governs health, safety, and welfare in construction projects.
- **CE Marking** – A certification mark indicating that a product complies with EU health, safety, and environmental protection standards for sale within the European Economic Area (EEA).
- **Connected Safety Net (CSN)** – The internal digital platform used by Mayflex for health and safety reporting, DSE assessments, training records, and documentation of incidents, near misses, and unsafe conditions.
- **Confidential (C2) / Secret (C3) Classification** – Data protection levels under Sonepar UK's policy. C2 refers to standard confidential safety data; C3 refers to sensitive personal or medical data requiring higher handling protections.
- **Corrective Action (CA)** – An action taken to eliminate the cause of a detected nonconformity or incident to prevent recurrence.
- **COSHH (Control of Substances Hazardous to Health Regulations 2002)** – Regulations requiring the assessment and control of hazardous substances used in the workplace.
- **DSE (Display Screen Equipment)** – Devices with alphanumeric or graphic display screens (e.g., computers, tablets) covered by regulations to prevent strain, discomfort, or long-term injury.
- **Emergency Contacts** – Individuals or services to be contacted in case of emergency, including emergency services, embassies, or designated internal staff.
- **Fire Alarm Call Point** – A device (usually a glass panel to break) used to manually activate the fire alarm system in case of emergency.
- **Fire Marshal / Fire Warden** – A trained employee responsible for implementing fire safety procedures and supporting evacuation efforts during emergencies.
- **Fishbone Diagram (Ishikawa)** – A visual tool used to explore and display possible causes of a specific problem in categories (e.g., People, Equipment, Environment).
- **Five Whys** – A root cause analysis method that involves asking "why" multiple times (typically five) to identify the underlying cause of an issue.
- **FLT (Forklift Truck)** – A powered industrial vehicle used to lift and transport materials over short distances.
- **Health & Safety Committee** – A group of employees and management representatives who meet regularly to review health and safety matters and promote safe working.
- **High-Risk Country** – A country with increased safety or security concerns (e.g., conflict zones, disease outbreaks), requiring extra precautions and approvals for business travel.
- **Hot Works** – Activities such as welding or grinding that generate heat or sparks and require a permit to prevent fire hazards.
- **HR (Human Resources)** – The department responsible for staff management, wellbeing, compliance, and training.
- **Incident** – An unplanned event that did not result in harm but had the potential to cause injury or damage (also known as a "near miss").
- **ISO 45001** – International standard for Occupational Health and Safety Management Systems.
- **ISO 9001** – International standard for Quality Management Systems.
- **ISO 14001** – International standard for Environmental Management Systems.
- **ISO 27001** – International standard for Information Security Management Systems.
- **Job Safety Analysis (JSA)** – A method for identifying potential hazards in specific tasks and developing procedures to perform them safely.
- **LOLER (Lifting Operations and Lifting Equipment Regulations 1998)** – UK regulations to ensure lifting equipment is properly installed, maintained, and used safely.

- **Lone Worker** – An individual who carries out work in isolation without close or direct supervision, requiring specific risk controls.
- **Manual Handling Operations Regulations 1992 (as amended)** – UK legislation requiring the assessment and reduction of risks related to lifting, carrying, or moving loads.
- **MHE (Manual Handling Equipment)** – Tools such as pallet trucks, sack barrows, or trolleys used to assist in manual lifting and reduce risk.
- **Near Miss** – An unplanned event that did not cause harm but could have under slightly different circumstances.
- **Nominated Person** – A designated employee with responsibility for emergency procedures and liaising with emergency services.
- **OEL / MEL (Occupational / Maximum Exposure Limit)** – Legal limits on exposure to hazardous substances in the workplace, typically averaged over a set period.
- **PEME Model (People, Equipment, Materials, Environment)** – A framework for categorizing causes in incident investigations.
- **Peripatetic Worker** – A worker who regularly travels between sites or locations to carry out job duties, rather than being based in one location.
- **Permit to Work (PTW)** – A formal, written system used to control certain types of high-risk work (e.g., hot works, confined spaces) to ensure essential safety measures are in place.
- **Personal Protective Equipment (PPE)** – Equipment or clothing worn to reduce exposure to hazards (e.g., gloves, goggles, safety boots).
- **Preventive Action (PA)** – Action taken to eliminate the cause of a potential nonconformity or hazard before it occurs.
- **PUWER (Provision and Use of Work Equipment Regulations 1998)** – UK regulations requiring that equipment provided for use at work is safe, properly maintained, and used only by trained individuals.
- **Risk Assessment / RAMS (Risk Assessment & Method Statement)** – The formal process of identifying hazards, assessing associated risks, and implementing control measures, often documented with an accompanying method statement.
- **RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013)** – UK legislation requiring the reporting of specific serious workplace incidents to the HSE.
- **Safe Operating Procedure (SOP)** – Detailed instructions designed to ensure safe execution of specific operations or tasks.
- **Safe Working Procedure (SWP)** – A documented step-by-step guide to safely performing a task, including associated hazards and required controls.
- **Safety KPI (Key Performance Indicator)** – Metrics used to measure and track the effectiveness of health and safety management efforts.
- **Site Induction** – The process of briefing staff, contractors, or visitors on site-specific safety procedures, hazards, and emergency arrangements before work begins.
- **Site Rules** – Specific safety and conduct regulations that must be followed while on site.
- **STARR Model (Situation, Task, Action, Result, Root Cause)** – A structured tool for investigating and documenting workplace incidents and determining root causes.
- **Toolbox Talk** – Informal safety meeting or briefing to discuss specific safety issues or updates.
- **UKCA (UK Conformity Assessed)** – A post-Brexit product marking used for goods placed on the market in Great Britain, replacing CE marking for most products.
- **Visitor Safety Briefing** – A short overview given to visitors about safety rules, emergency procedures, and required PPE while on site.
- **Welfare Facilities** – Amenities provided by employers for worker wellbeing, such as toilets, handwashing stations, drinking water, and rest areas.
- **Working at Height** – Any work where a person could fall and injure themselves, including ladders, rooftops, or raised platforms, requiring specific controls and permits.
- **Work at Height Permit** – A specific type of permit issued to control work carried out at height, ensuring all safety measures are in place.